



State of Ohio Environmental Protection Agency

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CERTIFIED MAIL
Return Receipt Requested

Re: **PPG Industries, Inc., Barberton**
EPA ID No.: OHD 004 198 917
Permit Renewal - Corrections

October 19, 2010

Ms. Irene Raiber
PPG Industries, Inc.
4829 Fairland Road
Barberton, Ohio 44203

Dear Ms. Raiber:

It was recently noticed that certain agreed upon changes were inadvertently omitted from the renewed Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) for PPG Industries Ohio, Inc. issued on September 24, 2010. In addition, other inconsistencies and/or typographical errors have also been noted. Corrections have been made to the affected permit pages. Enclosed are copies of the revised permit pages. These have been included to ensure that all involved parties have written confirmation of the changes.

If you have any questions concerning this action, please do not hesitate to contact John Nyers of Ohio EPA's Central Office at (614) 644-2822 or john.nyers@epa.state.oh.us.

Sincerely,

Edwin Lim, Manager
Division of Hazardous Waste Management

cc: John Nyers, ERAS, DHWM, CO
Natalie Oryshkewych/Suzanne Prusnek, DHWM, NEDO
File

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

MODULE C - CONTAINER STORAGE AND MANAGEMENT

C. CONTAINER STORAGE AND MANAGEMENT

The Hazardous Waste Storage Building (HWSB) is the only permitted storage area at the PPG Barberton Plant. It contains three rooms, the “north” and “south” rooms being used for hazardous waste container storage and the “middle” room being used for storage of operating supplies, spill clean-up materials, and tools.

The north container storage room in the HWSB is 73 feet by 20 feet. The maximum storage capacity of this room is 9,680 gallons (one hundred seventy-six (176) 55-gallon drums). Ignitable (D001), toxic (D004-D011, D018, D019, D022, D028, D029, D035, D039, D040, D043) and listed (F002, F003, F005, F027; U002, U080, U228, U239; P005) hazardous wastes are typically stored in this location. Secondary containment is provided by the concrete floor, coated with an impermeable coating, surrounded by a 1.75 inch concrete curb for a containment capacity of 1,500 gallons.

The south container storage room is 35 feet by 20 feet. Maximum storage capacity of this room is 3,960 gallons (seventy-two (72) 55-gallon drums). Corrosive (D002), toxic metals (D004-D011) and amines (D038), and listed (F005; U012, U196) hazardous wastes are typically stored in this location. Secondary containment is provided by the concrete floor, coated with an impermeable coating, and surrounded by a 1.75 inch concrete curb for a containment capacity of 700 gallons.

Waste will be stored in 55 gallon drums, 500 gallon portable containers, 250 gallon bulk containers, 30 gallon containers, and 5 gallon containers and other DOT approved containers. All drums must meet DOT specifications.

C.1 Container Storage/ Quantity Limitation

- (a) The Permittee is authorized to store 13,640 gallons of hazardous waste at any given time in the permitted container area located in the north room and the south room of the permitted container area located in the Hazardous Waste Storage Building.
- (b) For the purpose of compliance with the capacity limitation of this permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity, regardless of the actual quantity stored in the container.
- (c) Permit Conditions C.1(a) and C.2 shall not apply to the Permittee's activities as a generator accumulating hazardous waste on-site in compliance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC.

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and coal and ash cinders are also disposed here. Dense Non-Aqueous Phase Liquids from chlorinated solvent manufacturing waste are known to be present within Lime Lake 2.

REMEDIAL GOAL: Isolate to extent practicable sources of chlorinated organics from Lime Lake 2 to Main Plant area ground water, and nearby surface waters, by reduction of leachate production and dispersion. Prevent direct contact and wind dispersal.

CORRECTIVE MEASURES COMPLETED: A horizontal well leachate collection and Dense Non-Aqueous Phase Liquids removal system was installed to control seep discharges.

PERFORMANCE STANDARDS: Meet Ohio Surface Water Quality Standards for selected organic and inorganic constituents in Lower Hudson Run. Eliminate impact to Main Plant ground water. Meet human health and ecological risk based standards.

STATUS: Migration of contaminated ground water is under control (Corrective Action Environmental Indicator Determination 750). Additional measures as described in Condition E.10(o) are required to control unit and minimize risk to human health and the environment.

LIME LAKE #6

DESCRIPTION: A Solvay soda ash process waste impoundment that covers approximately 228 acres.

