



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Eric Hamm, EHS Leader
Thermafiber, LLC
3711 Mill St.
Wabash, IN 46992

August 28, 2018

Re: Inspection Summary/Violation Letter
Thermafiber, LLC
Plant ID 169-00009
Wabash, Wabash County

Dear Mr. Hamm:

A representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), has reviewed the Annual Compliance Certification (ACC) for calendar year 2017 submitted by Thermafiber, Inc. – Wabash Plant (Thermafiber) located at 3711 Mill St. in Wabash, Indiana. As a result of information obtained during this review, IDEM alleges that violations of 40 CFR 63 Subpart DDD, Permit T169-31618-00009 and/or subsequent permits 38543, 38562, and 39081 have occurred.

Our records indicate that no prior enforcement action has been issued regarding the following deviations reported in your ACC:

- 1) Visible emission checks required by Thermafiber's Operating, Monitoring, and Maintenance Plan were not recorded for Cupolas #2 and #4 for one time on 10/5/2017 in violation of 40 CFR 63.1187.
- 2) Records for startup/shutdown were not recorded for Cupola #2 two times and for Curing Oven one time in 1st half of 2017 in violation of 40 CFR 63.1197(e).
- 3) Malfunction procedures from the Startup Shutdown Malfunction plan were not followed for Cupola #4 one time in the 1st half of 2017. The operator failed to shut the line down within an hour of detecting that the caustic injection system was not in operation) in violation of 40 CFR 63.6(e)(1)(ii) and Permit Condition E.1.1. IDEM understands that the injection system was restarted within 1.57 hours.
- 4) The Line #2 Curing Oven RTO was reported offline for 10.22 hours in 2017 in violation of 40 CFR 63.1179(b)(2). Based on further input from Thermafiber, the RTO was actually offline only 6.55 hours including 55 incidents, the longest of which lasting 26 minutes with a median duration of 5 minutes. Mostly these were due to a burner kicking out because of integrated safety guards getting tripped and most of the time, the burner was simply relit without shutting down the line. For four of the incidents, the line was shut down. IDEM understands that the

frequency of incidents decreased after maintenance in July 2017 and that the burner system was replaced in February 2018.

The Office of Air Quality will not take legal action at this time. However, any such violation(s) in the future may result in legal action being pursued.

The following deviations identified in the 2017 ACC have been previously addressed in an Enforcement Action Letter dated 11/2/2017:

- 5) Pressure drop across the #2 trimming/sizing baghouse was below the lower limit allowed in the permit for four days in January, and one day in August, 2017 with no reasonable response steps being taken in violation of Permit Condition D.1.10(a).
- 6) Visible emission notations were not recorded for blowchamber #4 for two days in May of 2017 in violation of Permit Condition D.1.9(a).
- 7) The Line 2 curing oven regenerative thermal oxidizer (RTO) was operated for 16 ½ days in 2017 at a set point of 1350 F, which is below the average RTO temperature of 1369 F demonstrated in the 1/12/2016 stack test. This is a violation of Permit Condition E.1.2(e) and 40 CFR 63.1179(b)(2).

The following deviations identified in the 2017 ACC have been previously addressed in a Violation Letter dated 11/30/2017:

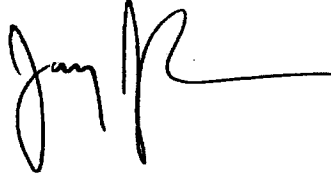
- 8) During the first and second shift on 8/21/2017, pressure drop across baghouse CE7 was measured at 1.0 inches of water, which is below the 1.2 – 6.0 inches of water range specified in the permit with no record of reasonable response steps being taken in violation of Permit Condition C.13.
- 9) Thermafiber's Semiannual Reports do not include a statement that no deviations of bag leak detection system limits occurred during the reporting period in violation of 40 CFR 63.1193(f).

The following deviations are similar and related to deviations already being addressed in enforcement case 2017-24867-A and will not be further addressed:

- 10) The remaining 3.67 hrs initially reported as offline (see item 4) were really periods when the RTO was operating at a temperature below the setpoint. This included 21 incidents, the longest of which lasting 32 minutes with a median duration of 7 minutes.

Please direct any questions to Wyman Clark, Compliance Inspector, at 317-232-8441 or by email at wclark@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janusz Johnson', with a long horizontal line extending to the right.

Janusz Johnson, Section Chief
Air Compliance Section 1
Office of Air Quality

ACES ID: 227657

cc: Wabash County Health Department
Wyman Clark, Air Compliance Section 1, Office of Air Quality