

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : LAFARGE MIDWEST INC.	SRN : B1477
Location : 1435 Ford Ave.	District : Gaylord
	County : ALPENA
City : ALPENA State: MI Zip Code : 49707	Compliance Status : Compliance
Source Class : MAJOR	Staff : Gloria Torello
FCE Begin Date : 9/30/2013	FCE Completion Date : 9/30/2014
Comments : 2014 FCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/29/2014	Site Review	Compliance	2014 FCE
09/22/2014	Other	Compliance	Consent Decree. On August 26, 2014 the governments (US EPA & MI AQD) approved with conditions Lafarge's Wet FGD Optimization Report For Kilns 22 & 23 allowing for optimization to be completed with operation on two reagent pumps, vs three.
09/17/2014	CEM RATA	Compliance	2014 CERMS RATA Emission Test Report for KG6-Initial RATA, results did not meet specifications for SO2 but passed specifications criteria for O2 and stack volumetric flow. Late report, June 19, 2014 was the last day of testing, September 16, 2014 AQD received the report.
09/17/2014	ROP Semi 1 Cert	Compliance	Jan-June 2014 Semiannual Report Certification. Deviations include emission monitor downtime, excess emissions, and missing VE reading records. On September 15, 2014 Lafarge sent the report via email, and on September 17, 2014 AQD received the hard copy.

Activity Date	Activity Type	Compliance Status	Comments
09/16/2014	CEM RATA	Compliance	2014 CERMS RATA Emission Test Report for KG5. The test results show the permittee's monitors meet the Relative Accuracy of the tester's equipment. Report was late, and on 8/12/14 Torello responded to Lafarge to send in late, but include as a deviation.
09/16/2014	Stack Test	Compliance	2014 HCl & Hg test results on all: Kilns, Raw Mills, & Clinker Coolers. See comments in MACES report B147726906. K22&23 did not test while burning plastic. Report was late, on 8/12/14 Torello responded to Lafarge to send in late and include in deviation report.
09/16/2014	CEM RATA	Compliance	2014 CERMS RATA Emission Test Report for KG6-Followup RATA. The test results show the permittee's monitors meet the Relative Accuracy of the tester's equipment. Report was late, June 21, 2014 was the last day of testing and on August 25, 2014 the AQD received the report.
09/16/2014	Other	Compliance	2014 Annual test results of HCl & Hg for all: Kilns, Raw Mills, & Clinker Coolers. Received September 15, 2014.
08/18/2014	Other Non ROP	Compliance	Lafarge sent a response to AQD's letter dated 7/31/14 with concerns about Dust Pump #5. The pump was plugged, cleared and returned to operation. Lafarge will continue to monitor the equipment.
08/14/2014	CO/CJ	Compliance	Consent Decree. AQD received the semi-annual report for January -June 2014 as required by the Consent Decree paragraph 106.
08/14/2014	Excess Emissions (CEM)	Compliance	2014 2nd Qrt EER. K21 NOx and SOx CEM downtime was 4.49%. K22 & 23 SO2 CEM downtime was 6.75%. K22 NOx, and CO CEM downtime was 2.53%.
08/11/2014	CO/CJ	Compliance	Lafarge submitted the Optimization Report for Kilns 22 & 23 as required by the Consent Decree. The governments (US EPA and MI AQD) will review and take action.

