

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Holcim (US) Inc. DBA Lafarge Alpena Plant	<b>SRN :</b> B1477
<b>Location :</b> 1435 Ford Avenue	<b>District :</b> Cadillac
	<b>County :</b> ALPENA
<b>City :</b> ALPENA <b>State:</b> MI <b>Zip Code :</b> 49707	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Kurt Childs
<b>FCE Begin Date :</b> 8/1/2021	<b>FCE Completion Date :</b> 9/26/2022
<b>Comments :</b> 2022 FCE	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
09/13/2022	CEMS Test Observation	Compliance	K23 breach CEMS RATA
09/09/2022	Stack Test	Compliance	June/July 2022 FG FUEL HAND PM/PM10 emission test report. See Activity Report.
09/09/2022	Sample Results Review	Compliance	FG FUEL HAND, EU FUEL PULV 20 -23 PM/PM10 test report.
09/08/2022	Excess Emissions (CEM)	Compliance	2022 2nd Qtr EER. See Activity Report.
09/08/2022	Stack Test	Compliance	July 2022 FG CLINK COOL PM/CPMS stack test report
09/08/2022	Sample Results Review	Compliance	July 2022 Clinker Cooler PM/CPMS emission and SSOL testing.
09/07/2022	Other	Compliance	2022 2nd 1/4 EER Review.
09/06/2022	Stack Test	Compliance	Portable Crusher NSPS Subpart OOO visible emissions test. No opacity observed from the crusher or two associated conveyor transfer points during the test.
08/30/2022	ROP Other	Compliance	CEDRI Reporting
08/26/2022	On-site Inspection	Compliance	MI-ROP-B1477-2020b 2022 FCE PCE 3.
08/24/2022	Stack Test Observation	Compliance	Observed testing of EU Raw Mill 14

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08/15/2022	Stack Test	Compliance	MI-ROP-B1477-2020b EU PORTCRUSH Visible Emission Test Report. New portable crusher NSPS Subpart OOO VE test. 3 test points, 30 minute observations each - no visible emissions. Water sprays required by permit. Test report appears to meet the NSPS requirements.
07/28/2022	Stack Test Observation	Compliance	KG5 Clinker Cooler PM/CPMS Stack Test.
07/07/2022	Stack Test Observation	Compliance	MI-ROP-B1477-2020b. CC22 and CC23 PM/CPMS Stack Test.
07/06/2022	Stack Test Observation	Compliance	MI-ROP-B1477-2021b FG FUEL HAND, EU FUEL PULV 21 and EU FUEL PULV 23 PM stack test.
07/05/2022	ROP Other	Compliance	Site Specific HCL CEMS Performance Test Plan.
06/21/2022	ROP Other	Compliance	FG RAW MILLS and KG5 and KG6 CEMS RATA Test Protocol. Includes testing for KG6 WGS CEMS but this testing was completed May 11, 2022 and a test report has been submitted..
06/13/2022	Stack Test	Compliance	EU KILN 21 PM CPMS.
06/13/2022	Stack Test	Compliance	FG KG6 RATA: Mercury (Hg), Oxygen (O2), Sulfur Dioxide (SO2), Total Hydrocarbons (THC), and Volumetric Flow Rate. Results indicate all monitors were meeting the performance requirements. Additional review pending TPU staff.
05/19/2022	On-site Inspection	Compliance	2022 FCE, PCE 2: FG FUEL HAND, FG KG5, FG KG 6, FG CLINK COOL.
05/11/2022	Stack Test Observation	Compliance	FG KG6 WGS CEMS RATA
05/10/2022	Sample Results Review	Compliance	EU KILN 21 PM/CPMS stack test Report received 6/13/22.
05/06/2022	Excess Emissions (CEM)	Compliance	2022 1st Qtr EER. See Activity Report.
05/06/2022	Other	Compliance	2022 1st Quarter EER.
04/05/2022	Stack Test	Compliance	EU SECOND CRUSH PM Emissions Test Report. See Activity Report.
04/05/2022	Sample Results Review	Compliance	EU SECONDCRUSH PM and VE emissions testing.
04/04/2022	Stack Test	Compliance	Emissions Test Protocol - Kiln 20 & 21 - Indirect Firing Baghouses; Clinker Cooler KG5 Fan 92 & 93; and Clinker Coolers 22 & 23.

