

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

August 10, 2018

Mr. Scott Anderson, Terminal Manager LaFarge – Zilwaukee Terminal 1601 Saline Street Essexville, Michigan 48732

SRN: N5746, Saginaw County

Dear Mr. Anderson:

VIOLATION NOTICE

On August 9, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lafarge – Zilwaukee Terminal (Lafarge) located at 900 Adams Street, Zilwaukee, Michigan. The purpose of this inspection was to determine Lafarge's 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 Permit to Install (PTI) number 192-05.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|--|-----------------------------------|--|
| EU-Cement Off-Loading of FG-Process | SC 1.2, 1.3 and 1.4 (R 301) | Visible emissions from associated stack more than 50% opacity. |
| EU-Cement Off-Loading of FG-Process | SC 1.6 | PMP not maintained. Required monthly inspection and weekly visual inspection of fabric filters not timely completed. |
| EU-Cement Off-Loading of FG-Process | R 910 | Baghouse malfunctioning. Continued to operate in malfunctioning status. |

During this inspection it was noted that EU-Cement Off-Loading processes were emitting opacity in excess of emissions allowed by Rule 301 of Act 451. Upon arrival to the site, opacity of 10% was noted coming out of the stack associated with EU-Cement Off-Loading. Observations ranged upward to 50% opacity at times.

On August 9, 2018, the AQD staff observed operation of cement storage offloading while the dust collector) was malfunctioning. Staff made Lafarge personnel aware of issue during the inspection. Staff left the facility at approximately 11:00 a.m. and drove back by the operation later in day, at approximately 2:30 p.m. and witnessed the excessive opacity coming from the stack.

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This constitutes a violation of Rule 910 of 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 August 30, 2018 (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 the DEQ, AQD, Saginaw Bay District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48631 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lafarge 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 Lafarge. 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

Gina L. McCann Senior Environmental Quality Analyst Air Quality Division 989-439-2282

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ Mr. Craig Fitzner, DEQ Mr. Christopher Ethridge, DEQ Ms. Jenine Camilleri, DEQ Mr. Chris Hare, DEQ