

Executive Summary – Enforcement Matter – Case No. 51083
Owens Corning Insulating Systems, LLC
RN100223585
Docket No. 2015-1207-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Owens Corning Insulating Systems Waxahachie Plant, 3700 North IH-35 East,
Waxahachie, Ellis County

Type of Operation:

Glass fiber insulation manufacturing plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: January 22, 2016

Comments Received: No

Penalty Information

Total Penalty Assessed: \$37,121

Amount Deferred for Expedited Settlement: \$7,424

Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$29,697

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project ("SEP") Conditional Offset: \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: February 17, 2015, May 5, 2015, July 22, 2015

Date(s) of NOE(s): August 4, 2015

Executive Summary – Enforcement Matter – Case No. 51083
Owens Corning Insulating Systems, LLC
RN100223585
Docket No. 2015-1207-AIR-E

Violation Information

1. Failed to prevent unauthorized emissions. Specifically, the Respondent released 843.51 pounds ("lbs") of particulate matter ("PM") from the V1 Furnace Dry Electrostatic Precipitator ("DEP") Stack, Emission Point Number ("EPN") 3, during an emissions event (Incident No. 212181) that began on March 26, 2015 and lasted until March 31, 2015. The event occurred due to a loss of power to two of the three Switch Integrated Rectifiers on the V1 Furnace DEP Stack. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and (c) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), Federal Operating Permit ("FOP") No. O1094, Special Terms and Conditions ("STC") No. 8, and New Source Review ("NSR") Permit No. 6093, Special Conditions ("SC") No. 1].
2. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 191316) began on December 4, 2013, but the initial notification was not submitted to the TCEQ until December 12, 2013 [30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b)].
3. Failed to prevent unauthorized emissions. Specifically, the Respondent released 315.22 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 191316) that began on December 4, 2013 lasting nine hours and 54 minutes. The event occurred due to an unplanned maintenance activity to open the DEP Bypass Stack to investigate the locked up screw. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1].
4. Failed to submit a final record no later than two weeks after the end of a scheduled maintenance activity. Specifically, the Respondent conducted a scheduled maintenance activity on May 14, 2014 but did not submit the final record until July 14, 2014 [30 TEX. ADMIN. CODE § 101.211(c) and TEX. HEALTH & SAFETY CODE § 382.085(b)].
5. Failed to prevent unauthorized emissions. Specifically, the Respondent released 429.84 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 198207) that began on May 14, 2014 lasting 13 hours and 28 minutes. The event occurred due to an unplanned maintenance activity to take the DEP offline to investigate and repair a screw/shaft causing the system to plug up. Since the emissions event could have been avoided by better operational practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4),

Executive Summary – Enforcement Matter – Case No. 51083
Owens Corning Insulating Systems, LLC
RN100223585
Docket No. 2015-1207-AIR-E

TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1].

6. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 194622) began on January 3, 2014, but the initial notification was not submitted to the TCEQ until February 24, 2014 [30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b)].

7. Failed to prevent unauthorized emissions. Specifically, the Respondent released 110.035 lbs of PM from the V3 Glass Furnace East and West Stacks, EPNs 38 and 39, during an emissions event (Incident No. 194622) that began on January 3, 2014 lasting five hours and eight minutes. The event occurred due to a lock up of twin augers on the V3 Batch Charger causing debris in the cullet system. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1].

8. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 188006) began on September 25, 2013, but the initial notification was not submitted to the TCEQ until October 3, 2013 [30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b)].

9. Failed to prevent unauthorized emissions. Specifically, the Respondent released 490.623 lbs of PM from the V1 Furnace DEP Stack, EPN 3, during an emissions event (Incident No. 188006) that began on September 25, 2013 lasting 16 hours and 44 minutes. The event occurred due to several repairs outside the scope of the normal inspection and maintenance. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1].

10. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 200592) began on July 1, 2014, but the initial notification was not submitted to the TCEQ until July 3, 2014 [30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b)].

11. Failed to prevent unauthorized emissions. Specifically, the Respondent released 215.3 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 200592) that began on July 1, 2014 lasting six hours and 46

Executive Summary – Enforcement Matter – Case No. 51083
Owens Corning Insulating Systems, LLC
RN100223585
Docket No. 2015-1207-AIR-E

minutes. The event occurred due to a screw fed by the drag chain which broke unexpectedly. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1].

12. Failed to submit the initial notification for a reportable emissions event within 24 hours of the discovery. Specifically, the emissions event (Incident No. 212181) began on March 26, 2015, but the initial notification was not submitted to the TCEQ until April 2, 2015 [30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b)].

13. Failed to submit the initial notification for a reportable emissions event within 24 hours of the discovery. Specifically, the emissions event (Incident No. 216183) began on June 20, 2015, but the initial notification was not submitted to the TCEQ until June 22, 2015 [30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b)].

