

From: [Danesh, Paymon](#)
To: [Childs, Kurt \(EGLE\)](#); [Nixon, Shane \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)
Cc: [Valenziano, Beth](#); [Blathras, Constantine](#); [Damico, Genevieve](#)
Subject: USEPA comments RE: 30 day public comment period; Holcim dba Lafarge Alpena Plant, B1477
Date: Wednesday, June 3, 2020 2:40:09 PM

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Below are EPA's comments regarding the draft renewal ROP for Holcim dba Lafarge Alpena Plant. If you have any questions or would like to discuss further, please let Beth Valenziano or me know.

Thank you,
Paymon

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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for Holcim dba Lafarge Alpena Plant (State Registration Number: B1477), located in Alpena, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Condition III(1) on page 12 states the Fugitive Dust Control Plan (the Plan) shall include, but not be limited to, fugitive emission control for all plant roadways, the plant yard, all material storage piles, and all material handling operations. However, the Plan does not include fugitive emission control measures for the portable crusher EU PORTCRUSH, which is used to reduce the size of aggregate for use as road gravel. We also note that Condition III(3) on page 27 appears to imply that the Plan includes dust control measures related to EU PORTCRUSH. Please review whether the Plan includes sufficient provisions for EU PORTCRUSH and request modifications to the Plan, as necessary, in accordance with condition III(1).
2. Condition III(3) on page 27 cites 40 CFR 60.672(a) as an underlying requirement, which pertains to stack emission limits for affected facilities. However, condition III(3) pertains

to fugitive emissions. An appropriate citation may be 40 CFR 60.672(b), which references the fugitive emission limits and compliance requirements of 40 CFR 60, Subpart OOO, Table 3. Please review and revise the citation as necessary, in accordance with 40 CFR §70.6(a)(1)(i).

3. Condition III(1) on page 37 cites 40 CFR 60.672(a) as an underlying requirement, which pertains to stack emission limits for affected facilities. However, the equipment described in condition III(1) involve both stack and fugitive emissions. As such, it appears that 40 CFR 60.672(b) is also an appropriate citation for condition III(1). Please review and update the citation as necessary, in accordance with 40 CFR §70.6(a)(1)(i).
4. The Staff Report indicates that the 44 tpy PM-10 limit for EU BALL MILL 20 AND EU BALL MILL 21 (in FG FINISHMILLS) is subject to the 40 CFR Part 64 Compliance Assurance Monitoring (CAM) requirements. However, the FG FINISHMILLS permit emissions table includes additional PM and PM-10 limits that may also be subject to CAM.
 - a. Please verify which pollutant specific emission units (i.e., which PM and PM-10 emission limits in FG-FINISHMILLS) are subject to CAM in the Staff Report. Pursuant to 40 CFR § 64.3, the monitoring design criteria established under CAM must provide a reasonable assurance of compliance with each emission limitation or standard. The Staff Report should document CAM applicability and the basis for the monitoring design criteria established under CAM by verifying the relevant PM and PM-10 emission limitations or standards subject to CAM for EU BALL MILL 20 and 21, in accordance with 40 CFR § 70.7(a)(5).
 - b. Please revise the permit as necessary to ensure that the permit identifies the monitoring requirements for EU BALL MILL 20 and EU BALL MILL 21 that are used to determine compliance with each CAM-subject PM and PM-10 emission limit, in accordance with 40 CFR §64.2(b), §70.6(a)(1), §70.6(a)(3)(i)(A), and §70.6(c)(1). For example, the Monitoring/Testing Method column in the emissions table could reference applicable CAM requirements for each CAM-subject limit. Note also that 40 CFR § 64.6(c)(2) states that the permit shall specify the means by which the owner or operator will define an exceedance or excursion for purposes of responding to and reporting exceedances or excursions under CAM. 40 CFR Part 64 defines “Exceedance” as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard” (emphasis added).

From: Nixon, Shane (EGLE) <NIXONS@michigan.gov>

Sent: Friday, May 1, 2020 10:03 AM

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Subject: ROP EPA Notification - 30 day public comment period; Holcim dba Lafarge Alpena Plant, B1477

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-B1477-20XX, for Holcim (US) Incorporated d/b/a Lafarge Alpena Plant (State Registration Number: B1477), located in Alpena, Alpena County, Michigan. The public comment period begins on May 4, 2020 and will end on June 3, 2020.

The Public Notice, Renewal ROP Application, Draft ROP, plans referenced in the ROP, and the Staff Report are available through the internet. The documents are located at the following address:

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<http://www.michigan.gov/egle/0,4561,7-135-3310-389493--,00.html>

Any comments that you could provide prior to the actual 45-day Environmental Protection Agency notice period would be appreciated. Comments can be e-mailed to Kurt Childs (ChildsK@michigan.gov), Senior Environmental Quality Analyst, EGLE, Cadillac District Office. Please copy Shane Nixon (NixonS@michigan.gov), Cadillac District Supervisor, EGLE, Christopher Ethridge (ethridgec@michigan.gov), Field Operations Manager, EGLE, and Kelly Orent, (orentk@michigan.gov), EGLE.

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