

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

B147772576

FACILITY: Holcim (US) Inc. DBA Lafarge Alpena Plant		SRN / ID: B1477
LOCATION: 1435 Ford Avenue, ALPENA		DISTRICT: Cadillac
CITY: ALPENA		COUNTY: ALPENA
CONTACT: Lisa Strbik , Environmental and Public Affairs Manager		ACTIVITY DATE: 07/11/2024
STAFF: David Bowman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Part 3 of 3 PCE for onsite inspection		
RESOLVED COMPLAINTS:		

On 24 May and 13 June 2024 and 11 July 2024, I, David Bowman MI EGLE AQD, conducted a site inspection of B1477 Holcim, Alpena MI. This is partial compliance evaluation (PCE) 3 of 3 for the site inspection. I completed the site inspection for the following flexible groups (FG) and emission units (EU):

FG CLINKER SYS (comprised of EU CLINK STR BLD and EU CLINK AD/PROP)

FG FINISH MILLS (comprised of EU BALL MILL 13, 14, 15, 18, 19, 20, and 21; EU ROLL PRESS 20 and 21)

FG FUEL HAND (comprised of EU BLD FUEL PILE; EU PULV 19; EU FUEL PULV 20; EU FUEL PULV 21; EU FUEL PULV 22; and EU FUEL PULV 23)

FG CMTN STR LOAD (comprised of EU STORE UNIT 2, 3, 4, and EU BULK LD TRUCK)

FG CKD HAND SYS (comprised of EU DUST RETURN 5; EU FEED END 6; EU CKD PUGMILL)

FG ALT FUEL HAND (comprised of EU ALT FUEL PILE and EU MIDKILN FUEL)

FG FPENGINES (comprised of EU-FPENGINE1 (149hp) and EU-FPENGINE2 (80 hp)

FGEXGEN (comprised of EUEXGEN19; EUEXGEN20; EUEXGEN21; EUXGEN22; and EUEXGEN23)

FGCOLDCLEANERS

Inspection:

FG CLINKER SYS

I visually inspected Dust Collectors 40-100; 40-110; 41-352, 41-356, 41-349, 41-427, and 41-447. They appeared to be operating correctly and there was no VE observed.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Permittee shall not operate FG CLINKER SYS unless the associated dust collectors and covered clinker conveyors are installed, maintained...

Discussion – the dust collectors and covered conveyors appeared to be maintained and being operated in a satisfactory manner.

3. Permittee may store clinker onsite according to procedures outlined in 40 CFR 63.1343(c)...

Discussion – the clinker that is stored onsite appears to meet the requirements of the regulation and is part of the O&M Plan. There did not appear to be any temporary storage piles older than 3 days.

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. Permittee shall equip and maintain the clinker conveyors with covers...**

Discussion – all the conveyors associated with FG CLINKER SYS appeared to be covered and maintained.

FG FINISH MILLS

I visually inspected dust collectors 45-262, 45-261, 45-264, 49-269, 49-270, 43-271, 43-272, 44-271, 44-272; 44-269 was being repaired; NOTE: 49-265 is a typo and as explained below is in actuality 43-265.

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Permittee shall not operate any equipment in FG FINISH MILLS unless the associated dust collectors are installed...**

Discussion – The dust collectors appeared to be installed and operating correctly. There was ZERO VE present at the time of inspection. There was a noted discrepancy with dust collector 49-265. This dust collector number appears to be a typo in the ROP. After a full walk down of the dust collectors in FG FINISHMILLS that is no indication that this has ever existed. There is a dust collector 43-265 that is installed and is not listed in the ROP. The dust collector was not marked, but the induction fan for this system was marked 43-266 so it makes sense that the dust collector, being the part of the process just before this fan, is 43-265. I believe that in the past inspections a count of outlets was used to determine compliance, and this would explain why it was not discovered in the past. The correct number of outlets is present and since they are not labeled it has been inferred that the numbering system in the ROP was correct.

FG CEMENT STR LD

ROP lists only dust collectors for this FG; However, there are bag houses clearly visible on top of EU STORE UNIT 4. In III. PROCESS/OPERATIONAL RESTRICTIONS references maintaining associated bag houses. I am addressing this during the ROP renewal process.

FG CKD HAND SYS

I visually confirmed the following dust collectors: 31-181; 31-182; 31-171, 32-173, 32-172, and 33-250.

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Permittee shall not operate any equipment in FG CKD HAND SYS unless the associated dust collectors are installed, maintained, and operated in a satisfactory manner...**

Discussion – I saw no VE from the dust collectors at the time of inspection and they appeared to be operating correctly.

FG FUEL HAND

III PROECSS/OPERATIONAL RESTRICTION

1. Permittee shall not operate any equipment in FG FUEL HAND unless the associated dust collectors are installed, maintained,....and includes following the AQD Approved malfunction abatement plan (MAP)...

Discussion – The MAP is on file with the Gaylord District Office and was approved 2 November 2017. During the site inspection the dust collectors appeared operational and maintained as require by the MAP.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. EU BLD FUEL PILE shall be operated in a manner which will minimize the fugitive particulate emissions...

Discussion – signed and a windsock as the fuel pile area is entered gives guidance on actions to take to minimize fugitive emissions. At the time of inspection, the heavy equipment that moves fuel was operating and there was minimal to no observable fugitive emissions. The piles are well inside the plant property boundaries, and I saw no indication that the fugitives would leave the plant property.

FG ALT FUEL HAND

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Shall not operate unless proper storage...including the AQD approved fugitive dust plan (FDP) ...

Discussion: The FDP is on file with the Gaylord District Office and was approved XX XXX XXXX. The plan requirements appeared to be followed and there were no visible emissions associated with the FG.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Shall be operated in a manner which minimized fugitive particulate emissions...

Discussion – the tires are stored in an enclosed trailer and slowly emptied into a sorting area and then moved via conveyor to the midline injection system. There was no VE associated with the storage or use of the alternate fuels.

FG FPENGINES

EU-FP ENGINE 1(S/N PE6068T767214, a John Deere Model 6068TF220) is located in the shed with the pump and EU-FP ENGINE2 (S/N 2103562, a GENERAC by Waukeshaw Model 11189340100) is located directly outside the shed.

IV. DESIGN/EQUIPMENT PARATMETERS

1. The permittee shall not operate any emission unit of FG-ENGINES unless the emission unit is equipped with a non-resettable hour meter.

Discussion – EU-FPENGINE1 has a analogue meter with 326.5 hours on it and EU-FPENGINE2 has a digital meter, but I could not read the display due to a part of the engine shroud that was in the way.

FGEXGEN

Each kiln has an emergency engine associated with it.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip each engine with a non-resettable hour meter...

Discussion—each engine had an analogue hour meter:

EUEXGEN19	3226.1hrs	EUEXGEN20	3750.1hrs	EUEXGEN21
4146.1hrs				
EUEXGEN22	5274.6hrs	EUEXGEN23	114.0hrs	

FG COLDCLEANERS

There are numerous small cold cleaners around the plant. Holcim uses an aqueous based solvent. The lids were closed on those not in use. Each had a copy of the instructions for use on the cold cleaner. I saw no heated cold cleaners. Each had a device (basket) for draining the cleaned parts off. There were no issues noted with the cold cleaners during the inspection process.

NAME



DATE 7-16-24

SUPERVISOR

