DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FÇE Summary Report

Facility:	LAFARGE MID	WEST	ŅĊ.				SRN:	B1477
Location :	1435 Ford Ave						District :	Cadillac
						Ì	County:	ALPENA
City:	ALPENA	State:	MI	Zip Code :	49707	Comp		Non Compliance
Source Cla	ss: MAJOR				•	Staf	f: Kurt C	childs
FCÉ Begin	Date: 1/1/2015					FCE Date	Completion :	8/23/2016
Comments	: 2016 FCE							•

List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
08/04/2016	Excess Emissions (CEM)	Compliance	2016 2nd Quarter EER. Report timely and certified. All EE and downtime less than 1% except KG6 NOX and CO.(scroll down for details) KG5 SO2, NOX, & CO: EE &CEM downtime less than 1%. KG5 VE EE & COM downtime: EE & downtime less than 1%. KG6 Kiln 22 NOX,@ 1.24% DT and CO @ 1.13%. and Kiln 23 NOX 2.15% and CO 2.09%. KG6 Wet FGD SO2 EE & downtime less than 1% FG CLINK COOL PM CPMS: downtime less than 1% FG CLINK COOL Opacity: EE and downtime less than 1%. Raw Mill 14 and 15 THC Monitor EE & downtime less than 1%. Includes CGA.
08/02/2016	CO/CJ	Compliance	Consent Decree Semiannual Report for January-June 2016. The report is a requirement of the consent decree, paragraph 106.
07/19/2016	Scheduled Inspection	Non Compliance	2016 PCE 4, FCE summary. FG QUARRY, FG RAW MAT, FG RAW MILL SYS, FG MERCURY.
07/19/2016	Stack Test Observation	Compliance	FG CLINK COOL, FG RAW MILL stack test observation.
07/12/2016	Stack Test Observation	Compliance	Observation of Kiln 20 HCL, PM, RATA testing and Raw Mill 14 PM, SO2, and THC emissions testing.

Activity Date	Activity Type	Compliance Status	Comments
06/21/2016	Excess Emissions (CEM)	Compliance	2016 1st Quarter EER. KG5 SO2, NOx, & CO: EE &CEM downtime less than 1%. KG5 VE EE & COM downtime: EE & downtime less than 1.51%. KG6 SO2, NOx, & CO EE: less than 1%. KG6 Wet FGD SO2 EE & downtime less than 1% FG CLINK COOL PM CPMS: downtime less than 1% FG CLINK COOL Opacity: EE & downtime less than 1%. Raw Mill 14 and 15 THC Monitor EE & downtime less than 1%. Includes CGA.
06/02/2016	Scheduled Inspection	Non Compliance	2016 FCE; PCE 3 FG FINISH MILLS, FG CMT STR LOAD, FG CKD HANDSYS, FG COLDCLEANERS.
05/16/2016	Telephone Notes	Compliance	The purpose of the call was to discuss FG FINISHMILLS, application 171-15, and CAM.
05/03/2016	Meeting Notes	Compliance	Meeting in Lansing to discuss PTI application 171-15 draft conditions.
04/27/2016	Scheduled Inspection	Non Compliance	2016 FCE; PCE #2. FG KG 5, FG FUEL HAND, FG CLINK SYS.
04/04/2016	CAM monitor downtime	Compliance	Semi-annual CAM Report July-December 2015 Monitor Downtime. The permittee reported there were downtimes on FG CLINK COOL COMs and KG5 COMs. The ROP does not have CAM conditions for the kilns because they are not subject to PC MACT.
04/04/2016	ROP Annual Cert	Compliance	Annual Compliance Certification Report ROP No. MI-ROP-B1477- 2012a January- December 2015. Report contains mainly monitor downtime and excess emission deviations previously reported. Also deviations for stack testing issues identified in G.T's. 12/15/2015 VN.
04/04/2016	CAM Excursions/Exceedan ces	Compliance	Semi-Annual CAM Report July- December 2015 Excursion/Exceedance. The FG CLINK COOL had 3266 minutes of exceedance. COMS have now been replaced by PM CPMS. FG KG5 COMS 48 minutes of exceedance.

