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Air Enforcement: Arkansas Department of Environmental Quality and Owner of Alexander, Arkansas, Metal Finishes Manufacturing Facility Enter into Consent Administrative Order

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The Arkansas Department of Environmental Quality ("ADEQ") and PPG Industries, Inc., ("PPG") entered into an April 15th Consent Administrative Order ("CAO") addressing alleged violations of an air permit. See LIS No. 19-033.

The CAO provides that PPG owns and operates a facility ("Facility") that manufactures conventional and high solids metal finishes, extrusion finishes, and wood finishes located in Alexander, Arkansas.

The Facility holds and/or has held two air permits (AR-8 and AR-9).

ADEQ personnel are stated to have conducted a routine compliance inspection of PPG's Facility on July 26, 2018, for the reporting period of December 1, 2015 through June 30, 2018. Certain sections of the Permit reference 40 CFR Part 63, Subpart CCCCCCC, which require the Facility to conduct weekly visual inspections of any flexible ductwork for leaks. Compliance is required to be demonstrated by permit conditions to record:

- Date, place, and time
- Person conducting activity
- Technique or method used
- · Operating conditions during the activity
- Results
- Description of corrective actions taken

The inspection is alleged to have indicated that PPG failed to demonstrate compliance with weekly visual inspection and recordkeeping requirements for the week of March 5-11, 2017.

PPG provided in correspondence dated August 18, 2018, that it had conducted an investigation into the missing weekly inspection for the previously referenced week and noted certain corrective actions:

Both the EHS Manager and EHS Technician will be trained and responsible for ensuring that all
weekly flexible duct work inspections are completed for compliance with Specific Conditions 17 and
18; and

The required weekly inspections are entered into the site's EMEX task manager system, so that
assignment of the task is set and closure of the task is recorded via electronic closure as well as filing
of the weekly inspection form.

A civil penalty of \$1,200 is assessed.

A copy of the CAO can be found <u>here</u>.