



Amanda Chapel
EGLE, AQD
Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009

Jenine Camilleri
EGLE, AQD
Enforcement Unit
P.O. Box 30260
Lansing, Michigan 48909



Dear Ms. Chapel and Ms. Camilleri,

The enclosed is in response to EGLE's December 6, 2021 Violation Notice regarding Knauf's installation of cooling towers in conjunction with its WBW3 project line. As stated in the Violation Notice, Knauf self-disclosed this information and provided verbally to EGLE information regarding the discovery and actions taken during the events leading up to notifying EGLE. They are summarized here and per EGLE's request from the Violation Notice.

During the week of Nov. 8th, 2021 Knauf Corporate HSE on a routine visit to the Albion plant noticed the presence of the Cooling Towers in monitoring the construction of the WBW3 Line. Upon seeing the Cooling Towers, the permit application for WBW3 was reviewed and determined that the Cooling Towers were not a part of the permit application.

Knauf Corporate HSE engaged in correspondence with Corporate and Plant personnel detailing that the emissions from the Cooling Towers had to be reviewed to ensure that PSD applicability had not been triggered. As the time of discovery, the Cooling Towers had already been installed, there was nothing Corporate HSE could do prevent the violation from doing so. It was communicated internally, that this would be a violation. However, Corporate HSE could verify whether this would impact PSD and if necessary, WBW3 Line would not be started as planned.

Knauf retained the services of Trinity and provided the with the drift rate, recirculation rate and total dissolved solids of the newly installed cooling towers (along with their location and height). This information was compiled with Trinity to determine Emissions total and changes to the modeling conducted for WBW3. It was determined that PSD was not triggered.

The WBW3 Line was started on November 18th, 2021 (as notified by Knauf to EGLE on that same day). Thereafter, Mr. Adam Estes of Corporate HSE notified Ms. Amanda Chapel regarding the discovery and Knauf's steps outlined above along with Knauf's understanding of the violation.

Immediately after Trinity and Knauf determined that the cooling towers had not exceeded PSD applicability, a PTI application was drafted for submittal to EGLE. Ms. Chapel was informed of this during the November 22nd



verbal call. The PTI application is being reviewed and Knauf anticipates submittal to EGLE in January of 2022. The cause of the violation is attributed to a disconnect between Knauf Engineering and Knauf HSE during the planning stages of WBW3; it has since been rectified through internal communications.

Although the cooling towers are not yet permitted, Knauf is maintaining them the same as the pre-existing cooling tower (EU-COOLING TOWER) and recording their emission rates in anticipation of their incorporation into the ROP-B7050-2021. This data will also be provided to EGLE through Knauf's MAERS submittal (as discussed with Ms. Chapel).

If you have any questions or comments, please do not hesitate to contact me at adam.estes@knauf.com or 317-421-4702.

Sincerely,

Adam Estes, CHMM
Knauf Corporate, HSE Technical Specialist

CC: Mr. Chris Mahin, HSE & Sustainability VP
Mr. Kevin Keen, Plant Manager

