

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

JELD-WEN, INC.

AI # 145506

PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT

LA. R.S. 30:2001, ET SEQ.

* Settlement Tracking No.
* SA-AE-19-0082
*
* Enforcement Tracking Nos.
* AE-CN-15-00005
* AE-CN-15-00005A
*
* Docket Nos. 2018-3106-EQ
* 2018-6469-DEQ
*

SETTLEMENT

The following Settlement is hereby agreed to between JELD-WEN, Inc. (“Respondent”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

I

Respondent is a corporation that owns and/or operates a door skin manufacturing facility located in Dodson, Winn Parish, Louisiana (“the Facility”).

II

On February 1, 2017, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-15-00005 (Exhibit 1).

On June 11, 2018, the Department issued to Respondent an Amended Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-15-00005A (Exhibit 2).

On December 15, 2016, the Department conducted an investigation of the Facility and identified certain violations not referenced in the above referenced Consolidated Compliance

Orders & Notice of Potential Penalties that have been resolved based on the Amended Enforcement Division Memo to File (Exhibit 3).

The following violations, although not cited in the foregoing enforcement action(s), are also included within the scope of this settlement:

An inspection conducted on or about December 15, 2016, revealed two (2) 150 gallon diesel tanks were not listed in the insignificant activities list of Title V Permit No. 3240-00028-V2. The operation of a source not authorized by a permit is a violation of LAC 33:III.501.C.2, and La. R.S. 30:2057(A)(2). Title V Permit No. 3240-00028-V3 was issued May 3, 2017, incorporating the two tanks into the insignificant activities list.

III

In response to the Consolidated Compliance Order & Notice of Potential Penalty and Amended Consolidated Compliance Order & Notice of Potential Penalty, Respondent made timely requests for hearings.

IV

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

V

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of FIVE THOUSAND SIX HUNDRED AND NO/100 DOLLARS (\$5,600.00), of which Three Thousand Three Hundred Ninety-Four and 56/100 Dollars (\$3,394.56) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described

above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

VI

Respondent further agrees that the Department may consider the permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty, the Amended Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VII

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

VIII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

IX

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is

appended to this Settlement Agreement.

X

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Winn Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

XI

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

XII

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

XIII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind

such party to its terms and conditions.

JELD-WEN, INC.

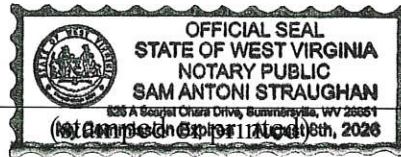
BY: [Signature]
(Signature)

Eric Ray
(Printed)

TITLE: Director of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 21st day of October, 20 21, at Summersville, West Virginia

[Signature]
NOTARY PUBLIC (ID # _____)

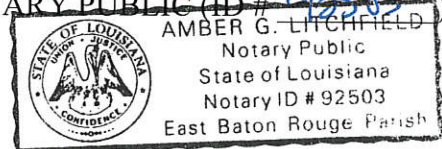


LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Chuck Carr Brown, Ph.D., Secretary

BY: [Signature]
Celena J. Cagy, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 14th day of May, 20 20, at Baton Rouge, Louisiana.

[Signature]
NOTARY PUBLIC (ID # 92503)



(stamped or printed)

Approved: [Signature]

Lourdes Iturralde, Assistant Secretary



JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

February 1, 2017

CERTIFIED MAIL (7016 0910 0000 2672 7118)
RETURN RECEIPT REQUESTED

JELD-WEN, INC.
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-15-00005
AGENCY INTEREST NO. 145506**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **JELD-WEN, INC. (RESPONDENT)** for the violations described therein.

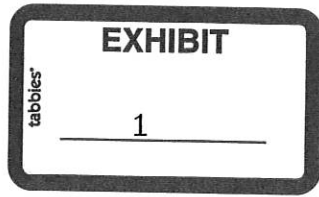
Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Mark E. Brown at (225) 219-3782.

Sincerely,

Celena J. Cage
Administrator
Enforcement Division

CJC/MEB/meb
Alt ID No. 3240-00028
Attachment



c: JELD-WEN, Inc.
John Hawkins
465 Tannehill Road
Dodson, LA 71422

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE**

IN THE MATTER OF

**JELD-WEN, INC.
WINN PARISH
ALT ID NO. 3240-00028**

**PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT,
La. R.S. 30:2001, ET SEQ.**

*
*
* **ENFORCEMENT TRACKING NO.**
*
* **AE-CN-15-00005**
*
* **AGENCY INTEREST NO.**
* **145506**
*

**CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **JELD-WEN, INC. (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

I.

