



December 20, 2019

Via Email

Mr. Jeremy Howe
Michigan EGLE, AQD
120 West Chapin Street
Cadillac, MI 49601

RE: Response to Violation Notice, Dated December 2, 2019
Regulatory Citation – 40 CFR, Part 63, Subpart LLL (63.1350(l)(1))
Holcim (US) Inc. d/b/a Lafarge Alpena Plant, SRN: B1477

Dear Mr. Howe:

This letter is in response to the Notice of Violation issued by EGLE on December 2, 2019 for failure to continuously monitor Total Hydrocarbons (THC) on EU KILN 20, during the third quarter 2019. Following is a written description of the findings that contributed to the excess monitor downtime on EU KILN 20 (EU Kiln 20, SV25-290).

Through investigation it has been determined that the deviation was due to a failure of the Flame Ionization Detector (FID). The time to receive a replacement for the FID lead to the downtime as the parts could not be found domestically and ultimately had to be procured from the manufacturer in Germany. Additionally, the equipment that failed is not a typical spare part that is recommended by the manufacturer. To help ensure this malfunction is not the cause for failures on the other FIDs at the Alpena Plant, replacement parts have been purchased and installed in advance of similar malfunction events.

From the investigation, it is believed that this was a unique situation that does not justify any modification to current preventative maintenance or malfunction abatement plans.

If you have any questions or would like to discuss, please contact me at (989) 358-3321 or by e-mail travis.weide@lafargeholcim.com.

Respectfully,

Holcim (US) Inc.



Travis B. Weide
Area Environmental & Public Affairs Manager

cc: Mr. Shane Nixon – EGLE, Cadillac
Mr. Jeffrey Scott – LafargeHolcim