14. Failed to prevent unauthorized emissions. Specifically, the Respondent released 998.68 lbs of PM from the V-3 Mixed Batch Bin, EPN 36, during an emissions event (Incident No. 216183) that began on June 20, 2015 lasting six hours. The event occurred due to a leak in a steel transport pipe. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures:

- a. On September 26, 2013, took the V1 Furnace DEP Stack offline to perform equipment maintenance to prevent the recurrence of emissions events due to the same causes as Incident No. 188006;
- b. On December 5, 2013, took the V1 Furnace DEP Stack offline to remove the debris in the DEP system to prevent the recurrence of emissions events due to the same causes as Incident No. 191316;
- c. On January 4, 2014, took the V3 Glass Furnace East and West Stacks offline to remove debris from both the twin auger and the batch metering gate and returned the batch charger to normal operation to prevent the recurrence of emissions events due to the same causes as Incident No. 194622;

Executive Summary – Enforcement Matter – Case No. 51083
Owens Corning Insulating Systems, LLC
RN100223585
Docket No. 2015-1207-AIR-E

d. On May 15, 2014, took the V1 Furnace DEP Stack offline to remove excessive buildup of material from the DEP system to prevent the recurrence of emissions events due to the same causes as Incident No. 198207;

e. On July 2, 2014, took the V1 Furnace DEP Stack offline to repair the screw to prevent the recurrence of emissions events due to the same causes as Incident No. 200592;

f. On April 6, 2015, took the V1 Furnace DEP Stack offline to perform emergency service to return the V1 Furnace DEP Stack to the proper operating parameters to prevent the recurrence of emissions events due to the same causes as Incident No. 212181; and

g. On June 22, 2015, took the V-3 Mixed Batch Bin offline to replace the steel transport pipe and to install cameras on the roof to prevent the recurrence of emissions events due to the same causes as Incident No. 216183.

Technical Requirements:

The Order will require the Respondent to:

a. Within 30 days:

i. Implement measures and/or procedures to ensure that initial notifications for reportable emissions events are submitted in a timely manner; and

ii. Implement measures and/or procedures to ensure that final records for reportable emissions events are submitted in a timely manner.

b. Within 45 days, submit written certification to demonstrate compliance with a.

Litigation Information

Date Petition(s) Filed: N/A

Date Answer(s) Filed: N/A

SOAH Referral Date: N/A

Hearing Date(s): N/A

Settlement Date: N/A

**Executive Summary – Enforcement Matter – Case No. 51083
Owens Corning Insulating Systems, LLC
RN100223585
Docket No. 2015-1207-AIR-E**

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Amancio Gutierrez, Enforcement Division,
Enforcement Team 5, MC 149, (512) 239-3921; Melissa Cordell, Enforcement Division,
MC 219, (512) 239-2483

TCEQ SEP Coordinator: N/A

Respondent: Gregory D. Bowling, Plant Leader, Owens Corning Insulating Systems,
LLC, 3700 North IH-35 East, Waxahachie, Texas 75165-6607

Kristi Fox, Senior EH&S Leader, Owens Corning Insulating Systems, LLC, 3700 North
IH-35 East, Waxahachie, Texas 75165-6607

Respondent's Attorney: N/A

TCEQ
DATES Assigned PCW: 26-Oct-2015 / 3-Sep-2015 Screening: 28-Oct-2015 EPA Due:

RESPONDENT/FACILITY INFORMATION
 Respondent: Owens Corning Insulating Systems, LLC
 Reg. Ent. Ref. No.: RN100223585
 Facility/Site Region: 4-Dallas/Fort Worth Major/Minor Source: Major

CASE INFORMATION

Enf./Case ID No.	51083	No. of Violations	14
Docket No.	2015-1207-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Jennifer Nguyen
		EC's Team	Enforcement Team 5

Admin. Penalty \$ Limit Minimum: \$0 Maximum: \$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) **Subtotal 1**

ADJUSTMENTS (+/-) TO SUBTOTAL 1
 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the Indicated percentage.
Compliance History Enhancement **Subtotals 2, 3, & 7**

Notes: Enhancement for two NOV's with same or similar violations, three NOV's with dissimilar violations, and two orders with denial of liability.

Culpability Enhancement **Subtotal 4**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments **Subtotal 5**

Economic Benefit Enhancement* **Subtotal 6**
 Total EB Amounts:
 Estimated Cost of Compliance:
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7 **Final Subtotal**

OTHER FACTORS AS JUSTICE MAY REQUIRE **Adjustment**
 Reduces or enhances the Final Subtotal by the Indicated percentage.

Notes:

Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT **Final Assessed Penalty**

DEFERRAL Reduction **Adjustment**
 Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	2	10%
	Other written NOVs	3	6%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	2	40%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
<i>Please Enter Yes or No</i>			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2)

>> Repeat Violator (Subtotal 3)

Adjustment Percentage (Subtotal 3)

>> Compliance History Person Classification (Subtotal 7)

Adjustment Percentage (Subtotal 7)

>> Compliance History Summary

Compliance History Notes

Enhancement for two NOVs with same or similar violations, three NOVs with dissimilar violations, and two orders with denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F) and (c) and 122.143(4), Tex. Health & Safety Code § 382.085(b), Federal Operating Permit ("FOP") No. O1094, Special Terms and Conditions ("STC") No. 8, and New Source Review ("NSR") Permit No. 6093, Special Conditions ("SC") No. 1

Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 843.51 pounds ("lbs") of particulate matter ("PM") from the V1 Furnace Dry Electrostatic Precipitator ("DEP") Stack, Emission Point Number ("EPN") 3, during an emissions event (Incident No. 212181) that began on March 26, 2015 and lasted until March 31, 2015. The event occurred due to a loss of power to two of the three Switch Integrated Rectifiers on the V1 Furnace DEP Stack. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

Table with columns: Release (Actual, Potential), Harm (Major, Moderate, Minor), Percent (15.0%).