STATUS: This unit is being remediated under an Ohio EPA Approved Sludge Management Plan, and Permits to Install under Ohio EPA's Division of Surface Water. The remedy is contouring to facilitate surface water run-off, amending surface materials with wastewater treatment plant sludge, and then establishing a vegetative cover. PPG has been providing habitat enhancements in the process.

PPG has been remediating the unit since 2000. The estimated date of completion is 2019.

E.4 No Corrective Action Required at this Time
OAC Rule 3745-54-101

Reserved
E.5 RCRA Facility Investigation (RFI)
OAC Rule 3745-55-011

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releases of hazardous waste(s) (including hazardous constituent[s]); and (4) comply with all applicable standards for management of wastes.

If two or more of the Corrective Measures studied meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination; (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the relative cost associated with the alternative.

In authorizing the proposed Corrective Measures, Ohio EPA may also consider such other factors as may be presented by site-specific conditions.

(a) Permit Modification

- Ohio EPA will initiate a permit modification as provided by OAC Rule 3745-50-51 to require implementation of the corrective measure(s) authorized.
- The Permittee must not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.

(b) Financial Assurance for Corrective Action
OAC Rule 3745-54-101

- Financial assurance is not required for Category 1 Waste Management Units.
- The Permittee must provide financial assurance in the amount necessary to implement the corrective measure(s) (long-term operation, maintenance and/or monitoring) for Category 2 Waste Management Units as required by OAC Rule 3745-54-101 (B) and (C) within 18 months after the issuance of this Permit Renewal/Modification.
- The Permittee must provide financial assurance in the amount necessary to implement the corrective measure(s) for Category 3 Waste Management Units as required by OAC Rule 3745-54-101 (B) and (C) within 45 days of Ohio EPA approval of a remedy decision.

E.10 Current Corrective Measures

The following Corrective Measures are a culmination of activities conducted under the PBA Agreement between the U.S.EPA and the Permittee, rather than through a more conventional CMS/CMI process. The Permittee must implement corrective measures as described below. A table of the schedule for deliverable documents is included at the end of Module E.

evaluation of the studies, the permittee shall submit a report to Ohio EPA for approval. The timing of this re-evaluation will be negotiated based on the nature of the remedies and/ or enhancements, e.g., an enhancement which takes a significant time to develop will not require a re-evaluation until after the stream is likely to be affected by the enhancement.

- (b) Wolf Creek. A survey of the lower mile of Wolf Creek was performed by Ohio EPA in 1993 (report dated July 30, 1994). Using the results of this survey as a baseline, the permittee shall evaluate post-enhancement conditions in Wolf Creek using the methods employed for the 1993 study. The permittee will also evaluate the post-enhancement (or remedy if required) Qualitative Habitat Evaluation Index for comparison to the survey required in Permit Condition E.10 (I) (1). Following completion and evaluation of the studies, the permittee shall submit a report to Ohio EPA for approval. The timing of this re-evaluation will be negotiated based on the nature of the enhancements, e.g., an enhancement which takes a significant time to develop will not require a re-evaluation until after the stream is likely to be affected by the enhancement.

- (m) Impounding Reservoir

The Permittee shall re-evaluate existing ecological and human health risk assessment data to ensure that potential negative affects to sensitive receptors are within acceptable boundaries. The remedies for this unit may need to be re-evaluated if the risk assessments document unacceptable exposures. A report on these assessments shall be submitted by the end of four years following the effective date of this permit renewal.

- (n) Lime Lake #1

The permittee shall pursue an Environmental Covenant per Section E.10. (a) of this permit.

The Permittee shall continue to operate and maintain the existing leachate collection system, until and unless such time as a remedy or pilot study workplan is approved which does not require continued operation of this Interim Measure. The Permittee shall maintain and update the existing Operation and Maintenance Plan as necessary to ensure optimal operation of the system. An updated Operation and Maintenance Plan shall be

- Monitor the implementation of the pilot study per the approved workplan
- Implement any other investigations identified by PPG to provide information relevant to the design of a final remedy

By the end of four years following the effective date of this permit renewal, the permittee shall:

- Submit a report of the pilot study implementation, and any other investigations undertaken, to Ohio EPA
- Complete the final remedy design, and submit an implementation workplan to Ohio EPA for approval
- Submit a schedule for remedy implementation to Ohio EPA

Permittee shall implement the final remedy following Ohio EPA's approval of the final remedy design and implementation workplan such that the remedy construction is completed by the end of the permit period. PPG may opt to implement any of these tasks earlier than called for in this permit, at its discretion.

