



December 20, 2019

Via Email

Mr. Jeremy Howe
Michigan EGLE, AQD
120 West Chapin Street
Cadillac, MI 49601

RE: Response to Violation Notice, Dated December 2, 2019
Regulatory Citation – 40 CFR, Part 60, Appendix F, Procedure 1, Section 5.1
Holcim (US) Inc. d/b/a Lafarge Alpena Plant, SRN: B1477

Dear Mr. Howe:

This letter is in response to the Notice of Violation issued by EGLE on December 2, 2019 for failure to perform a quarterly audit of the HCL component of the FTIR CEMS associated with EU Kiln 19, EU Kiln 20, EU Kiln 21 and FG KG6.

Through investigation it has been determined that the deviation was due to a miss interpretation of the quarterly requirement. The cause for not completing these during the quarter is the instrumentation department believed the audits were not necessary during the quarter. This interpretation was based on the belief that HCL was a component of the annual relative accuracy test audit that was completed on the CEMS (FTIR) during the quarter. To help ensure these audits are not missed in the future a unique work order for this activity has been developed. Additionally, a quarterly meeting with environmental management and instrumentation and maintenance department personnel has been developed to review the quarterly activities to review scheduling and completion of compliance obligations.

From the investigation, it is believed that this was a unique situation that does not justify any modification to current preventative maintenance or malfunction abatement plans.

HOLCIM (US) INC. D/B/A LAFARGE ALPENA PLANT
1435 Ford Avenue, Alpena, MI 49707
OFFICE: (989) 354-4171 FAX: (989) 354-2223

If you have any questions or would like to discuss, please contact me at (989) 358-3321 or by e-mail travis.weide@lafargeholcim.com.

Respectfully,

Holcim (US) Inc.



Travis B. Weide
Area Environmental & Public Affairs Manager

cc: Mr. Shane Nixon – EGLE, Cadillac
Mr. Jeffrey Scott – LafargeHolcim