



June 23, 2021

Via Email

Mr. Kurt Childs
Michigan Dept. of Environment, Great Lakes and Energy
Air Quality Division, Cadillac District
120 West Chapin Street
Cadillac, Michigan 49601

**Re: Holcim (US) Inc. Lafarge Alpena Cement Plant, SRN B1477
Response to Violation Notice dated June 4, 2021**

Dear Mr. Childs,

This correspondence is being submitted in response to the aforementioned violation notice, which as commented in the notice was the result of 'Operation of FG CLINKER SYS while a dust collector is not operating in a satisfactory manner.' The cited observation took place during the May 18, 2021 EGLE visit to observe stack testing at the Alpena Plant and appears to have been the result of fugitive dust escaping from the covered clinker conveyor system adjacent to dust collector identified as SV25-825.

Through investigation, it was determined that the fugitive dust was caused by abnormal operating events that led to the production of uncharacteristic fine clinker in the hours preceding the observation. In particular, these abnormal conditions occur as the result of a chemical imbalance within the kiln system or equipment failure that require the kiln to be slowed quickly, which is standard operating procedure to avoid excess emissions and equipment damage. When these conditions occur clinker can become extremely fine and prove to be difficult to manage. In this instance, it appears that the observed dust emissions adjacent to dust collector SV25-825 resulted from a plugged collection intake pipe caused by the fine clinker dust. When this occurred, fugitive dust bypassed the collector due to restricted flow reducing dust collection.

The conditions observed are not typical or easily identifiable using instrumentation, making managing these events difficult. As a result, preventing this type of event from reoccurring is challenging and will require significant engineering, including outside support, and capital to permanently resolve. Locally, the project has been identified as critical and resources have

HOLCIM (US) INC. D/B/A LAFARGE ALPENA
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been assigned. At this time, the permanent solution has not been identified and it is expected to take several weeks to determine. From the initial assessment, it is believed that improvements to the system could include elements such as additional dust collectors and potentially extending the total enclosure further up the existing conveyor. Once an engineering solution is identified, it may take several months to execute depending on the implementation complexity and current equipment sourcing conditions as a result of the COVID pandemic.

In the meantime, operations personnel have been made aware of the situation and are monitoring clinker handling and trying to identify and implement temporary preventative measures.

Lafarge is committed to resolving the conditions to led to this violation notice. Please do not hesitate to contact me if you have questions or would like to discuss further. I can be reached by phone at (989) 358-3321 or by email at travis.weide@lafargeholcim.com.

Respectfully,

Holcim (US) Inc.

A handwritten signature in black ink, appearing to read 'Travis B. Weide', written over a faint horizontal line.

Travis B. Weide
Area Environmental & Public Affairs Manager

Cc: Mr. Shane Nixon, EGLE
Mr. Jeffrey Scott, LafargeHolcim
Mr. Kevin Bretz, LafargeHolcim