



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
CADILLAC DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

December 19, 2018

Mr. Matthew Simon, Operations Manager  
St. Mary's Cement, Inc., Charlevoix Plant  
16000 Bells Bay Road  
Charlevoix, Michigan 49720

SRN: B1559, Charlevoix County

Dear Mr. Simon:

**VIOLATION NOTICE**

On October 1 and November 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received required reporting from St. Mary's Cement, Inc. located at 16000 Bells Bay Road, Charlevoix, Michigan. The October 1 reporting was required pursuant to Rule 912 (R 336.1912) and the November 26 reporting was the results of stack sampling performed at the facility. This reporting is required by Permit to Install 140-15; Title 40 of the Code of Federal Regulations, Part 63, Subpart LLL; and Michigan Air Pollution Control Rules. The review of this reporting indicated the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUINLINEKILN	Special Condition I.4 of Permit to Install 140-15. Emission limit for Sulfur Dioxide, 1175 pounds per hour.	Four instances (September 19, 20, 24, and 25) of SO2 emissions exceeding this limit for greater than two hours.
EUINLINEKILN	Air Pollution Control Rule R336.2001(5)	Facility did not provide the required results for PM10/2.5 testing within 60 days of the end of the testing event.
EUINLINEKILN	Air Pollution Control Rule R336.1944	The emission limit for Organic Hazardous Air Pollutants (OHAPs) is 12 ppmvd, the facility reported 12.6 ppmvd. This emission limit originates from 40 CFR 63.1343, Table 1, Item 1, Existing Kiln, Footnote 4.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 17, 2019 (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 violation 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.

Mr. Matthew Simon  
Page 2  
December 19, 2018

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

If St. Mary's Cement 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 violation 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, appearing to read 'Rob Dickman', with a long horizontal flourish extending to the right.

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

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Jay Oleguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Shane Nixon, DEQ