



April 22, 2020

Via Email

Mr. Shane Nixon
Cadillac/Gaylord District Supervisor
Michigan EGLE, AQD
120 West Chapin Street
Cadillac, MI 49601

RE: Response to Violation Notice, Dated March 30, 2020
Quarterly Excess Emission Report; 4th Quarter 2019
Holcim (US) Inc. d/b/a Lafarge Alpena Plant, SRN: B1477

Dear Mr. Nixon:

This letter is in response to the Notice of Violation issued by EGLE dated March 30, 2020 for deviations reported during the fourth quarter 2019 Excess Emission Report. Following is a discussion of the corrective actions and background information for each Rule/Permit Condition cited in the Notice of Violation.

Citation 1 - FG KG6, 40 CFR, Part 63, Subpart LLL 63.1343(b), Table 1 – Hydrochloric Acid emission in excess of the applicable standard were reported for 19.94% of the total source operating time during the fourth quarter 2019.

This deviation for excess emissions of Hydrochloric Acid Emissions (HCl) for FG KG6 started on November 11, 2019 and continued through November 28, 2019. The basis behind this deviation was addressed in a letter from Mr. Steven C. Kohl, addressed to both Mr. Kurt Childs and Mr. Shane Nixon, dated November 21, 2019. A copy of this letter is enclosed with the email for this response, file name; 19312716_1 Holcim Alpena Letter to AQD 11-21-19.

To resolve the challenges identified within the letter, a surrogate limit (SSOL) utilizing SO₂ ppmw was established to demonstrate compliance with the HCl standard. The facility first attempted to demonstrate compliance with the SSOL in early December of

2019, but due to issues experienced by the stack testing company contracted to perform the SSOL demonstration the site was not able to establish the SSOL until a successful test was performed on March 5, 2020; the final report was delivered to EGLE on April 11, 2020.

Citation 2 - FG KG6, 40 CFR, Part 63, Subpart LLL 63.1350(l) – Failure to continuously monitor Hydrochloric Acid emissions. Monitor downtime was calculated to be 27.15% of total source operating time during the fourth quarter 2019.

Upon review of the summary and downtime reports within the Data Acquisition and Handling System (DAHS) it was determined that HCl monitor downtime totaled 6.97% as reported during the quarter. A copy of the summary report and downtime report for the above referenced citation are included in the quarterly report referenced in this notice of violation. A review of source total operating time confirms that all hours were accounted for during the quarter for this calculation.

Citation 3 - FG KG6, 40 CFR, Part 63, Subpart LLL 63.1350(m)(2) – Failure to continuously monitor Total Hydrocarbon emissions. Monitor downtime was reported to be 10.30% of total source operating time during the fourth quarter 2019.

This deviation was due to a failure of the Flame Ionization Detector (FID). During the quarter, the FID experienced malfunctions that caused the flame to extinguish. This occurred on several occasions. As a result of these events the Instrumentation personnel performed maintenance to replace the FID Block (burner assembly) in December to correct the malfunction from reoccurring. It is believed that the replacement of the FID Block has corrected route cause of the downtime. Performance in the first quarter of 2020 has shown that the monitor up time was 96.98%, performing reliably.

Citation 4 – EU CLINK COOL 22, MI-ROP-B1477-2012c, FG CLINK COOL VI-1 – Failure to continuously monitor Particulate Matter emissions. Monitor downtime was reported to be 12.61% of total source operating time during the fourth quarter 2019.

This deviation was due to a malfunction of the CEM starting on December 24 that led to a prolonged downtime. Instrumentation personnel attempted to perform corrective maintenance during the Christmas Holiday week unsuccessfully. It was determined in early January that the reoccurring malfunctions would require the instrument to be sent to the manufacturer for repair. It was determined that the instrument needed component replacement. As the result, a retest to demonstrate compliance and reestablish the CPMS mA limit was completed on February 1, 2020.

ALPENA PLANT

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Citation 5 – EU KILN 21, MI-ROP-B1477-2012c, FG KG5 VI-2 – Failure to continuously monitor Visible Emissions. Monitor downtime was reported to be 14.85% of total source operating time during the fourth quarter 2019.

This primary cause of this deviation occurred when the opacity monitor malfunctioned on November 25 and remained out of service until December 4, accounting for more than 10% of the monitor downtime for the quarter. The reason for the extended downtime is the Plant did not have immediate access to a large enough man lift that is required access the monitor located on the stack. As gaining access to the monitor is a working at heights activity, the safety analysis performed for this task it was determined a man lift is the only safe means for access. A delay in the rental equipment delivery as the result of the Thanks Giving Holiday and led to the excess downtime. To eliminate this delay in the future a long term rental agreement was established for this piece of equipment. Additionally, during the period of downtime the Plant performed daily method 9 observations on the emission unit to demonstrate compliance. These compliance observations were included in the quarterly excess emissions report referenced in the notice of violation.

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.

If you have any questions or would like to discuss, please contact me at (989) 916-9637 or by e-mail travis.weide@lafargeholcim.com.

Respectfully,

Holcim (US) Inc.

Travis B Weide

Travis B. Weide
Area Environmental & Public Affairs Manager

cc: Mr. Jeffrey Scott – LafargeHolcim