



May 22, 2018

Mr. Jeremy Howe  
Michigan DEQ, AQD  
120 West Chapin Street  
Cadillac, MI 49601

RE: Response to Violation Notice, Dated May 22, 2018  
Lafarge Alpena Plant, SRN: B1477

Dear Mr. Howe:

This letter is in response the Notice of Violation issued by on May 2, 2018 for failure to continuously monitor opacity on EU KILN 19 during the first quarter 2018. Following is a written description of the findings that contributed to the excess monitor downtime.

From the investigation it has been determined that several circumstances contributed to this deviation. The first observation is in regard to the operating equipment, EU Kiln 19 (EU Kiln 19, SV25-289) that recorded limited operating time during the quarter due to annual maintenance activities. This limited operating time is significant as it elevates the significance of downtime events that would otherwise be considered insignificant in reporting periods where normal operating hours are observed.

Secondly, it was found that on Saturday, March 24<sup>th</sup> at 5:48 AM the opacity monitor for the emission unit was inadvertently placed into maintenance mode in the Data Acquisition System (DAS). Discovery of the monitors operating mode was later found and corrected on Tuesday, March 27<sup>th</sup> at 4:06 AM. While in maintenance mode in the DAS the instrument continues to send data to the DAS, however the data is flagged and for reporting purposes this data is considered invalid. During this time period, the opacity monitor continued to record compliant measurements that ranged from 13% to 16%, for reference a trend of the opacity during this time is attached to this letter.

The third contributing factor originated on Tuesday, March 27<sup>th</sup> when the instrument was put into maintenance mode intentionally to conduct the annual compliance audit. On March 27<sup>th</sup> at 4:24 AM, the monitor was placed in maintenance mode while maintenance was conducted and then returned on March 30<sup>th</sup> at 6:00 AM returning to normal operation. In the attached trend you can observe the period of time when the instrument was taken out of service and later returned as there is no data recorded during this timeframe.

From the investigation, it is believed that this was a unique incident that does not justify any modification to current preventative maintenance or malfunction abatement plans.

If you have any questions or would like to discuss, please contact Travis Weide at (989) 358-3321 or by e-mail [travis.weide@lafargeholcim.com](mailto:travis.weide@lafargeholcim.com).

**Certification:**

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Signature: 

Date: 5/22/18

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Name (Print): Michael Nixon

Position: Plant Manager

**ALPENA PLANT**

1435 Ford Avenue, Alpena, MI 49707

OFFICE: (989) 354-4171 FAX: (989) 354-2223

**Kiln 19 Opacity Trend**  
**March 24, 2018 through March 30, 2018**

**ALPENA PLANT**

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# Kiln 19

