



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

October 13, 2016

Mr. Paul Rogers, Plant Manager
Lafarge Midwest, Inc. - Alpena Plant
1435 Ford Road
Alpena, MI 49707

SRN: B1477, Alpena County

Dear Mr. Rogers:

VIOLATION NOTICE

On January 28, April 27, June 2, and July 19, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted inspections of Lafarge Midwest, Inc. - Alpena located at 1435 Ford Road, Alpena, Michigan. The purpose of the inspections was to determine Lafarge Midwest, Inc. - Alpena's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1477-2012a.

During the inspections, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG FUEL HAND	ROP SC V.2.	Failed to conduct PM-10 emission rate testing every five years.
FG FINISH MILLS, FG CMT STR LOAD, FG CKD HAND SYS, FG RAW MAT, FG RAW MILL SYS	ROP SC V.1., 40 CFR 63.1349(b)(2).	Failed to conduct opacity testing every five years.

MI-ROP-B1477-2012a requires testing of the PM10 emission rates from the fuel pulverizers in EU FUEL PULV 19, EU FUEL PULV 20, EU FUEL PULV 21, EU FUEL PULV 22, and EU FUEL PULV 23 of FG FUEL HAND every five years. The most recent test occurred on October 3, 2010.

Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart LLL – National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry (PC MACT) requires opacity testing of the dust collectors in FG FINISH MILLS, FG CMT STR LOAD, FG CKD HAND SYS, FG RAW MAT and FG RAW MILL SYS and MI-ROP-B1477-2012a requires the testing be conducted every five

years. The AQD does not have records indicating this testing has been conducted and no such records were provided by Lafarge Midwest, Inc. – Alpena as a result of the inspections.

Also please note that the inspections indicate the following records required by MI-ROP-B1477-2012a were not maintained:

- FG KG5 SC VI.12. and 13: Records of the tons of each alternative fuel used and the fuel load percentage of each alternative fuel; however, records of the amount of alternative fuel received were available.
- FG FUEL HAND SC VI.4: Records of water applied to EU BLD FUEL PILE as dust suppressant.
- FG FUEL HAND SC VII.5: Records of daily monitoring of the pressure drop across each dust collector associated with the FG FUEL HAND SYS.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 3, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include an explanation of the causes and duration of the violations and a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Lafarge Midwest, Inc. Alpena believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspections of Lafarge Midwest, Inc. - Alpena. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kurt Childs
Senior Environmental Quality Analyst
Air Quality Division
231-876-4411 / childsk@michigan.gov

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Janis Ransom, DEQ