PPG must submit a remedy construction completion report within 90 days after the final remedy is constructed.

(o) Lime Lake #2

The permittee shall pursue an Environmental Covenant per Section E.10. (a) of this permit.

The Permittee shall continue to operate and maintain the existing leachate collection system, until and unless such time as a remedy or pilot study workplan is approved which does not require continued operation of this Interim Measure. The Permittee shall maintain and update the existing Operation and Maintenance Plan as necessary to ensure optimal operation of the system. An updated Operation and Maintenance Plan shall be submitted for approval by the end of one year following the effective date of this permit renewal.

The Permittee shall continue to monitor the natural attenuation of pollutants in ground water, and ensure that the spatial extent of contamination is not

The Permittee shall continue the inspection and maintenance of the Public Access Interim Measure. The Permittee may review the need for continued inspection and maintenance of the Public Access Interim Measure. There may be justification to discontinue some or all of this Interim Measure.

The Permittee shall address affected soils on a Facility-wide basis, through continued and on-going implementation of the Barberton Excavation Plan.

The Permittee shall restrict future use of the Facility, where appropriate, to specific land uses, and restrict the extraction and use of ground water in specific areas of the Facility, through an Environmental Covenant per Ohio Revised Code 5301.80 through 5301.92. (See § E.10. (a).)

The Permittee shall continue implementation of the Facility-wide ground water monitoring plan. (See Module Z)

All operations and maintenance plans, inspection and maintenance plans, soil management plans (excavation plans), ground water monitoring plans, and health and safety plans mentioned in this permit are hereby incorporated by reference into this permit.

Beginning with the month following the effective date of this permit renewal, PPG shall provide Ohio EPA with progress reports every other month on or before the tenth day of the month for which it is required. The progress reports shall conform to the format of the current reports required under the U.S. EPA Administrative Order on Consent.

- (r) Financial Assurance
OAC Rule 3745-54-101

See Permit Condition E.9 (b) for financial assurance requirements.

E.11 Newly Identified WMUs or Releases
OAC Rule 3745-54-101

- (a) General Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, the following information regarding any new WMU identified at the Facility by

Tuscarawas River TMD evaluation and report	3	If corrective measures are indicated, enter Section E.8.	I (3)
Tuscarawas River, Hudson Run and Wolf Creek Re-Evaluation of Remedy Performance versus base-line		Negotiate based on nature of the remedies and/or enhancements	I (4)
North and South Plants infiltration control inspection and maintenance plan	1	resubmit within 45 days of OEPA comments	h
Groundwater attenuation enhancement FS and report, and implementation schedule if corrective measures are indicated	1	Implement if corrective measures are indicated	h Also see Section Z.8. (i) (F) (G)
Interim Measure II operation and maintenance Plan	1		n & o
Lime Lake 1: Submit reports and workplans for these tasks: review existing information, propose performance based goals, propose final remedy, propose a cover design, propose IM II shut-down pilot if appropriate	1		n
Lime Lake 1: (Implement pilot study if approved, monitor pilot study, implement other investigations deemed necessary) No specific deliverables.	2		n

Lime Lake 1: Submit pilot study and additional investigation reports, complete final remedy design and submit implementation workplan, submit remedy implementation schedule	4	n	
Lime Lake 1: Complete construction of final remedy.	Complete by end of permit period	n	
Lime Lake 2: Submit reports and workplans for these tasks: review existing information, propose performance based goals, propose conceptual corrective measures for DNAPL, initiate any necessary pilot studies	2	o	
Lime Lake 2: Submit reports and workplans for these tasks: propose final remedy, propose a cover design, finalize conceptual corrective measures for DNAPL	3	o	
Lime Lake 2: complete final remedy design and submit implementation workplan, submit remedy implementation schedule	5	o	
Lime Lake 2: Complete construction of final remedy.	Complete by end of permit period	o	

Lime Lakes 3 - 6 Tuscarawas River qualitative habitat evaluation, report, and possible work plan	3	If corrective measures are indicated, enter Section E.8.	i	
Contractors' Landfill operation and maintenance plan	1	resubmit within 45 days of OEPA comments	d	
Tuscarawas River Dredge Spoils inspection and maintenance plan	1	resubmit within 45 days of OEPA comments	j	
Tuscarawas River Dredge Spoils Ecological Risk Assessment and report	3		j & l (4)	
Impounding Reservoir reevaluation of existing human health and ecological risk assessments	4		m	
Progress reporting	1 month	every other month thereafter	q	