Activity Date	Activity Type	Compliance Status	Comments
04/04/2016	ROP SEMI 2 CERT	Compliance	2015 2nd Semi-annual Report ROP No. MI-ROP-B1477-2012a July - December 2015. Report contains mainly monitor downtime and excess emission deviations previously reported. Also deviations for stack testing issues identified in G.T's. 12/15/2015 VN.
03/22/2016	MAERS	Compliance	See MAERS database for further info.
03/02/2016	MACT (Part 63)	Compliance	PC MACT Semi-Annual Report July - December 2015 for emission units subject to the PC MACT that also have CEMS or other CMS. Currently includes FG RAW MILL SYS and FG CLINK COOL. The report was complete, timely and certified. No EE, malfunctions, exceedences, or O&M probs.
02/23/2016	Self Initiated Inspection	Compliance	Observations of Quarry and FG KG6 stack.
02/18/2016	Other	Compliance	MI-ROP-B1477-2012a. Source- Wide condition VII. 4.
02/18/2016	ROP Semi 1 Cert	Compliance	ROP No. MI-ROP-B1477-2012. January - June 2015 Semiannual Report.
02/17/2016	Telephone Notes	Compliance	2015 Semiannual Reports related to consent decree, terminating consent decree. AQD: Gloria Torello & Melissa Byrnes, EPA: Shawn Burke.
02/03/2016	Excess Emissions (CEM)	Compliance	2015 4th Quarter EER. KG5 SO2, NOx, & CO: EE &CEM downtime less than 1%. KG5 VE EE & COM downtime: EE & downtime less than 1.15%. KG6 SO2, NOx, & CO EE: less than 1%. KG6 Wet FGD SO2 EE & downtime less than 1% FG CLINK COOL PM CPMS: downtime less than 1% except CC22 6.99%. FG CLINK COOL Opacity: EE & downtime less than 1%. Raw Mill 14 and 15 THC Monitor EE & downtime less than 1%. Includes Annual COMS Audit and CGA.
01/28/2016	Scheduled Inspection	Compliance	2016 PCE Site inspection and records review FG KG6, FG CLINK COOL.

Activity Date	Activity Type	Compliance Status	Comments
01/27/2016	CO/CJ	Compliance	Consent Decree. Lafarge submitted the semi-annual report covering the period from January 1 to June 30, 2015. The report is a requirement of the consent decree, paragraph 106. Not considered late because Travis Weide/B1477 supplied a copy of a 1/24/15 email transmittal.
01/25/2016	CO/CJ	Compliance	Consent Decree. Lafarge submitted the semi-annual report covering the period from July 1st to December 31st, 2015. The report is a requirement of the consent decree, paragraph 106.
01/25/2016	Malfunction Abatement Plan	Compliance	MAP for KG 6 Wet Flue Gas Desulfurization System. Final MAP approval of revisions to 12/18/15 plan.
01/25/2016	Malfunction Abatement Plan	Compliance	Malfunction Abatement Plan for Kiln SNCR, DAA & Main Baghouse Systems. Final MAP approval of revisions to 12/18/15 plan.
01/19/2016	CO/CJ	Compliance	Lafarge sent AQD & EPA paperwork documenting they are seeking a PTI for the new KG6 w/ Wet FGD 30-day Rolling Average SO2 limit established as a result of the Consent Decree. On 11/10/15 Lafarge sent M. Byrness, AQD, paperwork adding this to application 171-15.
01/11/2016	ROP Other	Compliance	2015 Test Results, Kilns 22 & 23 HCl & PM. Lafarge sent AQD a revised page 2.0 HCL and PM Results for the Kilns 22 & 23 for HCL test showing shingles were burned during testing. This correction of "data entry error by the contractor" was requested in AQD's 12/2/15 letter to Lafarge.
12/10/2015	ROP Other	Compliance	Rec'd response to Letter of Violation Notice dated November 12, 2015. AQD anticipates seeing in Lafarge's July-December 2015 Semi-Annual Report Certification and in the 2015 Annual Compliance Certification deviations. And requested revised HCL test results showing plastic/shingles burned.

