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ENVIR. APPEALS BOARD

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U.S. Environmental Protection Agency
Clerk of the Board, Environmental Appeals Board (MC 1103B)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Knauf Insulation Permit No, NSR 4 -4 - 4, SAC 03-01

Dear Sirs:

I am hoping this letter of appeal will do some good, asking the EPA to further limit the amount of Pollution the Knauf Fiberglass plant will be allowed to emit.

Local citizens have been fighting this plant for years, to no avail. We even sent emissaries to Alabama to scout out the Knauf plant there. The report they brought back was scary: fiberglass shards were thick on lawns and in gardens; production was greatly increased at night, with clouds of black smoke belching from the stacks. When the films were shown to local groups, the emissaries were threatened with slander suits by Knauf, and that effectively quieted them down.

However, after many hearings, Shasta County and the local EPA officer (who was a county employee) allowed the plant to be built. We discovered that Knauf is a very large, rich, and powerful foreign owned, international corporation that is used to getting what it wants and operating the way it wants. So, it was to no one's surprise, when the plant's emissions turned out to be more than originally projected. Consequently, Knauf was allowed to purchase the allowed emissions from a nearby paper plant that was going out of business.

Now, Knauf has applied for an emission increase in Nox, PM10, and the furnace stack. The EPA held public hearings, which were obviously a sham, as no attention was paid to citizens' complaints. Those were brushed off in the answers. It would appear that that the EPA had already made a decision to grant Knauf's request. This is difficult to believe, when just recently, a national survey listed the Redding area in the top 10 dirtiest air cities in the nation! We do not need more!

Knauf is always asking for more and more exceptions and exemptions. For instance, Knauf asks

- A.) their performance deadline be deleted;
- B.) requirement of plant operation consistent with air control be deleted;
- C.) plant failure to monitor and record emission standards is not breaking the law;
- D.) change performance testing from 30 to 60 days;
- E.) to use the emission factor for one hour to show compliance for 24/7;
- F.) the emission limitations of Nox and PM10 be modified to remove the lb/ton limit;
- G.) no corrective action need be taken on torn or leaking bags in the plant, because they do not leak outside.

The EPA's authority to enforce compliance is really fuzzy and indefinite, considering the primary standard is based on "criteria used to protect the public's health."

....EPA may issue an order;

....EPA may apply an administrative penalty for non-compliance;

.... or, may file a judicial lawsuit, based on:

- prior compliance history (Knauf's is questionable)
- good faith effort (not really any)
- economic benefit of non-compliance (great to Knauf !)

Hopefully, you will understand the angst of us who do not trust the actions and future goals of Knauf. Their track record is so dismal, that we really are against allowing them further emissions.

Yours Truly,


Patricia Jiminez