



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  
Permit Condition - MI-ROP-B1477-2012c, FG KG5, VI, 2  
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 continuously monitor opacity on EU KILN 21, during the third quarter 2019. Following is a written description of the findings that contributed to the excess monitor downtime on EU KILN 21 (EU Kiln 21, SV25-291).

Through investigation it has been determined that the primary cause of this deviation was the ability to safely access the monitor to clear a fault that resulted from a malfunction of the opacity monitor. The Plant did not have access to trained emergency personnel to observe the stack climb that is required for this working at heights activity, which is company policy to abide by the regulations set forth by the Department of Labor's Mine Safety and Health Administration (MSHA). A new means to safely access this equipment has been determined and will be applied as necessary in the future.

Because it was known that the instrument was faulted and corrective maintenance could not be safely performed, certified plant personnel performed Method 9 visible emissions observations to verify compliance with the opacity standard during operating days without continuous monitoring.

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](mailto: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