



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

SEP 11 2018

NOTICE OF VIOLATION

Via Certified Mail
No. 7002 0510 0002 5821 9963

Via Certified Mail No.: 7002 0510 0002 5821 9970

To: Carmelo Carrubba, President
Thermafiber, Inc. – Wabash Plant
One Owens Corning Parkway
Toledo, OH 43659

To: C T Corporation System, Registered Agent
150 West Market St, Suite 800
Indianapolis, IN 46204

Case No. 2017-24867-A

Based on an investigation, the Indiana Department of Environmental Management ("IDEM") has reason to believe that Thermafiber, Inc. – Wabash Plant ("Respondent") has violated environmental rules and permits. The violations are based on the following:

1. Respondent owns and operates a facility with Plant I.D. No. 169-00009 located at 3711 Mill St in Wabash, Wabash County, Indiana (the "Site").
2. Pursuant to Part 70 Permit 169-31618-00009, issued June 25, 2013 ("Permit"), Conditions D.1.9(a) and D.1.13(a), Respondent shall observe and record the Visible Emissions for the Blowchambers once per day.

Respondent failed to observe or record the Daily Visible Emissions for the #4 Blowchamber, identified as EU-P6, for two (2) days in 2017, in violation of Permit, Conditions D.1.9(a) and D.1.13(a).

3. Pursuant to Permit, Conditions D.1.9(a) and D.1.13(a), Respondent shall observe and record the Visible Emissions for the #2 Line Cooling Section once per day.

Respondent failed to observe or record the Daily Visible Emissions for the #2 Line Cooling Section for six (6) days in 2016 and one (1) day in 2017, in violation of Permit, Conditions D.1.9(a) and D.1.13(a).

4. Pursuant to Permit, Condition D.1.10(a), when the #2 Trimming/Sizing baghouse Pressure Drop Reading is outside the range established during the latest stack test, Respondent shall take reasonable response steps.

Respondent failed to take reasonable response steps when the #2 Trimming/Sizing baghouse Pressure Drop Reading was below the range



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established during the latest stack test for four (4) days in 2017, in violation of Permit, Condition D.1.10(a)

5. Pursuant to Permit, Condition D.1.10(b), when the Cupola #4 caustic injection rate is outside the range established during the latest stack test, Respondent shall take reasonable response steps.

Respondent operated the Cupola #4 caustic injection rate at approximately 65 lb/hr, which was below the 102 lb/hr injection rate established during stack testing from March of 2016 until January of 2017, in violation of Permit, Condition D.1.10(b).

6. Pursuant to Permit, Conditions D.1.12(a) and D.1.13(d), Respondent shall conduct and record observations regarding the state of the Blowchamber dry media filters and the particulate matter from the stacks once per week.

Respondent failed to record the observations regarding the state of the Blowchamber dry media filters and the particulate matter from the stacks in December of 2016 and May of 2017, in violation of Permit, Conditions D.1.12(a) and D.1.13(d).

7. Pursuant to Permit, Condition E.1.2 and 40 CFR 63.1197, Respondent shall record the start-ups and shut downs for the Cupola #2 and Cupola #4 and the curing ovens.

Respondent failed to record the start-ups and shut downs for the Cupola #2 two (2) times in 2016 and two (2) times in the first half of 2017, Cupola #4 four (4) times in 2016 and three (3) times in the first half of 2017, and the curing ovens eighteen (18) times in 2016 and one (1) time in the first half of 2017, in violation of Permit, Condition E.1.2 and 40 CFR 63.1197.

8. Pursuant to Permit, Condition E.1.2 and 40 CFR 63.1179, Respondent shall operate the Line 2 curing oven Regenerative Thermal Oxidizer ("RTO") where the average operating temperature for each three-hour block period never falls below the average temperature established during the most recent valid performance test, or Respondent shall take reasonable response steps.

Respondent operated the Line 2 curing oven RTO at approximately 1350° F for most of 2016 and sixteen (16) days in 2017, which is below the average temperature of 1369° F demonstrated in the January 12, 2016 stack test, in violation of Permit, Condition E.1.2 and 40 CFR 63.1179.

9. Pursuant to Permit, Condition E.1.2 and 40 CFR 63.1179 Respondent shall operate the Line 2 curing oven RTO where the average operating temperature for each three-hour block period never falls below the average temperature established during the most recent valid performance test.

Respondent failed to operate the Line 2 curing oven RTO for 13.72 hours in 2016 and 8.27 hours in the first half of 2017, while the Line #2 curing oven was in operation, in violation of Permit, Condition E.1.2 and 40 CFR 63.1179.

In accordance with IC 13-30-3-3, the Commissioner herein provides notice that violations may exist and offers an opportunity to enter into an Agreed Order providing for the actions required to correct the violations and, as necessary and appropriate, for the payment of a civil penalty. The Commissioner is not required to extend this offer for more than sixty (60) days.

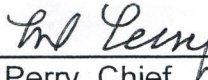
As provided in IC 13-30-3-3, an alleged violator may enter into an Agreed Order without admitting that the violations occurred. IDEM encourages settlement by Agreed Order, thereby resulting in quicker correction of the environmental violations and avoidance of extensive litigation. Timely settlement by Agreed Order may result in a reduced civil penalty. Also, settlement discussions will allow the opportunity to present any mitigating factors that may be relevant to the violations.

If an Agreed Order is not entered into within sixty (60) days of receipt of this Notice of Violation, the Commissioner may issue a Notice and Order under IC 13-30-3-4 containing the actions that must be taken to correct the violations and requiring the payment of an appropriate civil penalty. Pursuant to IC 13-30-4-1, the Commissioner may assess penalties of up to \$25,000 per day for each violation.

Please contact Lisa Hayhurst at (317) 232-8412 or e-mail lhayhurs@idem.in.gov within fifteen (15) days after receipt of this Notice to discuss resolution of this matter.

For the Commissioner:

Date: 9/10/18



Phil Perry, Chief
Compliance and Enforcement Branch
Office of Air Quality

cc: Eric Hamm, EHS Leader, Thermafiber, Inc. – Wabash Plant,
eric.hamm@owenscorning.com
Rochelle Marceillars, US EPA Region 5
Wabash County Health Department
Wyman Clark, Compliance and Enforcement Branch, OAQ
<http://www.in.gov/idem/enforcement/>