

July 19, 2024

Dave Bowman
EGLE AQD – Gaylord District
2100 West M-32
Gaylord MI 48909-7760

Re: Holcim, 1435 Ford Ave, Alpena MI 49707
SRN: B1477
Violation Notice Dated July 2, 2024 for Kiln 23, Dioxin Furan Stack Testing

Dear Mr. Bowman,

The Holcim, Alpena facility is in receipt of the Violation Notice dated July 2, 2024 regarding the alleged violation of 40 CFR 63.1349(c) for not testing EU KILN 23 for dioxin furans as scheduled. The Violation Notice requested a written response by July 23, 2024 to include the following:

1. **The dates the violation occurred:** The last stack test for K23 for dioxin furans took place on August 5, 2021. This testing is required every 30 months, with completion no more than 31 calendar months from the previous test. Therefore, testing for this kiln was due in March. However, Holcim requested an extension for the stack test via email on January 15 (Mallory Miller) for kiln maintenance outages in February. Testing for kiln 23 was set for June 12, 2024, in accordance with the approved extension request, but Holcim was not able to conduct the testing due to a process airflow obstruction and had to shut down the kiln to work on the obstruction.
2. **An explanation of the cause(s) and duration of the violation:** Kiln 23 shut down the day of the test due to a process airflow obstruction.
3. **Whether the violation is ongoing:** The violation is not ongoing. The Alpena facility completed dioxin furan testing on kiln 23 from July 12 to 13, 2024.
4. **Summary of actions taken and are proposed to be taken to correct the violation:** The dioxin furan testing was rescheduled with the Mostardi Platt crew, which was unable to provide a crew prior to the week of July 8, 2024. Three other stack testing firms were contacted to conduct the dioxin furan testing on kiln 23 and no other firm had availability to conduct testing prior to the week of July 8, 2024.
5. **Dates the actions will take place:** The dioxin furan testing for Kiln 23 took place from July 12, 2024 through July 13, 2024.
6. **Steps to prevent a reoccurrence:** The stack testing schedule for the Alpena plant was updated to reflect the testing for dioxin furans every 30 months, with completion no more than 31 calendar months from the previous test.

Please feel free to contact me at 989-657-5087 or Mallory Miller at 224-517-6896 with any questions.

Sincerely,



Lisa Strbik
Area Environmental and Public Affairs Manager
Mobile: 989-657-5087

Cc: Jenine Camilleri
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Jeffrey Scott, Alpena Plant Manager
Curtis Lesslie, Alpena
Mallory Miller, Alpena