LAFARGE

July 30, 2020

Via Email

Mr. Shane Nixon
Michigan EGLE, AQD
120 West Chapin Street
Cadillac, MI 49601

RE: Response to Violation Notice, Dated June 30, 2020
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 June 30, 2020 for items identified within the quarterly excess emission report for the first quarter of 2020. Following you will find a written discussion for each of the items cited.

Citation 1 - EU KILN 19 – Excess HCL emissions reported for 33.11% of the source operating time attributed to failure of the DAA system.

On Tuesday, March 10 during review of emissions it was discovered that the 3ppm @7% O2 30-day rolling average for HCl was in excess of the limit at the close of Monday, March 9; for EU Kiln 19. The 30-day average emissions remained in excess through April 2, returning to compliance with the April 3 rolling average. The HCl emission observed on March 9 was 26.61 ppm average for that day.

The event that contributed to the excess emission began with a malfunction of the blower that feeds the dry absorbent Additions (DAA - trona) to the kiln. In this situation the production and maintenance team took corrective action to correct the blower. However, the kiln was without the trona addition from 19:00 to 23:00 hours on March 9. The elevated emission during this five-hour period raised the one-hour average emission of HCl to approximately 40 ppm.

To correct this situation from reoccurring the kiln control system has been revised. For each of the kilns that rely on the DAA system for compliance management control logic has been installed that requires the minimum hourly quantity of dry absorbent as specified within the Malfunction Abatement Plan (MAP) to be delivered to the kiln, or the kiln system will automatically shut down.

HOLCIM (US) INC. D/B/A LAFARGE ALPENA PLANT
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Citation 2 - EU KILN 20 – Excess PM emissions reported for 74.95% of source operating time attributed to failure of the baghouse integrity resulting in excess PM emissions as determined through stack testing on February 13, 2020 and March 4, 2020.

The percent of source operating time in excess of the surrogate emission limit is believed elevated as the calculation is based on a calculation of 75% of the emission standard. In review of the measured information it is know that the emissions were in excess of the standard on February 13 and March 4 and in compliance from March 14 through the end of the quarter. Following is a summary of the events and activities during the period of time in question.

On February 13, 2020 testing performed to demonstrate compliance and establish a new PM CPMS limit. On February 21, it was determined that the February 13 test did not demonstrate compliance. Corrective action was immediately initiated with the kiln being shut down for investigation and corrective maintenance. Upon completion of corrective maintenance, the kiln returned to service on February 26. The second test to reestablish compliance was performed on March 4, it was determined on March 13 that the March 4 test was unsuccessful. The kiln was again taken out of service to investigate and perform corrective action. On March 16 the kiln returned to service, with a third successful test that demonstrates compliance was conducted on March 19.

Citation 3 - FG KG6 – Excess PM emission reported for 13.5% of source operating time attributed to unknown causes.

Compliance was maintained throughout the quarter. The false report indicating excess emissions is due to a reporting error. The issue stems from the start date that is used to calculate instrument reliability and downtime started on January 7, while the first thirty-day compliance value was calculated on February 6 as this mark the thirtieth day after report submission. The data acquisition and handling system (DAHS) only allows for one date range to calculate both compliance variables. In the interim time between the start of instrument reliability reporting and establishment of the first compliance average the DAHS interpreted compliance data incorrectly, thus the reasoning for the 13.5% calculation. This emission unit has remained in compliance with the emission standard since the establishment of the first 30-day compliance average on February 6.

Citation 4 - FG KG6 - Failure to continuously monitor Hydrochloric Acid emission. Monitor downtime was calculated to be 72.52% of the total source operating time during the first quarter of 2020. A successful SO2 parametric monitoring test was not completed until March 5, 2020 and the HCl channel was not active during this time.

Although the SO2 parametric monitoring test was not successfully completed until March 5, it is reasonable to believe the Flexible Group was in compliance throughout the reporting period. The emission limit established by the March 5 test is 1326ppmw and the greatest 30-day rolling average measured during the reporting period was observed on

March 11 at an SO2 emission of 53.5ppmw, which is 4% of the emission limit established by the March 5 testing.

The HCl channel of the FTIR monitor was not operational during the quarter as it was determined through comparison testing in November of 2019 that the data collected by the HCl channel of the FTIR was unreliable; as described in an email addressed to Mr. Shane Nixon from Mr. Steven Kohl, dated November 21, 2019. Testing to establish a SO2 parametric monitoring limit was conducted on December 4-5, 2019 and was believed to be compliant. As FTIR HCl on the emission unit was determined to be unreliable the monitoring channel was disabled. On January 22 an email from Ms. Lindsey Wells of EGLE notified the site that the December test was determined invalid.

Citaton 5 - EU CLINK COOL 22 – Failure to continuously monitor Particulate Matter emissions. Monitor downtime reported to be 17.80% of the total source operating time during the first quarter of 2020.

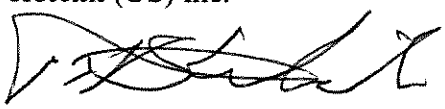
This deviation was due to a malfunction of the CEM starting on December 24 that led to a prolonged downtime. Instrumentation personnel attempted to perform corrective maintenance during the Christmas Holiday week unsuccessfully. It was determined in early January that the reoccurring malfunctions would 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 delayed until February 1, 2020.

From the investigations, it is believed that these are unique situations that do 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. Kurt Childs – EGLE, Cadillac
Mr. Jeffrey Scott – LafargeHolcim

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