



**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Nally, **Director**

Re: Erie County  
0322000017  
CertainTeed Corporation  
Stack Test  
HPV-GC8  
**Notice of Violation**

June 25, 2012

**CERTIFIED MAIL**

Mr. Marko Zeck, QA Manager  
CertainTeed Corporation  
11519 US Highway 250 North  
Avery, Ohio 44846

Dear Mr. Zeck:

The stack test conducted on October 11-14, 2011, on Ohio EPA emissions units Nos. P101 (Asphalt shingle process line no. 1), P102 (Asphalt shingle process line no. 2), P105 (Line No. 2 filler system), T101, T102, T103 (50,000 gallon coating asphalt storage tanks 1, 2, and 3), T104 (50,000 gallon coating AC-20 asphalt storage tank # 4), and T105 (Saturant/AC-20 asphalt storage tank) has been reviewed. The testing was conducted in conformance with Ohio EPA methods and procedures.

The following table summarizes the results of the testing. Our review has confirmed these data as accurate. For the testing of stacks EP03 and EP04, emissions units P101 and P102 were being operated in violation of their allowable emissions rates for OC, a violation of the Permit to Install 03-17171 term and condition C.1.(f)(2)(a), Ohio Administrative Code (OAC) rule 3745-31-05(A)(3), and Ohio Revised Code (ORC) §3704.05. In addition, all sources except for source P105 during the testing of stack EP20 were not shown to be operating at greater than 90% of their maximum source operating rates (MSOR). The Ohio EPA cannot accept compliance testing at less than the MSOR. It will therefore be necessary to retest these units or take other appropriate action to achieve or demonstrate compliance with the applicable emission limitations while operating at the maximum process weight rate.

It should be noted that emissions unit P102 was manufacturing a product that was not accounted for in the initial permit application. Therefore, it is necessary to submit information pertaining to that product to determine whether it was the worst-case scenario that was run during the compliance test. If this product is not considered as worst-case after our review of the submittal, emissions testing will need to be conducted with the worst-case scenario.

**Critical Test Data  
 (In Three Run Averages)**

Emission Units	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	MSOR <sup>a</sup>	% of MSOR
P101, P102, T105 (stack EP01)	PM <sub>10</sub>	0.0076 lb/ton coating asphalt	0.068 lb/ton coating asphalt	25.02 tons/hr coating asphalt	36.71 tons/hr coating asphalt	68.2
P101, P102, T105 (stack EP01)	OC	5.29 lbs/hr as propane	8.33 lbs/hr as propane	25.01 tons/hr coating asphalt	36.71 tons/hr coating asphalt	68.1
P101, P102, T105 (stack EP02)	PM <sub>10</sub>	0.0076 lb/ton coating asphalt	0.068 lb/ton coating asphalt	25.02 tons/hr coating asphalt	36.71 tons/hr coating asphalt	68.2
P101, P102, T105 (stack EP02)	OC	4.71 lbs/hr as propane	8.33 lbs/hr	25.15 tons/hr coating asphalt	36.71 tons/hr coating asphalt	68.5
P101, P102 (stack EP03)	PM <sub>10</sub>	0.0028 lb/ton coating asphalt	0.0571 lb/ton coating asphalt	25.08 tons/hr coating asphalt	36.71 tons/hr coating asphalt	68.3
P101, P102 (stack EP03)	OC	8.44 lbs/hr as propane	0.64 lbs/hr	25.05 tons/hr coating asphalt	36.71 tons/hr coating asphalt	68.2
P101 (stack EP04)	PM <sub>10</sub>	0.0174 lb/ton coating asphalt	0.08965 lb/ton coating asphalt	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP04)	OC	0.87 lb/hr as propane	0.75 lb/hr	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101, P102 (stack EP08)	PM <sub>10</sub>	0.015 lb/ton coating asphalt	0.07468 lb/ton coating asphalt	14.85 tons/hr coating asphalt	21.65 tons/hr coating asphalt	68.6
P101, P102 (stack EP08)	OC	0.43 lb/hr as propane	2.84 lbs/hr	14.85 tons/hr coating asphalt	21.65 tons/hr coating asphalt	68.6
P101 (stack EP05)	PM <sub>10</sub>	0.038 lb/ton coating asphalt	0.3396 lb/ton coating asphalt	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP05)	OC	0.33 lb/hr as propane	1.75 lbs/hr	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP06)	PM <sub>10</sub>	0.03 lb/ton coating asphalt	0.3396 lb/ton coating asphalt	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP06)	OC	0.23 lb/hr as propane	1.75 lbs/hr	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP07)	PM <sub>10</sub>	0.015 lb/ton coating asphalt	0.3396 lb/ton coating asphalt	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP07)	OC	0.13 lb/hr as propane	1.75 lbs/hr	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP-34)	PM <sub>10</sub>	0.003 lb/ton coating asphalt	0.08879 lb/ton coating asphalt	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P101 (stack EP-34)	OC	0.16 lb/hr as propane	0.40 lb/hr	10.34 tons/hr coating asphalt	15.06 tons/hr coating asphalt	68.7
P102 (stack EP11)	PM <sub>10</sub>	0.0034 lb/ton coating asphalt	0.00858 lb/ton coating asphalt	14.56 tons coating asphalt/hr	21.65 tons coating asphalt/hr	67.3
P102 (stack EP11)	OC	0.28 lb/hr	0.43 lb/hr	14.68 tons coating asphalt/hr	21.65 tons coating asphalt/hr	67.8
P102 (stack EP10)	PM <sub>10</sub>	0.055 lb/ton coating asphalt	0.4284 lb/ton coating asphalt	14.56 tons coating asphalt/hr	21.65 tons coating asphalt/hr	67.3

