



December 20, 2019

Via Email

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

RE: Response to Violation Notice, Dated November 25, 2019
Holcim (US) Inc. d/b/a Lafarge Alpena Plant, SRN: B1477

Dear Mr. Childs:

This letter is in response to the Notice of Violation issued by EGLE on November 25, 2019 for operation of FG CLINKER SYS while a dust collector is not operating in a satisfactory manner (40-100 Dust Collector). Secondly, operation of FG FINISH MILLS while a dust collector is not operating in a satisfactory manner, and failing to conduct daily Method 22 VE readings as required by the Operations and Maintenance Plan (EU BALL MILL 20, 43-269 Dust Collector).

Through investigation of FG CLINKER SYS it has been determined that the system for managing preventative maintenance work orders was not working as designed. This work order management system migrated from one operating platform to a new operating platform. During the migration the preventative maintenance routines (PMRs) for the equipment in FG Clinker Handling existed but the functionality that automatically schedules the work orders was not functioning. This has been corrected in system. There are now three unique PMRs for this equipment that include a six-week visual inspection while operating and a thirteen-week internal inspection, to be performed while out of service.

With respect to FG FINISH MILLS, EU BALL MILL 20 43-269 Dust Collector, the discovery of the visible emissions was found during our field inspection. Upon discovery the equipment was repaired following the Operations and Maintenance Plan. The discovery of the visible emission and corrective action response is believed to be a contributing factor of the failure to document the Method 22 on this day. As a result of the investigation it was identified that the newly employed electronic system for documenting the daily Method 22 observations was being used

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incorrectly. To correct, observations were performed using paper copy temporarily until the electronic system could be improved, to clearly document the observation details. The improvement has been completed and the electronic system is actively being use.

Additionally, a review of potential actions to minimize fugitive dust from EU Clinker Cooler 22 tailings conveyor is being completed. From this review actions to eliminate, minimize or contain the fugitive dust will be applied.

From the investigations, it is believed that these are unique situations that does not justify any modification to current preventative maintenance or malfunction abatement plans.

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