## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

## **FCE Summary Report**

Facility: Holcim (US) Inc. d/b/a Lafarge Alpena Plant SRN: B1477 Location: 1435 Ford Avenue District: Cadillac County: ALPENA ALPENA State: MI Zip Code: 49707 Compliance City: Compliance Status: Source Class: Staff: Kurt Childs **MAJOR** FCE Begin Date: 1/1/2017 **FCE Completion** 8/27/2018 Date: Comments: 2018 FCE

## **List of Partial Compliance Evaluations:**

Activity Date	Activity Type	Compliance Status	Comments
07/24/2018	Excess Emissions (CEM)	Compliance	See Activity Report
07/24/2018	Other	Compliance	2018 Second Quarter EER.
07/18/2018	Scheduled Inspection	Compliance	2018 PCE 3 and FCE.
07/17/2018	Stack Test Observation	Compliance	KG5 Clinker Cooler PM/CPMS stack test.
05/29/2018	Complaint Investigation	Compliance	Complaint follow-up. Process upset with Kiln 19 verified by Lafarge 6/7/18.
05/08/2018	Other	Non Compliance	2018 first Quarter EER and Monitor Downtime.
05/07/2018	Scheduled Inspection	Compliance	PCE2. FG FUEL HAND, FG KG5, FG KG6, FG CLINK COOL.
04/30/2018	ROP Annual Cert .	Compliance	Annual Compliance Certification Report ROP No. MI-ROP-B1477- 2012c January- December. Report contains mainly monitor downtime and excess emission deviations previously reported in Quarterly Excess Emission reports.
04/30/2018	CAM Excursions/Exceedan ces	Compliance	Semi-Annual CAM Report July- December Excursion/Exceedance. FG KG5 COMS :420 min. EE, FG CLINK COOL CPMS had 1056 minutes of exceedance.

Activity Date	Activity Type	Compliance Status	Comments
04/30/2018	CAM monitor downtime	Compliance	Semi-annual CAM Report July-December Monitor Downtime. The permittee reported there were downtimes on FG CLINK COOL COMs(CPMS) and KG5 COMs. The ROP does not have CAM conditions for the kilns because they are not subject to PC MACT. All Downtime previously reported.
04/30/2018	ROP SEMI 2 CERT	Compliance	2017 2nd Semi-annual Report ROP No. MI-ROP-B1477-2012c July - December 2016. Report contains mainly monitor downtime and excess emission deviations previously reported.
04/30/2018	Excess Emissions (CEM)	Compliance	See Activity Report
04/17/2018	ROP R215 Notification	Compliance	Change in RO from Paul Rogers to Michael Nixon. Notification of Change # 201800051
03/14/2018	Scheduled Inspection	Compliance	2018 FCE, PCE #1. Source Wide, FG QUARRY, FG RAW MAT, FG RAW MILL SYS.
03/05/2018	MAERS	Compliance	See MAERS for further info.
03/02/2018	MACT (Part 63)	Compliance	FG RAWMILL SYS VII.7 and FG CLINK COOL VII.5; Subpart LLL semi annual summary 40 CFR 63.1354(b)(9). Report was timely, certified. Hard copy print out of CEDRI submission. No O&M plan deviations, or monitor downtime. Excess emissions noted in 11/17 for clink cool 22 and 23.
03/02/2018	Other	Compliance	2017 2nd semi-annual PC MACT CEMS/CPMS summary report.
02/21/2018	Excess Emissions (CEM)	Compliance	See Activity Report B147743359
02/21/2018	Other	Compliance	2017 4th Quarter EER Review.
01/08/2018	Malfunction Abatement Plan	Compliance	MAP for Quarry Activities (FGQUARRY)
01/08/2018	ROP Other	Compliance	Operation and Maintenance Plan - (combined O&M and MAP) FG RAWMAT, FG RAW MILL SYS, FG CLINK COOL, FG CLINKER SYS, FG FINISH MILLS, FG CMT STR LOAD, FG CKD HAND SYS, FG KG5, FG KG6.
01/08/2018	Malfunction Abatement Plan	Compliance	MAP for Fuel Handling Activities (FG FUEL HAND)
01/08/2018	ROP Other	Compliance	Response to ROP additional information request - CAM applicability.

Activity Date	Activity Type	Compliance Status	Comments
01/08/2018	Malfunction Abatement Plan	Compliance	Fugitive Dust Control Plan
01/08/2018	Malfunction Abatement Plan	Compliance	Malfunction Abatement Plan, FG KG5 & FG KG6 Kiln SNCR, DAA & Main Baghouse Systems
01/08/2018	Malfunction Abatement Plan	Compliance	Malfunction Abatement Plan, FG KG6 Wet Flue Gas Desulfurization System
01/08/2018	Malfunction Abatement Plan	Compliance	AIR-SOP for Malfunctions Affecting Environmental Systems (AIR)
01/08/2018	Malfunction Abatement Plan	Compliance	Alternative Fuel Procurement Plan
01/08/2018	Malfunction Abatement Plan	Compliance	Sampling Plan for Mass Balance Calculations for HG Emissions
01/08/2018	Malfunction Abatement Plan	Compliance	CEMS Quality Assurance Plan
01/08/2018	Malfunction Abatement Plan	Compliance	CISWI Site Specific Monitoring Plans
01/08/2018	Malfunction Abatement Plan	Compliance	CISWI Waste Management Plan
12/20/2017	Stack Test	Compliance	3rd revision of July 2017 PM stack test report for FG KG6 and FG CLINK COOL. Report now contains all necessary information to determine compliance.
12/12/2017	Stack Test	Compliance	10/24/2017 Re-test of Clinker Coolers 22 and 23. Report was certified an timely. See Activity Report for more details.
12/12/2017	Sample Results Review	Compliance	10/24/2017 Clinker Cooler 22 and 23 PM emission test and PM CPMS operating limit.
11/27/2017	Stack Test	Compliance	FG CLINK COOL and FG KG6 Wet FGD PM emissions test report. Report was first reviewed by J.H. TPU. Several concerns have now been addressed. See Activity Report.
11/27/2017	Sample Results Review	Compliance	July 2017 FG CLINK COOL, FG KG6 WFGD emission test.
11/22/2017	CEM RATA	Compliance	FG KG5, FG KG6, and FG RAW MILL SYS CEMS RATA. Report indicates each CEMS passed RATA. Testing that was not completed as originally scheduled for K21, K23 and WGS was postponed and eventually completed. Additional review by TPU pending.
11/22/2017	Other	Compliance	2017 3rd Quarter EER review.
11/21/2017	Stack Test	Compliance	Revised Report for EU FUEL HAND PM10 Emissions Rates.