>> Programmatic Matrix

Table with columns: Falsification, Major, Moderate, Minor, Percent (0.0%).

Matrix Notes Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1 Number of violation days 6

Table with columns: Frequency (daily, weekly, monthly, quarterly, semiannual, annual, single event), mark only one with an x.

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0% Reduction \$937

Table with columns: Extraordinary, Ordinary, N/A, Before NOE/NOV, NOE/NOV to EDRP/Settlement Offer.

Notes The Respondent completed corrective measures on April 6, 2015, before the August 4, 2015 Notice of Enforcement ("NOE").

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$4

Violation Final Penalty Total \$4,913

This violation Final Assessed Penalty (adjusted for limits) \$4,913

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 1

Percent Interest 5.0
Years of Depreciation 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
 Item Description No commas or \$

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment	\$2,000	26-Mar-2015	6-Apr-2015	0.03	\$0	\$4	\$4
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to take the V1 Furnace DEP Stack offline to perform emergency service to return the V1 Furnace DEP Stack to the proper operating parameters to prevent the recurrence of emissions events due to the same causes as Incident No. 212181. The Date Required is the date the emissions event began. The Final Date is the date that corrective measures were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$4

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 2

Rule Cite(s)

30 Tex. Admin. Code § 101.201(a) and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 191316) began on December 4, 2013, but the initial notification was not submitted to the TCEQ until December 12, 2013.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				0.0%
	Potential				

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
			x	1.0%

Matrix Notes

Less than 30% of rule requirement was not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1

7 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$250

Economic Benefit (EB) for this violation

Estimated EB Amount \$188

Statutory Limit Test

Violation Final Penalty Total \$390

This violation Final Assessed Penalty (adjusted for limits) \$390

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$1,500	26-Sep-2013	31-Mar-2016	2.51	\$188	n/a	\$188
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to implement measures and/or procedures to ensure that initial notifications for reportable emissions events are submitted in a timely manner. The Date Required is the date the first notification was due. The Final Date is the estimated date of compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance

\$1,500

TOTAL

\$188

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 3

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1

Violation Description

Failed to prevent unauthorized emissions. Specifically, the Respondent released 315.22 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 191316) that began on December 4, 2013 lasting nine hours and 54 minutes. The event occurred due to an unplanned maintenance activity to open the DEP Bypass Stack to investigate the locked up screw. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			x
Potential			

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1

1 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	x
	semiannual	
	annual	
	single event	

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		(mark with x)

Notes

The Respondent completed corrective measures on December 5, 2013, before the August 27, 2015 NOE.

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$4,913

This violation Final Assessed Penalty (adjusted for limits) \$4,913

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment	\$2,000	4-Dec-2013	5-Dec-2013	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to take the V1 Furnace DEP Stack offline to remove the debris in the DEP system to prevent the recurrence of emissions events due to the same causes as Incident No. 191316. The Date Required is the date of the emissions event. The Final Date is the date that corrective measures were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 4

Rule Cite(s)

30 Tex. Admin. Code § 101.211(c) and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit a final record no later than two weeks after the end of a scheduled maintenance activity. Specifically, the Respondent conducted a scheduled maintenance activity on May 14, 2014 but did not submit the final record until July 14, 2014.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
			x

Percent 1.0%

Matrix Notes

Less than 30% of rule requirement was not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1

46 Number of violation days

mark only one with an x

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$138

Violation Final Penalty Total \$390

This violation Final Assessed Penalty (adjusted for limits) \$390

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC

Case ID No. 51083

Reg. Ent. Reference No. RN100223585

Media Air

Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
Item Description No commas or \$

Delayed Costs

Equipment			0.00	\$0	\$0	\$0	
Buildings			0.00	\$0	\$0	\$0	
Other (as needed)			0.00	\$0	\$0	\$0	
Engineering/Construction			0.00	\$0	\$0	\$0	
Land			0.00	\$0	n/a	\$0	
Record Keeping System			0.00	\$0	n/a	\$0	
Training/Sampling	\$1,500	29-May-2014	31-Mar-2016	1.84	\$138	n/a	\$138
Remediation/Disposal			0.00	\$0	n/a	\$0	
Permit Costs			0.00	\$0	n/a	\$0	
Other (as needed)			0.00	\$0	n/a	\$0	

Notes for DELAYED costs

Estimated cost to implement measures and/or procedures to ensure that final records for reportable emissions events are submitted in a timely manner. The Date Required is the date the final record was due. The Final Date is the estimated date of compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal			0.00	\$0	\$0	\$0
Personnel			0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling			0.00	\$0	\$0	\$0
Supplies/Equipment			0.00	\$0	\$0	\$0
Financial Assurance [2]			0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]			0.00	\$0	\$0	\$0
Other (as needed)			0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$1,500

TOTAL

\$138

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 5

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1

Violation Description

Failed to prevent unauthorized emissions. Specifically, the Respondent released 429.84 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 198207) that began on May 14, 2014 lasting 13 hours and 28 minutes. The event occurred due to an unplanned maintenance activity to take the DEP offline to investigate and repair a screw/shaft causing the system to plug up. Since the emissions event could have been avoided by better operational practices, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1

Number of violation days 1

daily	
weekly	
monthly	
quarterly	X
semiannual	
annual	
single event	

mark only one with an x

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	X	
N/A		(mark with x)

Notes

The Respondent completed corrective measures on May 15, 2014, before the August 27, 2015 NOE.

