



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

June 4, 2021

Mr. Jeffery Scott, Plant Manager  
Holcim (US) Inc. DBA Lafarge Alpena Plant  
1435 Ford Road  
Alpena, Michigan 49707

SRN: B1477, Alpena County

Dear Mr. Scott:

**VIOLATION NOTICE**

On May 18, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), attended emissions testing at the Lafarge Alpena Plant located at 1435 Ford Rd., Alpena, Michigan. During the course of the emissions test, AQD staff observed significant fugitive dust from a separate area of the plant. AQD staff along with Lafarge Alpena staff investigated and determined the sources were FG CLINKER SYS conveyers. In particular, the dust collection system associated with the 25-285 dust collector appeared to be malfunctioning and dust was escaping from gaps in the covered conveyors. As a result, the AQD has determined the following:

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG CLINKER SYS, conveying equipment	R 336.1910, 40 CFR 63.1347 FG CLINKER SYS; SC III.1.	Operation of FG CLINKER SYS while a dust collector is not operating in a satisfactory manner.

Rule 910 of the administrative rules promulgated under Act 451 requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

FG CLINKER SYS is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Portland Cement Plants found in 40 CFR Part 63, Subpart LLL. Subpart LLL requires proper operation of the dust collectors in accordance with the approved Operations and Maintenance plan which requires monthly visible emissions monitoring of FG CLINKER SYS.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 25, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

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 violation cited above and for the cooperation that was extended to me during my inspection of Lafarge Alpena. If you have any questions regarding the violation 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, appearing to read 'Kurt Childs', with a stylized flourish at the end.

Kurt Childs  
Senior Environmental Quality Analyst  
Air Quality Division  
231-878-2045

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