



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
CADILLAC DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

November 25, 2019

Mr. Jeffery Scott, Plant Manager  
Lafarge Alpena Plant  
1435 Ford Road  
Alpena, Michigan 49707

SRN: B1477, Alpena County

Dear Mr. Scott:

**VIOLATION NOTICE**

On October 23, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), attended an emissions testing at the Lafarge Alpena Plant located at 1435 Ford Road, Alpena, Michigan. During the course of the emissions test AQD staff observed significant visible emissions from several other emission points at the plant. AQD staff along with Lafarge Alpena staff investigated and determined the sources were the FG CLINKER SYS 40-100 dust collector, the FG FINISH MILLS 43-269 dust collector, as well as fugitive emissions from clinker tailing carry over from the Kiln 22 Clinker Drag #5 conveyor transfer to the Clinker Belt 13. As a result, the AQD has determined the following:

| Process Description                                    | Rule/Permit Condition Violated                                 | Comments  |
|--|--|---|
| FG CLINKER SYS, 40-100 Dust Collector                  | R 336.1910, 40 CFR 63.1347 FG CLINKER SYS; SC III.1.           | Operation of FG CLINKER SYS while a dust collector is not operating in a satisfactory manner.   |
| FG FINISH MILLS, EU BALL MILL 20 43-269 Dust Collector | R 336.1910, 40 CFR 63.1347 FG FINISH MILLS; SC III.1, SC VI.1. | 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. |

Rule 910 of the administrative rules promulgated under Act 451 requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

FG CLINKER SYS AND FG FINISH MILLS are also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Portland Cement Plants found in Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart LLL. In 40 CFR, Part 63, Subpart LLL, it requires proper operation of the dust collectors in accordance with the approved Operations and Maintenance plan which requires monthly Visible Emissions (VE) monitoring of FG CLINKER SYS and daily VE monitoring of FG FINISH MILLS.

Records provided upon request of the AQD indicate both the 40-100 and 43-269 dust collectors had bad bags that required partial or complete bag replacement, which has been completed.

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Records provided upon request of the AQD demonstrated that the daily visible emission monitoring of FG FINISH MILLS was either not conducted or not recorded on October 23, 2019.

The AQD understands that maintenance activities have been undertaken by Lafarge Alpena to replace the dust collector bags and restore the equipment to proper operation. Please submit a written response to this Violation Notice by December 16, 2019 (which coincides with 21 calendar days from the date of this letter) summarizing the response actions that were taken to correct the violations and what steps are being taken to prevent a reoccurrence such as revising preventative maintenance activities or the Operations and Maintenance plan. Additionally, please review what actions can be taken to eliminate, minimize or contain the fugitive dust from the Kiln 22 clinker tailing handling process.

Please submit the written response to EGLE, AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lafarge Alpena believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Lafarge Alpena. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kurt Childs  
Senior Environmental Quality Analyst  
Air Quality Division  
231-878-2045 / ChildsK@Michigan.gov

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Shane Nixon, EGLE