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$4,913

This violation Final Assessed Penalty (adjusted for limits) \$4,913

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 5

Percent Interest 5.0
Years of Depreciation 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
 Item Description No commas or \$

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment	\$2,000	14-May-2014	15-May-2014	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to take the V1 Furnace DEP Stack offline to remove excessive buildup of material from the DEP system to prevent the recurrence of emissions events due to the same causes as Incident No. 198207. The Date Required is the date of the emissions event. The Final Date is the date that corrective measures were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 6

Rule Cite(s) 30 Tex. Admin. Code § 101.201(a) and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 194622) began on January 3, 2014, but the initial notification was not submitted to the TCEQ until February 24, 2014.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Harm		
	Major	Moderate	Minor
			x

Percent 1.0%

Matrix Notes

Less than 30% of rule requirement was not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1

51 Number of violation days

mark only one with an x

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$390

This violation Final Assessed Penalty (adjusted for limits) \$390

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC

Case ID No. 51083

Reg. Ent. Reference No. RN100223585

Media Air

Violation No. 6

Percent Interest	Years of Depreciation
5.0	15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
Item Description No commas or \$

Delayed Costs

Equipment			0.00	\$0	\$0	\$0
Buildings			0.00	\$0	\$0	\$0
Other (as needed)			0.00	\$0	\$0	\$0
Engineering/Construction			0.00	\$0	\$0	\$0
Land			0.00	\$0	n/a	\$0
Record Keeping System			0.00	\$0	n/a	\$0
Training/Sampling			0.00	\$0	n/a	\$0
Remediation/Disposal			0.00	\$0	n/a	\$0
Permit Costs			0.00	\$0	n/a	\$0
Other (as needed)			0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit in Violation No. 2.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal			0.00	\$0	\$0	\$0
Personnel			0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling			0.00	\$0	\$0	\$0
Supplies/Equipment			0.00	\$0	\$0	\$0
Financial Assurance [2]			0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]			0.00	\$0	\$0	\$0
Other (as needed)			0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 7

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1

Violation Description

Failed to prevent unauthorized emissions. Specifically, the Respondent released 110.035 lbs of PM from the V3 Glass Furnace East and West Stacks, EPNs 38 and 39, during an emissions event (Incident No. 194622) that began on January 3, 2014 lasting five hours and eight minutes. The event occurred due to a lock up of twin augers on the V3 Batch Charger causing debris in the cullet system. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1

Number of violation days 1

daily	
weekly	
monthly	
quarterly	X
semiannual	
annual	
single event	

mark only one with an x

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	X	
N/A		(mark with x)

Notes

The Respondent completed corrective measures on January 4, 2014, before the August 27, 2015 NOE.

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$4,913

This violation Final Assessed Penalty (adjusted for limits) \$4,913

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 7

Percent Interest 5.0
Years of Depreciation 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
 Item Description No commas or \$

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment	\$2,000	3-Jan-2014	4-Jan-2014	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to take the V3 Glass Furnace East and West Stacks offline to remove debris from both the twin auger and the batch metering gate and return the batch charger to normal operation to prevent the recurrence of emissions events due to the same causes as Incident No. 194622. The Date Required is the date of the emissions event. The Final Date is the date that corrective measures were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 8

Rule Cite(s)

30 Tex. Admin. Code § 101.201(a) and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 188006) began on September 25, 2013, but the initial notification was not submitted to the TCEQ until October 3, 2013.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
			x

Percent 1.0%

Matrix Notes

Less than 30% of rule requirement was not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1

7 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

mark only one with an x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$390

This violation Final Assessed Penalty (adjusted for limits) \$390

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 8

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit In Violation No. 2.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0

Screening Date 28-Oct-2015
 Respondent Owens Corning Insulating Systems, LLC
 Case ID No. 51083

Docket No. 2015-1207-AIR-E

PCW

Policy Revision 4 (April 2014)
 PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 9

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1

Violation Description

Failed to prevent unauthorized emissions. Specifically, the Respondent released 490.623 lbs of PM from the V1 Furnace DEP Stack, EPN 3, during an emissions event (Incident No. 188006) that began on September 25, 2013 lasting 16 hours and 44 minutes. The event occurred due to several repairs outside the scope of the normal inspection and maintenance. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm		
		Major	Moderate	Minor
Actual				x
Potential				

Percent 15.0%

>> Programmatic Matrix

Falsification	Harm		
	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1

1 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	x
	semiannual	
	annual	
single event		

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		(mark with x)

Notes

The Respondent completed corrective measures on September 26, 2013, before the August 27, 2015 NOE.