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08/05/2014	ROP Other	Compliance	Annual audit of the COMs was last certified in June 2013. The results were included in the 2013 2nd Quarter EER. The audit results had a calibration error below the allowed 3% specification.
07/22/2014	Other	Compliance	Consent Decree. On July 22, 2014 the governments (US EPA & MI AQD) approved a modification to the Wet FGD Optimization Protocol allowing for optimization to be completed with operation on two reagent pumps, vs three.
07/22/2014	Self Initiated Inspection		Site visit as a follow up to a fire on the conveyor belt in the quarry.
07/01/2014	CO/CJ	Compliance	Per the consent decree, Steve Kohl, Lafarge's attorney, sent the US EPA and MI AQD a Force Majeure notice. The governments will review and take action.
06/26/2014	Rule 912	Compliance	Josh Strapec reported, per the SOP, opacity monitor for K20 was down this week from June 14 through June 18. Three 15 minute Method 9 visible emissions readings were performed each day that it was down. No visible emissions were observed. The issue was a faulty switch.
06/16/2014	Stack Test Observation		Testing
06/09/2014	Rule 912	Compliance	Lafarge sent AQD an email stating Kiln 21 COM "went down due to a faulty switch." VE readings were performed per the Standard Operating Procedures. Torello requested the results of the readings.
05/30/2014	Telephone Notes		Discussion with Matt Flecter with WHMD
05/30/2014	MAERS	Compliance	2013 MAERS. EUs & FGs from ROP used. Source reported: 591 tons CO; 4,504 tons NOx; 408 tons PM 10 Filtrble; 10,087 tons SO2.
05/21/2014	Telephone Notes	Compliance	Tx call with Gloria Torello & Karen Kajiya-Mills of AQD, Bob Budnik & Josh Strapec of B1477, and Bob Jongleux of URS to discuss test plans for the KG 6 retest on RATA, and KG 5 RATA, & HG. Test Dates: June 15-25. Start on KG5. The failed KG6 RATA from May 13-17, 2014 will be included in the final report.

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05/20/2014	Self Initiated Inspection	Compliance	2014 FCE
05/19/2014	Telephone Notes	Compliance	Tx call with Josh Strapec of Lafarge, and then Tom Gasloli of AQD, to discuss Lafarge's RATA of FG KG6. The RATA ended on Saturday May 17, 2014.
05/13/2014	Stack Test Observation	Compliance	AQD staff observe RATA on Kilns 22 & 23.
05/12/2014	Excess Emissions (CEM)	Compliance	2014 1st Qrt EER. COM req'd on all kilns & CCs. CEMS NOx, SOx, CO req'd on all kilns. K22/23 share SOx CEM. COM KG6 omitted w/ FGD but semiannual report needs deviation. K22/23 SO2 down 25.65% because FGD being optimized. K21 COM down 12.14%. CC 23 COM 7.45% EE.
05/06/2014	Self Initiated Inspection	Compliance	2014 Scheduled Inspection
05/05/2014	CEM RATA	Non Compliance	AQD received the test protocol for the KG6 CEM RATA and Certification. AQD did not have 30 days before testing to review. Per tx with Karen Kajiya-Mills, AQD Lansing, AQD is not going to review and/or send Lafarge a written approval/denial of the plan.
05/05/2014	ROP Other	Compliance	Lafarge sent AQD a CEM Quality Assurance Plan. AQD filed the plan.
04/14/2014	Self Initiated Inspection	Compliance	2014 Scheduled Inspection
04/09/2014	ROP Other	Compliance	Lafarge sent AQD A C-001: Certification Form as notification the Wed FGD began "full trial operation" on January 9, 2014.
04/07/2014	Self Initiated Inspection	Compliance	2014 Scheduled Inspection
04/03/2014	CAM Excursions/Exceedances	Non Compliance	Torello told Josh/B1477 a semi-annual CAM report is required; and provided links to CAM reports. CAM applies to PM from KG5, KG6, EU CC19, EU CC20, CC21, EU BALL MILLS 20, and 21.

