



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 5, 2016

Mr. Paul Rogers
Lafarge Midwest, Inc - Alpena Plant
1435 Ford Avenue
Alpena, Michigan 49707

SRN: B1477, Alpena County

Dear Mr. Rogers:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD), reviewed the 2015 emission testing report submitted by Lafarge Midwest, Inc - Alpena Plant located at 1435 Ford Avenue, Alpena, Michigan. The Renewable Operating Permit number MI-ROP-B1477-2012 requires the facility to test and report hydrochloric acid and chlorine gas in parts per million corrected to seven percent oxygen and pounds per hour emissions from EU KILN 19, EUKILN 20, EU KILN 21 and FG KG6 in a manner acceptable to the AQD. Furthermore, the Renewable Operating Permit number MI-ROP-B1477-2012 and Consent Decree 3:10-cv-44-JPG require the facility to monitor and record sulfur dioxide emissions from FG KG6 on a continuous basis in a manner and with instrumentation acceptable to the AQD.

The oxygen and flow continuous emission monitors data used during the associated emission testing was not provided. This data is necessary to calculate emissions to show the sources are in compliance. The sulfur dioxide, oxygen, and flow continuous emission monitors data for the wet gas scrubber controlling emissions from FG KG 6 was not provided. This data is necessary to calculate relative accuracy to show the monitors are in compliance.

During the report review, staff noted the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|--|-------------------------------------|---|
| EU KILN 19, EU KILN 20, EU KILN 21 | MI-ROP-B1477-2012, FG KG5, V, 5 | Annually, the permittee shall test the HCl and chlorine gas emissions from EU KILN 19, EU KILN 20, and EU KILN 21 |
| EU KILN 19, EU KILN 20, EU KILN 21 | MI-ROP-B1477-2012, FG KG5, VI, 1 | The permittee shall make records (including monitoring data) available to the AQD upon request. |

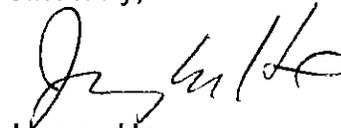
| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|-----------------------------------|---|
| FG KG6 | MI-ROP-B1477-2012, FG KG6, V, 5 | Annually, the permittee shall test the HCl and chlorine gas emissions from EU KILN 22 and EU KILN 23 |
| FG KG6 | MI-ROP-B1477-2012, FG KG6, VI, 1 | The permittee shall make records (including monitoring data) available to the AQD upon request. |
| FG KG6 | MI-ROP-B1477-2012, FG KG6, III, 3 | The SO ₂ , NO _x and CO CEMS shall be calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and Performance Specification (PS) 2 of Appendix B, 40 CFR, Part 60 |
| FG KG6 | MI-ROP-B1477-2012, FG KG6, VI, 1 | The permittee shall make records (including monitoring data) available to the AQD upon request. |

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 26, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the one-minute averages from the oxygen and flow continuous emission monitors on EU KILN 19, EUKILN 20, EU KILN 21 and FG KG6 during the associated emission testing that occurred during July and August, 2015; the one-minute averages from the sulfur dioxide, oxygen and flow continuous emission monitors on FG KG6 during the relative accuracy test audit that occurred on July 14, 2015; an explanation of the causes for not submitting the data; 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 Midwest, Inc - Alpena Plant 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,



Jeremy Howe

Environmental Quality Analyst

Air Quality Division

231-876-4416 / HoweJ1@michigan.gov

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Janis Ransom, DEQ
Mr. Kurt Childs, DEQ