Air Enforcement: U.S. Environmental Protection Agency and Kansas City, Kansas Wool Fiberglass Manufacturing Facility Enter Into Consent Agreement



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The United States Environmental Protection Agency ("EPA") and CertainTeed, LLC ("CT") entered into a March 16th Consent Agreement ("CA") addressing alleged violations of the Clean Air Act. See Docket No. CAA-07-2025-0030.

The CA provides that CT operates a wool fiberglass manufacturing facility in Kansas City, Kansas.

CT is stated to have obtained a facility-wide Clean Air Act Prevention of Significant Deterioration permit in 2016.

EPA is stated to have conducted an on-site inspection of the facility in 2022. Further, in 2023, EPA is stated to have issued a request for information to the facility pursuant to section 114 of the Clean Air Act. CT submitted its response to the request for information on October 11, 2023.

The CA alleges the following violations:

- Failure to operate the electrostatic precipitator ("ESPs") such that the monitored ESP parameter is not outside the limits established during the performance test for more than 10 percent of the total operating time in a 6-month block reporting period.
- Failure to have records of corrective actions taking on ESPs that were operated outside the limits established during the performance test.
- The facility's Quality Improvement Plan did not contain adequate procedures for improved preventative maintenance practices, process operation changes, and improvement to control methods.
- From at least January 1, 2023, to at least December 31, 2023, failure to operate the K12 scrubbers 1, 2 and 3 and the K22 Scrubbers 1 and 2 such that each monitored parameter is not outside the limit(s) established during the performance test and in a manner consistent with the applicable provisions of 40 C.F.R. Part 60, Subpart PPP.
- Violation of certain requirements of Subpart NNN and the facility's Permit related to calibration of the K1 DEP and the K2 DEP from at least January 1, 2020, through at least December 31, 2023.
- Violation of certain requirements of Subpart PPP and the facility's Permit related to calibration of monitoring devices.
- Failure to record the gas pressure drop and liquid flow rate of K12 Scrubbers 1, 2 and 3, and K22 Scrubbers 1 and 2.

- Failure to monitor ESPs in accordance with the procedure in the facility's O&M Plan.

CT neither admits nor denies the factual allegations.

The CA assesses a civil penalty of $781,175.

A copy of the CA can be found here.