



The Pittsburgh Paints Company
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October 2, 2025

Via U.S. Mail

Self-Disclosure and Environmental Audit Administrator
 Indiana Department of Environmental Management
 Mail Code 60-02P
 100 North Senate Avenue, IGCN 1301
 Indianapolis, Indiana 46204-2251

**Re: Voluntary Disclosure Pursuant to Indiana's Self-Disclosure and Environmental
 Audit Policy
 The Pittsburgh Paints Company
 400 Bertha Lamme Drive, Cranberry Township, Pennsylvania 16066**

To whom it may concern:

We are writing to disclose certain potential violations of environmental laws discovered as the result of a recent voluntary environmental compliance audit at various The Pittsburgh Paints Company ("Pittsburgh Paints") facilities throughout the United States, including Indiana. This disclosure is submitted pursuant to Indiana Department of Environmental Management's ("IDEM") *Self-Disclosure and Environmental Audit Policy*, MP-004-R2-NPD (Feb. 5, 2010) ("Self-Disclosure Policy"). Concurrently and because the environmental compliance audit giving rise to this disclosure was nationwide in scope, Pittsburgh Paints is also disclosing the items referenced in this disclosure to the U.S. Environmental Protection Agency ("EPA") pursuant to its *Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations*, 65 Fed. Reg. 19617 (April 11, 2000) (the "Audit Policy"), and the EPA's *Interim Approach to Applying the Audit Policy to New Owners*, 73 Fed. Reg. 44991 (August 1, 2008) (the "New Owner Audit Policy"). This voluntary disclosure concerns potential Resource Conservation and Recovery Act ("RCRA") hazardous waste management noncompliance at various Pittsburgh Paints facilities (collectively, the "Facilities") discovered in an environmental compliance audit that occurred after A-Paint Bidco, Inc. purchased 100 percent of the equity PPG Industries, Inc. ("PPG") held in PPG Architectural Finishes, Inc. and later renamed the newly independent company as Pittsburgh Paints in December 2024.

I. Further Background

Pittsburgh Paints manufactures interior and exterior paints, stains, caulks, repair products, adhesives, sealants, and industrial grade protective coatings across the United States and Canada. Subsequent to the acquisition closing, Pittsburgh Paints initiated an environmental compliance audit of Pittsburgh Paints facilities across the United States, which was designed as a systematic and objective review of Pittsburgh Paint's operations and practices related to meeting

environmental requirements and compliance with applicable environmental regulations (the “Environmental Audit”).

II. Disclosure of Potential Violations

During this Environmental Audit, Pittsburgh Paints discovered on August 21, 2025, that certain Facilities had neglected to notify EPA of episodic events at very small quantity generator facilities producing non-routine waste in amounts above applicable thresholds (collectively, the “Noncompliance”).

As for correcting the Noncompliance, Pittsburgh Paints will be retraining relevant personnel and reemphasizing the importance of submitting the appropriate notification for episodic generation events for the very small generator facilities. Given the number of Facilities involved and extent of the corrective actions, Pittsburgh Paints respectfully requests an additional 60 days, for a total of 120 days from the date of discovery, to ensure sufficient time to fully address the identified issues related to RCRA requirements.¹ Pittsburgh Paints will implement corrective actions to ensure future compliance with applicable RCRA hazardous waste management requirements at the Facility. More information on the specific noncompliance at the facility is provided below.

A. Resource Conservation and Recovery Act Hazardous Waste Management (40 C.F.R. Part 262; Rule 329 I.A.C. 3.1-7)

1. **Very Small Quantity Generator (“VSQG”) Facilities** – One (1) VSQG facility may have experienced episodic generation events involving more than 220 lbs of waste without notification to EPA based on available shipment records. Pittsburgh Paints has been unable to locate the relevant generation dates; the waste was generated and accumulated over an unknown period of time. Pittsburgh Paints provides the years in which the waste was shipped off-site in quantities above the episodic generation event threshold, below.

- i.* Indianapolis, Indiana (Store No. 9269 – 6951 E 30th Street, Indianapolis, Indiana 46219).
 - a.* 976 lbs shipped off-site in 2024.