The Respondent owns and/or operates **JELD-WEN** (the facility), a door skin manufacturing facility, located at 465 Tannehill Road in Dodson, Winn Parish, Louisiana. The facility operates, or has operated under the Title V Permits shown in Table A:

TABLE A

Permit No.	Permit Issue Date	Permit Expiration Date
3240-00028-V0	January 31, 2007	January 31, 2012
3240-00028-V1	April 20, 2012	April 20, 2017
3240-00028-V2	March 19, 2015	April 20, 2017

II.

On or about April 23, 2015, and December 27, 2016, file reviews were performed to determine the degree of compliance with the Louisiana Environmental Quality Act (the Act) and the Air Quality Regulations.

While the investigation by the Department is not yet complete, the following violations were noted during the course of the file reviews:

- A. In correspondence dated April 2, 2014, the Respondent submitted the facility's revised 2013 Second Semiannual Monitoring Report for the period encompassing July 1, 2013 through December 31, 2013. In electronic correspondence dated October 21, 2014, the Respondent submitted additional data to supplement the Monitoring Report. The report disclosed deviations of either a Specific Requirement (SR), or of 40 CFR 63 Subpart DDDD Table 2 (CFR) as shown in Table B:

TABLE B

Opacity greater than 20% in one six-minute period within 60 consecutive minutes					
Emission Source	Deviation Date, 2013	Deviation, minutes	Deviation Cause	Maximum opacity, %	SR
Wood Fired Boiler (EQT 0019)	July 4	11	Wet Fuel	29.6	109
	July 7	11		23.3	
	August 15	17		55.4	
	September 22	11		24.6	
	November 25	17		45.2	
	December 7	17		35.8	
	December 7	77		48.5	
	December 7	17		76.4	
	December 24	11		80.1	
	December 24	11		30.1	
	December 28	11		36.8	
	December 29	29		33.8	
	December 29	35		33.0	
	December 29	11		22.7	
	December 29	11		23.7	
December 29	29	25.6			
December 29	17	42.3			
24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°.					
Emission Source	Deviation Date, 2013	Deviation, hours	Deviation Cause, Bed Temperature	Bed Temperature	CFR
Biofilter (TRT 0001)	September 12	24	Too high	113.53	CFR
	September 15	24		110.99	
	September 17	48		114.55	
	September 26	24	Too low	94.1	
	September 29	24	Too high	109.78	
	October 1	24		111.8	
	October 4	48		113.61, 114.18	
	October 9	12		109.77	

TABLE B

24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°*				
Emission Source	Deviation Date, 2013	Deviation, hours	Deviation Cause, Bed Temperature	Bed Temperature
Biofilter (TRT 0001)	October 13	144	Too High	110.49, 110.4., 112.42, 113.97, 109.72, 111.06
	October 22	24		113.52
	October 23	24		111.94
	October 26	144		117.49, 133.00, 144.11, 124.87, 110.21, 109.96
	November 2	24	Too low	93.13
	November 16	96	Too High	110.24, 113.60, 116.59, 117.82
	November 21	24		110.35
	December 3	24		112.34
	December 5	96	Too low	97.17, 92.87, 92.19, 89.93
	December 11	24		97.05
	December 14	24	Too high	111.16
	December 17	24		116.27
	December 18	24	Too low	86.78
	December 20	24	Too high	109.71
	December 22	24	Too high	109.82
	December 26	16.5	Too low	78.35
December 27	24	Too high	109.76	
*Range established November 27, 2013				
Pressure Drop readings not taken daily				
Emission Source	Deviation Date, 2013	Deviation Duration, days		SR
Primeline Surface Coating (ARE 0001)	September 7	2		14
	September 14	2		
	September 21	2		
	September 28	2		
	October 5	2		
	October 12	2		
	October 19	2		
	October 26	2		
	November 2	2		
	November 9	2		
	November 16	2		
	November 23	2		
	November 30	1		
	December 1	1		
	December 7	2		
	December 14	2		
December 21	2			
December 28	2			

TABLE B

Method 22 Opacity Readings not conducted daily			
Emission Source	Deviation Date, 2013	Deviation Duration, days	SR
Primeline Surface Coating (ARE 0001)	September 7	2	14
	November 2	2	
	December 21	2	
Sandblasting Booth (ARE 0003)	September 14	2	41
	November 9	2	
	December 28	2	
Startup Cyclone (EQT 0015)	September 21	2	73
	November 16	2	
Condensate Blow down Exhaust Vent (EQT 0017)	September 28	2	79
	November 23	2	
Sizer Baghouse (EQT 0028)	October 5	2	130
	November 30	1	
Main Waste Baghouse (EQT 0029)	October 12	2	136
	December 1	1	
Blending Baghouse (EQT 0030)	October 19	2	142
	December 7	2	
Biofilter (TRT 0001)	October 26	2	174
	December 14	2	

