

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Knauf Insulation, Inc.		SRN : B7205	
Location : 1000 E NORTH ST		District : Kalamazoo	
		County : CALHOUN	
City : ALBION	State: MI	Zip Code : 49224	Compliance Status : Non Compliance
Source Class : MAJOR		Staff : Rex Lane	
FCE Begin Date : 8/22/2016		FCE Completion Date : 8/23/2017	
Comments : FCE Report			

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/16/2017	Self Initiated Inspection	Non Compliance	Self Initiated Inspection
03/21/2017	MAERS	Compliance	ROP certification report for MAERS contains an original dated signature by the facility's responsible official. The report is considered to be late since it was received on 3/17/17. The MAERS report was received electronically by the AQD on 3/15/17. -RIL

Activity Date	Activity Type	Compliance Status	Comments
03/21/2017	ROP Annual Cert	Compliance	<p>ROP certification report contains an original dated signature by the facility's responsible official. The report is considered to be late since it was received on 3/17/17. Facility reported numerous events where either scrubber differential pressure or scrubber water flow rates deviated from allowable ranges under NSPS, Subpart PPP based on the most recent performance test for control equipment on EU-WBWALBFORMING or FG-ML2ALB. Knauf included a spreadsheet with the ROP certification report that identifies the number of minutes of control equipment monitoring deviation compared to total process operating hours during the reporting period. Based on a review of the spreadsheet, the highest % out time was for the white blown wool scrubber differential pressure at 1.36% of total process operating hours. White blown wool scrubber flow rate deviations and resinated line two scrubber differential pressure deviations were 0.56% and 0.6% of total process operating time, respectively. A violation notice will not be sent at this time. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
03/21/2017	ROP SEMI 2 CERT	Compliance	<p>ROP certification report contains an original dated signature by the facility's responsible official. The report is considered to be late since it was received on 3/17/17. Facility reported numerous events where either scrubber differential pressure or scrubber water flow rates deviated from allowable ranges under NSPS, Subpart PPP based on the most recent performance test for control equipment on EU-WBWALBFORMING or FG-ML2ALB. Knauf included a spreadsheet with the ROP certification report that identifies the number of minutes of control equipment monitoring deviation compared to total process operating hours during the reporting period. Based on a review of the spreadsheet, the highest % out time was for the white blown wool scrubber differential pressure at 1.36% of total process operating hours. White blown wool scrubber flow rate deviations and resinated line two scrubber differential pressure deviations were 0.56% and 0.6% of total process operating time, respectively. A violation notice will not be sent at this time. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
03/21/2017	NSPS (Part 60)	Compliance	<p>40 CFR Part 60, Subpart PPP</p> <p>ROP certification report for NSPS, Subpart PPP contains an original dated signature by the facility's responsible official. The report is considered to be late since it was received on 3/17/17. Facility reported numerous events where either scrubber differential pressure or scrubber water flow rates deviated from allowable ranges under NSPS, Subpart PPP based on the most recent performance test for control equipment on EU-WBWALBFORMING or FG-ML2ALB. Knauf included a spreadsheet with the ROP certification report that identifies the number of minutes of control equipment monitoring deviation compared to total process operating hours during the reporting period. Based on a review of the spreadsheet, the highest % out time was for the white blown wool scrubber differential pressure at 1.36% of total process operating hours. White blown wool scrubber flow rate deviations and resinated line two scrubber differential pressure deviations were 0.56% and 0.6% of total process operating time, respectively. A violation notice will not be sent at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/10/2016	Stack Test	Non Compliance	<p>PM and Ammonia Emission Test Results for FG-FURNACES 1,3 and 4; FURNACE 2; EU-WBWALBFORMING; and FG-ML2ALB</p> <p>Test report was received on 9/26/16. Knauf Insulation also attempted to maintain certain emission test results as confidential business information (CBI) that upon review did not meet MDEQ criteria to be maintained as such. The test report did not include a signed ROP certification report. Staff contacted facility regarding what could be maintained as CBI through a redacted submittal and that the facility also needed to submit a certification report. A violation notice was sent on 10/3/16 for exceeding PM10 emission rate limits under FG-ML2ALB and EU-WBWALBFORMING. Redacted cover letter and CBI submittals were received on 10/4/16 along with the signed ROP certification report. -RIL</p>

09/30/2016	ROP Semi 1 Cert	Compliance	<p>Knauf ROP Semi-annual Compliance Certification Report:</p> <p>Report contains an original dated signature by the facility's responsible official. Facility reported numerous events where either scrubber differential pressure or water flow rates deviated from allowable ranges based on the most recent performance test for control equipment on EU-WBWALBFORMING or FG-ML2ALB. Staff sent an email (attached) to Mr. Don Adams, HSE Technical Specialist on 9/21/16 regarding substantially more reported deviations associated with EU-WBWALBFORMING in this reporting cycle than typical. By 9/28/16, staff requested total operating hours for EU-WBWALBFORMING for the first half of the calendar year and for any other information pertinent to the circumstances associated with the reported deviations. The attached 9/28/16 email from Mr. Adams notes that EU-WBWALBFORMING and FG-ML2ALB were both down during the second half of CY2015 to change over from Guardian to Knauf process technology and control equipment. When reported deviations were reviewed again following staff inquiry, it was discovered that the new Knauf recording system did not make provisions for the production line being down when the system recorded scrubber parameter deviations. Knauf submitted a spreadsheet showing the revised duration events once production line down time was removed along with a summation for each scrubber on minutes of deviation compared to total process operating hours during the reporting period. Based on a review of the revised spreadsheet, the highest % out time was for WBW2 scrubber water flow (0.633%) and the average % out time for all control device parameters was 0.161% of total hours of operation. A violation notice will not be sent at this time.</p>
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Name: RIL

Date: 8/23/17

Supervisor: mm 8/23/2017

