



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 20 2018

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dennis Rogers, Plant Manager
Owens Corning Insulating Systems, LLC
400 Case Avenue
Newark, Ohio 43055

Re: Administrative Order EPA-5-19-113(a)-OH-01

Dear Mr. Rogers:

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at (312)886-6797.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Marshall", is written over a horizontal line.

Sarah Marshall, Chief
Air Enforcement and Compliance Assurance Section (MI/WI)

Enclosure

cc: Josh Zaharoff/C-14J
Bob Hodanbosi, OEPA
James Kavalec, OEPA
Kelly Toth, Central District Office, OEPA

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:	)	EPA-5-19-113(a)-OH-01
	)	
Owens Corning Insulating Systems, LLC	)	Proceeding Under Sections 113(a)(1) and
Newark, Ohio	)	114(a)(1) of the Clean Air Act, 42 U.S.C.
	)	§§ 7413(a)(1) and 7414(a)(1)
	)	

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to Owens Corning Insulating Systems, LLC (Owens Corning), under Sections 113(a)(1) and 114(a)(1) of the Clean Air Act (CAA or the Act), 42 U.S.C. §§ 7413(a)(1) and 7414(a)(1).

Statutory and Regulatory Background

2. Each state must submit to the Administrator of EPA a State Implementation Plan (SIP) for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the CAA, 42 U.S.C. § 7410.

3. Effective March 22, 2013, EPA approved modifications to Ohio Administrative Code (OAC) Rules 3745-31-01, 3745-31-02, and 3745-31-05 as part of the Ohio SIP, which contain requirements for Ohio's permit-to-install (PTI) program. 78 *Fed. Reg.* 11748.

4. OAC Rule 3745-31-02(A) prohibits any person from causing, permitting, or allowing any installation or modification of any new source that is, or will be, part of a facility, as defined in OAC Chapter 3745-77, and that is required to obtain a Title V permit under OAC Chapter 3745-77, without first obtaining a permit-to-install (PTI) from the Director of the Ohio Environmental Protection Agency (OEPA).

5. OAC Rule 3745-31-05(A) requires the Director of OEPA to issue a PTI if the director determines that the installation, modification, or operation of the air contaminant source will: (1) not prevent or interfere with the attainment or maintenance of applicable ambient air quality standards; (2) not result in a violation of any applicable laws including, but not limited to, emission standards adopted by OEPA and Federal Standards of Performance for New Sources adopted by EPA pursuant to Section 111 of the CAA and the regulations promulgated thereunder; and (3) employ best available technology (BAT) in accordance with certain requirements.¹

6. OAC Rule 3745-31-05(D)(1) provides that the Director of OEPA may impose special terms and conditions as are appropriate or necessary to ensure compliance with the applicable laws and to ensure adequate protection of environmental quality. Special terms and conditions necessary to ensure compliance mandated by the CAA, which include synthetic minor emissions unit terms and conditions, shall be federally enforceable. Federally enforceable terms and conditions shall be designated as such through the terms and conditions of, among other things, a final PTI issued under the SIP.

7. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b), provides that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except in compliance with a Title V permit. EPA codifies regulations governing the federal operating permit program at 40 C.F.R. Part 70. Effective October 1, 1995, EPA approved Ohio's Title V operating permit program. *See* 60 Fed. Reg. 42045; 40 C.F.R. Part 70, App. A. Ohio's Title V operating permit regulations are codified at OAC Chapter 3745-77.

¹ OAC Rule 3745-31-05(A)(3)(a)(ii), which exempts certain air contaminant sources from BAT requirements, has not been approved as part of the Ohio SIP. *See* 78 Fed. Reg. 11748, 11749.

8. Under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating a SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

9. The Administrator of EPA may require any person who owns or operates an emission source to make reports, sample emissions, and provide information under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

10. Owens Corning owns and operates a wool fiberglass manufacturing facility located at 400 Case Avenue, Newark, Ohio (the Facility). Emission sources at the Facility include several wool fiberglass furnaces, forming processes, curing ovens, and cooling and trimming operations for processing fiberglass.

11. Owens Corning is a “major source” subject to Title V of the CAA, 42 U.S.C. § 7661 *et seq.*; 42 U.S.C. § 7412(a)(1). Effective January 28, 2004, OEPA issued Owens Corning a Title V permit with an expiration date of February 18, 2009 for the Facility (Facility ID: 01-45-02-0185).