Each failure to meet the requirement listed is a violation of 40 CFR 63 Subpart DDDD, which language has been incorporated as a Louisiana regulation in LAC 33:III.5122.A, or of Title V Permit No. 3240-00028-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- B. In correspondence dated September 10, 2014, the Respondent submitted the facility's 2014 First Semiannual Monitoring Report for the period encompassing January 1, 2014 through June 30, 2014. In electronic correspondence dated October 21, 2014, the Respondent submitted additional data to supplement the Monitoring Report. In correspondence dated July 1, 2015, the Respondent submitted a Revised 2014 First Semiannual Monitoring Report, supplementing the September 10, 2014 submission. The reports disclosed deviations, length of deviation in minutes (m) or hours (h), of either a Specific Requirement (SR), or of 40 CFR 63 Subpart DDDD Table 2 (CFR) as shown in Table C:

TABLE C

Opacity greater than 20% in one six-minute period within 60 consecutive minutes					
Emission Source	Deviation Date, 2014	Deviation, Time	Deviation Cause	Maximum opacity, %	SR
Wood Fired Boiler (EQT 0019)	January 23	160m	Wet Fuel	77.8	109
	January 23	42m		43.7	
	January 31	9m		66.4	
	February 7	5m		42.1	

TABLE C

Opacity record keeping continually					
Emission Source	Deviation Date, 2014	Deviation, Time	Deviation Cause	SR	
Wood Fired Boiler (EQT 0019)	January 3	4m	Computer off-line; facility maintained no hard copy of operating logs	90	
	January 4	4m			
	January 6	106m			
	January 6	5m			
	January 18	4m			
	January 26	11m			
	February 23	17m			
	March 4	7.6h			
	March 9	58m			
	March 18	42m			
	April 8	5m			
	April 8	16m			
	April 19	6m			
	May 29	3.4h			
	May 30	11m			
	May 30	23.3h			
June 7	23.3h				
June 24	48.5h				
June 28	26m				
June 29	6m				
24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°*					
Emission Source	Deviation Date, 2014	Deviation, hours	Deviation Cause, Bed Temperature	Max/Minimum Temperature	
Biofilter (TRT 0001)	January 8	24	Too Low	86.86	
	January 11	24	Too High	110.70	
	January 14	24		110.20	
	January 19	24	Too Low	91.23	
	January 21	24	Too High	111.72	
	January 23	24		115.57	
	February 2	24		110.70	
	February 6	48		109.94, 109.84	
	February 9	72		112.87, 111.46, 110.86	
	February 13	48		112.15, 109.92	
	February 16	72		111.00, 116.08, 117.66	
	February 22	120		111.03, 116.16, 113.11, 114.16, 117.41	
	February 28	168		110.83, 117.34, 117.10, 114.66, 111.24, 110.55, 113.89	
	March 8	96		113.94, 115.74, 112.24, 110.75	
	March 15	48		112.95, 114.60	
	March 18	48		114.92, 110.88	
					CFR

TABLE C

24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°*

Emission Source	Deviation Date, 2014	Deviation, hours	Deviation Cause, Bed Temperature	Max/Minimum Temperature	
Biofilter (TRT 0001)	March 21	120	Too High	112.98, 113.29, 112.15, 110.34, 110.49	CFR
	March 28	264		115.79, 114.13, 112.88, 113.71, 115.24, 116.82, 115.99, 112.64, 110.76, 110.56, 112.42	
	April 9	168		112.57, 111.69, 109.72, 110.61, 113.84, 112.84, 109.85	
	April 17	192		110.53, 112.64, 113.85, 112.68, 114.06, 114.69, 113.38, 113.20	
	April 26	480		114.39, 115.15, 115.74, 112.06, 112.18, 112.47, 113.12, 113.17, 114.42, 113.63, 116.46, 116.93, 117.46, 116.43, 119.57, 117.91, 117.60, 117.16, 114.50, 113.31	
	May 18	192		112.58, 115.98, 113.16, 116.84, 117.29, 116.53, 116.70, 117.47	
	June 2	144		116.18, 116.90, 117.84, 117.98, 116.33, 117.08	
	June 9	144		113.88, 117.10, 115.07, 118.38, 117.09, 116.09	
	June 16	144		116.68, 117.23, 116.69, 118.40, 118.30, 120.41	
	June 23	144		117.65, 118.29, 120.23, 120.00, 120.58	
	June 30	24		116.03	

