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**R. Shawn Mendt, PE**  
**Global EHS Director, Industrial Segment**

October 9, 2021

**Via E-mail**

Ms. Chrystal Wagner  
Self-Disclosure and Environmental Audit Administrator  
Indiana Department of Environmental Management  
100 North Senate Avenue, IGCN 1301  
Indianapolis, IN 46204  
[cawagner@idem.in.gov](mailto:cawagner@idem.in.gov)

**Re: Worwag Coatings LLC – Lafayette, Indiana Facility**  
**Voluntary New Owner Disclosure Pursuant to Self-Disclosure Policy**  
**Request for Corrective Action Extension**

Dear Ms. Wagner:

I am writing to request an extension beyond October 19, 2021 to complete corrective actions for one potential violation that was the subject of the voluntary new owner self-disclosure pursuant to the Indiana Department of Environmental Management's *Self-Disclosure and Environmental Audit Policy*, Policy No. MP-004-R2-NPD ("Self-Disclosure Policy") submitted to IDEM on August 20, 2021 for the above-referenced Worwag Coatings, LLC ("Worwag") facility located at 3420 Kossuth Street, Lafayette, Indiana 47905 ("Facility"). As background, the Facility manufactures paints and coatings for automotive and industrial applications. PPG Industries, Inc. ("PPG") acquired Worwag in a stock acquisition on May 17, 2021. Following that acquisition, Worwag remains the legal entity that owns and operates the Facility, and Worwag is now a wholly-owned subsidiary of PPG. The self-disclosed potential violations were discovered in an environmental compliance audit following PPG's acquisition of Worwag.

For the reasons discussed below, PPG and Worwag request an extension to complete corrective actions for the following potential violation in the August 20, 2021 Self-Disclosure:

*Self-Disclosure Potential Violation 2.b: The Facility performs paints and allied products manufacturing, is an area source of HAP emissions, and processes, uses, or generates materials containing HAP, but it has not met the standards and monitoring and compliance and notification requirements set forth in 40 CFR Part 63, Subpart CCCCCC.*

**Extension Request:** An extension is needed for the above self-disclosed potential violation as PPG and Worwag are still evaluating whether or not the Facility is processing, using, or generating any "Materials containing HAP" as defined under 40 CFR Part 63, Subpart CCCCCC. 40 CFR Part 63, Subpart CCCCCC is only applicable to area source facilities with paint and

allied manufacturing that process, use, or generate “materials containing HAP, as defined in § 63.11607.” See 40 CFR 63.11599. When the August 20, 2021 Self-Disclosure was submitted to IDEM, a high level review determined that certain materials used in the Facility’s paint manufacturing process did contain one of the specific HAPs regulated under 40 CFR Part 63, Subpart CCCCCC, which are benzene, methylene chloride, cadmium, chromium, lead, and nickel (“7Cs Regulated HAP”). However, upon a more detailed evaluation after the self-disclosure was submitted, none of the materials evaluated so far contain a 7Cs Regulated HAP greater than or equal to 0.1% by weight, and thus, would not be a “Material containing HAP” as defined under 40 CFR 63.11607. PPG and Worwag are still evaluating additional materials processed or used at the Facility to determine whether or not such materials contain a 7Cs Regulated HAP at or above 0.1% by weight meeting the definition of a “Material containing HAP” and thus, would trigger applicability under 40 CFR Part 63, Subpart CCCCCC. This evaluation to determine applicability under 40 CFR Part 63, Subpart CCCCCC has taken longer than anticipated due to the numerous different raw materials used at the Facility, but PPG and Worwag expect to complete this applicability evaluation by October 19, 2021. If the results of this evaluation determine that the Facility’s paint manufacturing processes are using, processing, or generating a “Material containing HAP” as defined under 40 CFR 63.11607, an additional thirty (30) days is needed to achieve compliance with the applicable requirements under 40 CFR Part 63, Subpart CCCCCC. Accordingly, PPG and Worwag request an additional thirty (30) days, until **November 18, 2021**, to complete corrective action for this potential violation if it is determined that 40 CFR Part 63, Subpart CCCCCC is applicable to the Facility’s paint manufacturing operations.

Thank you in advance for your assistance with this process and consideration of this extension request. I can be reached at (724) 274-3885 or [RSMendt@ppg.com](mailto:RSMendt@ppg.com) if you have any questions regarding this matter.

Regards,

*/s/ R. Shawn Mendt*

R. Shawn Mendt, PE  
Global EHS Director, Industrial Segment  
PPG

cc: Jason Nowak (*via e-mail only*)  
Jessica Sharrow Thompson (*via e-mail only*)