

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> David Bowman
<b>FCE Begin Date :</b> 7/23/2023	<b>FCE Completion Date :</b> 7/22/2024
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
07/22/2024	CAM monitor downtime	Compliance	CY24Q2 EER submission.
07/22/2024	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.
07/22/2024	CAM Excursions/Exceedances	Compliance	CY24Q2 includes previously reported Kiln 19 NOx exceedance (R912 - 6.14.24) and Kiln 22 BH Inlet exceedance as part of testing - allowable under 40 CFR Part 63 Subpart LLL during testing.
07/19/2024	On-site Inspection	Compliance	Records review and compliance with D/F testing requirements.
07/18/2024	ROP Other	Compliance	CEMS Performance Evaluation Plan to TPU for review
07/18/2024	Rule 912	Compliance	initial report of R912 for PM SSOL. via phone call, Written report to follow
07/11/2024	On-site Inspection	Compliance	Part 3 of 3 PCE for onsite inspection
06/28/2024	Meeting Notes	Compliance	F/U meeting from 6/27/24 -- Met with Jeff, Mallory and Curtis Leslie (Holcim Environmental Manager) they claim that 40 CFR 63.9(h)(2) (ii) means that the test results are only implemented when they submit the NOC. I disagree. I have an email to US EPA for clarification before VN is issued.

Activity Date	Activity Type	Compliance Status	Comments
06/27/2024	Meeting Notes	Compliance	I met with Chris (plant engineer) and Mallory to discuss the K19 and K21 test report and determine if is reflective of max normal operating conditions. We discussed the data from the tests. Plant Manager and Environmental Manager are out today so no official determination was made. They have a deadline of 1 July to make a decision.
06/25/2024	Telephone Notes	Compliance	setting up meeting to discuss K19 and K21 D/F BH Inlet temp issues from April 2024 with Malory and Plant Engineer for Thursday 6/27/24
06/17/2024	Stack Test	Compliance	Limit 0.2 ng/dscm TEQ 7% O2; K19: 0.0295 ng/dscm TEQ 7% O2 @ 445.8°F; K20: 0.025 ng/dscm TEQ 7% O2 @ 486.7°F; K21: 0.0361 ng/dscm TEQ 7% O2 @ 455.3°F
06/14/2024	Stack Test	Compliance	Emission Test Protocol for Raw Mills 14 & 15
06/14/2024	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart LLL requires O&M Plan for FG MACT KILNS. The O&M plan was reviewed and accepted.
06/14/2024	Rule 912	Compliance	Written report for R912 violation. limit - 4.72lb Nox/ton clinker--31 May 4.81lb NOx/ton clinker an 1 June 4.78lb NOx/ton clinker. 30 day average was exceeded due to multiple days of low production and start up/shut down of kiln during that time.
06/13/2024	Other	Compliance	Scheduled records review for FY24 FCE. Part 3 of 3
06/10/2024	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.
06/04/2024	Telephone Notes	Compliance	Notification message for K19 excess emission of NOx limit lb/hr on 1 June 2024. R 912 written response is being sent.
05/30/2024	CEM RATA	Compliance	CEMS RATA Raw Mill 14 THC 11.62% (standard is 20% of mean ref value) in ppmvd.
05/30/2024	CEM RATA	Compliance	K21 Breaching Duct filterable PM CEMS: CPMS SSOL calculation 4.52mA.
05/21/2024	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.

Activity Date	Activity Type	Compliance Status	Comments
05/15/2024	Stack Test	Compliance	Protocol for KG5 & KG6 RATAs & PM, CC22 & CC23 PM Stack Tests
05/06/2024	Complaint Investigation	Unknown	Allegation of fall out on private property - samples collected.
04/29/2024	Other	Compliance	Questions for the O&M/MAP plan that was submitted. cannot approve until these are answered.
04/29/2024	CAM monitor downtime	Compliance	CY24Q1 monitor downtime report. CC22 PM downtime 43.88%. - Per Lisa CC22 PM monitor was not passing the 4th quarter CGA, so it was sent off site on January 5 to the manufacturer. When the manufacturer dug into repairs, they had to get parts from Germany, which delayed fixing the monitor. The monitor was put back into service on February 14.
04/29/2024	Malfunction Abatement Plan	Compliance	O&M plan/MAP required by PC MACT LLL. Returned for three questions to be answered.
04/29/2024	CAM Excursions/Exceedances	Compliance	CY24Q1-- 0.00% excess and CGA conducted.
04/19/2024	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.
04/19/2024	ROP Other	Compliance	CEDRI Reporting - NESHAP LLL & Annual Compliance
04/11/2024	Stack Test Observation		FGKG5 D/F testing.
04/03/2024	ROP Other	Compliance	Notification of initial start up for EU PORTCRUSH, Section VII.4. a. required by MI-ROP-B1477-2020c. Source self reported failure to notify and corrected.
03/19/2024	ROP Annual Cert	Compliance	CY23annual cert. RO signed off and all previously reported deviations included on the report.
03/19/2024	ROP SEMI 2 CERT	Compliance	CY23H2 - signed by RO and included all previously reported deviations from quarterly reporting.
03/19/2024	CAM monitor downtime	Compliance	CY23H2 Signed by RO.
03/19/2024	CAM Excursions/Exceedances	Compliance	CY23H2 signed by RO.
03/19/2024	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.