Activity Date	Activity Type	Compliance Status	Comments
11/24/2015	Stack Test	Non Compliance	PM testing on Clinker Coolers 19, 20, 21, 22, and 23; and the performance test of the THC CEM on Raw Mills 14 and 15. AQD was not notified of the September 1-3, 2015 PM testing on CC 19, 20, 21. The test report was received more than 60 days after last date of testing. VN
11/10/2015	Stack Test	Compliance	2015 Test Results: Raw Mills PM; and Kilns 19, 20, 21, 22, and 23 HCI & PM. Raw Mills and Kilns PM below permitted limits. Report shows Kilns 21, 22, and 23 did not burn plastic &/or shingles during HCI testing-as required in 2015, deviates from approved test plan, follow-up needed.
11/10/2015	ROP Other	Compliance	May-September 2015 ozone report. ROP FG KG6 NOx limits are 12.7 lbs/ton clinker per kiln (22 and 23). Lafarge reported combined NOx emissions averaged 4.36 #/ton clinker. NOx emissions for the individual kilns were 4.33 lbs/Ton for 22 and 4.39 lbs/ton for 23. Certification included.
11/09/2015	Other	Compliance	Follow-up to AQD's 10/13/15 letter to Lafarge regarding readings from the control room monitor as the readings relate to FG KG6 Wet FGD operating parameters described in the MAP approved the governments on June 16, 2014.
11/09/2015	Other	Compliance	Follow-up to AQD's 10/13/15 letter to Lafarge regarding readings from the control room monitor as the readings relate to FG KG6 Wet FGD operating parameters described in the MAP approved the governments on June 16, 2014.
11/09/2015	Other	Compliance	Follow-up to AQD's 10/13/15 letter to Lafarge regarding readings from the control room monitor as the readings relate to FG KG6 Wet FGD operating parameters described in the MAP approved the governments on June 16, 2014.