*Range established November 27, 2013

TABLE C

Pressure Drop readings not taken daily			
Emission Source	Deviation Date, 2014	Deviation Duration, days	SR
Primeline Surface Coating (ARE 0001)	January 5	1	14
	January 11	2	
	January 18	2	
	January 26	1	
	February 2	1	
Primeline Surface Coating (ARE 0001)	February 8	2	
	February 16	1	
	February 22	2	
	March 2	1	
	March 9	1	
	March 16	1	
	March 23	1	
	March 29	2	
	April 6	1	
	April 12	2	
	April 20	1	
	April 27	1	
	May 4	1	
May 11	1		
Method 22 Opacity Readings not conducted daily			
Emission Source	Deviation Date, 2014	Deviation Duration, days	SR
Primeline Surface Coating (ARE 0001)	January 4	2	11
	March 15	2	
Die Coat Paint Booth (ARE 0004)	January 11	2	44
	March 29	2	
Startup Cyclone (EQT 0015)	January 18	2	73
	March 15	2	
	May 10	2	
Condensate Blow down Exhaust Vent (EQT 0017)	January 25	2	79
	May 24	1	
Sizer Baghouse (EQT 0028)	February 1	2	130
	March 29	2	
	June 22	1	
Main Waste Baghouse (EQT 0029)	February 8	2	136
	June 25	1	
Blending Baghouse (EQT 0030)	February 22	2	142
	June 29	1	

Each failure to meet the requirement listed is a violation of 40 CFR 63 Subpart DDDD, which language has been incorporated as a Louisiana regulation in LAC 33:III.5122.A., or of Title V Permit No. 3240-00028-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- C. In correspondence dated March 24, 2015, the Respondent submitted the facility's 2014 Second Semiannual Monitoring Report for the period encompassing July 1, 2014 through December 31, 2014. In electronic correspondence dated April 14, 2015, the Respondent submitted additional data to supplement the Monitoring Report. The reports disclosed deviations, length of deviation in minutes (m) or hours (h), of either a Specific Requirement (SR), or of 40 CFR 63 Subpart DDDD Table 2 (CFR) as shown in Table D:

TABLE D

Opacity greater than 20% in one six-minute period within 60 consecutive minutes					
Emission Source	Deviation Date, 2014	Deviation, minutes	Deviation Cause	Maximum opacity, %	SR
Wood Fired Boiler (EQT 0019)	December 6	24	Wet Fuel	66.1	109
	December 6	96		77.3	
Opacity record keeping continually					
Emission Source	Deviation Date, 2014	Deviation, Time	Deviation Cause	SR	
Wood Fired Boiler (EQT 0019)	July 4	6m	Computer off-line; facility maintained no hard copy of operating logs	90	
	July 9	12m			
	July 23	30m			
	July 25	6m			
	July 29	6m			
	August 12	6m			
	August 12	1.8h			
	August 12	24m			
	August 12	6m			
	September 1	12m			
	September 1	18m			
	September 6	6m			
	September 18	4.0h			
	September 20	6m			
	September 23	1.7h			
	September 30	17.0h			
	October 2	1.9h			
	October 10	12m			
	October 10	6m			
	October 10	6m			
October 25	2.2h				
November 3	6m				
November 24	30m				
December 9	6m				
December 26	1.4h				

TABLE D

24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°*					
Emission Source	Deviation Date, 2014	Deviation, hours	Deviation Cause, Bed Temperature	Max/Minimum Temperature	
Biofilter (TRT 0001)	July 1	48	Too High	121.36	CFR
	July 8	120		119.83	
	July 14	120		118.96	
	July 21	144		121.39	
	July 28	72		120.92	
*Initial range established November 27, 2013. Second range established July 31, 2014 of 97.6 F° to 130.1 F°					
Method 22 Opacity Readings not conducted daily					
Emission Source	Deviation Date, 2014	Deviation Duration, days			SR
Primeline Surface Coating (ARE 0001)	July 1	1			14
	September 27	1			
Sand Blast Booth (ARE 0003)	July 4	1			41
	September 27	1			
Die Coat Paint Booth (ARE 0004)	July 6	1			44
	October 9	1			
Startup Cyclone (EQT 0015)	July 11	1			73
	October 11	2			
Condensate Blow down Exhaust Vent (EQT 0017)	July 13	3			79
	October 19	1			
Sizer Baghouse (EQT 0028)	July 20	1			130
	October 29	1			
Main Waste Baghouse (EQT 0029)	July 23	1			136
	October 31	1			
Blending Baghouse (EQT 0030)	August 2	2			142
	November 2	1			
Biofilter (TRT 0001)	August 7	1			174
	August 11	1			
	August 17	1			
	August 28	2			
	September 6	1			
	September 10	2			
	September 14	1			
	September 18	5			
	November 9	1			
	November 16	1			

Each failure to meet the requirement listed is a violation of 40 CFR 63 Subpart DDDD, which language has been incorporated as a Louisiana regulation in LAC 33:III.5122.A., or of Title V Permit No. 3240-00028-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

COMPLIANCE ORDER

Based on the foregoing, the Respondent is **hereby ordered**:

I.

To immediately take, upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to achieve and maintain compliance with Title V Permit No. 3240-00028-V1 and comply with the Air Quality Regulations and the Act.

II.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, copies of the Quality Improvement Plan(s) established for the Wood Fired Boiler (EQT 0019), Biofilter (TRT 0001), and Primeline Surface Coating (ARE 0001) as required by Title V Permit No. 3240-00028-V1, once six (6) excursions occurred for each emission source in any six month reporting period.

III.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that shows evidence that during the periods listed for the Biofilter (TRT 0001) that the 24-hour average Total Hydrocarbon concentration in the Biofilter exhaust was below the maximum concentration established during the performance test.

IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Mark E. Brown
Re: Enforcement Tracking No. AE-CN-15-00005
Agency Interest No. 145506

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. AE-CN-15-00005
Agency Interest No. 145506

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violations described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from

contesting the findings of facts in any subsequent penalty action addressing the same violations, although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violations described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violations described herein. Written comments may be filed regarding the violations and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violations. If you would like to have such a meeting, please contact Mark E. Brown at (225) 219-3782 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.


III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violations to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement.

IV.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 18 day of February, 2017.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Mark E. Brown



JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

June 11, 2018

CERTIFIED MAIL (7014 0510 0001 7431 7458)
RETURN RECEIPT REQUESTED

JELD-WEN, INC.

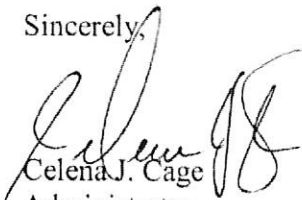
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

**RE: AMENDED CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-15-00005A
AGENCY INTEREST NO. 145506**

Dear Sir:

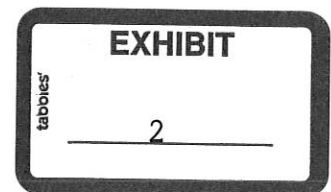
Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **JELD-WEN, INC. (RESPONDENT)** for the violations described therein.

Any questions concerning this action should be directed to Mark E. Brown at (225) 219-3782.

Sincerely,

Celena J. Cage
Administrator
Enforcement Division

CJC/MEB/meb
Alt ID No. 3240-00028
Attachment

cc: JELD-WEN, Inc.
John Hawkins
465 Tannehill Road
Dodson, LA 71422



STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF	*	
	*	
JELD-WEN, INC.	*	ENFORCEMENT TRACKING NO.
WINN PARISH	*	
ALT ID NO. 3240-00028	*	AE-CN-15-00005A
	*	
	*	AGENCY INTEREST NO.
	*	
PROCEEDINGS UNDER THE LOUISIANA	*	145506
ENVIRONMENTAL QUALITY ACT,	*	
La. R.S. 30:2001, ET SEQ.	*	

**AMENDED CONSOLIDATED COMPLIANCE ORDER &
NOTICE OF POTENTIAL PENALTY**

The Louisiana Department of Environmental Quality (the Department) hereby amends the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-15-00005** issued to **JELD-WEN, INC. (RESPONDENT)** on February 1, 2017 in the above-captioned matter as follows:

I.

On or about March 10, 2017 and April 7, 2017, the Respondent submitted responses to Consolidated Compliance Order & Notice of Potential Penalty (CONOPP) Enforcement Tracking No. AE-CN-15-00005, issued by the Department on or about February 1, 2017. A review of the responses and/or revised amended deviation reports revealed several violations reported to the Department and included in CONOPP AE-CN-15-00005 were attributed to Startup/Shutdown/Malfunction and/or other mitigating factors and as such, will not be considered and/or cited as violations.

II.

CONOPP AE-CN-15-00005, issued February 1, 2017, will be amended to remove those violations as follows:

"II.

On or about April 23, 2015, and December 27, 2016, file reviews were performed to determine the degree of compliance with the Louisiana Environmental Quality Act (the Act) and the Air Quality Regulations. On or about March 10, 2017 and April 7, 2017, the Respondent submitted responses to CONOPP AE-CN-15-00005.

While the investigation by the Department is not yet complete, the following violations were noted during the course of the file reviews:

- A. In correspondence dated April 2, 2014, the Respondent submitted the facility's revised 2013 Second Semiannual Monitoring Report for the period encompassing July 1, 2013 through December 31, 2013. In electronic correspondence dated October 21, 2014, the Respondent submitted additional data to supplement the Monitoring Report. In correspondence dated April 7, 2017, the Respondent submitted a response to CONOPP Enforcement Tracking No. AE-CN-15-00005. The report and response disclosed deviations of either a Specific Requirement (SR), or of 40 CFR 63 Subpart DDDD Table 2 (CFR) as shown in Table B:

TABLE B

Opacity greater than 20% in one six-minute period within 60 consecutive minutes					
Emission Source	Deviation Date, 2013	Deviation, minutes	Deviation Cause	Maximum opacity, %	SR
Wood Fired Boiler (EQT 0019)	July 4	11	Wet Fuel	29.6	109
	July 7	11		23.3	
Pressure Drop readings not taken daily					
Emission Source	Deviation Date, 2013	Deviation Duration, days		SR	
Primeline Surface Coating (ARE 0001)	September 7	2		14	
	September 14	2			
	September 21	2			
	September 28	2			
	October 5	2			
	October 12	2			
	October 19	2			
	October 26	2			
	November 9	2			
	November 16	2			
	November 23	2			
	November 30	1			
	December 1	1			
	December 14	2			
December 21	2				

TABLE B

24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°.

