

# ADEM



## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR  
DIRECTOR

FOB JAMES, JR.  
GOVERNOR

June 16, 1997

**CERTIFIED MAIL NO. P 130 616 321**  
**RETURN RECEIPT REQUESTED**

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Mr. Dan Carden  
President  
Warrior Roofing Manufacturing, Inc.  
3050 Warrior Road  
P.O. Box 40185  
Tuscaloosa, Alabama 35404-0185

Dear Mr. Carden:

**RE: Notice of Violation**

This letter serves as Notice of Violation of Provisos 7 and 18 of Air Permit No. 413-0023-X003.

In your letter of January 21, 1997, you stated that the units covered by Air Permit Nos. 413-0023-X002 and X003 had been constructed as proposed in the submitted Air Permit applications. Based on this letter, the Department issued Warrior Roofing Manufacturing, Inc. Temporary Authorization to Operate these units until August 10, 1997.

During an inspection of your facility on April 24, 1997, an ADEM inspector observed the tank covered by Air Permit 413-0023-X003. Contrary to the permit applications submitted for this unit and the certification you sent, the emissions from this tank were not being vented to the Fiber Bed Mist Eliminator. The tank was observed operating with the emissions being uncontrolled.

Proviso 7 of Air Permit No. 413-0023-X003 states:

*All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.*

110 Vulcan Road  
Birmingham, Alabama 35206-4702  
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Proviso 18 of Air Permit No. 413-0023-X003 states:

*The emissions from this tank shall be vented to the control device common to Air Permit 413-0023-X002.*

Since the tank was observed operating with the emissions uncontrolled, this is a violation of the above provisos.

Please provide the Department with a written response to the following questions by July 11, 1997:

1. Why was the tank not vented to the Fiber Bed Mist Eliminator as shown in the permit applications and as required by the Air Permit?
2. By what date will the tank be connected to the control device?

Due to the serious nature of these violations, the Department is considering further enforcement action, including an administrative penalty. The Department's actions will be influenced by your response to this Notice of Violation.

If you have any questions concerning this matter, please contact Jeffery Kitchens at (334) 271-7861 in Montgomery.

Sincerely,



Ronald W. Gore, Chief  
Air Division

RWG/JWK:jwk