

CLEAN AIR ACT INSPECTION REPORT

FOR

Owens Corning Kansas City Plant
300 Sunshine Road
Kansas City, Kansas 66115

TELEPHONE NUMBER: (913) 281-9575

FRS PLANT I.D.: 110000445643

Inspection Date: September 13-14, 2021

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division's Air Branch I conducted an unannounced Partial Compliance Evaluation at Owens Corning Kansas City Plant (Owens Corning) on September 13-14, 2021. This inspection was performed pursuant to Section 114 of the Federal Clean Air Act (CAA), as amended. A Region 7 Multimedia Screening Checklist was completed and is included as Attachment 1. This narrative report and attachments present the findings and observations made during the CAA inspection.

PARTICIPANTS

Owens Corning:

Jeff Buckmaster, Plant Leader jeffery.buckmaster@owenscorning.com

Brianne Bass, EHS Manager

Robin Bennett-Edmiston, Regional Environmental Leader (joined via telephone)

Justin Meyer, Plant Controller

Brad Casemier PE, Engineer

U.S. Environmental Protection Agency (EPA):

Tyler Salamasick, CAA Inspector

Luke Rodriguez, CAA Inspector

INSPECTION PROCEDURES

We arrived at Owens Corning at approximately 10:07 a.m. on September 13, 2021. Prior to entering the facility, I conducted a visual observation of Owens Corning's facility and the surroundings from the public road. I did not observe opacity, new construction, fugitive dust or abnormal odors prior to entry.

Upon arrival at the facility, I contacted security, informed security that we were with the US EPA and were there to conduct a CAA inspection. They permitted us onto the property. We met with facility representatives Mr. Buckmaster, Plant Leader, and Mrs. Bass, EHS Leader of Owens Corning. Upon meeting with the facility representatives, I presented my credentials and my business card. I also informed them that I was there to conduct a CAA inspection under the authority of Section 114 of the CAA.

I explained to Mr. Buckmaster and Mrs. Bass that in order to fully understand their operations and properly evaluate their compliance status, it is important that I collect truthful and accurate information. I also informed them that if they were unsure of an answer that we could follow up later to get the information instead of collecting information that may not be correct.

I explained that the inspection would include reviewing the facility operations and records. I described the framework of the inspection, including that it would start with an introductory meeting followed by a facility walk-through, a review of records, and conclude with a closing conference. I informed them that I would document my findings and observations by collecting copies of records, taking photographs and/or videos and by noting my observations.

After discussing the facilities processes, reviewing which records I would like to see and discussing site safety, we went out and I conducted a site inspection. The inspection concluded on the following day. I conducted a closing conference with the facility representatives and Mrs. Bennett-Edmiston joined via telephone. I explained Owens Corning's right to make a claim of business confidentiality and presented Mr. Buckmaster with a *Confidentiality Notice* (Attachment 2). Mr. Buckmaster did not make any confidentiality claims at the time of the inspection. I prepared a *Receipt for Documents and Samples* (Attachment 3) for all material I requested from Mr. Buckmaster and provided him with a copy of the receipt. Owens Corning provided the records electronically following the inspection on 9/23/2021 via a secure link.

FACILITY DESCRIPTION

Owens Corning is a fiberglass manufacturing facility with a NAICS code of 327993 (Mineral Wool Manufacturing). The facility primarily produces residential batts/rolls and loose fill fiberglass insulation. The facility has operated at this location since 1946. The facility normally operates 24 hours a day 365 days per year with normal business hours between 7:00 a.m. and 5:00 p.m. Monday through Friday. The facility currently employs approximately 140 people.

The facility has three furnaces, K-Furnace, J Furnace and 70 Furnace. They are not currently operating the 70 Furnace. Mr. Buckmaster informed me that it had not operated since 2010 and that it would require a significant amount of capital investment get it running.

Owens Corning is permitted by the State of Kansas as a Title V major source facility (Attachment 4). The facility's permit lists the facility's potential to emit particulate matter under 10 microns (PM10), volatile organic compounds (VOCs) and carbon monoxide (CO) above 100 tons per year and the potential to emit nitrous oxide (NOx) and sulfur dioxide (SO2) under 100 tons per year. The permit also lists the facility's potential to emit hazardous air pollutant (HAP) formaldehyde less than 10 tons per year and total HAPs less than 25 tons per year.

FINDINGS AND OBSERVATIONS

Throughout this section the following formatting conventions will be used. The emission source or parameter will be **bolded**. The regulatory requirements will be in *italics* and the inspection findings will be in regular text. The Inspection Guide contains my observations of the facility and their activities pertaining to the operating permit's requirements (Attachment 5). A review of several significant permit requirements is summarized below.

Permit requirements and findings

The following requirements apply to the following emission units

EU-JBATCH, EU-K5BATCH, EU-70 BATCH, EU-70FORMING, EU-70OVEN, EU-70COOLING, EU-U4PACKING, EU-70FURNACE, EU-K5FURNACE, EU-U4FORMING, EU-U3FORMING

Limit Particulate matter emissions are limited to the rate determined by the following equation

Process weight rate ≤ 30 tons/hr, $E = (4.1)(P^{0.67})$

Process weight rate > 30 tons/hr, $E = (4.1)(P^{0.11}) - 40$

Where: E = the rate of emissions in lbs/hr

P = process weight rate in tons/hr

Following the inspection, the facility provided this information with their stack testing information (CBI).

The control equipment shall be continuously operated while the emission unit is operating.

The facility uses a dashboard called "Ignition" that they can observe the operating conditions with.

During the onsite evaluation of the control devices monitoring equipment, I observed that some of the past recordings for K5 C WEP water flow rate and the K5 D WEP water flow rate (inlet and duct) were outside of their required range. I requested the facility provide records for the units. "K5 C and D WEPs 2021" demonstrates the deviation from the required water flow. (Attachment 6)

While discussing the facilities operations and maintenance Mr. Buckmaster indicated that if the DEP were to go down during an emergency, they would run the emissions through a bypass. This was since the melt could not easily be shut down. He informed me that this only occurred

very rarely. He also informed me that when a bypass occurs it is reported to the state as a deviation. Mr. Buckmaster also informed me that they will bypass for scheduled maintenance. He told me that they report that as a deviation in their semi-annual and annual report.

EU-BURNOFFOVEN/ CE-I BURN OFF

EU-BURNOFFOVEN is used to burn off asphalt from filters and binder spray rings. The facility utilizes an oven which is equipped with a secondary afterburner.

Limitation or Standard

The operation is limited to processing 120 pounds of asphalt / binder from the asphalt filters or binder spray rings per each 30-day period.

I observed the facility's burn off oven's records for all of 2021 except for September. I did not collect the record and did not observe the facility exceeding the 120 lb/ 30-day limit.

The burn-off oven's secondary chamber shall be equipped with a temperature-monitoring device and the secondary chamber temperature shall be maintained at a temperature not less than 1700 degrees Fahrenheit while the unit is operating.

Monitoring

The temperature of the burn-off oven's secondary chamber shall be continuously monitored while the unit is operating.

During the inspection I observed that the unit was not connected to a continuous temperature recording device but instead to an instantaneous digital monitor. The instantaneous monitor did not appear to record the temperature during all times of the oven's operation but was instead checked by a worker periodically and the worker recorded the operation on a chart.

While in the burn off area I observed a paint booth. The booth did not appear to have spray guns hooked up. There was an airline still in place. I observed spray cans and paint buckets. At least 18 cans of paint were left open on a shelf and were dried out. The paint appeared to be all acrylic based.

Standard for Particulate matter

On and after the date on which the performance test is required to be conducted by 40 CFR 60.8 is complete, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which contain particulate matter in excess of 5.5 kg/Mg (11.0 lbs/ton) of glass pulled.

An owner or operator subject to the provisions of this subpart who uses a wet scrubber control device to comply with the mass emissions standard shall install, calibrate, maintain, and operate the monitoring devices that measure the gas pressure drop across each scrubber and scrubber liquid flow rate to each scrubber.

During the inspection I requested the facility provide a copy of their most recent stack test. The facility submitted the records for their stack test (Attachment 7 CBI).

SUMMARY

The facility is permitted as a Title V source of air contaminants.

The facility was operating during the inspection.

No excess visible or fugitive emissions were observed.

I observed records for the K5 C and D WEPS which indicated the units had been operated outside of the listed water flow range.

The asphalt burn-off oven was not connected to a continuous temperature recording device but instead to an instantaneous digital monitor.

TYLER SALAMASICK Digitally signed by TYLER
SALAMASICK
Date: 2022.02.01 14:32:58 -06'00'

Tyler Salamasick, Life Scientist

Date

TRACEY CASBURN Digitally signed by TRACEY
CASBURN
Date: 2022.02.03 14:49:40 -06'00'

Tracey Casburn, Air Branch Chief

Date

ATTACHMENTS:

1. Multimedia Screening Checklist (3 pages)
2. Confidentiality Notice (1 page)
3. Receipt for Documents and Samples (1 page)
4. Owens Corning Title V permit (1 pdf)
5. Inspection guide (5 pages)
6. Electronically provided records (11 pdfs)
7. Electronically provided records CBI (5 pdfs)