



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 30, 2020

VIA E-MAIL ONLY

Mr. Jeffery Scott
Lafarge Alpena
1435 Ford Avenue
Alpena, Michigan 49707

SRN: B1477, Alpena County

Dear Mr. Scott:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed the quarterly excess emission report submitted by Lafarge Alpena located at 1435 Ford Avenue, Alpena. The Renewable Operating Permit number MI-ROP-B1477-2012c and Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry (PC MACT) requires the facility to monitor and record emissions on a continuous basis in a manner and with instrumentation acceptable to the AQD.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
FG KG6	40 CFR, Part 63, Subpart LLL 63.1343(b), Table 1	Hydrochloric Acid emissions in excess of the applicable standard were reported for 19.94% of total source operating time during the fourth quarter of 2019.
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 of 2019.
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 of 2019.
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 of 2019.
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 of 2019.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 22, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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. 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,

A handwritten signature in black ink that reads "Shane Nixon". The signature is written in a cursive, flowing style.

Shane Nixon
Cadillac/Gaylord District Supervisor
Air Quality Division
231-492-5954

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