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$4,913

This violation Final Assessed Penalty (adjusted for limits) \$4,913

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 9

Percent Interest 5.0
Years of Depreciation 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
 Item Description No commas or \$

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment	\$2,000	25-Sep-2013	26-Sep-2013	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to take the V1 Furnace DEP Stack offline to perform equipment maintenance to prevent the recurrence of emissions events due to the same causes as Incident No. 188006. The Date Required is the date of the emissions event. The Final Date is the date that corrective measures were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 10

Rule Cite(s)

30 Tex. Admn. Code § 101.201(a) and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 200592) began on July 1, 2014, but the initial notification was not submitted to the TCEQ until July 3, 2014.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Harm		
	Major	Moderate	Minor
			x

Percent 1.0%

Matrix Notes

Less than 30% of rule requirement was not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1

1 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

mark only one with an x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$390

This violation Final Assessed Penalty (adjusted for limits) \$390

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 10

Percent Interest	Years of Depreciation
5.0	15

	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
--	-----------	---------------	------------	-----	----------------	---------------	-----------

Item Description No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit In Violation No. 2.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 11

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1

Violation Description

Failed to prevent unauthorized emissions. Specifically, the Respondent released 215.3 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 200592) that began on July 1, 2014 lasting six hours and 46 minutes. The event occurred due to a screw fed by the drag chain which broke unexpectedly. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

		Harm		
		Major	Moderate	Minor
OR	Release			
	Actual			x
	Potential			

Percent 15.0%

>> Programmatic Matrix

		Major	Moderate	Minor
	Falsification			

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1

1 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	x
	semiannual	
	annual	
	single event	

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		(mark with x)

Notes

The Respondent completed corrective measures on July 2, 2014, before the August 27, 2015 NOE.

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$4,913

This violation Final Assessed Penalty (adjusted for limits) \$4,913

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Air
Violation No. 11

Percent Interest 5.0
Years of Depreciation 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
 Item Description No commas or \$

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment	\$2,000	1-Jul-2014	2-Jul-2014	0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to take the V1 Furnace DEP Stack offline to repair the screw to prevent the recurrence of emissions events due to the same causes as Incident No. 200592. The Date Required is the date of the emissions event. The Final Date is the date that corrective measures were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

V12 12

Rule Cite(s)

30 Tex. Admin. Code § 101.201(a) and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit the initial notification for a reportable emissions event within 24 hours of the discovery. Specifically, the emissions event (Incident No. 212181) began on March 26, 2015, but the initial notification was not submitted to the TCEQ until April 2, 2015.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Harm		
	Major	Moderate	Minor
			x

Percent 1.0%

Matrix Notes

Less than 30% of rule requirement was not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1

6 Number of violation days

mark only one with an x

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with x)

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$390

This violation Final Assessed Penalty (adjusted for limits) \$390

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC

Case ID No. 51083

Reg. Ent. Reference No. RN100223585

Media Air

Violation No. 12

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit in Violation No. 2.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 13

Rule Cite(s) 30 Tex. Admin. Code § 101.201(a) and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery. Specifically, the emissions event (Incident No. 216183) began on June 20, 2015, but the initial notification was not submitted to the TCEQ until June 22, 2015.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR Release Actual/Potential vs Harm Major/Moderate/Minor. Percent 0.0%

>> Programmatic Matrix

Falsification Major/Moderate/Minor. Percent 1.0%

Matrix Notes Less than 30% of rule requirement was not met.

Adjustment \$24,750

\$250

Violation Events

Number of Violation Events 1 Number of violation days 1

mark only one with an x. Frequency: daily, weekly, monthly, quarterly, semiannual, annual, single event (x)

Violation Base Penalty \$250

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV vs NOE/NOV to EDPRP/Settlement Offer. Extraordinary, Ordinary, N/A (x)

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$250

Economic Benefit (EB) for this violation

Estimated EB Amount \$0

Statutory Limit Test

Violation Final Penalty Total \$390

This violation Final Assessed Penalty (adjusted for limits) \$390

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC

Case ID No. 51083

Reg. Ent. Reference No. RN100223585

Media Air

Violation No. 13

Percent Interest 5.0 | **Years of Depreciation** 15

Item Cost **Date Required** **Final Date** **Yrs** **Interest Saved** **Onetime Costs** **EB Amount**
Item Description No commas or \$

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit in Violation No. 2.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0

Screening Date 28-Oct-2015

Docket No. 2015-1207-AIR-E

PCW

Respondent Owens Corning Insulating Systems, LLC

Policy Revision 4 (April 2014)

Case ID No. 51083

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100223585

Media [Statute] Air

Enf. Coordinator Jennifer Nguyen

Violation Number 14

Rule Cite(s) 30 Tex. Admin. Code § 116.115(b)(2)(F), 116.115(c), and 122.143(4), Tex. Health & Safety Code § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1

Violation Description

Failed to prevent unauthorized emissions. Specifically, the Respondent released 998.68 lbs of PM from the V-3 Mixed Batch Bin, EPN 36, during an emissions event (Incident No. 216183) that began on June 20, 2015 lasting six hours. The event occurred due to a leak in a steel transport pipe. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

Release	Harm		
	Major	Moderate	Minor
Actual			x
Potential			

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 1

1 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	x
	semiannual	
	annual	
	single event	

Violation Base Penalty \$3,750

One quarterly event is recommended.

Good Faith Efforts to Comply

25.0%

Reduction \$937

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		(mark with x)

Notes

The Respondent completed corrective measures on June 22, 2015, before the October 22, 2015 NOE.