12. Effective June 16, 2005, OEPA issued a significant modification to the Title V permit, No. P0083726 (2005 Title V permit). Owens Corning submitted a timely renewal application prior to February 18, 2009. OEPA issued a Draft OAC Chapter 3745-77 Title V permit on April 26, 2018. Owens Corning is awaiting final issuance and is operating in accordance with the terms of the Preliminary Proposed Title V Permit pending issuance by OEPA.

13. OEPA issued PTI No. P0108954 on June 12, 2012 to Owens Corning, thereby modifying the applicable federally-enforceable limitations for VOC emissions that applied to, among other units, emission unit P066 (F-6 Curing Oven).

14. P066 was subject to a VOC emission limit of 0.5 pounds per ton of binder solids applied when employing non-phenolic binder under Condition 2.(b)(1)(c) of PTI No. P0108954.

15. On April 1, 2013, Owens Corning submitted an administrative modification of PTI No. P0108954 for, among other units, emission unit P066.

16. On September 26, 2013, OEPA issued PTI No. P0113567 and revised the VOC emissions limit for emission unit P066.

17. P066 is subject to a VOC emission limit of 1.00 pound per ton of binder solids applied when employing non-phenolic binder under Condition 2.(b)(1)(c) of PTI No. P0113567.

18. Owens Corning conducted stack testing at P066 in January 2013. Stack test results showed VOC emissions of 1.33 pounds per ton of binder solids applied when employing non-phenolic binder, in exceedance of the 0.50 pounds per ton of binder solids limit in P0108954 and the 1.00 pound per ton of binder solids limit in P0113567.

19. On September 27, 2017, EPA issued to Owens Corning a notice of violation alleging that it violated the emission limits established in accordance with the Ohio State Implementation Plan, and Owens Corning's 2005 Title V Permit, PTI No. P0108954, and PTI No. P0113567.

20. On November 7, 2017, representatives of Owens Corning and EPA discussed the September 27, 2017 notice of violation.

21. Owens Corning conducted stack testing at P066 on March 14, 2018. Stack test results showed VOC emissions of 2.37 pounds per ton of binder solids applied when employing non-phenolic binder, in exceedance of the 1.00 pound per ton of binder solids limit in P0113567.

22. Owens Corning subsequently performed maintenance on P066 and conducted further stack testing at P066 on June 14, 2018. The stack test results showed VOC emissions in compliance with the limit in P0113567.

23. Owens Corning violated federally-enforceable limits in PTI No. P0108954 and PTI No. P0113567, and therefore violated Section 502(a) of the Act.

Compliance Program

24. By the effective date of this Order, Owens Corning must achieve, demonstrate, and maintain compliance with PTI No. P0113567, OAC Rule 3745-31-05, OAC Rule 3745-77-02(A), and Section 502(a) of the Act for VOC emissions at its Newark, Ohio facility.

25. By the effective date of this Order, Owens Corning shall develop and implement an Inspection & Maintenance Plan (IMP), consistent with paragraph 26 of this Order, for the regenerative thermal oxidizer (RTO) at P066.

26. The IMP must address and remedy the VOC emissions violation shown in the January 2013 stack test results as well as establish procedures to prevent future VOC emissions violations. Specifically, the IMP must ensure regular inspections and maintenance are conducted on the RTO, which is responsible for limiting the VOC emissions output of P066. At a minimum, Owens Corning must conduct and document the following Bi-Weekly, Quarterly, Semi-Annual, and Annual inspection tasks as part of the IMP:

A. Bi-weekly Inspection Tasks

- i. Examine air inlet filters for loose dirt or any obstruction; clean or replace, as needed.
- ii. Check to ensure all fan/motor guards are in place, operational, and properly secured.
- iii. Check to ensure all oxidizer doors and access panels are closed properly.
- iv. Check the fan(s) mounting bolts to ensure they are secure and properly tight.
- v. Visually inspect the oxidizer surface, looking for any new "hot-spots" which may be identified by burnt paint and other signs of over-heating found on the oxidizer shell or valve housing.
- vi. During the oxidizer's normal operation, check for fan vibration, abnormal sounds, or increased noise levels.
- vii. Visually inspect and listen for unusual sounds/vibration during valve operation. Valves should shift smoothly and evenly in both directions.
- viii. Inspect the oxidizer fuel train for leaks.
- ix. Check all temperature device read-outs to confirm temperature operation is within normal ranges.
- x. View pressure device read-outs to confirm operation is within normal range.
- xi. Verify temperature chart recording device is "On" and recording data.

