



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

January 4, 2022

VIA CERTIFIED MAIL AND U.S. MAIL

Ms. Caroline Depp
Environment & Government Affairs
Lafarge Holcim, Inc.
15215 Day Road
Dundee, Michigan 48131

SRN: B1743, Monroe County

Dear Ms. Depp:

VIOLATION NOTICE

On December 15 and December 21, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection in the area surrounding Lafarge Holcim quarry located at 15215 Day Road, Dundee, Michigan. The purpose of these inspections was to determine Lafarge Holcim Inc.'s (Company) 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 to investigate recent complaints which were received on December 14, 2021, regarding objectionable odors attributed to the Company and Aggregate Industries operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Limestone quarry dewatering process.	R 336.1901 (Rule 901)	Offsite odors in the immediate vicinity of several residential areas were of sufficient intensity, frequency, and duration to constitute a violation of Rule 901

In the professional judgment of AQD staff, the odors observed were of sufficient intensity, frequency, and duration to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451. On both December 15 and 21, the AQD staff detected odors in a residential area near the Company up to two miles downwind. In addition to these observations, staff collected ambient air measurements at the same locations using a Jerome Hydrogen Sulfide (H₂S) meter. The H₂S measurements were above the odor threshold of 5-10 parts per billion (ppb) in the immediate vicinity of residential homes. A copy of the H₂S data is attached.

This letter acknowledges an earlier letter sent to the Company dated September 3, 2021, in which the H₂S ambient levels, odor concerns and complaint history were discussed following a facility site inspection. AQD requested that the Company and Aggregate Industries evaluate and

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implement additional measures to reduce or eliminate areas contributing to high ambient levels of H₂S. AQD believes some reductions may be achieved by operational, physical, or chemical treatment. AQD is again requesting the company take immediate action to reduce the generation of H₂S.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 25, 2022, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 EGLE, AQD, Jackson District, at 301 E. Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 violation cited above and for the cooperation that was extended to me during my inspection of December 15, 2021. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-416-3537

cc:

Mr. George Lukas, Aggregate Industries
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Scott Miller, EGLE
Mike Kovalchick, EGLE
Rachel Burns, EGLE

Holcim Quarry Area H2S Survey

12/15/2021 between 7:30 & 8:30 AM. H2S readings are in ppb. Red house symbol where H2S impacting residence.

Legend

Strong H2S Odors on US 23



Milan Vault

Azalia

Ostrander Rd

London



Wind Direction



1 mi

H2S Survey 12-21-21

Readings in yellow (ppb). House symbols are where homes exceeded 10 ppb
Red Arrow is direction of wind

Legend

