



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of PPG
Inspection Date(s): 04/16/24-04/17/2024
Regulatory Program(s): SIP, Title V, NSPS, MACT

Company Name: PPG Industries
Facility Name: PPG Springdale
Facility Location: 125 Colfax Street
Springdale, PA 15144

Latitude: 40.536826 **Longitude:** -79.785659
County/Parish: Allegheny

AFS/ICIS-Air Number: PAACH0004200300191
Permit Number: 0057-OP18a
NAICS Code: 325510 **SIC:** 2821
DSB ID #: ECAD-51

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<i>For List of Attendees at opening conference see Attachment 2</i>	☐

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Table of Contents

I. Introduction	4
A. Summary of the Facility.....	4
B. Inspection Opening Conference.....	5
II. Site Activity/Process Description	5
III. Observations	7
IV. Records Review	9
V. Closing Conference	12
VI. List of Attachments	14

I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at PPG Industries Springdale (PPG or Facility) to verify compliance with applicable State and Federal regulations. The Allegheny County Health Department (ACHD) was notified of the inspection on April 2, 2024 via email. On April 12, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Tim Previni, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 125 Colfax Street, Springdale, PA 15144. PPG was founded in 1883 as Pittsburgh Plate Glass and began manufacturing glass and coatings. PPG is a publicly traded company on the New York Stock Exchange (NYSE: PPG). PPG has locations around the world and its corporate headquarters is located in Pittsburgh, PA. For more information see ppg.com.

The Facility received a Title V permit (0057-OP18a) from ACHD issued on May 10, 2018.

PPG is classified as major volatile organic compounds (VOC) and hazardous air pollutants (HAP) and a minor source for all other criteria pollutants. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 C.F.R. Part 63, Subpart HHHHH: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing (MACT 5H)
- 40 C.F.R. Part 63, Subpart FFFF: National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (MON)
- 40 C.F.R. Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- 40 C.F.R. Part 63, Subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (MACT 5D).

DAY 1: April 16, 2024

B. Inspection Opening Conference

At 8:55AM on April 16, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and completed a safety briefing before conducting an opening conference the began at 9:15AM. PPG was represented by Tim Previni, EHS Manager; Aaron Signarovitz, Regional Environmental Manager; Kelsey Siebert, EHS Specialist; Paul Holcomb, Site Manager; Brennan Keillor, EHS Site Lead; Zach Chun, Paint Plant Manager. Also, Allason Holt (ACHD) was present. EPA inspectors, Bruce Augustine, Paul Arnold, and Steve Ott presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, PPG did not claim any photos or documentation as CBI. However, PPG did claim three photographs CBI and one document submitted in the records request.

II. Site Activity/Process Description

The PPG Springdale site began operation in the 1940's as a paint coating manufacturing site with the research and development side of the Facility opening in the late 1950's. The site has been owned and operated by PPG since it began operating. The Facility is divided into two distinct plants: Paint Plant and Resin Plant (research and development is located on the Resin Plant side). There are approximately 240 full time employees in the Paint Plant and 150 on the Resin Plant. The Paint Plant is a union shop while the Resin/R&D is not. In addition, the Paint Plant operates 24 hours/day, 5 day/week while the Resin Plant operates 8 hours/day, 5 days/week. The combined size of both plants is about 23 acres. Both the Paint and Resin Plants are considered large quantity generators under the Resource Conservation & Recovery Act (RCRA).

The Resin Plant produces water and solvent based polymers mostly for other PPG sites. Resins are made for the PPG Cleveland Plant for auto paints, a Wisconsin facility which makes industrial coatings, and approximately a quarter of their products are sent overseas. Some of the main raw materials used in the Resin plant include: Aeromatic 100, Methyl Isobutyl Ketone (MIBK), Xylene, Toluene, and city water. Resins are produced through a reaction of monomers in solvent and either thinned or dispersed in organic solvents or water. Most of the raw materials are brought in by truck and then sent to bulk storage. Methyl methacrylate (MMA) and Butyl acrylate (BA) are two monomers that are brought in by bulk. The remaining raw materials are brought in by drums and totes. All of the tanks at the Resin Plant are considered Group 2 tanks and all tanks are nitrogen blanketed.