B. Quarterly Inspection Tasks

- i. Check the burner linkage and external burner components for wear or signs of loosening that could cause gradual slipping and adjustment issues with gas and air settings.
- ii. Check fan drive coupling -for wear and to ensure correct alignment.
- iii. Remove all pressure switch sensing lines, or open drain valves if available, to ensure all such lines or valves are clear and dry.
- iv. Grease process air and exhaust fan/motor bearings per manufacturer's recommendation if necessary.
- v. Clean and check all drains or weep holes on all fan motors for debris as necessary.
- vi. Verify oil level of compressed air lubricator; add oil as necessary.
- vii. Verify burner flame visually at burner or system; check Peep-Sight for color and intensity.

C. Semi-Annual Inspection Tasks

- i. Inspect the interior of the oxidizer. While inside, inspect the insulation for signs of deterioration, damage, or gaps.
- ii. Clean the inner lens of the burner view port with a soft, dry cloth.
- iii. Check the ceramic media for buildup of particulate or residue and visible damage.
- iv. Inspect the gaskets, replacing or repairing as necessary to maintain a leak-free seal before closing access doors.

- v. Visually inspect valve shafts, seats, and disks.
- vi. Inspect spark igniter – replace if required.
- vii. Inspect the exterior of the burner for damage or areas showing excessive heat.
- viii. Inspect all fan flex joints and replace, if necessary.
- ix. Inspect the T-dampers and linkage (if applicable) for proper operation and check the linkage for tightness and lubrication at appropriate points.

D. Annual Inspection Tasks

- i. Mechanical: perform an external and internal inspection of the RTO's mechanical components, including components such as ductwork, valves, linkage, heat exchanger, reactor, fan, motor assembly, burners, catalyst, stack, and observation ports.
- ii. Electrical: inspect and electrically test the electrical components – including switches, lights, relays, timers, controllers, recorders, motors, starters, actuators, disconnects, and wiring – to ensure that they are functioning properly.
- iii. Combustion/Fuel System & Control: (i) inspect the flame Safeguard system for proper sequencing; (ii) ensure high and low gas pressure switches are active and set within proper range; (iii) ensure the U.V. detector is clean and functioning properly; (iv) confirm proper purge and ignition sequence; and (v) verify stable flame at low fire.
- iv. Process Control Loops: (i) inspect and test the temperature and pressure control loops to verify correct operation and sequence, including a visual

inspection and adjustment of the air/fuel mixture ratio of the burner, if necessary; (ii) perform an operational review of the controllers, actuators, thermocouples, pressure switches and variable speed drives; and (iii) evaluate the system (or catalyst) ready circuit, inlet and atmospheric bypass damper circuits, warning alarm circuits, and shutdown alarm circuits to determine if they are functioning properly.

- v. Retention Chamber, Heat Exchanger: (i) perform visual checks on internal cleanliness and note any detrimental particulate built-up observed internally; (ii) inspect thermocouples from inside and outside and note any concerns for reliability until change-out is required; (iii) inspect all tube sheets, tubes, expansion joints, baffles, and liners for material degradation, cracks, separation, excessive warpage or plugging; (iv) inspect all internal insulation/refractory (including burner blocks) for cracking, separation, damage or failure; (v) identify existing or potential hot spots; (vi) inspect airflow entry perimeter and baffles for potential bypass (hot side and cold side); (vii) inspect burner for degradation, damage and plugging; (viii) inspect the access doors and entry for damage, degradation, or missing components (flashing, insulation, seals, fasteners) and check door seal integrity; (ix) inspect internal burner control damper for damage, degradation and unrestricted operation; and (x) inspect exterior casing for hot spots, potential leakage, and signs of metal or component degradation.
- vi. Oxidizer Inlet, Outlet, Combustion Air Ducting & Dampers: (i) inspect all ductwork and dampers, inside and outside, for any process residuals or

condensate; (ii) inspect expansion joints for deterioration or signs of overheating/brittleness; (iii) check fuel flow valves for leakage; (iv) check flange bolting for security; (v) inspect all dampers (e.g. fresh air, by pass, combustion air, and process isolation) for damage, degradation, blade sealing, and unrestricted operation; (vi) inspect damper actuators, linkages, and proximity switches for any missing, degraded or damaged components; and (vii) check for confirmation of damper's position indicator.