Emission Source	Deviation Date, 2013	Deviation, hours	Deviation Cause, Bed Temperature	Bed Temperature
Biofilter (TRT 0001)	September 12	24	Too high	113.53
	September 15	24		110.99
	September 17	48		114.55
	September 29	24		109.78
	October 1	24		111.8
	October 4	48		113.61, 114.18
	October 9	12		109.77
	October 13	144		110.49, 110.4., 112.42, 113.97, 109.72, 111.06
	October 22	24		113.52
	October 23	24		111.94
	November 16	96		110.24, 113.60, 116.59, 117.82
	November 21	24		110.35
	Biofilter (TRT 0001)	December 3		24
December 14		24	111.16	
December 17		24	116.27	
December 18		24	Too low 86.78	
December 22		24	Too high 109.82	
December 27		24	Too high 109.76	

CFR

*The initial temperature range was established August 27, 2013

Method 22 Opacity Readings not conducted daily

Emission Source	Deviation Date, 2013	Deviation Duration, days	SR
Primeline Surface Coating (ARE 0001)	September 7	2	22
	December 21	2	
Startup Cyclone (EQT 0015)	September 21	2	73
	November 16	2	
Condensate Blow down Exhaust Vent (EQT 0017)	September 28	2	79
	November 23	2	
Sizer Baghouse (EQT 0028)	October 5	2	127
	November 30	1	
Main Waste Baghouse (EQT 0029)	December 1	1	134
Blending Baghouse (EQT 0030)	October 19	2	140
	December 7	2	
Biofilter (TRT 0001)	October 26	2	175
	December 14	2	

Each failure to meet the requirement listed is a violation of 40 CFR 63 Subpart DDDD, which language has been adopted as a Louisiana regulation in LAC 33:III.5122.A, or of Title V Permit No. 3240-00028-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- B. In correspondence dated September 10, 2014, the Respondent submitted the facility's 2014 First Semiannual Monitoring Report for the period encompassing January 1, 2014 through June 30, 2014. In electronic correspondence dated October 21, 2014, the Respondent submitted additional data to supplement the Monitoring Report. In correspondence dated July 1, 2015, the Respondent submitted a Revised 2014 First Semiannual Monitoring Report, supplementing the September 10, 2014 submission. In correspondence dated April 7, 2017, the Respondent submitted a response to CONOPP Enforcement Tracking No. AE-CN-15-00005. The report and response disclosed deviations. The reports disclosed deviations, length of deviation in days, of either a Specific Requirement (SR), or of 40 CFR 63 Subpart DDDD Table 2 (CFR) as shown in Table C:

TABLE C

24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°*.					
Emission Source	Deviation Date, 2014	Deviation, hours	Deviation Cause, Bed Temperature	Bed Temperature	
Biofilter (TRT 0001)	January 8	24	Too Low	86.86	CFR
	January 11	24	Too High	110.70	
	January 14	24		110.20	
	January 21	24		111.72	
	February 2	24		110.70	
	February 6	48		109.94, 109.84	
	February 9	72		112.87, 111.46, 110.86	
	February 13	48		112.15, 109.92	
	February 16	72		111.00, 116.08, 117.66	
	February 22	120		111.03, 116.16, 113.11, 114.16, 117.41	
	February 28	168		110.83, 117.34, 117.10, 114.66, 111.24, 110.55, 113.89	
	March 8	96		113.94, 115.74, 112.24, 110.75	
	March 15	48		112.95, 114.60	
	March 18	48		114.92, 110.88	
	March 21	120		112.98, 113.29, 112.15, 110.34, 110.49	

