



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

December 6, 2021

Mr. Kevin Keen
Knauf Insulation, Inc.
1000 East North Street
Albion, Michigan 49224

SRN: B7205, Calhoun County

Dear Mr. Keen:

VIOLATION NOTICE

On November 22, 2021, Mr. Adam Estes, Technical Specialist, Corporate HSE from Knauf insulation contacted the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), to discuss installation of possibly unpermitted equipment.

During the phone call, Facility staff disclosed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-WBW3ALBFORMING	R 336.1201(1)	The facility self-disclosed that cooling towers were installed along with the rest of EU-WBW3ALBFORMING. The cooling towers were not included in the Permit to Install (PTI) application and therefore were installed without a permit. The EU-WBW3ALBFORMING line has commenced operation.

During the phone conversation with the Facility, it was disclosed that the Facility had installed and commenced operation of unpermitted equipment at this facility. The facility was issued PTI No. 132-19A to install a new white-blown wool line (EU-WBW3ALBFORMING). This PTI has been rolled into the Renewable Operating Permit (ROP) MI-ROP-B7205- 2021. Once the line was installed and started, facility personnel discovered that cooling towers were installed along with the new line. These cooling towers were not included in the PTI application and therefore were installed without a permit. The AQD staff advised the Facility on November 22, 2021, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the unpermitted cooling towers associated with EU-WBW3ALBFORMING process equipment. The Facility provided information that modeling was conducted to include the cooling towers in the emissions calculations. Based on calculations, including the cooling towers does not violation Prevention of Significant Deterioration (PSD) rules.

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Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 27, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Chapel
Senior Environmental Quality Analyst
Air Quality Division
(269)910-2109

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE
Mr. Adam Estes, Knauf Insulation