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Jared Edgerton
Environmental Quality Analyst
Air Quality Division
(269) 312-1540

Re: SRN: B7205, Calhoun County
Violation Notice

Dear Mr. Edgerton,

I apologize for the delayed response. As discussed during our telephone call, Adam Estes, Knauf Senior Environmental Specialist, has recently left our organization. We are also in the process of attempting to fill the HSE Manager role at our Albion, MI facility. Additionally, we are working with and responding to U.S. EPA's June 14, 2024, Findings of Violation which also includes alleged violations regarding Knauf's WBW3 WEP and Scrubber parametric set points.

EPA has requested information regarding the following allegations.

Alleged Violation # 1

EU-WBW3ALBFORMING - The parametric values for the wet electrostatic precipitator (WEP) were not updated from the 2022 and 2023 tests, and thus the facility was unaware that the WEP had gone into alarm on many dates in 2022 and 2023.

Alleged Violation # 2

EU-WBW3ALBFORMING - The parametric values for the scrubbers were not updated from the 2022 and 2023 tests, and thus the facility was unaware that the scrubbers had gone into alarm on many dates in 2022 and 2023.

On March 12 and 13, 2024 Knauf submitted to U.S. EPA and EGLE revised Semi-Annual Reports for 2023 as well as a revised Annual Compliance Certification for 2023. On May 1, 2024, Knauf submitted revised Semi-Annual Reports and a revised ACC for 2022 to U.S. EPA and EGLE. For your convenience copies of these 2022 and 2023 revised reports are attached to this letter as Attachments 1, and 2. These submittals address the alleged violations listed above and include the dates Knauf would have experienced an alarm had the set points from the May 11, 2022 stack tests been entered and set in Knauf's monitoring system.

Knauf's current set points for its WBW3 WEP and scrubbers are set consistent with Knauf's May 11, 2024 Stack Test Report. To prevent reoccurrence, Knauf has updated our stack test procedure to ensure that follow up with the plant Process Manager is completed after the stack test results have been reviewed by our Environmental Specialist. This review would include a confirmation that the parametric set points have been



updated in our monitoring system.

Please direct future correspondence regarding this matter to me and Kevin Keen and reach out to me should you have any further questions.

Sincerely,

Jamie Cain

Jamie Cain
Knauf Insulation North America
Director of HSE

CC: Chris Mahin VP HSE/Sustainability
Kevin Keen Knauf Albion Plant Manager
Jennifer Thompson Legal Council