



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
CADILLAC DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 30, 2020

Mr. Jeffery Scott
Lafarge Alpena
1435 Ford Avenue
Alpena, Michigan 49707

SRN: B1477, Alpena County

Dear Mr. Scott:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed the quarterly excess emission report for the first quarter of 2020 submitted by Lafarge Alpena located at 1435 Ford Avenue, Alpena. The Renewable Operating Permit number MI-ROP-B1477-2012c and 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 requires the facility to monitor and record emissions on a continuous basis in a manner and with instrumentation acceptable to the AQD, comply with emission limits, and ensure pollution control equipment is operating properly.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EU KILN 19	40 CFR, Part 63, Subpart LLL 63.1343(b) and MI-ROP-B1477-2012c, General Condition 10 (R 336.1910)	Excess HCL emissions reported for 33.11% of source operating time attributed to failure of the DAA system.
EU KILN 20	40 CFR, Part 63, Subpart LLL 63.1343(b) and MI-ROP-B1477-2012c, General Condition 10 (R 336.1910)	Excess PM emissions reported for 74.95% of source operating time attributed to failure of baghouse integrity resulting in excess PM emissions as determined through stack testing on February 13, 2020 and March 4, 2020.
FG KG6	40 CFR, Part 63, Subpart LLL 63.1343(b)	Excess PM emissions reported for 13.50% of source operating time attributed to unknown causes.
FG KG6	40 CFR, Part 63, Subpart LLL 63.1350(l)	Failure to continuously monitor Hydrochloric Acid emissions. Monitor downtime was calculated to be 72.52% of total source operating time during the first quarter of 2020. A successful SO2 parametric monitoring test was not completed until March 5, 2020 and the HCl channel was not active during this time.
EU CLINK COOL 22	MI-ROP-B1477-2012c, FG CLINK COOL, VI, 1	Failure to continuously monitor Particulate Matter emissions. Monitor downtime was reported to be 17.80% of total source operating time during the first quarter of 2020.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 30, 2020 (which coincides with 30 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; 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 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. 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,

A handwritten signature in black ink that reads "Shane Nixon". The signature is written in a cursive, flowing style.

Shane Nixon
Cadillac/Gaylord District Supervisor
Air Quality Division
231-492-5954

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE