



VIA E MAIL

October 24, 2022

EGLE, AQD  
Cadillac District Office  
120 West Chapin Street  
Cadillac, Michigan, 49601

RE: Holcim Alpena Plant  
SRN: B1477; Alpena County  
Violation Notice 20221003

Dear Mr. Dickman and Ms. Camilleri,

Holcim Alpena Plant (Holcim) received a violation notice from the Department of Environment, Great Lakes and Energy (EGLE) Air Quality Division (AQD) dated October 3, 2022. EGLE AQD issued the violation to Holcim for exceeding the 10 percent threshold downtime for the CEMS. This letter is Holcim's response to the notice. Per the AQD's request, the dates of the violation, explanation of cause and duration of the violation, and the status of the violation are found in Appendix A.

The majority of the CEMS downtime was associated with water infiltrating the analyzer unit as a result of an air drier failure. The analyzer unit was down an abnormally long period due to supply chain delays that resulted in Holcim exceeding 10 percent downtime. To prevent a similar event from occurring in the future, Holcim has installed a second air drier and implemented a daily visual inspection of the CEMS unit. Holcim reviewed the on-site consumables and critical parts inventory and have made adjustments as required. Discussions with staff focused on CEMS operations and upkeep indicate additional training of management and control room operators will aid in reducing the likelihood of future downtime exceedances. Holcim is currently evaluating how best to streamline procurement of consumables and critical parts.

Holcim looks forward to closing this matter in a timely manner. Should you have any questions or need additional information, you may contact myself at [mallory.miller@holcim.com](mailto:mallory.miller@holcim.com) or (224) 517-6896 or Michael McCarter at [michael.mccarter@holcim.com](mailto:michael.mccarter@holcim.com) or (989) 657-5087.

Sincerely,

A handwritten signature in black ink, appearing to be 'M' followed by a flourish.

Mallory Miller  
Environmental Engineer, Holcim Alpena Plant



CC: Mary Ann Dolehanty, EGLE  
Annett Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Shane Nixon, EGLE  
Kurt Childs, EGLE  
Jeffery Scott, Holcim  
Derrick Dease, Holcim  
Michael McCarter, Holcim

**Appendix A**  
**Holcim Alpena Plant**  
**EU Raw Mill 15**  
**THC CEMS Downtime**

# Downtime Report

**Facility Name:** LafargeHolcim Alpena KG6

**Location:** ,

**Source:** RM15

**Parameter:** THC

Data in the Reporting Period: 01/01/2022 00:00 to 06/30/2022 23:59

Incid. No.	Start Date	End Date	Duration Hours	Reason	EPA Downtime Category	Corrective Action
1	01/07/2022 16:00	01/07/2022 19:59	4	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
2	01/07/2022 23:00	01/08/2022 06:59	8	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
3	01/08/2022 08:00	01/08/2022 20:59	13	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
4	01/09/2022 03:00	01/09/2022 09:59	7	Maintenance	Monitor Equipment Malfunctions	Changed hydrogen bottle
5	01/23/2022 04:00	01/23/2022 06:59	3	Failed calibration	Calibration/QA	Recalibrated CEMS
6	01/30/2022 04:00	01/30/2022 15:59	12	Maintenance	Monitor Equipment Malfunctions	Replaced daily span and hydrogen bottles
7	01/30/2022 22:00	01/31/2022 05:59	8	Failed calibration	Calibration/QA	Recalibrated CEMS
8	02/06/2022 22:00	02/07/2022 01:59	4	Maintenance	Monitor Equipment Malfunctions	Relit FIDs, recalibrated CEMS
9	02/08/2022 04:00	02/08/2022 04:59	1	Failed calibration	Calibration/QA	Recalibrated CEMS
10	02/08/2022 06:00	02/08/2022 07:59	2	Maintenance	Monitor Equipment Malfunctions	Changed hydrogen bottle, recalibrated CEMS
11	02/09/2022 08:00	02/09/2022 09:59	2	Maintenance	Monitor Equipment Malfunctions	Replaced analyzer sample pump, recalibrated CEMS
12	02/12/2022 07:00	02/12/2022 08:59	2	Maintenance	Monitor Equipment Malfunctions	Changed nitrogen bottle, recalibrated CEMS
13	02/18/2022 04:00	02/18/2022 07:59	4	Failed calibration	Calibration/QA	Recalibrated CEMS
14	02/21/2022 04:00	02/21/2022 10:59	7	Maintenance	Monitor Equipment Malfunctions	Changed probe head heater element and probe head
15	02/24/2022 04:00	02/24/2022 07:59	4	Failed calibration	Calibration/QA	Recalibrated CEMS
16	02/25/2022 06:00	02/25/2022 06:59	1	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
17	03/13/2022 02:00	03/13/2022 02:59	1	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
18	03/19/2022 18:00	03/19/2022 18:59	1	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
19	03/19/2022 22:00	03/20/2022 06:59	9	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault

# Downtime Report

20	03/27/2022 01:00	03/27/2022 08:59	8	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
21	03/27/2022 10:00	03/27/2022 13:59	4	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
22	03/27/2022 17:00	03/28/2022 02:59	10	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
23	03/28/2022 04:00	03/28/2022 08:59	5	Calibration failure	Calibration/QA	Recalibrated CEMS
24	03/28/2022 15:00	03/28/2022 18:59	4	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
25	03/28/2022 21:00	03/29/2022 00:59	4	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
26	03/29/2022 02:00	03/29/2022 02:59	1	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
27	03/29/2022 11:00	03/29/2022 12:59	2	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
28	03/29/2022 14:00	03/29/2022 14:59	1	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
29	03/29/2022 21:00	03/29/2022 23:59	3	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
30	03/30/2022 01:00	03/30/2022 03:59	3	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
31	03/30/2022 05:00	03/30/2022 06:59	2	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
32	04/01/2022 14:00	04/03/2022 05:59	40	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
33	04/11/2022 08:00	04/11/2022 10:59	3	Maintenance	Monitor Equipment Malfunctions	Changed hydrogen bottle
34	05/18/2022 10:00	05/19/2022 08:59	23	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
35	05/26/2022 13:00	05/26/2022 13:59	1	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
36	05/30/2022 15:00	05/30/2022 23:59	9	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
37	05/31/2022 01:00	05/31/2022 07:59	7	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
38	05/31/2022 12:00	05/31/2022 21:59	10	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
39	06/01/2022 00:00	06/01/2022 12:59	13	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
40	06/01/2022 14:00	06/02/2022 01:59	12	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
41	06/02/2022 11:00	06/04/2022 11:59	49	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault
42	06/04/2022 14:00	06/04/2022 18:59	5	Analyzer fault	Monitor Equipment Malfunctions	Cleared fault

EPA Downtime Category	Duration	% Unavailable
1. Monitor Equipment Malfunctions	287	9.85%
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00%

## Downtime Report

3. Calibration/QA	25	0.86%
4. Other Known Causes	0	0.00%
5. Unknown Causes	0	0.00%

Total Downtime in the Reporting Period = 312 Hours

Data Availability for this Reporting Period = 89.30%

Total Operating Time in the Reporting Period = 2915 Hours