



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

April 2, 2024

Kevin Keen
Knauf Insulation, Inc.
1000 E. North Street
Albion, MI 49224

SRN: B7205, Calhoun County

Dear Kevin Keen:

VIOLATION NOTICE

On March 20, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Knauf Insulation, Inc. located at 1000 E. North Street, Albion, Michigan. The purpose of this inspection was to determine Knauf Insulation, Inc. compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B7205-2021a; and to investigate a recent complaint which we received on March 20, 2024, regarding fallout attributed to Knauf Insulation, Inc. operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-ML2ALB	Rule 901 (R 336.1901): The facility caused the emission of an air contaminant or water vapor in quantities that cause injurious effects to human health or safety, animal life, plant life, or property.	Vitreous liquid fallout was observed on vehicles in a parking lot adjacent to the facility. Multiple complaints of this nature have been received. Facility staff report they are aware that this is an ongoing issue.
FG-ML2ALB	MI-ROP-B7205-2021a: FG-ML2ALB: Special Condition IV.1	Permittee shall not operate FG-ML2ALB unless the four wet scrubber control systems are installed, maintained, and operated in a satisfactory manner.

FG-ML2ALB	Rule 910 (R336.1910): An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.	Facility reports that the four scrubbers are operating at a velocity which prohibits the proper condensation of air contaminants and that an additional stack is required to separate cold and hot exhaust flows from the ML2ALB process.
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In the professional judgment of AQD staff, the fallout that was observed was of sufficient intensity, frequency, and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451. A viscous fallout was observed by staff on vehicles in a parking lot adjacent to the facility. Multiple complaints of this nature have been received with some complaints reporting the inclusion of charred remnants accompanying the highly viscous liquid fallout. AQD staff observed the same charred remnants while on the facility roof during the most recent stack test (March 5, 2024) for ML2ALB. Facility staff reported they are aware that this is an ongoing issue.

On March 20, 2024, AQD staff observed the operation of ML2ALB while the Venturi scrubbers were operating in an unsatisfactory manner. Facility staff reported that the four scrubbers are operating at a velocity which is not allowing the proper removal of air contaminants from stack exhaust. Additionally, it was reported that the facility has been aware for some time now that an additional stack is required to separate cold and hot exhaust flows from the ML2ALB process to avoid fallout from occurring.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 22, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 Rachel Benaway at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or

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BenawayR@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Knauf Insulation, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Knauf Insulation, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Benaway". The signature is fluid and cursive, with the first name "Rachel" and last name "Benaway" clearly distinguishable.

Rachel Benaway
Senior Environmental Quality Analyst
Air Quality Division
269-370-2170

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE