UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
Raybestos Products Company	)	**NOTICE OF VIOLATION**
1204 Darlington Avenue	)	
Crawfordsville, Indiana	)	**EPA-5-00-IN-17**
	)	
	)	
	)	
Proceedings Pursuant to	)	
Section 113(a)(1) of the	)	
Clean Air Act, 42 U.S.C.	)	
§ 7413(a)(1)		

NOTICE OF VIOLATION

The Administrator of the United States Environmental Protection Agency (U.S. EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). U.S. EPA finds that Raybestos is violating the Indiana State Implementation Plan (SIP), as follows:

I. Batch Cleaning Machine

Statutory and Regulatory Background

1. On April 5, 1992, U.S. EPA approved Indiana SIP Rule 8-1-4, which contains the required test methods and procedures for sources subject to 326 IAC 8. 57 Fed. Reg. 8086.

2. On April 5, 1992, U.S. EPA approved 326 IAC 8-3-6, which provides control equipment and operating requirements for organic solvent degreasing operations, as part of the federally enforceable SIP for Indiana. 57 Fed. Reg. 8086.

3. 326 IAC 8-3-6(a)(1) requires the owner or operator of an open top vapor degreaser to equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone. 326 IAC 8-3-6(b)(1) requires the owner or operator of an open top vapor degreaser to keep the cover closed at all times except when processing workloads through the degreaser.

4. Raybestos Products Company ("Raybestos") owns and operates a Batch Cleaning Machine which is an open-top vapor cleaning machine (degreaser) that was installed in 1989 at 1204

Darlington Avenue, Crawfordsville, Indiana.

5. Emissions from Raybestos' Batch Cleaning Machine which uses a vapor degreaser process is subject to the Volatile Organic Compound (VOC) Rules in the Indiana SIP at 326 IAC 8-1-2 and 326 IAC 8-3-6.

Violations

6. From December 1, 1999 to present, in violation of 326 IAC 8-3-6(a)(1), Raybestos failed to equip its vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone. The IDEM inspector found that the degreaser cover is not operational and cannot be closed in idling mode.

7. From December 1, 1999 to present, in violation of 326 IAC 8-3-6(b)(1), Raybestos failed to keep its degreaser cover closed at all times except when processing workloads through the degreaser. The IDEM inspector found that the degreaser cover is not operational and cannot be closed in idling mode.

II. Thermal Oxidizer

Statutory and Regulatory Background

8. On April 5, 1992, U.S. EPA approved Indiana SIP Rule 8-1-4, which contains the required test methods and procedures for sources subject to 326 IAC 8. 57 Fed. Reg. 8086.

9. On April 5, 1992, U.S. EPA approved 326 IAC 8-2-5, which establishes emission limitations for web coating and saturation processes of paper, plastic, metal foil, and pressure sensitive tapes and labels, as part of the federally enforceable SIP for Indiana. 57 Fed. Reg. 8086.

10. 326 IAC 8-2-5(b) requires that no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds per gallon excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

11. Raybestos owns and operates two paper saturation lines (NATS I and NATS II) which use thermal oxidizers as control equipment at 1204 Darlington Avenue, Crawfordsville,

Indiana.

12. In order to achieve the 2.9 pounds per gallon excluding water limit required in 326 IAC 8-2-5, Raybestos must operate its thermal oxidizers at a temperature established by the latest stack test.

13. Per the stack test performed on April 10, 1996, Raybestos' thermal oxidizers established a minimum operating temperature of 1380 degrees F. This operating temperature is found in Raybestos' Title V permit conditions D.4.1 and D.4.6 as a means of complying with 326 IAC 8-2-5(b) limits.

Violations

14. On December 1, 1999, in violation of 326 IAC 8-2-5(b), Raybestos' paper saturation lines exceeded the VOC limit of 2.9 pounds per gallon excluding water. On this date, temperatures for all thermal oxidizers were not at the minimum operating temperature of 1380 degrees F.

III. Catalytic Oxidizer

Statutory and Regulatory Background

15. On April 5, 1992, U.S. EPA approved Indiana SIP Rule 8-1-4, which contains the required test methods and procedures for sources subject to 326 IAC 8. 57 Fed. Reg. 8086.

16. On April 5, 1992, U.S. EPA approved 326 IAC 8-2-9, which provides surface coating emission limitations, as part of the federally enforceable SIP for Indiana. 57 Fed. Reg. 8086.

17. 326 IAC 8-2-9(d)(2) requires that no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds per gallon of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194 degrees F.

18. Raybestos owns and operates one Adhesive Formulation and Application AT line with a catalytic oxidizer as a control at 1204 Darlington Avenue, Crawfordsville, Indiana.

19. Emissions from Raybestos' Adhesive Formulation and

Application process is subject to the Volatile Organic Compound (VOC) Rules in the Indiana SIP at 326 IAC 8-1-2 and 326 IAC 8-2-9.

20. In order to achieve the required limit in 326 IAC 8-2-9(d)(2), Raybestos must operate its catalytic oxidizer at a temperature established by the latest stack test.

21. Per the stack test performed on June 12, 1998, Raybestos' catalytic oxidizer established a minimum operating temperature of 907 degrees F. This operating temperature is found in Raybestos' Title V permit condition D.3.1 as a mean to comply with 326 IAC 8-2-9(d)(2) limit.

Violations

22. On September 9-14, 1999, September 16-22, 1999, September 27 and 28, 1999, October 4, 9, 10, 18, 24, and 29, 1999, and November 11, 18, and 21, 1999, in violation of 326 IAC 8-2-9(d)(2), Raybestos' Adhesive Formulation and Application AT line exceeded the VOC emissions limit of 3.5 pounds per gallon of coating, excluding water. On these dates, temperatures for the catalytic oxidizer was not at the minimum operating temperature of 907 degrees F.

9-20-00
Date

Bharat Mathur, Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, do hereby certify that a Notice of Violation, No. EPA-5-00-IN-17 and a Finding of Violation, No. EPA-5-00-IN-18 was sent by Certified Mail, Return Receipt Requested, to:

Jan Morse, Manager of Technical Services
Raybestos Products Company
1204 Darlington Avenue
Crawfordsville, Indiana 47933

I also certify that copies of the Notice of Violation and Finding of Violation were sent by First Class Mail to:

David McIver, Chief
Air Section
Office of Enforcement
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46206-6015

and

Felicia Robinson, Assistant Commissioner
Office of Enforcement
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46206-6015

on the 21st day of September, 2000.

Betty Williams

Betty Williams, Secretary
AECAS (IL/IN)

Z 199026403

CERTIFIED MAIL RECEIPT NUMBER: