



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



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

May 29, 2019

Mr. Matthew Simon, Operations Manager
 St. Mary's Cement, Inc., Charlevoix Plant
 16000 Bells Bay Road
 Charlevoix, Michigan 49720

SRN: B1559, Charlevoix County

Dear Mr. Simon:

VIOLATION NOTICE

On May 3, 2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received required emissions reporting at St. Mary's Cement, Inc. located at 16000 Bells Bay Road, Charlevoix, Michigan. This reporting is required by Permit to Install 140-15: Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart LLL: and Michigan Air Pollution Control Rules. The review of this reporting indicated the following violations

Process Description	Rule/Permit Condition Violated	Comments
EUINLINEKILN	Permit to Install Number 140-15, EUINLINEKILN, I.6	Nitrogen Oxide (NOx) emissions are limited to 700 pounds per hour (pph) from the Main and Bypass stacks combined. Reported emissions were in excess of this limit for 72 hours and 5.02% of the total source operating time for the first calendar quarter of 2019.
EUINLINEKILN	Permit to Install Number 140-15, EUINLINEKILN, I.4	Sulfur Dioxide (SO2) emissions are limited to 1175 pounds per hour (pph) from the Main and Bypass stacks combined. Reported emissions were in excess of this limit for 120 hours and 8.36% of the total source operating time for the first calendar quarter of 2019.
EUINLINEKILN	Permit to Install Number 140-15, EUINLINEKILN, I.10, Main Stack	Opacity from the Main Stack is limited to 10% based on six-minute averages. Reported opacity was in excess of this limit for 1202 six-minute averages and 8.65% of the total source operating time for the first calendar 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 June 18, 2019 (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.

Additionally, on February 12, 2019, St. Mary's Cement was sent a violation notice for exceedance of the PM10/2.5 emissions limits on EUINLINEKILN. A response to this violation was received on March 6, 2019 which detailed the facility's resolution to this violation. Included as part of this resolution was an extended outage at the facility to occur first quarter of 2019 to make necessary repairs and submission of a new testing plan for retesting following this outage. The facility outage occurred in April of 2019 and no testing plan or proposed retest dates have been received. As of the date of this letter, the facility continues to be in violation of this emissions limit. Please include with the response to this letter an updated proposal to resolve this violation.

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

If St. Mary's Cement 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 St. Mary's Cement. 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,



Rob Dickman
Senior Environmental Quality Analyst
Air Quality Division
231-878-4697

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