TABLE C

24 hour average temperatures outside the established range of 97.6 F° to 109.7 F°*.					
Emission Source	Deviation Date, 2014	Deviation, hours	Deviation Cause, Bed Temperature	Bed Temperature	
Biofilter (TRT 0001)	March 28	264	Too High	115.79, 114.13, 112.88, 113.71, 115.24, 116.82, 115.99, 112.64, 110.76, 110.56, 112.42	CFR
	April 9	168		112.57, 111.69, 109.72, 110.61, 113.84, 112.84, 109.85	
	April 17	192		110.53, 112.64, 113.85, 112.68, 114.06, 114.69, 113.38, 113.20	
	April 26	480		114.39, 115.15, 115.74, 112.06, 112.18, 112.47, 113.12, 113.17, 114.42, 113.63, 116.46, 116.93, 117.46, 116.43, 119.57, 117.91, 117.60, 117.16, 114.50, 113.31	
Biofilter (TRT 0001)	May 18	192	Too High	112.58, 115.98 113.16, 116.84, 117.29, 116.53, 116.70, 117.47	CFR
	June 2	144		116.18, 116.90, 117.84, 117.98, 116.33, 117.08	
	June 9	144		113.88, 117.10, 115.07, 118.38, 117.09, 116.09	
	June 16	144		116.68, 117.23, 116.69, 118.40, 118.30, 120.41	
	June 23	144		117.65, 118.29, 120.23, 120.00, 120.58	
	June 30	24		116.03	

*Initial range established August 27, 2013

TABLE C

Pressure Drop readings not taken daily			
Emission Source	Deviation Date, 2014	Deviation Duration, days	SR
Primeline Surface Coating (ARE 0001)	January 5	1	14
	January 11	2	
	January 18	2	
	February 2	1	
	February 8	2	
	February 16	1	
	February 22	2	
	March 2	1	
	March 9	1	
	March 16	1	
	March 23	1	
	March 29	2	
	April 6	1	
	April 12	2	
	April 20	1	
	April 27	1	
	May 4	1	
	May 11	1	

TABLE C

Method 22 Opacity Readings not conducted daily			
Emission Source	Deviation Date, 2014	Deviation Duration, days	SR
Primeline Surface Coating (ARE 0001)	January 4	2	22
	March 15	2	
Startup Cyclone (EQT 0015)	March 15	2	73
	May 10	2	
Condensate Blow down Exhaust Vent (EQT 0017)	May 24	1	79
Sizer Baghouse (EQT 0028)	February 1	2	127
	March 29	2	
Main Waste Baghouse (EQT 0029)	February 8	2	134
	June 25	1	
Blending Baghouse (EQT 0030)	February 22	2	140

Each failure to meet the requirement listed is a violation of 40 CFR 63 Subpart DDDD, which language has been adopted as a Louisiana regulation in LAC 33:III.5122.A., or of Title V Permit No. 3240-00028-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

- C. In correspondence dated March 24, 2015, the Respondent submitted the facility's 2014 Second Semiannual Monitoring Report for the period encompassing July 1, 2014 through December 31, 2014. In electronic correspondence dated April 14, 2015, the Respondent submitted additional data to supplement the Monitoring Report. In correspondence dated April 7, 2017, the Respondent submitted a response to CONOPP Enforcement Tracking No. AE-CN-15-00005. The report and response disclosed deviations, length of deviation in days, of either a Specific Requirement (SR), or of 40 CFR 63 Subpart DDDD Table 2 (CFR) as shown in Table D:

TABLE D

Method 22 Opacity Readings not conducted daily			
Emission Source	Deviation Date, 2014	Deviation Duration, days	SR
Primeline Surface Coating (ARE 0001)	July 1	1	22
Die Coat Booth(ARE 0004)	October 9	1	42
Startup Cyclone (EQT 0015)	July 11	1	73
Sizer Baghouse (28)	October 29	1	127
Main Waste Baghouse (EQT 0029)	July 23	1	134
	October 31	1	
Biofilter (TRT 0001)	August 7	1	175
	September 10	2	

Each failure to meet the requirement listed is a violation of 40 CFR 63 Subpart DDDD, which language has been adopted as a Louisiana regulation in LAC 33:III.5122.A., or of Title V Permit No. 3240-00028-V1, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1) and 30:2057(A)(2)."

III.

The Department incorporates all of the remainder of the original **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. AE-CN-15-00005** and **AGENCY INTEREST NO. 145506** as if reiterated herein.

IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a

settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached **“CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE”** form. The Respondent must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

This **AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 11th day of June, 2018.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

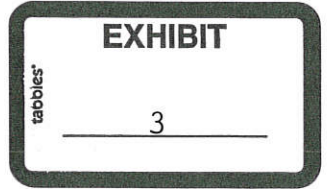
Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
Post Office Box 4312
Baton Rouge, LA 70821-4312
Attention: Mark E. Brown

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE ENFORCEMENT DIVISION CONSOLIDATED COMPLIANCE ORDER & POST OFFICE BOX 4312 NOTICE OF POTENTIAL PENALTY BATON ROUGE, LOUISIANA 70821-4312 REQUEST TO CLOSE			
Enforcement Tracking No.	AE-CN-15-00005A	Contact Name	Mark E. Brown
Agency Interest (AI) No.	145506	Contact Phone No.	(225) 219-3782
Alternate ID No.	3240-00028		
Respondent:	JELD-WEN, Inc.	Facility Name:	JELD-WEN
	c/o C T Corporation System	Physical Location:	465 Tannehill Road
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Dodson, LA. 71422
Baton Rouge, LA 70816	Parish:	Winn	
STATEMENT OF COMPLIANCE			
STATEMENT OF COMPLIANCE		Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph III of the "Order" portion of the COMPLIANCE ORDER.			
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph II of the "Order" portion of the COMPLIANCE ORDER.			
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:			
SETTLEMENT OFFER (OPTIONAL)			
<i>(check the applicable option)</i>			
_____	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:I.Subpart1.Chapter7.		
_____	In order to resolve any claim for civil penalties for the violations in CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY AE-CN-15-00005A, the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.		
_____	In order to resolve any claim for civil penalties for the violations in CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY AE-CN-15-00005A, the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$_____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> • Monetary component = \$_____ • Beneficial Environmental Project (BEP) component (optional)= \$_____ • <i>DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.</i> 		
	The Respondent has reviewed the violations noted in CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY AE-CN-1-00005, and has attached a justification of its offer and a description of any BEPs if included in settlement offer.		
CERTIFICATION STATEMENT			
I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.			

Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date
MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:		
Louisiana Department of Environmental Quality Office of Environmental Compliance Enforcement Division P.O. Box 4312 Baton Rouge, LA 70821 Attn: Mark E. Brown		

AMENDED ENFORCEMENT DIVISION MEMO TO THE FILE



FACILITY: JELD-WEN
INSPECTION DATE: 12/15/16
TRACKING NO.: AE-17-00166
AI NUMBER: 145506
ALT. ID NUMBER: 3240-00028

DATE: 4-26-2021
SUBJECT: NFA for Citation
 NFA for referral
 Information for file

Information for file:

On or about February 13, 2020, the Department issued a Memo to the File regarding the inspection conducted on December 15, 2016, and Enforcement Tracking No. AE-17-00166. The memo is hereby amended to read as follows:

The Department conducted an inspection of the facility, owned and/or operated by JELD-WEN, Inc. (Respondent), on or about December 15, 2016. The inspection, identifying areas of concern, was referred to the Enforcement Division and was assigned Enforcement Tracking No. AE-17-00166.

The inspection cited the Respondent for failing to comply with Specific Requirement 147 of Title V Permit No. 3240-00028-V2 which required that EPA Method 9 or a Continuous Opacity Meter (COM) was required to observe opacity on the Emergency Fire Pump Engine (EQT 0040). The report stated a COM was not installed on EQT 0040 and the Respondent was utilizing EPA Method 22 for opacity readings. The Respondent's September 30, 2016 Title V Permit Renewal Application addressed the issue, and on May 3, 2017, the Department issued Title V Permit No. 3240-00028-V3 removing the language requiring opacity observations on EQT 0040, as the engine is in use intermittently for testing. Based on this information, the Department will take no further action to this citation at this time.

Additionally, the inspection cites Specific Requirement 182 of Title V Permit No. 3240-00028-V2 which required that the facility comply with 40 CFR 60 Subpart A. The inspection report stated the facility was utilizing Method 22 for opacity readings in lieu of Method 9, as required by 40 CFR 60 Subpart A, for the Sandblast Booth (ARE0003), Die Coat Paint Booth (ARE0004), Dust Collector (EQT 0010), Emergency Dump Cyclone (EQT 0015), Condensate Blowdown Exhaust (EQT 0017), Sizer Baghouse (EQT 0028), Main Waste Baghouse (EQT 0029), Blending Baghouse (EQT 0029), Blending Baghouse (EQT 0030), and Biofilter (TRT00001). Method 9 requires a qualified observer follow the

procedures in 40 CFR 60 Subpart Appendix A to determine the opacity of visible emissions (measured in percent opacity) in order to meet an opacity limit. Method 22 is used to identify if visible emissions are occurring and determines the frequency or duration of visible emissions. Method 22 does not require observer certification. In correspondence dated July 6, 2018, the Respondent stated visible emissions at the aforementioned sources were seldom observed and a recent amendment to the facility's permit clarified the use of the two (2) methods. Specifically, the Department issued Title V Permit No. 3240-00028-V3 on May 3, 2017, removing the opacity monitoring requirements for some of the aforementioned equipment and modifying the opacity monitoring requirements for the remaining equipment to state the facility shall perform Method 22 followed by Method 9 if any visible emissions are detected. Based on this information, the Department will take no further action to this citation at this time.

The remaining violation cited in the December 12, 2016 inspection will be addressed separately.

Name of ES, Date

Approved by:

Name of Supervisor, Date

Approved by:

Kayla Lerner 4-20-2021
Name of Manager, Date

Approved by:

Calvin G. [Signature] 4/26/2021
Administrator, Date