

Received
State of Indiana

April 21, 2020

Indiana Department of Environmental Management
Office of Air Quality
Mail Code 61-50
100 North Senate Avenue
Indianapolis, IN 46204-2251

APR 2 8 2020

DeptofEnvironmentalManagements
State of Indiana

RE: Title V Compliance Stack Testing – ID # T-145-39089-00001 (Stacks 6-22 and 6-29)

Dear Mr. Cline:

In response to the ongoing COVID-19 pandemic, Knauf Insulation would like to request an extension for the testing requirements for Stack 6-22 and 6-29 as detailed in Section D.1.8(a)(2) and D.5.11 of T-145-39089-00001.

Knauf's stack testing requirements for Stacks 6-22 and 6-29 are due by May 7<sup>th</sup> and 8<sup>th</sup> of 2020. Per Knauf's IDEM test protocol, these two stacks were scheduled for testing the first week of May (either the 4<sup>th</sup>, 5<sup>th</sup>, or 6<sup>th</sup> pending scheduling).

Unfortunately, the COVID-19 pandemic has forced Knauf to reduce the labor force and measures to address the ongoing slowing. At this time, there is no clear indication of how long this crisis will continue and therefore Knauf has postponed the scheduled testing.

Knauf is following updates from Governor Holcomb's office, IDEM, CDC, and other governmental bodies for safe management during the COVID-19 pandemic. As such, Knauf is requesting a 120-day extension for Stacks 6-22 and 6-29. The novel emergence of COVID-19 makes prediction difficult on both a safety and economic forecast. Knauf is estimating that within a 4-mo. period not only will the safety of its staff be assured but that production levels will have increased where testing will be capable.

IDEM previously granted Knauf an extension for Stack 6-21 due to the convergence of the 611 Furnace Rebuild schedule and regulatory deadline for Stack Testing. Knauf is very grateful and worked diligently to complete both its rebuild and stack testing on Stacks 2-2, 6-21, and 6-30 prior to the shift to scale down production levels in response to the pandemic.

Knauf has kept in close contact with IDEM throughout the scheduling of the above stack tests due to the dual nature of maintaining environmental regulatory compliance and ensuring safe practices to prevent the spread of COVID-19. Knauf will continue to keep IDEM informed of plans to coordinate



the scheduling of Stacks 6-22 and 6-29. If stack testing becomes feasible prior to the 120 day extension, Knauf will provide notification to IDEM.

If you have any questions, please contact me at your convenience. I can be reached at 317-421-4702 or e-mail at adam.estes@knaufinsulation.com.

Sincerely,

Adam Estes, CHMM

Corporate HSE, Technical Specialist

Man E. ...

Knauf Insulation, Inc.

cc: Mr. Craig Laker, Shelbyville Plant Manager

Mr. Chris Mahin, HSE Regional Manager

Mr. Markus Jones, Plant 3 HSE Manager

Mr. Andy Linville, Plant 1 HSE Manager

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