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11/21/2017	Sample Results Review	Compliance	Review of amended test report for FG FUEL HAND PM10 emissions test. Also see CA B147741255 8/28/2017.
10/05/2017	Telephone Notes	NA	FG CLINK COOL 7/2017 test results.
09/13/2017	ROP Semi 1 Cert	Compliance	2016 1st Semi-annual Report ROP No. MI-ROP-B1477-2012b. Report contains 27 monitor downtime incidents and 8 excess opacity deviations. EERs for 2017 1st and 2nd quarter also reported high Monitor downtime and are being reviewed by TPU.
09/11/2017	MACT (Part 63)	Compliance	FG RAWMILL SYS VII.7 Subpart LLL semi annual summary 40 CFR 63.1354(b)(9). Report was timely, certified. Hard copy print out of CEDRI submission. No O&M plan deviations, emissions exceedences or monitor downtime.
08/31/2017	Stack Test	Compliance	MI-ROP-B1477-2012b FG FUEL HAND PM10 emissions test. Results indicate compliance but report is still under review by TPU.
08/28/2017	Sample Results Review	Compliance	Review of test report for June 2016 test of EU FUEL HAND.
07/31/2017	Excess Emissions (CEM)	Compliance	2017 2nd Quarter EER. Report timely and certified, see Activity Report for details.
07/31/2017	Other	Compliance	2017 2nd Quarter EER review.
07/19/2017	Stack Test Observation	NA	2017 FG KG5 Clinker Cooler PM/CPMS test.
06/27/2017	Stack Test Observation	NA	FG FUEL HAND PM/PM10 testing.
06/27/2017	Complaint Investigation	Compliance	VE complaint and hazardous waste fuel burning allegation.
05/19/2017	MAERS	Compliance	Received ROP Cert Form for MAERS Submittal. MAERS report was submitted timely but without this certification. MAERS has been returned to Lafarge to update the submittal to include missing emission units.
05/11/2017	Other	Compliance	Receipt of 7/12 and 8/25 2016 EU RAW MILL 14 PM stack test review by Mark Dziadosz - AQD TPU. Review indicates emissions reported were within ROP emission limits and can be used for compliance determination.

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05/08/2017	ROP Annual Cert	Compliance	Annual Compliance Certification Report ROP No. MI-ROP-B1477- 2012a January- December. Report contains mainly monitor downtime and excess emission deviations previously reported in Quarterly Excess Emission reports.
05/08/2017	CAM Excursions/Exceedan ces	Compliance	Semi-Annual CAM Report July- December Excursion/Exceedance. The FG CLINK COOL PM CPMS had 1686 minutes of exceedance. FG KG5 COMS 156 minutes of exceedance.
05/08/2017	CAM monitor downtime	Compliance	Semi-annual CAM Report July-December Monitor Downtime. The permittee reported there were downtimes on FG CLINK COOL COMs(CPMS) and KG5 COMs. The ROP does not have CAM conditions for the kilns because they are not subject to PC MACT. All Downtime previously reported.
05/08/2017	ROP SEMI 2 CERT	Compliance	2016 2nd Semi-annual Report ROP No. MI-ROP-B1477-2012a July - December 2016. Report contains mainly monitor downtime and excess emission deviations previously reported.
04/27/2017	Excess Emissions (CEM)	Compliance	2017 1st Quarter EER. Report timely and certified, see Activity Report for details.
04/27/2017	Other	Compliance	2017 1st Quarter EER Review.
03/13/2017	MAERS	Compliance	See MAERS for additional info.
03/10/2017	MACT (Part 63)	Compliance	FG RAWMILL SYS VII.7 Subpart LLL semi annual summary 40 CFR 63.1354(b)(9). Report was timely, certified. Hard copy of CEDRI submission. No O&M plan deviations, emissions exceedences or monitor downtime.
03/06/2017	CO/CJ	Compliance	July-December 2016 Semiannual Report. Consent Decree.
02/07/2017	Sample Results Review	Non Compliance	Review of results from 12/13-14/2016 PM/PM10 emissions test on Kiln 19 and 20 fuel pulverizers.
02/07/2017	Stack Test	Non Compliance	PM/PM10 Test for FG FUEL HAND, EU FUEL PULV19 and EU FUEL PULV20. PM-10 exceedence on EU FUEL PULV20. See activity report B147738565.

Activity Date	Activity Type	Compliance Status	Comments
02/06/2017	Excess Emissions (CEM)	Compliance	2016 4th Quarter EER. Report timely and certified, see Activity Report for details.
02/06/2017	Other	Compliance	4th Quarter EER Review.

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