Violation Subtotal \$2,813

Economic Benefit (EB) for this violation

Estimated EB Amount \$1

Statutory Limit Test

Violation Final Penalty Total \$4,913

This violation Final Assessed Penalty (adjusted for limits) \$4,913

Economic Benefit Worksheet

Respondent Owens Corning Insulating Systems, LLC
Case ID No. 51083
Reg. Ent. Reference No. RN100223585
Media Alr
Violation No. 14

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
------------------	-----------	---------------	------------	-----	----------------	---------------	-----------

No commas or \$

Delayed Costs

Equipment	\$2,000	20-Jun-2015	22-Jun-2015	0.01	\$0	\$1	\$1
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to take the V-3 Mixed Batch Bin offline to replace the steel transport pipe and to install cameras on the roof to prevent the recurrence of emissions events due to the same causes as Incident No. 216183. The Date Required is the date of the emissions event. The Final Date is the date that corrective measures were completed.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$1

The TCEQ is committed to accessibility.
To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



TCEQ Compliance History Report

PENDING Compliance History Report for CN603159088, RN100223585, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

Customer, Respondent, or Owner/Operator: CN603159088, Owens Corning Insulating Systems, LLC **Classification:** SATISFACTORY **Rating:** 8.11

Regulated Entity: RN100223585, OWENS CORNING INSULATING SYSTEMS WAXAHACHIE PLANT **Classification:** SATISFACTORY **Rating:** 8.11

Complexity Points: 16 **Repeat Violator:** NO

CH Group: 14 - Other

Location: 3700 N IH 35 E WAXAHACHIE, TX 75165-6607, ELLIS COUNTY

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER ED00510

INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD007332570

WASTEWATER PERMIT WQ0001178000

AIR NEW SOURCE PERMITS PERMIT 6093

AIR NEW SOURCE PERMITS AFS NUM 4813900005

AIR NEW SOURCE PERMITS REGISTRATION 45087

AIR NEW SOURCE PERMITS REGISTRATION 84393

STORMWATER PERMIT TXR05V224

POLLUTION PREVENTION PLANNING ID NUMBER P00494

AIR OPERATING PERMITS PERMIT 1094

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 31420

WASTEWATER EPA ID TX0065749

AIR NEW SOURCE PERMITS ACCOUNT NUMBER ED00510

AIR NEW SOURCE PERMITS PERMIT 6092

AIR NEW SOURCE PERMITS REGISTRATION 78155

AIR NEW SOURCE PERMITS REGISTRATION 113627

AIR EMISSIONS INVENTORY ACCOUNT NUMBER ED00510

Compliance History Period: September 01, 2010 to August 31, 2015 **Rating Year:** 2015 **Rating Date:** 09/01/2015

Date Compliance History Report Prepared: October 12, 2015

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: October 12, 2010 to October 12, 2015

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Jennifer Nguyen

Phone: (512) 239-6160

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If YES for #2, who is the current owner/operator? N/A
- 4) If YES for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If YES, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1 Effective Date: 02/22/2014 ADMINORDER 2013-0889-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Special Terms & Conditions 8 OP

Description: Failed to comply with the permitted CO emission rate of 20.70 lbs/hr and the permitted VOC emission rate of 10.50 lbs/hr. Specifically, during a stack test conducted from July 25 through 27, 2012, it was determined that the CO and VOC emission rates from the Mixing Chamber Stack, EPN 40, were 22.95 lbs/hr and 11.38 lbs/hr, respectively, resulting in the release of approximately 15,282 lbs of CO and 5,977 lbs of VOC.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 46 PERMIT

Special Terms & Conditions 8 OP

Description: Failed to submit records of adjusted operating parameters and daily records of glass production and binder usage rates sufficient to demonstrate compliance with the permitted emission rates for EPN 40 within 60 days after a stack test is conducted, and on a monthly basis until a permit amendment has been approved or until a re-test showing compliance is performed. Specifically, the stack test report submitted on 9/24/12 documented that the operating parameters were adjusted, but monthly records

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)

5C THSC Chapter 382 382.085(b)

Description: Failed to submit an initial notification for Incident No. 177834 within 24 hours after discovery of the emissions event. Specifically, the emissions event was discovered on December 26, 2012, but the initial notification was not submitted until January 8, 2013.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Special Terms & Conditions 8 OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,743.32 lbs of particulate matter from the V-2 Mixed Batch Bin (EPN 26), during an emissions event (Incident No. 177834) that began on December 25, 2012 and lasted 138 hours. The emissions event occurred when two level limit switches, or bindicators, in the V2 mixed batch storage system failed simultaneously due to loose set screws on the bindicator paddle. Since this emissions event was reported late, prompt act

2 Effective Date: 07/10/2015 ADMINORDER 2015-0061-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP 01094 OP

Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event which occurred on August 25, 2014

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	October 22, 2010	(882297)
Item 2	November 12, 2010	(888762)
Item 3	November 30, 2010	(897109)
Item 4	December 06, 2010	(858301)
Item 5	January 14, 2011	(878241)
Item 6	January 21, 2011	(903026)
Item 7	February 17, 2011	(909895)
Item 8	March 21, 2011	(917134)
Item 9	March 31, 2011	(938829)
Item 10	April 11, 2011	(895419)