Activity Date	Activity Type	Compliance Status	Comments
03/22/2022	ROP Annual Cert	Compliance	2021 Annual Report ROP No. MI-ROP-B1477-2020b. MD and EE grouped by EU and monitor. All monitors reported, some with no MD or EE. Reflects 1/4ly EERs. No other ROP deviations.
03/22/2022	ROP SEMI 2 CERT	Compliance	2021 2nd Semi-annual Report ROP No. MI-ROP-B1477-2020b. MD and EE grouped by EU and monitor. All monitors reported some with no MD or EE. Reflects 1/4ly EERs. No other ROP deviations.
03/22/2022	CAM Excursions/Exceedances	Compliance	See Activity Report.
03/22/2022	CAM monitor downtime	Compliance	See Activity Report.
03/21/2022	MAERS	Compliance	MAERS ROP Cert Form Received 3-17-22. See MAERS for further Info.
03/21/2022	ROP Other	Compliance	Alternative Fuels Sampling Plan. PTI 83-21. Plan submitted in accordance with the permit requirement. District approval not required, Adequacy of the plan to be evaluated in practice.
03/16/2022	Other	Compliance	CAM MD Report.
03/14/2022	ROP Other	Compliance	CEMS RATA Test Protocol - NO ROP Cert Form Submitted.
03/09/2022	Other	Compliance	CAM E/E Report.
03/03/2022	Stack Test Observation	Compliance	EU SECOND CRUSH PM/PM10 stack test.
03/03/2022	On-site Inspection	Compliance	Partial Compliance Evaluation #1 FG QUARRY, FG RAW MAT, FG RAW MILL SYS.
02/10/2022	Stack Test	Compliance	EU KILN 20 12-23-2021 PM test report.
02/10/2022	Sample Results Review	Compliance	12-23-21 PM/CPMS test Kiln 20.
02/08/2022	Excess Emissions (CEM)	Compliance	2021 4th Qtr EER Review. See Activity Report.
02/08/2022	Other	Compliance	2021 4th Quarter EER Review.
01/31/2022	Stack Test	Unknown	EU KILN 19 PM/CPMS stack test. See Activity Report for test report review.
01/31/2022	Sample Results Review	Unknown	EU KILN 19 PM/CPMS stack test report review.
01/12/2022	Stack Test Observation	Compliance	EU KILN 19 PM-CMPS Stack Test.

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01/07/2022	ROP Other	Compliance	Notification of initial operation of EU SECONDCRUSH pursuant to MI-ROP-B1477-2020b, FGQUARRY V.4. From voided PTI 155-19.
12/21/2021	ROP Other	Compliance	Emissions Test Protocol for Secondary Crusher 11-002;
12/21/2021	Malfunction Abatement Plan	Compliance	Fugitive Dust Plan Revision 4.0
12/21/2021	Malfunction Abatement Plan	Compliance	Revision of the Fuel Procurement Monitoring Plan received via email.
12/20/2021	Rule 912	Compliance	PC MACT - EU Kiln 19 Surpassed 30 day rolling average of OM CPMS SSOL. Retest scheduled for 1/12/2022.
11/18/2021	Excess Emissions (CEM)	Compliance	2021 3rd Qtr EER Review. See Activity Report.
11/18/2021	Other	Compliance	2021 3rd Qtr EER Report Review.
11/01/2021	Rule 912	Compliance	10/20/21 EU KILN 22 baghouse inlet temperature exceedance written response. See previous R 912 notification. Cause was a problem with kiln dust evacuation system and soot blower fault. System has been reprogrammed to shut down kiln system with re-occurrence.
10/27/2021	Stack Test	Compliance	EU Kiln 19, 20, 22, 23 D/F Emissions Test Report. D/F limit 0.4 ng/dscm @ 7% O2 Dry TEQ. Test Results were 0.0194, 0.0065, 0.0076, 0.0048 ng/dscm @ 7% O2 Dry TEQ respectively. Results demonstrate compliance. Baghouse inlet temps and production rates were normal. Received in Paper on 10/28/21
10/22/2021	Stack Test	Compliance	EU Kiln 21 D/F Emissions Test Report. D/F limit 0.4 ng/dscm @ 7% O2 Dry TEQ. Test Result:= 0.0233 ng/dscm @ 7% O2 Dry TEQ. Results demonstrate compliance. Avg. Baghouse inlet temp: 248 degrees F and production rate 57 tph are normal and within limits.
10/22/2021	Other	Compliance	Review of Stack Test Report M213409A for 8/23 and 25/2021 testing of EU KILN 19 and EU CLINK COOL 23 PM-CPMS.
10/22/2021	Stack Test	Compliance	EU KILN 19 and EU CLINK COOL 23 PM-CPMS test report.