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04/03/2014	Other Non ROP	Compliance	Budnik provided record per 195-10B. Appendix 1, "Mercury Concentration of Each Fuel Used." The record shows no information under shingles. A revised Calculated Mercury Emissions record was requested. Advised unsatisfactory to blend shingles/coal-coke then determine Hg.
04/02/2014	Self Initiated Inspection	Compliance	2014 Scheduled Inspection
04/01/2014	Scheduled Inspection	Compliance	2014 Scheduled Inspection
03/27/2014	ROP Other	Compliance	Deviation report, FG CLINK COOL 23. Opacity exceedance. MI-ROP-B1477-2012. Duration over 8 hours. Abnormally cold weather caused water and air lines to freeze. Resolved.
03/27/2014	ROP Other	Compliance	Deviation report of a calibration gas leak which caused the readings to be skewed for K22 stack emission monitor. Repair made.
03/26/2014	Excess Emissions (CEM)	Compliance	2013 Fourth Quarterly Report - EER. Maximum excess emissions below 1%. Maximum CEM downtime below 2%. Rob Dickman AQD TPU will review Calibration Error Determination reports. Torello will discuss with Lafarge using EU Descriptions in ROP.
03/26/2014	ROP Other	Compliance	Deviation Report for MI-ROP-B1477-2012 - FG Clink Cool - Opacity exceedance in kiln 23 cooler, duration over 7 hours. Abnormally cold weather caused water and air lines to freeze. Resolved.
03/26/2014	ROP Other	Compliance	Deviation Report - Kiln 23 Cooler Opacity Exceedance, duration 3 hrs 30 mins. Air pressure was lost in K23 cooler duct. Resolved.
03/26/2014	ROP Annual Cert	Compliance	MI-ROP-B1477-2012. 2013 Annual Compliance Cert. During the reporting period the permittee reported the source was in compliance with all ROP conditions plus 57 deviations. Deviations for Kilns and Clinker Coolers only. During SI Torello will confirm all EUs are reviewed for certification.

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03/26/2014	CO/CJ	Compliance	Lafarge sent AQD a letter and a C-001: Certification form. In the near future Lafarge will develop an administrative amendment application to incorporate the Wet FGD permits (195-10B, 89-13A, and 126-86E) into the ROP.
03/26/2014	ROP SEMI 2 CERT	Compliance	Semi ROP No. MI-ROP-B1477-2012. All monitoring and associated recordkeeping requirements of the ROP were met, but there were 29 deviations. Deviations for Kilns and CCs only. During SI Torello will confirm all EUs are reviewed for certification.
03/26/2014	Other	Compliance	2013 Semiannual PC MACT Report, July-December 2013.
03/17/2014	ROP Other	Compliance	Results of audit samples from Lafarge. Rob Dickman, AQD TPU forwarded the results to Gaylord along with a note, Rob did not have objections to the audit sample results.
03/10/2014	CO/CJ	Compliance	Per the requirements of the Consent Decree, Lafarge submitted the Kiln 22 SNRC Seventh Interim Demonstration Report to the governments.
03/10/2014	ROP Other	Compliance	AQD collect a sample of broth at Lafarge on 5/16/13. The lab sent AQD results on 6/4/2013. A note was written into MACES regarding the results on 3/10/2014, see note B147724465 in MACES.
03/10/2014	Sample Results Review	Compliance	Broth sample results. Broth collected on 5/16/13. Lab sent AQD results on 6/4/13.
03/04/2014	Sample Results Review	Compliance	Lafarge submitted Analytical Lab Reports from Fibertec for Shredded PET Plastic, and Shredded Plastic-Containing Carpet Material-filed in orange file: Lafarge Requests to Use Plastic. Lafarge burns the plastics in the kilns. AQD's review shows plastics' parameters similar to plastic reviewed in PTI 106-08.
03/04/2014	CO/CJ	Compliance	The July-December 2013 semiannual report for the global settlement shows ongoing progress toward implementation of the consent decree.