Item 11	April 21, 2011	(906449)
Item 12	April 25, 2011	(927451)
Item 13	April 29, 2011	(901311)
Item 14	May 02, 2011	(908208)
Item 15	June 20, 2011	(946198)
Item 16	June 28, 2011	(934958)
Item 17	July 13, 2011	(953467)
Item 18	July 18, 2011	(935077)
Item 19	August 09, 2011	(933611)
Item 20	August 11, 2011	(960100)
Item 21	September 13, 2011	(966147)
Item 22	September 16, 2011	(951152)
Item 23	September 19, 2011	(948785)
Item 24	October 11, 2011	(972176)
Item 25	October 17, 2011	(958969)
Item 26	October 18, 2011	(962479)
Item 27	November 04, 2011	(952306)
Item 28	November 10, 2011	(957902)
Item 29	November 14, 2011	(978334)
Item 30	November 21, 2011	(968613)
Item 31	December 15, 2011	(985134)
Item 32	January 12, 2012	(991412)
Item 33	January 23, 2012	(974784)
Item 34	February 13, 2012	(1025018)
Item 35	March 14, 2012	(1004297)
Item 36	April 12, 2012	(1010857)
Item 37	April 24, 2012	(995348)
Item 38	May 10, 2012	(1017230)
Item 39	May 18, 2012	(1003312)
Item 40	June 08, 2012	(1025019)
Item 41	June 11, 2012	(1006720)
Item 42	July 05, 2012	(1032370)
Item 43	August 09, 2012	(1038789)
Item 44	September 10, 2012	(1047676)
Item 45	October 11, 2012	(1065203)
Item 46	December 10, 2012	(1042894)
Item 47	December 13, 2012	(1065204)
Item 48	January 15, 2013	(1080748)
Item 49	February 12, 2013	(1080747)
Item 50	February 25, 2013	(1058315)
Item 51	March 12, 2013	(1090150)
Item 52	April 08, 2013	(1096530)
Item 53	April 29, 2013	(1076375)
Item 54	May 07, 2013	(1077730)
Item 55	May 10, 2013	(1085149)
Item 56	May 14, 2013	(1107488)
Item 57	May 17, 2013	(1077282)
Item 58	June 13, 2013	(1111130)
Item 59	July 02, 2013	(1101125)
Item 60	July 15, 2013	(1118024)
Item 61	August 06, 2013	(1101609)
Item 62	August 20, 2013	(1125824)
Item 63	August 27, 2013	(1115199)
Item 64	September 17, 2013	(1130367)
Item 65	October 15, 2013	(1136137)
Item 66	December 23, 2013	(1147973)
Item 67	January 21, 2014	(1154044)
Item 68	February 12, 2014	(1150179)
Item 69	February 18, 2014	(1161366)
Item 70	April 14, 2014	(1175166)

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
OWENS CORNING INSULATING
SYSTEMS, LLC
RN100223585

§
§
§
§
§
§

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2015-1207-AIR-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Owens Corning Insulating Systems, LLC ("Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the together stipulate that:

1. The Respondent owns and operates a glass fiber insulation manufacturing plant located at 3700 North Interstate Highway 35 East in Waxahachie, Ellis County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Executive Director and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
4. The Respondent received notices of the violations alleged in Section II ("Allegations") on or about August 9, 2015, September 1, 2015, and October 27, 2015.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Thirty-Seven Thousand One Hundred Twenty-One Dollars (\$37,121) is assessed by the Commission in settlement of the

violations alleged in Section II ("Allegations"). The Respondent has paid Twenty-Nine Thousand Six Hundred Ninety-Seven Dollars (\$29,697) of the administrative penalty and Seven Thousand Four Hundred Twenty-Four Dollars (\$7,424) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a).
9. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:
 - a. On September 26, 2013, took the V1 Furnace Dry Electrostatic Precipitator ("DEP") Stack offline to perform equipment maintenance to prevent the recurrence of emissions events due to the same causes as Incident No. 188006;
 - b. On December 5, 2013, took the V1 Furnace DEP Stack offline to remove the debris in the DEP system to prevent the recurrence of emissions events due to the same causes as Incident No. 191316;
 - c. On January 4, 2014, took the V3 Glass Furnace East and West Stacks offline to remove debris from both the twin auger and the batch metering gate and returned the batch charger to normal operation to prevent the recurrence of emissions events due to the same causes as Incident No. 194622;
 - d. On May 15, 2014, took the V1 Furnace DEP Stack offline to remove excessive buildup of material from the DEP system to prevent the recurrence of emissions events due to the same causes as Incident No. 198207;
 - e. On July 2, 2014, took the V1 Furnace DEP Stack offline to repair the screw to prevent the recurrence of emissions events due to the same causes as Incident No. 200592;
 - f. On April 6, 2015, took the V1 Furnace DEP Stack offline to perform emergency service to return the V1 Furnace DEP Stack to the proper operating parameters to prevent the recurrence of emissions events due to the same causes as Incident No. 212181; and
 - g. On June 22, 2015, took the V-3 Mixed Batch Bin offline to replace the steel transport pipe and to install cameras on the roof to prevent the recurrence of emissions events due to the same causes as Incident No. 216183.