Raw materials at the Resin Plant are charges in one of twelve reactors, which range from 5 to 2000 gallons. The reactors are atmospheric vessels which vent emissions to a condenser to recover material. Any vapors from the condenser which aren't recovered are vented to a regenerative thermal oxidizer (RTO). All reactors vent to the RTO, except small side reactors. Polymers from the reactors are then sent to thin tanks, which are 2.5 times larger than the reactors. In between the reactor and thin tanks

are two optional batch strippers used to remove solvents. If the RTO is out of service for greater than one hour, the vapors are vented to a carbon bed. The only other time the carbon beds are used is once per month when hydrogen is a by-product of a batch. The temperature on the RTO is monitored continuously and temperature must be maintained above 1500°F at all times. From the thin tank, products are sent to an optional thin filter then to shipping. Two percent of the products are sent out via tank truck while the vast majority are shipped in drums or totes.

PPG indicated that the number of reactors that can be used at any time is limited by the number of people in the plant. A single employee is assigned to a single reactor line. Typically, PPG operates six reactors at a time. A reactor is used for 35 hours per batch, while 18-24 hours are actual polymer synthesis. Approximately 70 batches are produced each month. Batches range from 400-40,000 pounds. Twenty batches are between 10,000-15,000 pounds, a single batch is 40,000 pounds and the remaining batches are less than 10,000 pounds.

PPG stated that a third party (Alliance) conducts leak detection and repair (LDAR) at the Resin Plant affected components. PPG monitors agitators and pumps on a monthly basis while valves are monitored semiannually.

The Paint Plant produces both solvent and water based coatings which are sold to over 350 different customers. Approximately 94% of production supports industrial coatings while the remaining percentage is produced for automotive manufacturers. The Paint Plant began operation in 1947 and currently has 14 departments. Solvents used in production include toluene, methyl ethyl ketone, among others. The large batch center produces batches in the range of 250-4000 gallons. The large batch area has stationary tanks (700-4000gal) and portable tanks (200-550gal). The largest product in the Paint Plant is Duranar, which has 80-90k gallons per month produced. Some products made in the large batch area are sent to one of six (6) dispense cells which is a smaller mixing process of topcoats from products already produced. PPG ships 400-450k gallons of finished coating each month and averages about 7.5 million gallons each year. PPG indicated that 85% of the products are made from the conventional (large batch) process while 15% is manufactured in the dispense cells. Thirty six percent of products are made for stock while the remainder is made based on customer orders.

Paint Plant raw materials are received at the Facility in totes. Drums, and supersacks. PPG also receives 405 trucks each day of bulk solvents. PPG stated that all storage vessels in the Paint Plant are considered Group 2 storage vessels and are fitted with conservation vents. The emissions for the tanks are calculated based on tank turnovers and they previously used Tanks software. Solids in the raw material process (powders) are vented to a baghouse for particulate matter control. Raw materials are mixed in the raw mill before being sent to thin tanks where solvents or water are added. There are multiple tanks in this process that are vented to a RTO to control VOC and HAP emissions. The K-13 reactor is the largest reactor in the Paint Plant. This reactor receives material from the monomer and catalyst tanks. Vapors from K-13 are sent to a condenser and then sent back to the reactor. Reacted product leaves K-13 and is sent to the thin tanks. Both the Paint Plant and Resin Plant utilize solvent stills for cleaning solvents.

The Paint Plant is subject to MACT 5H, which regulates HAP from process vessels, storage tanks, wastewater streams and transfer operations at coating operations. MACT 5H has equipment leak provisions that apply to all operations within the Paint Plant. PPG conducts monthly walkthroughs of the Paint Plant using audio, visual, olfactory (AVO) monitoring for leaks. PPG does not have a component inventory, rather they conduct AVO by department. The Paint Plant also has two baghouses (Ohio Blowpipe & Environ) that control PM from mills and tanks. PPG indicated that they conduct weekly pressure drop monitoring of the baghouses. The Facility also has two Cleaver Brooks natural gas boilers. One of the boilers is considered redundant and only needs to operate as a backup. PPG also indicated there are four to five emergency generators located in the Paint Plant and one in the Resin Plant. All generators are fired with natural gas.

The opening conference concluded at 11:40AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 1:05PM by Tim Previni and Aaron Signarovitz of PPG and Nick Caito of ACHD was also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 3) and that a FLIR GX320 infrared camera would be used to observe sources for fugitive emissions (Attachment 4).

The walkthrough commenced in the raw material storage area where EPA observed raw material in totes and supersacks. No emission sources were observed in this area. The EPA inspection team moved to the production area and observed holding tanks 48-52. Also, the mixing tanks for CP Cell and Dark Cell were observed with the FLIR camera. These are 2,000 gallon tanks in the large batch center. Using the FLIR camera, EPA observed fugitive emissions from a Hockmyer portable mixer whose lid was not fully closed (FLIR0002.mp4). This leak was quantified using the FLIR camera as 5220ppm (FLIR0001.jpg). EPA also observed emissions from the hatch on Tank PM10 (FLIR0003.mp4) and this leak was quantified with the FLIR camera as 2658ppm (FLIR0004.jpg).

