



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

June 6, 2024

VIA EMAIL ONLY

Dayna Kent
Aggregates and Construction Materials
Holcim (US) Inc.
6211 North Ann Arbor Road
Dundee, Michigan 48131

SRN: B1743, Monroe County

Dear Dayna Kent:

SECOND VIOLATION NOTICE

On May 23, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Holcim US, located at 15215 Day Road, Dundee, Michigan. The purpose of the inspection was to determine Holcim US compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; the status of the odor minimization plan; and to conduct odor observations and hydrogen sulfide (H₂S) monitoring of quarry areas. AQD's recent monitoring results are attached.

On January 4, 2022, the AQD sent Holcim (then LaFarge Holcim, Inc), a Violation Notice citing a Rule 901 violation discovered as a result of the inspection and requested your written response by January 25, 2022. A copy of that letter is enclosed for your reference. On January 25, 2022, AQD received Holcim's initial response with proposed action items for an odor minimization plan.

Since that date numerous correspondence has taken place between Holcim and EGLE's AQD and Water Resources Division (WRD) including Holcim having obtained a WRD NPDES permit revision/renewal. The AQD has conducted four site inspections since the date of the initial VN. The inspections were necessary to verify proposed action item completion status and to determine improvement in the on-site H₂S odors and emissions (through monitoring with handheld instruments).

AQD acknowledges that Holcim completed the primary proposed odor and H₂S reduction project that included Hydrogen Peroxide treatment relocation and improvements at the South Quarry initial pump & discharge. This appears to have reduced odor/emissions in the area determined at the time to generate the highest H₂S emissions. AQD subsequent site inspections identified additional highly odorous H₂S emission locations and we requested Holcim address these. Holcim has since completed two additional action items in areas identified by AQD. Unfortunately, other action items Holcim proposed for the North Quarry water discharge were continually delayed and then discontinued without notice to AQD. North Quarry water was to be used at their Limestone Crusher Wash Plant and by their site Water Trucks (fugitive dust control is required by N6283 Crusher Plant PTI No.135-97).

The most recent May 23, 2024, AQD inspection and monitoring continues to observe distinct and definite H₂S odors and high H₂S concentrations. The most significant being the South

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Quarry Lake and the adjacent upstream natural springs outwash plain. AQD has determined that the actions taken by Holcim to date have not significantly reduced the site's H2S odors and emissions. AQD is requiring Holcim reevaluate the site's existing groundwater discharge areas primarily in the South Quarry, that continue to produce high H2S odors and emissions.

AQD requests that Holcim US (formerly included then Aggregate Industries) evaluate and implement additional measures to reduce or eliminate areas contributing to high ambient levels of H2S. AQD believes further reductions may be achieved by operational, physical, or biological/chemical treatment. AQD is again requesting the company take immediate action to reduce the generation of H2S.

Please be advised that failure to respond in writing and identifying actions Holcim will take or has taken to resolve the cited violation may result in escalated enforcement action by the AQD. Please provide the information requested in an updated Odor Minimized Plan letter by June 30, 2024.

Please submit the written response to Diane Kavanaugh Vetort at EGLE, AQD, Jackson District, at 301 E. Louis B. Glick Hwy, Jackson, Michigan 49201 or kavanaughhd@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violation or the actions necessary to bring Holcim into compliance, please contact me at the number listed below.