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03/04/2014	CO/CJ	Compliance	Consent Decree. Lafarge sent the AQD a notice of a temporary cessation of operation of K 22 starting on December 31, 2013 and restart of operation on January 8, 2014. K22 was tied-in to the Wet FGD.
12/23/2013	CO/CJ	Compliance	Consent decree. Final Report. Final Report Approval. Lafarge made application 89-13A for the final governments (EPA & MI AQD) approved limits for NOx from all kilns, and SO2 from Kilns 19, 20, 21. On December 9, 2013 the AQD issued PTI 89-13A..
12/23/2013	CO/CJ	Compliance	Consent decree. Baseline Data Collection Report. The permittee submitted the K22 & K23 baseline SO2 report for the Wet FGD. Revision on 3/25/14: On March 24, 2014 the governments sent Lafarge an email approving the baseline data collection.
12/23/2013	CO/CJ	Compliance	Consent Decree. Demonstration Program. Final Report. Kilns 22 & 23. Governments approval of final emissions limits: 5.47 # NOx/ton Kiln 22; and 5.69 # NOx/ton Kiln 23.
12/23/2013	CO/CJ	Compliance	Consent Decree. Optimization Report Approval. Kilns 22 & 23. The governments approved the Wet FGD optimization protocols.
12/17/2013	MACT (Part 63)	Compliance	PC MACT Semi-Annual Report. Included in the report are EUs not subject to the PC MACT including the kilns. The PC MACT covers VE or PM from the following FGs: Clinker Cooler, Clinker Sys, Finish Mills, CMNT STR LOAD, CKD HAND SYS, FUEL HAND. Email to follow to permittee.
12/17/2013	Stack Test	Compliance	Shingles Trial Burn Emission Test Report. Permit 167-12 allowed this testing. Results include Arsenic-Zinc emissions. Shingles burned during test were 0.49 MT/h and the PTI allowed 6.0 tph.
12/16/2013	ROP SEMI 2 CERT	Compliance	July-Dec 2012 semiannual report certification. This report is not late, it is a re-submittal to include a deviation stating the annual HCL and chlorine gas emission testing from K19 and K20 was not completed in 2012.

Activity Date	Activity Type	Compliance Status	Comments
12/16/2013	Excess Emissions (CEM)	Compliance	Third Quarter EER July to September 2013. A review of the report shows no noteworthy excess emissions. The Opacity COM on Kiln 20 was down 3.48% of the time-which is TPU's purview. No objection.
12/16/2013	ROP Other	Compliance	Ozone period May-September 2013, NOx emissions from Kilns 22 and 23. The ROP limit is 12.7 pounds of NOx per ton of clinker. The permittee reported 4.93 pounds of NOx per ton of clinker. No objection.
12/16/2013	Excess Emissions (CEM)	Compliance	April to June 2013 CEM EER. A review of the report shows no noteworthy excess emissions. The Opacity COM was down 3.82% of the time-which is TPU's purview. No objection.
12/16/2013	ROP Other	Compliance	Deviation report, Kiln 21 stack opacity data not recorded. Repairs were made. No objection.
12/04/2013	Meeting Notes	Non Compliance	Meeting to discuss violation notice for burning plastic other than PE/PP.
11/18/2013	Self Initiated Inspection	Compliance	View quarry.
11/13/2013	Stack Test	Compliance	2013 Manila File. Test Report of Shingles Trial Burn for PTI 167-12 of 2013, for metals. The PTI limits asphalt shingles to 6.0 tph. Appendix D of report shows shingles use in metric tons/ hour (505 mt/hr). Results include stack test and sampling of pollutants in 167-12, V.2, 3 and 4.
11/13/2013	CEM RATA	Compliance	2013 Manila File. CERMS Compliance Certification 2013 (CERMS RATA) all five kilns. The test results show the permittee's monitors meet the Relative Accuracy of the tester's equipment.
11/13/2013	Stack Test	Compliance	2013 Manila File. Hydrogen Chloride & Mercury stack test report 2013. HCl & Cl2 testing on all kilns is required annually; Hg testing is required every 5 years on all kilns and raw mills. HCl and Cl2 meet the limits in the ROP. There is no Hg limit in the ROP.
10/16/2013	CEM RATA		2013 Annual CERMS RATA Emission Test Report for Kiln Groups 5 & 6

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10/16/2013	ROP Other		2013 HCl and HgEmission Test Report, Kiln Groups 5 & 6 and Raw Mill 14 & 15
09/30/2013	Sample Results Review	Compliance	Review of plastic and wood analytical reports from permittee's samples, and from supplier's certificate of analysis.

Name: Gloria Inella Date: 4-8-15 Supervisor: 