Activity Date	Activity Type	Compliance Status	Comments
03/14/2024	ROP Other	Compliance	Testing - Emission Test Protocol for Kilns 19,20,21,22 & 23
02/29/2024	Other	Compliance	FY 24 records review (part 2 of 3) for FG KG5, FG KG6, and FG MACTKILNS.
02/15/2024	MACT (Part 63)	Compliance	40 CFR Part 63 subpart LLL required - Method 321 for WGS HLC SSOL test report. Proper Certification; 3 runs averaged for HCL corrected to ppmv dry 7% O <sub>2</sub> - R1 <0.33; R2 0.89; R3 0.35.
02/13/2024	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.
02/12/2024	ROP Other	Compliance	CEDRI - MACT
01/25/2024	Excess Emissions (CEM)	Compliance	CY23/Q4 report -- investigating issue of 25.45% K20 HgT DT. the K20 HgT monitor calibration unit has failed and a new one is on order.
01/25/2024	Other	Compliance	Emailed ref CY23Q4 EER excessive DT for K20 HgT monitor. There is an issue with the calibration mechanism that has been ordered to replace the damaged one currently being used. "the Tekran produces it's own calibration gas from a mercury source or calibrator. The calibrator needs replacement, it's been ordered with Tekran and Holcim is waiting for the delivery."
01/18/2024	Meeting Notes	Compliance	D/F testing dates and regulations that apply; PC MACT plan submission.
01/18/2024	Complaint Investigation	Compliance	Complaint investigation found no supporting evidence for violation.
01/10/2024	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.
01/08/2024	ROP Other	Compliance	40 CFR 52.42(g) initial "Good Neighbor Plan" reporting. Anticipated compliance 1 May 2026.
01/05/2024	ROP Other	Compliance	CEDRI Reporting - RATA Test; and Initial Reporting for Type III Landfill - Initial Notification for the Cement and Concrete Product Manufacturing Industry.
01/05/2024	ROP Other	Compliance	CEDRI Reporting for CEMS

Activity Date	Activity Type	Compliance Status	Comments
12/20/2023	ROP SEMI 2 CERT	Compliance	amended CY22S2 ROP Certification and supporting documentation covering data that was self reported following Holcim Internal Review.
12/20/2023	CAM monitor downtime	Compliance	CAM reporting amendments from CY22 with supporting documentation covering issues identified during the Holcim internal review.
12/19/2023	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.
12/14/2023	Other	Compliance	FY 24 Records review - EUEXIDF, EUCIGEN, EUPORTCRUSH, FGQUARRY, FGRAWMAT, FGRAWMATSYS.
11/28/2023	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241.
11/14/2023	Malfunction Abatement Plan	Compliance	received update MAP for PORTCRUSH. reviewed and approved MAP
11/14/2023	Malfunction Abatement Plan	Compliance	Updated MAP for PORTCRUSH. Plan is acceptable
11/14/2023	Fugitive Dust Control Plan	Compliance	FDCP updated following the MAP update for PORTCRUSH. Plan appears to be sufficient.
11/08/2023	CEM RATA	Compliance	Kiln 19,20,and 21A ACF5000 HCL CEMS successfully met the performance evaluation requirements of PS 15.
10/30/2023	CEM RATA	Compliance	CC 22 Emission rate 0.018 lb/ton; limit 0.07 lb/ton; CPMS SSOL 4.53
10/30/2023	CEM RATA	Compliance	RATA report from testing K19, K20, K20, K21, K23, WGS, and Raw Mill 15- all testing was within the limits allowed per test.
10/30/2023	CEM RATA	Compliance	CEMS SSOL K19 4.25mA ; K20 4.21mA; K21 4.21mA; WGS 4.93mA filterable PM
10/30/2023	Excess Emissions (CEM)	Compliance	CY23 Q3 EER sent to TPU to review. THC for WGS DT was 11.11% relating to a 2 yr calibration requirement.
10/26/2023	ROP Other	Compliance	CEDRI REPORTING - RATA Test Data