Activity Date	Activity Type	Compliance Status	Comments
11/09/2015	Other	Compliance	Follow-up to AQD's 10/13/15 letter to Lafarge regarding readings from the control room monitor as the readings relate to FG KG6 Wet FGD operating parameters described in the MAP approved the governments on June 16, 2014 & Steve Kohl's 10/20/15 email w/ a revised MAP.
11/05/2015	CEM RATA	Compliance	2015 CERMS RATA. FG KG5 & FG KG6. EU Kiln 21 NOx 19.9% of RA, limit is 20%. Includes Drift results which are below the Acceptance Criteria. Report Certification not included with report, VN.
11/04/2015	Excess Emissions (CEM)	Compliance	2015 Q 3EER. KG5 SO2, NOx, & CO: EE &CEM downtime less than 1%. KG6 SO2, NOx, & CO EE: less than 1%.KG5 VE EE & COM downtime: less than 1%. KG6 no COM. Clinker Cooler VE EE &COM: downtime less than 1%. RO signature included. TPU reviews CEMS downtime & CGA.
10/27/2015	Meeting Notes	Compliance	Lafarge's/Kohl's response to notes from meeting on Thursday October 22, 2015. PTI/ROP clean up; MAPs KG6 Wet FGD, KG5 SNRC, and DAA; Incorporating PTIs 89-13A, 195-10B, 106-08A into the ROP.
10/26/2015	CO/CJ	Compliance	On October 16, 2015 US EPA & MI AQD, the governments, approved the Final Demonstration Report for FG KG6 and the proposed final limit of 1.98 pounds of SO2 per ton of clinker.
10/22/2015	Meeting Notes	Compliance	Notes from meeting on Thursday October 22, 2015. PTI/ROP clean up; MAPs KG6 Wet FGD, KG5 SNRC, and DAA; Incorporating PTIs 89-13A, 195-10B, 106-08A into the ROP.
10/06/2015	Rule 912	Compliance	Deviation report, Kiln 23 cooler opacity exceedance. The purge blower intake line became plugged thus not allowing the lens to be properly cleaned, leading to higher recorded opacity readings.
10/05/2015	Self Initiated Inspection	Compliance	Site visit with AQD's Gloria Torello, Melissa Byrnes, and Kurt Childs.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2015	CO/CJ	Compliance	Consent Decree. AQD received the 5th Interim Demonstration Report for the KG6 Wet FGD which is a requirement of the consent decree. EPA/Burke & AQD/Torello & Byrnes staff spoke on 6/4/15. EPA will review the report and contact AQD if they find anything noteworthy.
09/01/2015	Telephone Notes	Compliance	September 1, 2015 meeting with AQD staff and Lafarge: ROP Cleanup.
08/26/2015	Telephone Notes	Compliance	Notes from AQD Staff Call on 8/26/15.
08/20/2015	Telephone Notes	Compliance	Tx with EPA staff to discuss the MAP approved by EPA which is a requirement of the consent decree.
08/12/2015	Telephone Notes	Compliance	ROP Clean-up telephone call.
08/05/2015	Excess Emissions (CEM)	Compliance	2015 2nd Quarter EER. KG5 SO2, NOx, & CO EE and CEM downtime less than 1%. KG5 VE EE and COM downtime less than 1%. KG6 SO2, NOx, & CO EE less than 1%, SO2's Wet FGD down 3.99%. KG6 no COM. Clinker Cooler VE EE and COM downtime less than 1% RO signature.
07/29/2015	Telephone Notes	Compliance	ROP Clean-up telephone call.
07/21/2015	Stack Test Observation	Compliance	On site for Clinker Cooler testing.
07/20/2015	Other Non ROP		Fugitive dust Control Plan, Appendix A to Air Use Permit No. 186-99
07/14/2015	Stack Test Observation	Compliance	On site for RATA.
07/09/2015	Scheduled Inspection	Compliance	2015 FCE
06/18/2015	Telephone Notes	Compliance	ROP Clean-up telephone call.
06/16/2015	Self Initiated Inspection	Compliance	Meet Travis Weide.
06/15/2015	Telephone Notes	Compliance	ROP Clean-up telephone call.
06/15/2015	CO/CJ	Compliance	Consent Decree. AQD received the 5th Interim Demonstration Report for the KG6 Wet FGD which is a requirement of the consent decree. EPA/Burke & AQD/Torello & Byrnes staff spoke on 6/4/15. EPA will review the report and contact AQD if they find anything noteworthy.
05/27/2015	Self Initiated Inspection	Compliance	View facility while in the county.

Activity Date	Activity Type	Compliance Status	Comments
05/21/2015	Other	Compliance	Bob Jongleux of URS Raleigh, via Bob Budnik of Lafarge, submitted the 2015 test plans for: KG5 & KG6 CERMS RATA, HCL, and PM; and Raw Mills 14 & 15 PM. AQD's Jeremy Howe and Gloria Torello are assigned.
05/21/2015	Self Initiated Inspection	Compliance	View Quarry
05/12/2015	Excess Emissions (CEM)	Compliance	2015 First Quarterly Report, January-March. Excess emissions were typically zero or well below 2%. COM downtime: KILN 19 was 3.73% and KILN 21 was 5.25% both due to purge blower failure and a weather delay in the repair-TPU will review.
05/04/2015	Telephone Notes	Compliance	ROP Clean-up telephone call.
04/13/2015	CO/CJ	Compliance	Consent Decree. AQD received the 4th Interim Demonstration Report for the KG6 Wet FGD which is a requirement of the consent decree. EPA was copied on the report.
04/06/2015	ROP Other	Compliance	Deviation report, Kiln 23 cooler opacity exceedance. A large piece of coating in Kiln 23 came loose and dropped causing a spike in opacity that lasted two hours. The kiln was slowed down to help control the dust until the incident passed.
03/31/2015	Telephone Notes	Compliance	ROP Clean-up Telephone Call.
03/26/2015	Self Initiated Inspection	Compliance	Site visit with: from AQD staff Gloria Torello, Eric Wolf, and Jeremy Howe; from Lafarge Josh Strapec, and from FTCH consulting Lillian Woolley and Stephanie Jarrett.
03/25/2015	ROP Other	Compliance	Permit 195-10B, to be incorporated into the ROP, has a FG MERCURY limit of 218.0 lbs/year. Lafarge reported a total of 118.1249 tons Hg for 2014.
03/23/2015	CAM monitor downtime	Compliance	Semiannual CAM Report July- December 2014 Monitor Downtime. The permittee reported there were downtimes on FG CLINK COOL COMs, KG6 Wet FGD CEMS, and KG5 COMs. The ROP does not have CAM conditions for the kilns because they are not subject to PC MACT.

