

ALABAMA DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT

IN THE MATTER OF

KNAUF FIBER GLASS GmbH, INC.

HUGULEY, ALABAMA

ORDER NO. 94-039-AP

FINDINGS OF FACT

Pursuant to the provisions of the Alabama Environmental Management Act, §22-22A-1 et seq., Code of Alabama 1975, as amended, and the Alabama Air Pollution Control Act, §22-28-1 et seq., Code of Alabama 1975, as amended, the Alabama Department of Environmental Management (hereinafter, the "Department") makes the following FINDINGS OF FACT:

1. The Knauf Fiber Glass GmbH, Inc. (hereinafter "Knauf") owns and operates a fiberglass manufacturing plant (the Huguley facility) in Huguley, Chambers County, Alabama (Air Division facility number 302-0011). The plant is located on Lafayette-Fairfax Road in Huguley, Alabama.

2. On August 22, 1989, under the authority of §22-28-16(a), Code of Alabama 1975, as amended, the Department issued revised permit No. 302-0011-X001 to Knauf, which authorized the operation of a wool fiberglass manufacturing line. The emissions from the process are controlled by six (6) venturi scrubbers and the emissions from the curing oven are controlled by two thermal incinerators.

3. Proviso No. 16 of Knauf's aforementioned permit requires the fiberglass manufacturing line to comply with all

ISSUED 2/23/94	SERVED 2/28/94
-------------------	-------------------

applicable provisions of the federal New Source Performance Standards (NSPS) for Wool Fiberglass Insulation Manufacturing Plants, 40 CFR Part 60, Subpart PPP (§§60.680 through 60.685).

4. That regulation has been adopted by reference into the Department's administrative code at ADEM Admin. Code R. 335-3-10-.02(68).

5. One requirement of the NSPS, 40 CFR §60.683(a), requires an owner or operator who uses a wet scrubber to comply with a mass emission standard to install, calibrate, maintain, and operate monitoring devices that measure the gas pressure drop across each scrubber and the scrubbing liquid flow rate to each scrubber.

6. Also, 40 CFR §60.684(a) requires that the owner or operator record at least once every four (4) hours the scrubber liquid flow rate and 40 CFR §60.684(d) states that any such exceedances of specified limits must be reported semiannually.

7. According to Proviso No. 18 of its air permit, Knauf must maintain a temperature of 1500°F in the incinerators' fireboxes of the curing oven.

8. Moreover, Proviso No. 21 of Knauf's permit requires it to report quarterly any period when the firebox temperature reached temperatures less than 1500°F.

9. On January 19, 1003, Pacific Environmental Services, Inc. (under a contract with the U. S. Environmental Protection Agency, Region IV Air Enforcement Branch) conducted an inspection of Knauf's Huguley facility.

10. In its report of the inspection, Pacific Environmental

Services indicated that one of the incinerators on the curing oven was operating at a temperature of 1492°F and that Knauf was not monitoring the flow rate of the scrubbing liquor to the venturi scrubber.

11. A subsequent review of Knauf's quarterly report regarding its incinerators' firebox temperature by Department personnel showed that during the first quarter of 1993 the temperature did not fall below the required 1500°F for any period of time.

12. On August 13, 1993, the Department sent Knauf a letter and requested that it submit the following information: (1) The recorded strip charts for the incinerators' fireboxes for the period of time 5 days before and 5 days after the January 19, 1993 inspection; (2) Any notations that the temperatures for the incinerators' fireboxes were below 1500°F during the first quarter of 1993; and (3) Whether Knauf has installed and is operating scrubber liquid flow rate monitors on the liquor to the venturi scrubbers.

13. On August 31, 1993, the Department received a response to its request from Knauf. It provided the following information:

A. In the first quarter of 1993, the temperature on one of the incinerators fell below 1500°F for periods of time ranging from 6 to 24 minutes on 18 separate occasions. During one specific instance, the temperature fell to 1450°F and remained at that level for 12 hours and 45 minutes. (Prior to this August 31, 1993 submission, Knauf had never reported any period of time during which the temperature in one of the fireboxes fell below 1500°F.) Knauf acknowledged that these instances should have been reported to the Department.

B. Flow meters were purchased by Knauf in March of 1993 and subsequently installed on the liquid supply lines to the venturi scrubbers after March of 1993. (Knauf has not submitted any reports on the results of the monitoring.)

ORDER

Based upon the foregoing FINDINGS OF FACT and pursuant to §§22-22A-5(10), 22-22A-5(12), 22-22A-5(18), 22-28-10(2) and 22-28-18, Code of Alabama 1975, as amended, it is hereby ORDERED:

A. That Knauf shall report quarterly all periods of time that the temperatures in the incinerators' fireboxes fall below 1500°F and the reasons for the insufficient temperature.

B. That within 60 days after issuance of this Order, Knauf shall comply with all monitoring and reporting requirements detailed in 40 CFR Part 60, Subpart PPP.

C. That on or before March 31, 1994, Knauf shall install, and thereafter operate and maintain, a monitoring data acquisition system (as described in a January 10, 1994 letter received by the Department from Knauf's Environmental Affairs Manager, Stephen R. Aldridge) which will continuously monitor the following parameters at its Huguley facility:

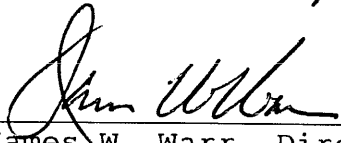
- (1) The differential pressure on each venturi scrubber at the facility;
- (2) The scrubber liquor flow rate on each venturi scrubber at the facility;
- (3) The oven entry and exit incinerators' firebox temperatures;
- (4) The opacity in the glass furnace's electrostatic precipitator stack; and
- (5) The opacity in the incinerators' stack.

D. That there is hereby assessed a civil penalty against Knauf in the amount of \$20,000.00, for violations detailed

herein, to be paid to the Alabama Department of Environmental Management within 30 days of receipt of this Order. In determining the aforementioned penalty amount, the Department considered the monies Knauf will be required to expend in order to comply with Paragraph C of this Order.

E. That the failure of Knauf to comply with any of the provisions of this Order shall constitute cause for the commencement of legal or other appropriate enforcement action for the recovery of civil penalties, criminal fines, or other appropriate relief by the Department or others against Knauf.

ORDERED and ISSUED this 23<sup>rd</sup> day of February, 1994.

  
\_\_\_\_\_  
James W. Warr, Director  
Alabama Department of  
Environmental Management  
1751 Cong. W.L. Dickinson Drive  
Montgomery, Alabama 36130  
(205) 271-7700

CERTIFICATE OF SERVICE

I, Tommy E. Bryan, hereby certify that I have served the foregoing Administrative Order No. 94-039-AP upon Knauf Fiber Glass GmbH, Inc. by sending the same, postage paid, through the United States Mail, as Certified Mail, No. P 014 549 958, with instructions to forward and return receipt requested to:

Mr. Stephen R. Aldridge  
Manager, Environmental Affairs  
Knauf Fiber Glass GmbH, Inc.  
240 Elizabeth Street  
Shelbyville, Indiana 46176-1496

DONE this 23<sup>rd</sup> day of February, 1994.

  
\_\_\_\_\_  
Tommy E. Bryan