Activity Date	Activity Type	Compliance Status	Comments
10/19/2023	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241 for August. In document submitted heat content appears to exceed EPA max, but that is actually the minimum. They are looking to add clarifying language to the form
10/19/2023	ROP Other	Compliance	CEDRI Reporting - RATA Testing.
10/18/2023	Malfunction Abatement Plan	Non Compliance	updated MAP due to internal Audit. Sent back for missing information.
10/16/2023	Environmental Audit Disclosure	Compliance	Self reported audit found violations - source updated the MAP and submitted to cover what their audit uncovered.
10/13/2023	ROP Other	Compliance	CEDRI Reporting - RATA and Performance Test Data
10/12/2023	Meeting Notes	Compliance	presented fall out presentation to locals and Holcim. Jeff - adding 3rd street sweeper; Elmers paving road crossing points; Holcim approved by city to repair Ford Ave near plant; debris apron on over road conveyor being expanded and improved.
10/12/2023	Complaint Investigation		Fugitive Dust and Fall out complaint investigation
09/29/2023	CEM RATA	Compliance	CEM RATA for K22 old and new CEMS TPU sent copies. Existing CEMS O2- 2.13%; CO2 2.91%; NOX 4.07%; CO 6.13%; Flow1.13%- New CEMS O2 - 0.00%; CO2 2.89%; NOX 2.69%; CO 6.28%
09/27/2023	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241 for July
09/18/2023	ROP Other	Compliance	K22 New CEMS certification data submitted to TPU. Reports include cycle response time (part 75); 7 day drift; and RATA prelim data with RA 0.41% using method 3A and O2% Dry
09/13/2023	ROP Semi 1 Cert	Compliance	CY23S1 - all reported deviations have been addressed in reporting from CY23Q1 and CY23Q2.
09/13/2023	CAM monitor downtime	Compliance	CY23S1 all data previously reported during CY23Q1 and CY23Q2
09/13/2023	CAM Excursions/Exceedances	Compliance	CY23S1 - all data previously reported during CY23Q1 and CY23Q2

Activity Date	Activity Type	Compliance Status	Comments
09/06/2023	ROP Other	Compliance	CEDRI Reporting - RATA
09/06/2023	ROP Other	Compliance	CEDRI Reporting - CEMS
08/30/2023	CEM RATA	Compliance	7 day notice for RATA testing HCL FGKG5 and WGS FGKG6
08/28/2023	ROP Other	Compliance	Testing - CEM RATA test Protocol
08/28/2023	ROP Monthly	Compliance	reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241 for April
08/28/2023	CEM RATA	Compliance	ABB ACF5000 HCL CEMS performance evaluation test report K19,20, and 21. Copy sent to TPU for evaluation
08/28/2023	CEM RATA	Compliance	PM test report, KG5 CC fan 92 and 93 SSOL determination
08/25/2023	Telephone Notes	Compliance	Discussed how to report SSOL exceedance. Time is going to be reported but it is not considered an exceedance until the limit is exceeded nor is it monitor down time. Exceeding the SSOL starts a clock requiring correction of operation or retesting.
08/18/2023	CEMS Test Observation	Compliance	Observation of tests and inspection of FGKG6 TDF delivery system
08/10/2023	CEMS Test Observation	Compliance	Observation of two tests.
07/31/2023	Other	Compliance	Lisa emailed explanation for a dust cloud that was identified on site 21 June. Explanation: An internal review was conducted on this equipment for Kiln 19 in response to these pictures. There was an overcurrent situation with the over spill screw, the system tripped and the reclaim return dustbin was overfilled and material spilled to the ground.
07/31/2023	Telephone Notes	Compliance	Quick call - there was an error in reporting excess emissions on the CY23Q2 EER. They over reported and are amending the report this week and submitting.
07/31/2023	ROP Monthly	Compliance	PTI 83-21 requires reporting of nonhazardous secondary materials (NHSM) as required by 40 CFR Part 241 for May
07/31/2023	Excess Emissions (CEM)	Compliance	Submitted on time. There was a reporting error in excess emissions on CC92 and CC 93. After phone call with Lisa they are submitting an amendment before end of week.

Name: 

Date: 7-30-24

Supervisor: 