10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Plant, the Respondent is alleged to have:

1. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and (c) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), Federal Operating Permit ("FOP") No. O1094, Special Terms and Conditions ("STC") No. 8, and New Source Review ("NSR") Permit No. 6093, Special Conditions ("SC") No. 1, as documented during a record review conducted on May 5, 2015. Specifically, the Respondent released 843.51 pounds ("lbs") of particulate matter ("PM") from the V1 Furnace DEP Stack, Emission Point Number ("EPN") 3, during an emissions event (Incident No. 212181) that began on March 26, 2015 and lasted until March 31, 2015. The event occurred due to a loss of power to two of the three Switch Integrated Rectifiers on the V1 Furnace DEP Stack. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
2. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery, in violation of 30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on February 17, 2015. Specifically, the emissions event (Incident No. 191316) began on December 4, 2013, but the initial notification was not submitted to the TCEQ until December 12, 2013.
3. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1, as documented during a record review conducted on February 17, 2015. Specifically, the Respondent released 315.22 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 191316) that began on December 4, 2013 lasting nine hours and 54 minutes. The event occurred due to an unplanned maintenance activity to open the DEP Bypass Stack to investigate the locked up screw. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

4. Failed to submit a final record no later than two weeks after the end of a scheduled maintenance activity, in violation of 30 TEX. ADMIN. CODE § 101.211(c) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on February 17, 2015. Specifically, the Respondent conducted a scheduled maintenance activity on May 14, 2014 but did not submit the final record until July 14, 2014.
5. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1, as documented during a record review conducted on February 17, 2015. Specifically, the Respondent released 429.84 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 198207) that began on May 14, 2014 lasting 13 hours and 28 minutes. The event occurred due to an unplanned maintenance activity to take the DEP offline to investigate and repair a screw/shaft causing the system to plug up. Since the emissions event could have been avoided by better operational practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
6. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery, in violation of 30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on February 17, 2015. Specifically, the emissions event (Incident No. 194622) began on January 3, 2014, but the initial notification was not submitted to the TCEQ until February 24, 2014.
7. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1, as documented during a record review conducted on February 17, 2015. Specifically, the Respondent released 110.035 lbs of PM from the V3 Glass Furnace East and West Stacks, EPNs 38 and 39, during an emissions event (Incident No. 194622) that began on January 3, 2014 lasting five hours and eight minutes. The event occurred due to a lock up of twin augers on the V3 Batch Charger causing debris in the cullet system. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
8. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery, in violation of 30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on February 17, 2015. Specifically, the emissions event (Incident No. 188006) began on September 25, 2013, but the initial notification was not submitted to the TCEQ until October 3, 2013.
9. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1, as documented during a record review conducted on February 17, 2015. Specifically, the Respondent released 490.623 lbs of PM from the V1 Furnace DEP Stack, EPN 3, during an emissions event (Incident No. 188006) that began on September 25, 2013 lasting 16

hours and 44 minutes. The event occurred due to several repairs outside the scope of the normal inspection and maintenance. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

10. Failed to submit the initial notification for a reportable emissions event within 24 hours of discovery, in violation of 30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on February 17, 2015. Specifically, the emissions event (Incident No. 200592) began on July 1, 2014, but the initial notification was not submitted to the TCEQ until July 3, 2014.
11. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1, as documented during a record review conducted on February 17, 2015. Specifically, the Respondent released 215.3 lbs of PM from the V1 Furnace DEP Bypass Stack, EPN 6, during an emissions event (Incident No. 200592) that began on July 1, 2014 lasting six hours and 46 minutes. The event occurred due to a screw fed by the drag chain which broke unexpectedly. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
12. Failed to submit the initial notification for a reportable emissions event within 24 hours of the discovery, in violation of 30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on May 5, 2015. Specifically, the emissions event (Incident No. 212181) began on March 26, 2015, but the initial notification was not submitted to the TCEQ until April 2, 2015.
13. Failed to submit the initial notification for a reportable emissions event within 24 hours of the discovery, in violation of 30 TEX. ADMIN. CODE § 101.201(a) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on July 22, 2015. Specifically, the emissions event (Incident No. 216183) began on June 20, 2015, but the initial notification was not submitted to the TCEQ until June 22, 2015.
14. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F), 116.115(c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O1094, STC No. 8, and NSR Permit No. 6093, SC No. 1, as documented during a record review conducted on July 22, 2015. Specifically, the Respondent released 998.68 lbs of PM from the V-3 Mixed Batch Bin, EPN 36, during an emissions event (Incident No. 216183) that began on June 20, 2015 lasting six hours. The event occurred due to a leak in a steel transport pipe. Since the initial notification for the emissions event was submitted late, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Owens Corning Insulating Systems, LLC, Docket No. 2015-1207-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. It is further ordered that the Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order:
 - i. Implement measures and/or procedures to ensure that initial notifications for reportable emissions events are submitted in a timely manner; and
 - ii. Implement measures and/or procedures to ensure that final records for reportable emissions events are submitted in a timely manner.
 - b. Within 45 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Air Section Manager
Dallas/Fort Worth Regional Office
Texas Commission on Environmental Quality
2309 Gravel Drive
Fort Worth, Texas 76118-6951

3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and

may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

8. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



For the Executive Director

4/29/16

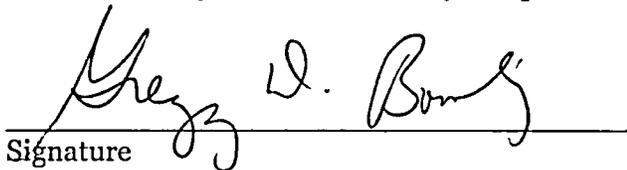
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature

12/18/2015

Date

GREGORY D. BOWLING

Name (Printed or typed)
Authorized Representative of
Owens Corning Insulating Systems, LLC

PLANT LEADER

Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section IV, Paragraph 1 of this Agreed Order.