<sup>a</sup> Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

Emission Units	Pollutant	Actual Emission Rate	Allowable Emission Rate	Source Operating Rate	MSOR <sup>b</sup>	% of MSOR
P102 (stack EP10)	OC	1.40 lbs/hr	3.10 lbs/hr	14.68 tons coating asphalt/hr	21.65 tons coating asphalt/hr	67.8
P105 (stack EP16)	PM <sub>10</sub>	0.01 lb/hr	0.4863 lb/hr	27.15 tons (average weight on trucks unloaded)	40 tons/hr	??
P105 (stack EP17)	PM <sub>10</sub>	0.01 lb/hr	0.4863 lb/hr	27.15 tons (average weight on trucks unloaded)	40 tons/hr	??
P105 (stack EP19)	PM <sub>10</sub>	0.03 lb/hr	0.3182 lb/hr	Rate not measured during test	100 tons/hr	??
P105 (stack EP20)	PM <sub>10</sub>	0.031 lb/ton coating asphalt	0.04043 lb/ton coating asphalt	14.63 tons/hr coating asphalt	15.56 tons/hr coating asphalt	94
P105 (stack EP20)	OC	2.0 lbs/hr as propane	5.43 lbs/hr	14.68 tons coating asphalt/hr	15.56 tons/hr coating asphalt	94.3
T101, T102, T103, T104 (stacks EP 26, EP27, EP28)	PM <sub>10</sub>	0.0004 lb/ton	0.0237 lb/ton	24.75 tons/hr coating asphalt	36.71 tons/hr coating asphalt	67.4
T101, T102, T103, T104 (stacks EP 26, EP27, EP28)	CO	0.13 lb/hr	2.17 lbs/hr	24.77 tons/hr coating asphalt	36.71 tons/hr coating asphalt	67.5
T101, T102, T103, T104 (stacks EP 26, EP27, EP28)	OC	2.47 lbs/hr as propane	29.19 lbs/hr	24.77 tons/hr coating asphalt	36.71 tons/hr coating asphalt	67.5

The following parameters were recorded during the testing of the following emission units:

Stack	Parameter	Required Value	Actual Value
EP01, EP02	CVM coalescing filter/mist eliminator pressure drop	2.0-12.0 inches of water	5.82 inches of water
EP03	Flat Bed HEAF pressure drop	24.0-32.0 inches of water	26.68 inches of water
EP04	Baghouse pressure drop	0.5-7 inches of water	2.8 inches of water
EP08	Baghouse pressure drop	0.5-7.0 inches of water	4.0 inches of water
EP11	Mini-HEAF pressure drop	6.0-35.0 inches of water	15.7 inches of water
EP16	Baghouse pressure drop	0.5-7.0 inches of water	1.8 inches of water
EP17	Baghouse pressure drop	0.5-7.0 inches of water	1.5 inches of water
EP19	Baghouse pressure drop	0.5-7.0 inches of water	3.2 inches of water
EP20	Baghouse pressure drop	0.5-7.0 inches of water	5.5 inches of water

Ohio EPA is requesting that the facility submit a written response to this letter which includes, at a minimum, a compliance plan and schedule. The facility is required to submit this information by no later than August 7, 2012.

<sup>b</sup> Maximum Source Operating Rate (MSOR) is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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Please note that the submission of the requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC §3704.06. The Ohio EPA will make the decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

If you have any questions or comments regarding the contents of this letter or would like to discuss this matter further, feel free to contact me by phone at (419) 373-3118 or by e-mailing mohammad.smidi@epa.ohio.gov.

Sincerely,



Mohammad Smidi  
Environmental Specialist  
Division of Air Pollution Control

/llr

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