

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 : Compliance
Source Class : MAJOR	Staff : Amanda Cross
FCE Begin Date : 1/1/22	FCE Completion Date : 4/6/2023
Comments : 2022-2023 FCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/24/2023	On-site Inspection	Compliance	
03/23/2023	MAERS	Compliance	MAERS Reporting CBI Information. MAERS report received on 2/27/23. MAERS was reviewed by staff and shown to be accurate with operations.
03/23/2023	ROP Annual Cert	Compliance	Facility submitted an ROP Certification form with an original signature and date from the responsible official. Facility reports that during the entire reporting period, this source was in compliance with all terms and conditions contained in the ROP, except the deviations identified on the enclosed reports. The facility reported one deviation during the first semi-annual reporting period, and two deviations on the second semi-annual report. All deviations have been addressed.

Activity Date	Activity Type	Compliance Status	Comments
03/23/2023	ROP SEMI 2 CERT	Compliance	<p>Facility submitted an ROP Certification form with an original signature and date from the responsible official.</p> <p>The facility reported that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations occurred except those identified. Facilities identified that FG-ML2ALB scrubber 3 differential pressure was out of parameter 9/2/22 and 10/3/22. Maintenance was notified, damper was out of adjustment and realigned, and the differential pressure was restored. The facility also reported that the semi-annual certification was not reported in a timely manner due to the cyber attack and is therefore a deviation. The information has been submitted since the report was due.</p>
03/23/2023	NSPS (Part 60)	Compliance	<p>Subpart PPP Semi-annual Report</p> <p>Facility submitted the Certification with an original signature and date from the responsible official. The facility reported 3 deviations. For details, see ROP Semi-Annual Certifications 1 and 2.</p> <p>Knauf reported scrubber malfunctions and out of parameter conditions using the four-hour averages specified in the ROP and Subpart PPP.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/23/2023	ROP Semi 1 Cert	Compliance	<p>The facility submitted an updated ROP Semi-Annual Certification 1 as they suffered a ransomware cyber attack, and the information was unavailable at the time of the required reporting. The facility reported the attack and submitted an ROP semi-annual 1 report as a place holder until the data could be restored.</p> <p>The facility reported they were in compliance with all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements occurred except for the reported deviations. Reported deviation is on FG-ML2ALB with scrubber 2 differential pressure out of parameter. Maintenance was notified, all lines cleaned, and pressure restored after ports were cleaned.</p>
01/26/2023	ROP Semi 1 Cert	Unknown	<p>The facility submitted an ROP certification with original signature of responsible official and date. The facility reported that during the reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations occurred except as identified in the report.</p> <p>The certification form accompanied a letter. This letter explained that it was a placeholder for the semi-annual monitoring and PPP report. On June 29, 2022, the facility suffered a cyber attack which resulted in losing access to the digital servers. One of those servers was the parametric monitoring data needed for the report. Once the IT group restores access, the data will be pulled, reviewed, and submitted. In the meantime, Knuaf has switched to manual, hardcopy recordkeeping and has been doing so since the cyber attack was discovered. A secondary server was built for data to be stored in August. This will serve as a placeholder until the data is submitted to EGLE for review.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/14/2022	Stack Test	Compliance	<p>WBW3 Forming and Furnace 1, 3 & 4 Stacks Test Report (MI-PTI-B7205-2021a) - 2022</p> <p>Facility reports that FG-FURNACE1,3&4 tested PM10 at 0.898 with a permitted emission limit of 2.08 showing compliance with the permit. The facility also tested to show compliance with the MACT PPP limit of 11.00 lbs/ton glass pulled and the permit limit of 2.34 lbs/tgp. Test results showed the facility tested with Method 5 + 202 with an amount of 1.514 lbs/tgp and Method 5 with an amount of 1.141 lbs/tgp, showing compliance with both permitted limit.</p>
05/19/2022	ROP Other	Compliance	<p>As required by PTI No. 132-19B which is in the process of being rolled into MI-ROP-B7205-2021, the facility has submitted and Inspection and Maintenance Program for EU-COOLTOWER2 and EU-COOLTOWER3. In addition, EU-COOLTOWER1's Inspection and Maintenance Program (submitted to EGLE on March 22, 2019), has been updated and rolled into the submitted plan.</p> <p>The plan includes weekly, monthly, quarterly requirements for inspection as maintenance as detailed in the program. GoPlant is Knauf's internal digital system that allows staff to perform inspections and enter information on their phone. An inspection form for the cooling towers has been added to the system to allow fast retrieval of information, company wide. Hard copies will be available by request of EGLE.</p>
05/10/2022	Stack Test Observation		
03/22/2022	MAERS	Compliance	<p>The facility submitted an ROP certification form with original signature and date. The form certifies the 2021 MAERS submission and includes data determined to be CBI.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/22/2022	ROP Annual Cert	Compliance	The facility submitted an ROP certification form with original signature and date. The facility certifies that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations occurred except for the ones reported during the first semi-annual and second semi-annual ROP reporting period. No violation notice was sent for any deviations.
03/22/2022	ROP SEMI 2 CERT	Compliance	The facility submitted an ROP certification form with original signature and date. The facility certifies that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations occurred except for the ones enclosed. Facility reports that on 8/5/22 and 9/1/22 the ML2 cooling scrubber water flow was out of parameter. Maintenance was called in both issues to restore the water. On 8/12/22 the ML2 scrubber 3 water flow was out of parameter and a loss of water occurred. Maintenance was notified and it was fixed. On 8/10/21, 9/1/21, and 9/15/21 EU-WBWALBFORMING experiences differential pressure out of parameters on WBW1 Scrubber 1B,1C, and WBW2 Scrubber. The issues were identified as a plugged valve, lost water and sprayers plugged, and blower and IT pumps needed replacement. The maintenance was completed on these. Finally, on EU-WBW3ALBFORMING on 11/18/21 had the WBW3 scrubber differential pressure out of parameter. The dampener was adjusted while determining base setpoints for WBW3. Since these issues have all been addressed, no VNs will be issued for any deviations.
03/22/2022	Stack Test	Compliance	Notification for intent to complete stack testing on May 10-11, 2022 was submitted to the department.

Name: Aimee Cross Date: 4/10/23 Supervisor: RIL 4/6/23