III. Self-Disclosure Policies Conditions

The following information is provided to show that this disclosure falls within the scope of the Self-Disclosure Policies.

1. The Systematic Discovery of Potential Violations

¹ The disclosed noncompliance was discovered as part of a multi-facility audit throughout the United States and Pittsburgh Paints requests the extra time to align corrective action items and completion for all facilities.

The Environmental Audit was a systematic, documented, and objective review, undertaken specific to address compliance with, and to prevent, detect and correct potential violations of applicable environmental requirements.

2. The Potential Violations were Voluntarily Discovered

The Noncompliance that is the subject of this disclosure was discovered voluntarily as the result of an environmental audit. It was not discovered through a legally mandated monitoring or sampling requirement prescribed by statute, regulation, permit, judicial, or administrative order or consent agreement.

3. The Potential Violations are Promptly Disclosed

A regulated entity must fully disclose the potential noncompliance to IDEM 45 days after discovery. The Noncompliance that is the subject of this disclosure was discovered by the new owner after this date on August 21, 2025. This disclosure therefore satisfies the Audit Policy's requirement for prompt disclosure.

4. The Discovery was Independent of Government or a Third-Party

The Environmental Audit that led to the Noncompliance identified in this disclosure was voluntarily initiated to identify, correct, and prevent non-compliance with applicable environmental laws and regulations. The Audit was entirely voluntary, and discovery and disclosure of these matters did not stem from any federal, state, local, or third-party action or whistleblower employee nor is Pittsburgh Paints disclosing these matters because it has knowledge that unilateral discovery by a regulatory agency is imminent.

5. The Prompt Action will be Taken to Correct and Remediate the Potential Violations

Pittsburgh Paints will promptly address and correct the items that are the subject of this disclosure. Given the number of Facilities involved and the extent of the corrective actions, Pittsburgh Paints respectfully requests an additional 60 days, for a total of 120 days from the discovery date, to correct all identified potential noncompliance. Pittsburgh Paints will take steps to help ensure future compliance with applicable environmental requirements at the Facilities.

6. Measures will be Implemented to Prevent Recurrence

Pittsburgh Paints will take steps and implement programs to help ensure that the Noncompliance identified in this disclosure do not recur, such as additional training. Pittsburgh Paints believes that this written disclosure, and the corrective measures that will be taken, demonstrate that the company has taken and is taking appropriate steps to avoid repeat or recurring violations.

7. The Disclosure Does Not Involve Repeat Violations

The Audit Policy directs that disclosure does not involve "repeat violations" within the meaning of the Policy. That is, the same or closely related violations cannot have occurred at the same facility under the same ownership or is not a part of a series or pattern of violations by the facility's parent organization at other facilities within the past three years. The Noncompliance here does not involve repeat violations as defined.

8. The Disclosure Does Not Involve Excluded Violations

The eighth condition of the Audit Policy is that the identified violations must not be ones that resulted in serious actual harm, or which may have presented an imminent and substantial endangerment to human health or the environment, or that violate the specific terms of any judicial or administrative order or consent agreement. The Noncompliance here did not result in serious actual harm or pose an imminent and substantial endangerment to human health or the environment. Nor do they violate the specific terms of any judicial or administrative order or consent agreement.

9. Pittsburgh Paints will Cooperate with IDEM

Pittsburgh Paints will cooperate fully with IDEM with respect to this disclosure as is necessary and required by IDEM to determine the applicability of the Self-Disclosure Policies.

IV. Conclusion

Pittsburgh Paints will notify IDEM to confirm completion of the corrective actions to address the Noncompliance. Furthermore, it is Pittsburgh Paints' intent to continue its assessment of the compliance status of the acquired Facilities to determine if additional self-disclosures are warranted.

Thank you in advance for your assistance with this process. In the event that any other action is required of Pittsburgh Paints, to satisfy the requirements of the Self-Disclosure Policy, please let us know. Please contact Pittsburgh Paints' legal counsel, Gary Steinbauer, at gsteinbauer@babstcalland.com or (412) 394-6590 with any questions.

Regards,



Jihyan Giordano

cc: Gary Steinbauer, Esq., Babst Calland (via email)