



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 7, 2022

VIA E-MAIL

Jeffery Scott, Plant Manager
Holcim (US), Inc. dba Lafarge Alpena Plant
1436 Ford Road
Alpena, Michigan 49707

SRN: B1477; Alpena County

Dear Jeffery Scott:

VIOLATION NOTICE

On November 28, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) received Excess Emission Reporting (EER) relating to Continuous Emissions Monitoring Systems (CEMS) installed on various processes at Lafarge Alpena Plant located at 1435 Ford Road, Alpena, Michigan. These CEMS are required by; 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-B1477-2020b.

A review of this reporting indicated CEMS monitoring system downtime as indicated below:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|---|--|
| EU KILN 19 | FG KG5, VI.2; FG MACT KILNS, VI.5, 6, 7; 40 CFR, Part 63.1343(b)(1) | Excess monitoring system downtime for 2 nd and 3 rd quarters of 2022 |

Monitoring on this process is expected to be continuous. This reporting indicates monitoring was not performed as listed in the following table:

| Monitor | 2nd Quarter Downtime (%)* | 3rd Quarter Downtime (%)* |
|-------------------|---------------------------|---------------------------|
| Mercury | 8.10 | 7.55 |
| Nitrogen Oxides | 8.65 | 12.01 |
| Hydrogen Chloride | 8.65 | 12.01 |
| Carbon Monoxide | 5.57 | 10.77 |
| Sulfur Dioxide | 8.65 | 12.01 |
| Total Hydrocarbon | 8.76 | 13.24 |

* Monitoring system downtime is expressed as a percentage of total source operating time.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 6, 2023 (which coincides with 30 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is on-going; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lafarge Alpena Plant 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Rob Dickman
Senior Environmental Quality Analyst
Air Quality Division
231-878-4697

cc: Mallory Miller, Holcim
Mary Ann Dolehanty
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Shane Nixon, EGLE
Jerimiah Brown, EGLE
Kurt Childs, EGLE