



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



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

October 2, 2019

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 September 16, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received required reporting from St. Mary's Cement, Inc. located at 16000 Bells Bay Road, Charlevoix, Michigan. This reporting is required by Permit to Install (PTI) 140-15; Title 40 of the Code of Federal Regulations, Part 63, Subpart LLL; Renewable Operating Permit (ROP) Number MI-ROP-B1559-2014; and Michigan Air Pollution Control Rules. The review of this reporting indicated the following violations:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|---|---|
| SOURCE WIDE | ROP-MI-ROP-B1559-2014; Source-Wide Conditions; IX.2, & VI.2 | Records associated with the facility Fugitive Dust Control Plan (FDCP) were not maintained for the entire six-month reporting period. |
| EUSOLIDFUELSYSTEM | PTI 140-15, VI.3.g | Records associated with the required Bag Leak Detection System (BLDS) were not maintained for the entire six-month reporting period. |
| EUBLENSILO | PTI 115-15, IV.1 | Failure to install a required BLDS on the baghouse controlling the process . |
| EUIINLINEKILN | 40 CFR 63.1343(b)(1) | Monitoring system downtime for mercury (Hg) emissions monitoring for 63 days of the reporting periods (approximately 35% downtime) |
| EUIINLINEKILN | 40 CFR 63.1343(b)(1) | Hydrogen Chloride (HCl) emissions above the emissions limit of 3 ppmvd corrected to 7% oxygen and based on a 30-day rolling average; for 59 days (approximately 33%) of the reporting period. |

Mr. Matthew Simon
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 28, 2019 (which coincides with 21 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.

Please submit the written response to the EGLE-AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE-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 and for the cooperation that was extended to me during my inspection of St. Mary's Cement . 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,



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

cc/via email: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Shane Nixon, EGLE