27. Owens Corning must create and maintain a record of performance of each of the inspection tasks conducted under the IMP as required by paragraph 26, including any corrective action steps taken to address deviations, the date of such steps, and the date the deviation at issue was resolved. Documentation of the results of each IMP inspection task must be kept for a minimum two years following the completion of the inspection task.

28. Within 60 days from the effective date of this Order, Owens Corning shall re-train all maintenance personnel to implement the IMP and certify that all maintenance personnel have been informed about the IMP, including the procedures applicable to the P066 RTO. Owens Corning must incorporate the IMP and training regarding performance of the IMP tasks into training conducted for all new personnel who are responsible for conducting maintenance tasks.

29. Pursuant to Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), within 60 days from the effective date of this Order, Owens Corning must submit confirmation that the Compliance Program outlined in Paragraphs 24-26 of this Order has been implemented.

30. Pursuant to Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), within one year from the effective date of this Order, Owens Corning must submit a certified statement to EPA

confirming that it has completed all the tasks required under this Order, including implementation of the IMP. If a deviation is detected at any point under the Compliance Program outlined in this Order, Owens Corning must notify EPA in writing at the address below within 30 days of the detection of the deviation.

31. Within one year from the effective date of this Order, Owens Corning must submit to OEPA a Request for Administrative Permit Modification of the most recent Permit to Install for P066 to incorporate the IMP, as described in paragraph 26, as a federally enforceable requirement provided under the Emission Unit Terms and Conditions. Owens Corning must provide a copy of the Request for Administrative Permit Modification to EPA within 10 days after submission to OEPA.

32. Owens Corning must send all reports required by this Order to:

Attention: Compliance Tracker (AE-18J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Alternatively, Owens Corning can also submit all reports required by this Order via electronic mail (e-mail) at R5airenforcement@epa.gov

General Provisions

33. This Order does not affect Owens Corning's responsibility to comply with other federal, state, and local laws.

34. This Order does not restrict EPA's authority to enforce the CAA and its implementing regulations.

35. Failure to comply with this Order may subject Owens Corning to penalties of up to \$46,192 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

36. The terms of this Order are binding on Owens Corning, its assignees and successors. Owens Corning must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.

37. EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.

38. Owens Corning agrees to the terms of this Order. Owens Corning waives any remedies, claims for relief, and otherwise available rights to judicial or administrative review that it may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Section 307(b) of the CAA, 42 U.S.C. § 7607(b).

39. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate two years from the effective date, provided that Owens Corning has complied with all terms of the Order throughout its duration.

Owens Corning Insulating Systems, LLC

12/18/2018
Date



Dennis Rogers
Plant Manager
Owens Corning Insulating Systems, LLC

United States Environmental Protection Agency

12/20/18
Date



Edward Nam
Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

CERTIFICATE OF MAILING

I certify that I sent the Administrative Consent Order, EPA-5-19-113(a)-OH-01, by certified mail, return receipt requested, to:

Dennis Rogers, Plant Manager
Owens Corning Insulating Systems, LLC
400 Case Avenue
Newark, Ohio 43055

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-19-113(a)-OH-01, by E- mail to:

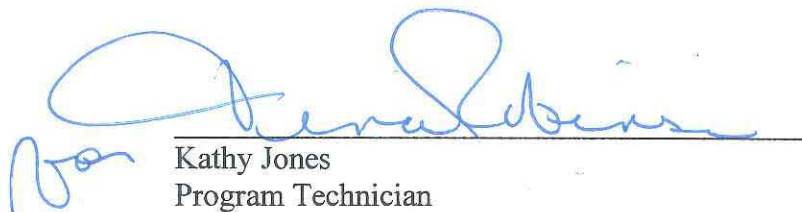
Bob Hodanbosi, Chief
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Kelly Toth, Air Pollution Control
Central District Office
Ohio Environmental Protection Agency
Kelly.toth@epa.ohio.gov

On the 21st day of December 2018.


Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT
NUMBER:

2017062000036618427