



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

March 25, 2020

VIA EMAIL

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 November 6, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received required reporting from St. Mary's Cement 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 (CFR) 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
EUINLINEKILN	40 CFR 63.1343(b)(1), Table 1.	Testing performed for compliance with the Organic Hazardous Air Pollutant (OHAP) emission limit is not acceptable.

Justifications for rejecting these testing results included:

- Para-xylene isomer analytical results were not reported.
- Naphthalene was not included in the laboratory analysis.
- Collected condensate containers arrived at the contract laboratory with headspace.
- Quality assurance analyte spiking of collected condensate was not performed.
- Quality assurance spiking for ortho-xylene in the activated carbon collection tubes was not performed.
- Styrene and Naphthalene spiking in the activated carbon collection tubes did not meet acceptable quality assurance recovery standards.
- No analysis regarding breakthrough of the activated carbon collection tubes was performed.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 24, 2020 (which coincides with 30 calendar days from the date of this letter). The written response should include: 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 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. You may also email the response to myself at [DickmanR@Michigan.gov](mailto:DickmanR@Michigan.gov) and to Jenine at [CamilleriJ@Michigan.gov](mailto:CamilleriJ@Michigan.gov).

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 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 / [DickmanR@Michigan.gov](mailto:DickmanR@Michigan.gov)

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