The EPA inspection team continued through the Paint Plant process and observed TK900, which makes batches for the Duranar product. PM 213 and 1650 were also observed. The second floor metering deck was observed, where material is pulled from the tank farm and sent into the process. EPA observed with the FLIR camera a leaking hatch on TK2006 (FLIR0005.mp4). This leak could not be quantified with the FLIR camera (FLIR0006.jpg).

The EPA inspection team observed the Paint Plant RTO where the vapors from most of the tanks in the process are routed prior to going to atmosphere. The 3-hour average temperature observed was 1538°F. Chamber 1 was 1524°F and Chamber 2 was 1579°F.

The two Cleaver Brooks boilers were also observed. They are both Model CB200-606 boilers rated at 25.106MMbtu/hr. Boiler 1 construction date was 9/27/1985 while Boiler 2 construction date on the nameplate was 7/09/1979. The boilers were operating during the inspection and create non-contact

steam for process heating. EPA also observed a diesel fire pump with an hour meter totaling 259 hours. A photograph was taken of the nameplate. This source was not operating during the inspection.

Located outside of the main process building, EPA observed the Ohio Blowpipe baghouse. The pressure drop observed during the inspection was 4"WC. PPG indicated that they stack tested both the Ohio Blowpipe and PVC baghouses for PM and have not yet submitted the report for the Environ baghouse. The PVC baghouse pressure drop was 2.8"WC while the Environ baghouse pressure drop was 4.9"WC during the inspection. The EPA returned to the conference room at 4:16PM.

After returning to the conference room, EPA and PPG discussed the sources observed during the walkthrough. PPG noted that the bulk tank farm is located in the yard storage area and that TK2006 is a Duranar based product that contains toluene. They further indicated that Tanks 48-52 are not controlled by the RTO. Finally, they stated that the leaks observed with the FLIR camera at the Hockmeyer mixer and the small batch tank hatches would be fixed that day and could be observed again tomorrow to determine if fugitive emissions still exist.

This completed the first day of the inspection and EPA exited the Facility at 4:35PM.

DAY 2: April 17, 2024

EPA arrived at the Facility at 9:05AM on April 17, 2024 to continue the inspection. PPG provided a photo of the hour meter on emergency generator 5 (376.4 hours). PPG and EPA were unable to determine the hours during the previous day's inspection. PPG also provided a copy of the Notification of Compliance Status (NOCS) for MACT Subpart FFFF dated October 7, 2008. The NOCS lists the batch process vents as Group 1 and reactors K13 and K15 as controlled.

PPG has chosen to comply with the LDAR provisions of the MON by complying with MACT Subpart UU. Also, PPG indicated that all applicable components are either in gas vapor or light liquid service. When a leak is detected during LDAR monitoring, the maintenance group is called to fix the leak and the component is re-checked by their contractor (Darbone). Darbone follows the management of change for P&IDs and is responsible for adding and deleting components from the LDAR program. The brief opening conference ended at 9:36AM and the EPA inspection team signed into the R&D Plant at 9:44AM.

During the walkthrough, EPA utilized a GX320 FLIR camera to observe equipment for fugitive emissions. EPA observed several labs with vent hoods that vent directly to the atmosphere. Automated spray booth (POO6) that vents directly to atmosphere. The R&D unit supports the coatings business. The RTO that controls emission sources in the Resin Plant was observed. Chamber 1 was operating at 1576°F and Chamber 2 was operating at 1459°F with an average temperature of 1540°F. A Caterpillar 3408 emergency generator was also observed. The generator is rated at 538HP and 254 hours were observed on the hour meter.

EPA met with Darbone's LDAR contractor (Tory Sweet) who indicated he conducts the periodic monitoring at the Facility. Mr. Sweet was using a Cosmos photoionization detector to conduct LDAR

monitoring. He stated that this is the device he typically uses while onsite. PPG identifies LDAR components in their Facility with distinct LDAR tags that are attached to the affected component. EPA observed multiple untagged components at the K65 reactor that appear to be in VOC service. EPA also observed tags missing on the reflux return line on the same reactor. EPA also observed that component tags were missing on the monomer and surfactant lines on reactor K100. In addition, the nitrogen line at this reactor was observed with several component tags. The EPA inspection team observed the K500F, K500A, and K300 reactor tops with the FLIR camera. EPA observed multiple open ended lines throughout the Resin Plant. PPG stated that they had made a legal determination that allowed open ended lines in their process and agreed to provide a copy of the determination to EPA. The walkthrough ended at 12:20PM for a break.

