

8/29/17
Pob69

landscapeforms®

Memo:

To: Monica Brothers
From: Rush Burpee
Date: August 29, 2017
C.C.: Bob Trayers, Nate Quick, Mike Fick
Re: Landscape Forms Responses to DEQ for Burn-Off Oven



E-MAILED

8/29/17
ARD-K200

Monica,

Following are Landscape Forms responses to the violation notice issued July 25th, 2017 in regards to the Burn-Off Oven and the conditions of PTI No. 203-15.

Thermocouples were not calibrated at least once per year (Special Condition III.3).

- Oversight on not getting this on the Maintenance schedule within the first year after the Feb. 8th, 2016 start up. These were calibrated on July 12, 2017 (see attached **Burn Off Oven Calibration**) and this is now on our Maintenance Team preventive maintenance calendar to be done annually per permit requirements.

No records for afterburner temperature. Without records, the Facility cannot show that they are meeting the 1400°F or above requirement (Special Condition IV.1).

- Afterburner temperatures have been monitored by electronic controls, however they were never recorded. Documentation for these temperatures is now occurring using the circular chart recorder. Please see statement below regarding the Circular Chart Monitoring system.

Some records were not being maintained and were not available upon request (Special Condition VI.1).

- The daily record of keeping track of oven operations were not up to date at time of inspection; they were last updated in July 2016. We have records that indicate what days/shifts we operated the paint line and we have one burn-off for every operational shift. This has been updated and we will be using the chart recorder data to keep this current.
- The 12 month rolling calendar had not been developed at the time of inspection and was created on June 26, 2017 (see attached **Burn Off Oven Rolling Calendar**). We are keeping this current and this is logged into my calendar for monthly updates/recording.

Circular chart monitoring system was not working properly and temperatures were not being recorded (Special Condition VI.2).

- Circular chart recorder was installed but was never operational. There was a misunderstanding on my behalf of the permit requirements and felt that the controls would meet the requirements of the permit without the circular recorder.
- It was determined that the chart recorder was not installed to measure the afterburner temperature. New parts and wiring were ordered to install the circular chart thermocouple into the afterburner stack. This was completed on August 24, 2017; it is now operational as of August 25, 2017 (see attached **Chart 08_25_17**).
- Charts will be installed, evaluated and filed on every operational day. These records will be kept on file in Landscape Forms Paint Lab area. These charts will also provide daily operational information that will be used to update the 12 month rolling calendar to ensure we don't exceed our 600 batch per year threshold limit.

Facility could not produce maintenance records for the unit (Special Condition VI.3).

- We do have preventive maintenance records and repair records for the burn-off oven (see attached **Burn Off Oven PM 2017**). Our Maintenance personnel were unavailable at the time of the inspection to provide documentation and/or bring up the documentation electronically.
- On the day of the inspection (June 14, 2017) there was a malfunction of the oven due to the main chamber burner would not ignite. The afterburner was working properly and above 1400F. After troubleshooting the problem, it was determined that the toggle switch on the ignition box had been accidentally turned off while personnel were in the area cleaning the floors. The switch was turned on and there have not been any problems since.

Please let me know if you need further information or documents. I apologize for not getting this information back to you per your original request date, the violation notice was found in the mailbox at the Midlink facility after speaking to you by phone on August 21, 2017 when I returned from vacation.

Regards,

Rush Burpee
Manufacturing Engineer
Landscape Forms, Inc.