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10/21/2021	CEM RATA	Compliance	Test Report(M213603A) for RATA of FG KG5, FG KG6, and FG RAW MILL SYS CEMS. Results show compliance with all relative accuracy requirements. Additional in-depth review of this report to be conducted by TPU staff. Received in Paper 10/18/21
10/21/2021	Stack Test	Compliance	Test Report (M213603C) for FG KG6 PM-CPMS and EU FUEL PULV 19 PM emissions testing. See Activity Report CA B147760556 for detailed review.
10/21/2021	Other	Compliance	Review of Stack Test Report M213603C for 9/20 and 21/2021 testing of FG KG6 PM-CPMS and EU FUEL PULV 19 PM10 emissions.
10/20/2021	Rule 912	Compliance	EU KILN 22 Rule 912 initial notification(EMAIL) of excess baghouse inlet temperature. The temperature was in excess of the limit beginning at 22:18 on Tuesday, October 19 and returned to compliance at 0:48 of the following day, today, October 20.
09/28/2021	Stack Test Observation	Compliance	FG KG 5, Kiln 19 2021 HCL Dynamic Spike Test.
09/28/2021	Stack Test	Compliance	ROP Cert Form ONLY - For Emissions Testing PMCPMS - Kiln 19 Breaching Duct & Clinker Cooler 23 Stack. Report Received on 10/8/21 - Via paper.
09/23/2021	Excess Emissions (CEM)	Compliance	2021 2nd Quarter EER Review. See Activity Report.
09/23/2021	Stack Test	Compliance	MI-ROP-B1477-20120a, EU CLINK COOL 22 PM/CPMS Emission Test. Test results of 0.013lb/ton demonstrate compliance with 0.07 lb./ton limit and set new SSOL of 5.06.
09/23/2021	ROP Semi 1 Cert	Compliance	2021 1st Semi-annual Report ROP No. MI-ROP-B1477-2020b. Report contains previously reported monitor downtime and excess emissions incidents for KG5 and KG6 monitors. Also Raw Mill 14 and 15 THC monitors and Clinker Cooler PM CPMS.

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09/23/2021	CAM monitor downtime	Compliance	MI-ROP-B1477-2020b, 1st Semi CAM Monitor Downtime. The permittee reported there were downtimes on FG KG5 COMS (no longer required), FG KG6 WGS CMS, FG CLINK COOL CPMS, FG FINISHING VE. All Downtime previously reported.
09/23/2021	CAM Excursions/Exceedances	Compliance	MI-ROP-B1477-2020b, 2021 1st Semi-Annual CAM Report Excursion/Exceedance. One reported excursions FG KG5 COMS but this is no longer a requirement of the ROP. PM CPMS have replaced COMS for CAM.
09/23/2021	Other	Compliance	2021 2nd Quarter EER Review.
09/21/2021	ROP Other	Compliance	CEDRI - ERT Performance Report
09/14/2021	Stack Test	Compliance	MI-ROP-B1477-20120a, EU CLINK COOL 19,20,21 PM/CPMS Emission Test. Test was observed, see AR CA B147759128. Test results for stack 92 and 93 of 0.013lb/ton and 0.018 lb/ton demonstrate compliance with 0.07 lb./ton limit and set new SSOL's of 6.33mA and 5.53mA.
09/13/2021	Stack Test	Compliance	EU KILN 21 5-18-21 PM CPMS Test Report. The reported results of 0.024 lb./ton demonstrates compliance with the 0.07 lb./ton PM limit and establishes a new SSOL of 4.40. See 6/23/21 Stack Test report for re-test and establishment of a new SSOL.
09/09/2021	Stack Test	Compliance	SO2 Emission Test Report for RAW Mills 14 & 15. Report indicates actual emissions were 0.002lb./ton Permit limit is 0.0147 lb./ton.
09/09/2021	Stack Test	Compliance	EU KILN 21 6-23-21 PM CPMS Test Report. Re-test of 5/18/21 test to improve SSOL. The report demonstrates compliance with the 0.024 lb./ton PM limit and establishes a new SSOL of 4.98.
09/08/2021	Stack Test Observation	Compliance	EU KILN 22 NOx and CO RATA, EU KILN 23 Dioxin/Furan emissions test.

Name:  Date: \_\_\_\_\_ Supervisor: \_\_\_\_\_