Activity Date	Activity Type	Compliance Status	Comments
03/23/2015	ROP Annual Cert	Compliance	Annual Compliance Certification Report ROP No. MI-ROP-B1477- 2012 January- December 2014.
03/23/2015	CAM Excursions/Exceedan ces	Compliance	Semi-Annual CAM Report July- December 2014 Excursion/Exceedance. The FG CLINK COOL had 1062 minutes of exceedance.
03/17/2015	CO/C1	Compliance	Consent Decree. AQD received the 2nd Interim Demonstration Report for the KG6 Wet FGD which is a requirement of the consent decree. EPA was copied on the report.
03/16/2015	ROP SEMI 2 CERT	Compliance	Semiannual Report ROP No. MI- ROP-B1477-2012 July - December 2014.
03/16/2015	MAERS		2014 MAERS, Check MAERS for any review comments
03/09/2015	CO/CJ	Compliance	Consent Decree. AQD received the 3rd Interim Demonstration Report for the KG6 Wet FGD which is a requirement of the consent decree. EPA was copied on the report.
03/09/2015	CO/C1	Compliance	Consent Decree. AQD received the July-December 2014 Semiannual Report which is a requirement of the consent decree. EPA was copied on the report.
02/17/2015	Telephone Notes	Compliance	Tx call to discuss ROP clean-up.
02/11/2015	MACT (Part 63)	Compliance	PC MACT Semi-Annual Report July - December 2014 for FG RAW MAT, FG KG5, FG KG 6, FG CLINK COOL, FG FINISH MILLS. Per the ROP, the report is a future applicable requirement for FG RAW MILL SYS, and FG CLINK COOL.
02/11/2015	Excess Emissions (CEM)	Compliance	2014 4th Quarter EER. Excess Emissions below 1%. Kiln 19 Monitor Downtime 2.73 percent.
02/05/2015	Telephone Notes	Compliance	Tx w/ AQD's Torello, Ransom, Byrnes. ROP Clean-up. 15-05. PSD. ROP Source wide condition VI. 1. and VII.4.
01/29/2015	ROP Other	Compliance	ROP. FG RAW MAT. Bob Budnik provided New Ash Supplier info, see Bob's email from 1/28/15.

Activity Date	Activity Type	Compliance Status	Comments
01/29/2015	ROP Other	Compliance	Shingles Asbestos Certification Documents-on 12/2/14 Bob Budnik submitted. A copy of the document is attached and in the Lab Samples folder. Document shows asbestos "Not detected."
01/28/2015	Malfunction Abatement Plan	Compliance	Bob Budnik submitted a Sampling Plan For Alternate Fuels as required by PTI 106-08A. Torello requested the plan name be changed to Alternate Fuels Procurement Plan, Bob did not object. With this change, the plan is approved.
01/27/2015	Scheduled Inspection		Site visit, in response to notification the secondary crusher pump malfunctioned causing visible emissions.
01/22/2015	Malfunction Abatement Plan	Compliance	Dust Incident with Stone Tower. MAP update needed.
01/20/2015	Telephone Notes	Compliance	Telephone meeting to discuss a PTI to clean-up ROP conditions.
01/13/2015	Complaint Investigation	Compliance	Fugitive dust complaint.

lame: ZZZ-16 Supervisor:

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