



November 14, 2022

Joseph Scanlan
 Environmental Quality Analyst
 EGLE Air Quality Division
 Marquette District
 1504 West Washington Street
 Marquette, Michigan 49855

**RE: Response to October 24, 2022, Notice of Violation
 Graymont Western Lime Inc. – Port Inland Plant**

Dear Mr. Scanlan:

This responds to your October 24, 2022 Notice of Violation (NOV) submitted to Graymont Western Lime Inc. Port Inland Plant (Graymont) regarding a failed stack test that occurred on August 17, 2022.

As requested by the NOV, Graymont's 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.

August 17, 2022 Stack Test Results

The August stack test showed PM-10 results slightly above the permitted levels:

Emission Unit IDs	Emission Unit Name	Regulated Constituent	Regulatory Citations	Regulatory Limit	Average Test Result
Kiln 1	Lime Kiln	Particulate Matter ¹	40 CFR 63.7090(a)	≤0.10 LB/Ton Stone Feed (TSF)	0.0475 LB/TSF
				≤0.05 grams/dscm	0.0175 grams/dscm
		PM-10 ²	R 336.1205 40 CFR 52.21(j)	≤7.5 LB/HR	7.85 LB/HR
				≤0.10 LB/TSF	0.125 LB/TSF

¹Filterable non-condensable particulate matter (EPA Method 5).

²Filterable + condensable particulate matter (EPA Method 201A/202).



GRAYMONT

Investigation Summary

Prior to the test, maintenance of the kiln air pollution control device was found to be up to date including a recent internal inspection of the clean-side plenum, bag condition, and mechanical equipment. A fluorescent powder test had also been performed, and no bag leaks were identified.

Following the stack test, Graymont promptly investigated and found the elevated emissions were likely attributable to a small number of bags in the initial baghouse compartment closest to the inlet. Graymont made the decision to immediately change all baghouse bags and perform a retest, which was conducted by Pace Analytical on September 13, 2022.

September 13, 2022 Stack Test Results

The results from the retest were well within the permitted levels as shown in the table below.

Emission Unit IDs	Emission Unit Name	Regulated Constituent	Regulatory Citations	Regulatory Limit	Average Test Result
Kiln 1	Lime Kiln	Particulate Matter ¹	40 CFR 63.7090(a)	≤0.10 LB/Ton Stone Feed (TSF)	0.00218 LB/TSF
				≤0.05 grams/dscm	0.000720 grams/dscm
		PM-10 ²	R 336.1205 40 CFR 52.21(j)	≤7.5 LB/HR	1.44 LB/HR
				≤0.10 LB/TSF	0.0216 LB/TSF

¹Filterable non-condensable particulate matter (EPA Method 5).

²Filterable + condensable particulate matter (EPA Method 201A/202).



GRAYMONT

If you have any questions or require additional information, please feel free to contact me at 906-283-2352.

Sincerely,

A handwritten signature in black ink that reads "Steve White". The signature is written in a cursive, flowing style.

Steve White
Plant Manager

cc: John Maitland – Graymont
Hal Lee – Graymont
Keith Miller – Graymont