Sincerely,



Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-416-3537

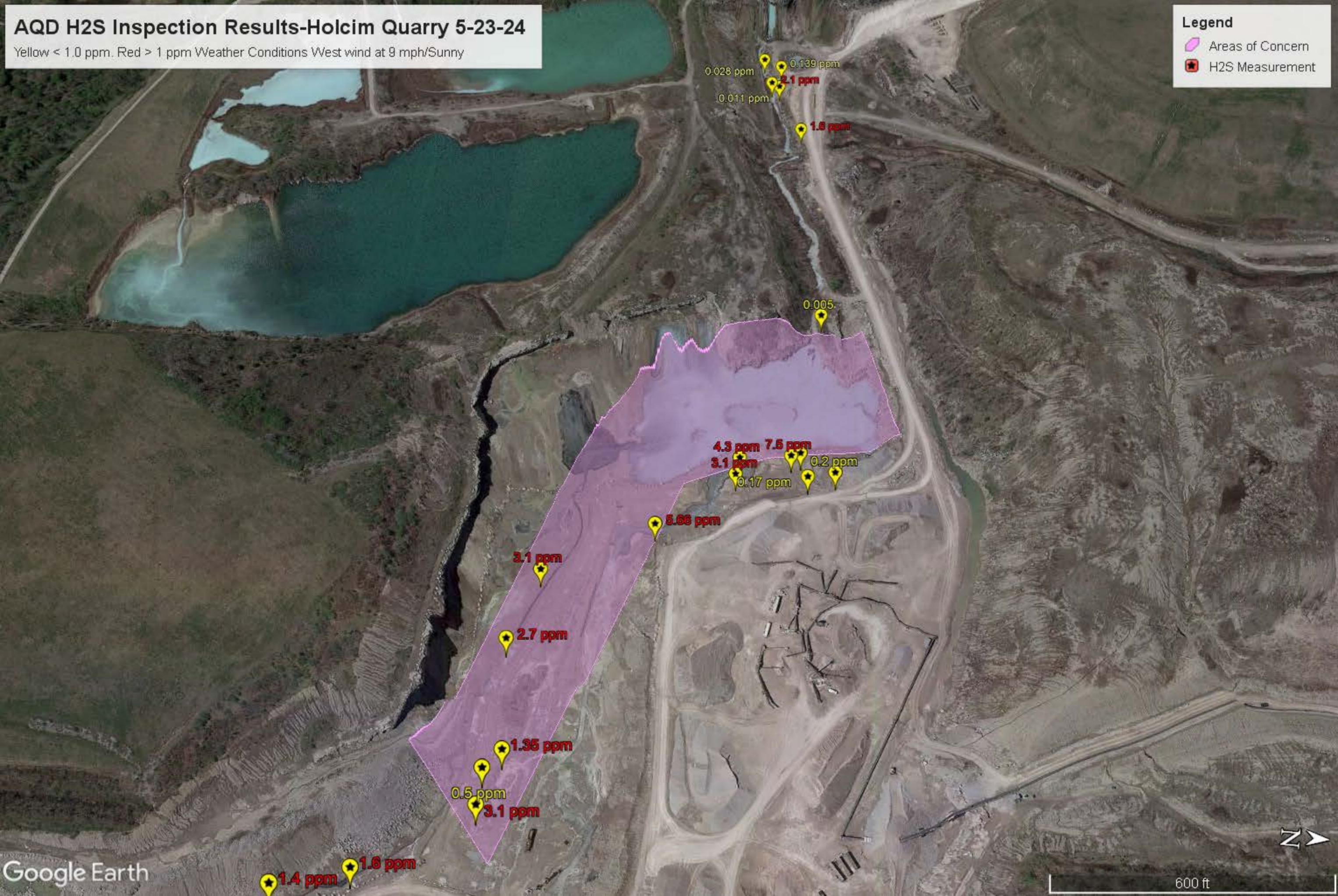
cc/encs: Daniel Klimmek, Holcim
George Lucas, Holcim
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Scott Miller, EGLE
Michael Kovalchick, EGLE

AQD H2S Inspection Results-Holcim Quarry 5-23-24

Yellow < 1.0 ppm. Red > 1 ppm Weather Conditions West wind at 9 mph/Sunny

Legend

- Areas of Concern
- H2S Measurement



0.028 ppm
0.139 ppm
2.1 ppm
0.011 ppm
1.6 ppm

0.005

4.3 ppm **7.5 ppm**
3.1 ppm **0.2 ppm**
0.17 ppm

5.66 ppm

3.1 ppm

2.7 ppm

1.35 ppm

0.5 ppm
3.1 ppm

1.4 ppm **1.6 ppm**



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