The walkthrough resumed following a break at 1:49PM. EPA observed emergency generator 1 with 204.4 hours on the hour meter. EPA used the FLIR camera to check the leak observed the previous day on PM-13. PPG had made repairs to the vessel and no leak was observed. EPA also re-checked the Hockmeyer mixing tank and a leak was observed with the FLIR camera on the second day of the inspection.

The walkthrough concluded at 2:30PM.

IV. Records Review

The records review commenced immediately after the plant walkthrough. EPA inspectors reviewed documents requested in the April 12, 2024 email to Tim Previni (see Attachment 1). The list of records were reviewed but records were provided after the inspection. Below are the records requested and the discussion that took place:

1. Provide a plot plan of the Facility and process flow diagram. The plot plan and the flow diagram should clearly indicate all process units and emission points. *(Also provide a paper copy at the time of the inspection). PPG and EPA agreed that the flow diagrams in the Title V permit are sufficient and PPG also agreed to provide the fire suppression diagram.*
2. Provide a detailed process description that includes all process areas from raw material to finished goods shipping. This should include each process unit and the products manufactured in each individual unit. Also, provide a list of hazardous air pollutants and VOC solvents used in each process. *PPG provided a detailed process description during the opening conference. PPG agreed to provide a list of HAP in use at the Facility.*
3. Provide copies of the annual emission statements submitted to Allegheny County Health Department (ACHD) for the years 2020-2023. This should include the emission calculations and emission factors used to calculate emissions from each emission point. *PPG agreed to provide annual emission statements from 2020-2023.*
4. For each combustion unit (boiler, engine, etc.) at the facility, provide:
 - a. Make/model;
 - b. Year of installation;
 - c. Size or rating (MMBtu/hr, kW, MW, etc.);

- d. Hours of operation monthly from January 2022 through March 2024;
- e. Fuel combusted monthly from January 2022 through March 2024;
- f. Any pre or post controls installed to limit or reduce emissions of any pollutant to the atmosphere and the year it was installed.

PPG agreed to provide this information by 5/24/24.

5. For each storage vessel or tank at the facility, provide:

- a. Size of the tank (gallon);
- b. Year of installation;
- c. Material stored or processed in tank and the maximum vapor pressure of the material;
- d. Throughput (gal) from January 2022-March 2024;
- e. The pressure of the tank (psi);
- f. Whether the tank is part of a closed vent system and if the tank vents to a control device or directly to atmosphere.

PPG agreed to provide this information by 5/24/24.

6. Provide a list of each Authorization for Expenditure (AFE) at the facility since 2014 over \$100,000. This should include a brief description of the project and the amount of money authorized.

PPG agreed to provide this information by 5/24/24.

7. Provide copies of the following semiannual reports:

- a. Title V permit (#0057-OP18a) required by Section III.15.d from January 2022-March 2024;
- b. 40 C.F.R. Part 63 Subparts FFFF and HHHHH from January 2022- March 2024;
- c. Title V permit (#0057-OP18a) required by Section V.A.5.c from January 2022-March 2024;
- d. Title V permit (#0057-OP18a) required by Section V.B.5.c from January 2022-March 2024;
- e. Title V permit (#0057-OP18a) required by Section V.C.5.c from January 2022-March 2024;
- f. Title V permit (#0057-OP18a) required by Section V.D.5.b from January 2022-March 2024;
- g. Title V permit (#0057-OP18a) required by Section V.E.5.b from January 2022-March 2024;
- h. Title V permit (#0057-OP18a) required by Section V.F.5.b from January 2022-March 2024.

PPG agreed to provide semiannual reports for the times requested.

8. Provide in an Excel spreadsheet records of coating production (gallon) at the Paint Plant monthly from January 2022-March 2024.

*PPG provided a table of coating production from January 2022 through March 2024. **PPG claimed this table CBI.***

9. For the Paint Plant & Development Center RTO, provide the following records:

- a. Periods of RTO downtime or that the temperature was below 1500°F from January 2022-March 2024;
- b. Hours of operation January 2022-March 2024;
- c. Copies of the most recent stack test;
- d. List of vessels and equipment routed to the RTO;
- e. Records of temperature monitoring in Excel spreadsheet from January 2022-March 2024.

PPG indicated that this information is available in the semiannual reports provided.

10. Provide copies of weekly pressure readings for the Environ Baghouse and Ohio Blowpipe collection and control system from January 2022-March 2024.

PPG agreed to provide this information by 5/24/24

11. Provide a copy of the Startup Shutdown and Malfunction Plan for the Paint Plant.

PPG provided a copy of the Paint Plant SSM plan.

