



November 3, 2016

Mr. Kurt Childs
Michigan DEQ, AQD
120 West Chapin Street
Cadillac, MI 49601

RE: Violation Notice, Dated October 13, 2016
Lafarge Midwest, Inc. – Alpena Plant; SRN: B1477, Alpena County

Dear Mr. Childs:

This letter is in response to the Violation Notice referenced above. Each of the five unique conditions referenced have been independently addressed in the following text.

Reference 1: MI-ROP-B1477-2012a requires testing of the PM10 emission rates from the fuel pulverizers in EU FUEL PULV 19, EU FUEL PULV 20, EU FUEL PULV 21, EU FUEL PULV 22, and EU FUEL PULV 23 of FG FUEL HAND every five years. The most recent test occurred on October 3, 2010.

Reference 1, Response: Lafarge Midwest, Inc. (Lafarge) does not believe that there has been a violation of the conditions referenced based on the following: The initial testing performed on the referenced equipment was completed as the result of a specific condition (SC) from Permit to Install (PTI) 15-05. Following is the condition that required the initial testing:

“Within 180 days after commencement of trial operation, verification of PM-10 and Mn emission rates from FG-INCREASE, by testing at owner's expense, in accordance with Department requirements will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. [R336.1205, R336.1224, R336.1225, R336.2001, R336.2003, R336.2004, 40 CFR 52.21(c) & (d)]”

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This condition does not specify a reoccurring sampling frequency. The initial reference to the reoccurring test frequency was initially published in Renewable Operating Permit (ROP) MI-ROP-B1477-2012; issued on September 13, 2012. This permit conditions simply states *“Once every five years, verification of PM-10 rates by testing at owners expense, in accordance with AQD requirements shall be required from:”* It is Lafarge’s interpretation that the current permit condition requires testing to be conducted prior to September 13, 2017, and therefore no violation has occurred.

Reference 2: Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart LLL – National Emissions Standard for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry (PC MACT) requires opacity testing of the dust collectors in FG FINISH MILLS, FG CMT STR LOAD, FG CKD HAND SYS, FG RAW MAT and FG RAW MILL SYS and MI-ROP-B1477-2012a requires the testing to be conducted every five years. The AQD does not have records indicating this testing has been conducted and no such records were provided by Lafarge Midwest, Inc. – Alpena as the result of the inspection.

Reference 2, Response: Lafarge Midwest, Inc. (Lafarge) does not believe that there has been a violation of the conditions referenced based on the review of Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart LLL – National Emissions Standard for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry (PC MACT). A breakdown of the regulation for further review can be found in Appendix A of this letter.

In review of the language referenced in Appendix A that was cited directly from the Code of Federal Regulations it is evident that there is not a reoccurring opacity testing requirement, but only “Initial” testing required. Initial testing was completed and submitted as a requirement of the Notiification of Compliance for the purposes of demonstrating compliance with 40 CFR Subpart LLL. In lieu of ongoing opacity testing, compliance in this Subpart is managed through visual monitoring as required in 63.1350 Monitoring requirements. It is believed that the reference in the permit was applied in error and likely copied from an irrelevant version of the Subpart LLL standard, prior to the current applicable standard that went into effect when the September 2010 revision was published in the Federal Registrar.

Reference 3: The inspections indicate the following records required by MI-ROP-B1477-2012a were not maintained. FG KG5 SC VI.12 and 13: Records of the tons of each alternative fuel used and the fuel load percentage of each alternative fuel; however, records of the amount of alternative fuel received were available.

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Reference 3, Response: Lafarge Midwest, Inc. (Lafarge) does not believe that there has been a violation of the conditions referenced, but a misunderstanding in information requested. Records for alternative fuels as specified in the conditions referenced for the last five years are located in Appendix B of the attached.

Reference 4: The inspections indicate the following records required by MI-ROP-B1477-2012a were not maintained. FG FUEL HAND SC VI.4: Records of water applied to EU BLD FUEL PILE as dust suppressant.

Reference 4, Response: Lafarge Midwest, Inc. (Lafarge) does not believe that there has been a violation of the conditions referenced, but a misunderstanding in information requested. Records of water applied for the last five years are located in Appendix C of the attached.

Reference 5: The inspections indicate the following records required by MI-ROP-B1477-2012a were not maintained. FG FUEL HAND SC VII.5: Records of daily monitoring of the pressure drop across each dust collector associated with the FG FUEL HAND SYS.

Reference 5, Response: Lafarge Midwest, Inc. (Lafarge) does not believe that there has been a violation of the conditions referenced, but a misunderstanding in information requested. Records of daily monitoring of pressure drop across each of the dust collectors for the last five years are located in Appendix D of the attached.

If you have any questions regarding this, please contact me at 989-358-3321.

Respectfully,

Lafarge Midwest Inc.

A handwritten signature in black ink, appearing to read 'Travis B. Weide', is written over the typed name.

Travis B. Weide
Area Environmental & PA Manager

Enclosure: As described above

Cc: Mr. Paul Rogers, Lafarge