

November 14, 2016

Michigan Department of Environmental Quality Air Quality Division – Detroit District Office Stephen Weis, Senior Environmental Engineer 3058 W. Grand Blvd., Suite 2-300 Detroit, MI 48202

Re: Response to Violation Notice dated November 4, 2016

Mr. Stephen Weis:

This letter is the response to the Violation Notice issued to the Carmeuse River Rouge facility for failing to meet the Lime MACT emission limit during compliance stack testing held during August and September 2016.

During the month of July the site had the baghouse inspected due to the bags being near the end of what is considered normal life cycles for bags in that baghouse but no issues were found during the inspection. The compliance test was conducted on August 30th and 31st. The week following that test in August there was some visible emission from room 3 on Kiln #2. The site inspected and found that there was a hole in a bag in that cell. The hole was capped and the visible emission had stopped.

The site had no other issues and the results from the testing showed that Kiln #1 had no issues and Kiln #2 had not passed PM portion of compliance test. The test results indicated that the hole in the bag must have been there during the test and since the issue had since been fixed the site scheduled for a retest of the Kiln #2.

The second test event was held in September and in the middle of the test some visible emission started again. The site continued the test and as soon as the test was complete began isolating cells to see what the problem was. Immediately it was noticed that the cap had come off the hole that was previously capped and there was another hole in a bag in that same cell. The site continued to check all the cells and found other areas that were getting bad. The kiln was already scheduled to be down for the month of October for a planned outage so the kiln was brought down. A contractor was called in and they changed all the bags in cell 3, cell 4, cell 8 and 18 other bags were changed. Once the bags were changed they also conducted a die test and no issues were found.

The site brought the kiln up after the outage and the bag changes and has seen no other issues and will retest the kiln on November 15th.



Should you have any questions or comments upon your review of this information, please contact me via email at <u>stacey.king@carmeusena.com</u> or call 419-986-2016.

Sincerely,

Staceyeking

Stacey King Area Environmental Manager Carmeuse Lime & Stone