12. For the automated paint spray booth, provide:

- a. Volume of topcoat and primer usage (gal) daily (7 day rolling average) from January 2023-March 2024;
- b. Volume of topcoat and primer usage (gal) on a 12 month rolling basis from January 2023-March 2024;

VOC content as applied for topcoat and primer from January 2023-March 2024.

PPG agreed to provide this information by 5/24/24.

13. Provide a copy of the facility's Leak Detection and Repair database in both Microsoft Excel and a Microsoft Access .bak file from August 1, 2020-March 31, 2024. The database should include, at a minimum:

- a. Component ID;
- b. Component tag ID;
- c. Date of inspection;
- d. Recorded reading;
- e. Name of the technician
- f. Type of component
- g. Pass/fail;
- h. Leak definition for the component;
- i. Process unit.

PPG provided a copy of the LDAR database in both Excel and .bak file. PPG also provided the number which corresponds to each LDAR technician.

14. Provide a copy of the LDAR inventory for the facility which includes each component in LDAR service. The inventory should include, at a minimum:

- a. Component ID;
- b. Component tag ID;
- c. Date of inspection;
- d. Recorded reading;
- e. Name of the technician
- f. Type of component

- g. Pass/fail;
- h. Leak definition for the component;
- i. Process unit.

PPG provided a copy of the LDAR database containing the information requested.

Additional Records Requested:

1. PPG provided a copy of the energy assessment for the process boiler pursuant to the Boiler MACT.
2. PPG agreed to provide copies of the last two boiler tuneups required by MACT 5D by 5/24/24.
3. EPA requested PPG's reasoning as to why the small side reactors are not vented to the RTO. PPG agreed to provide this information by 5/24/24.
4. Provide a list of HAP in use at the Resin and Paint Plants. PPG agreed to provide this information by 5/24/24.
5. EPA requested preventative maintenance reports for the emergency generators. PPG agreed to provide this information by 5/24/24.
6. EPA requested a copy of the initial notification for the MON. PPG provide a copy of the NOCS dated October 7, 2008.
7. EPA requested a copy of the NOCS for MACT 5H. PPG provided a copy of the NOCS that was submitted on April 30, 2007.
8. EPA requested copies of the audio, visual, olfactory inspections for the same time period as the LDAR database. PPG agreed to provide this information by 5/24/24.

V. Closing Conference

After the records review, EPA inspectors, Tim Previni and Aaron Signarovitz of PPG had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 4:03PM.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by PPG.

- PPG is subject to the requirements of the MON at the Resin Plant because the Facility is a major source of HAP emissions. Under Table 6 of the MON (Section 1.i), PPG has chosen to comply with the provisions of MACT Subpart UU. According to 40 C.F.R. § 63.1033(b)(1), each open ended line shall be equipped with a cap, blind flange, plug, or second valve. During the inspection, EPA observed multiple open ended lines throughout the process units in the Resin

Plant. PPG indicated that they had submitted a determination for the open ended lines to PADEP. PPG has not provided a copy of this determination.

- PPG's LDAR contractor (Darbone) is using a Cosmos photoionization detector to conduct periodic LDAR monitoring at the Facility. This unit is not the industry standard when conducting Method 21 monitoring and is rarely used by industry. PPG should consider using another device that meets the standards of EPA Method 21 when conducting periodic monitoring. This includes using a device that can automatically read and record monitoring data for each component.
- EPA observed multiple components in the Resin Plant that either were not identified as components in HAP/VOC service with tags or components that clearly are not in HAP/VOC service that were tagged as part of the LDAR program. PPG provides Darbone with P&IDs to add and delete components from the LDAR program. PPG should consider a retagging of the components in HAP/VOC service to ensure components aren't missed and that overtagging doesn't occur.
- PPG indicated during the inspection that they are not conducting LDAR monitoring of connectors at the Springdale Facility. As mentioned above, PPG has chosen to comply with the provisions of 40 C.F.R. Part 63, Subpart UU to comply with the MON. Section 63.1027 of Subpart UU details the monitoring requirements for connectors at affected facilities in HAP service. PPG should provide an explanation as to why connectors are not part of the periodic LDAR monitoring program.
- EPA noted that the small side reactors in the Paint Plant are not vented to the RTO prior to discharge to the atmosphere. PPG agreed to provide a rationale as to why the reactors are not vented to one of the RTO's for control. This response is under review.

VI. List of Attachments

- Attachment 1: Email correspondence to Tim Previni of records requested to review during inspection
- Attachment 2: List of Attendees
- Attachment 3: Photograph Log (Contains CBI)
- Attachment 4: FLIR Video Log