



June 24, 2019

*Via Email*

Mr. Jeremy Howe  
Michigan EGLE, AQD  
120 West Chapin Street  
Cadillac, MI 49601

RE: Response to Violation Notice, Dated June 3, 2019  
Holcim (US) Inc. d/b/a Lafarge Alpena Plant, SRN: B1477

Dear Mr. Howe:

This letter is in response to the Notice of Violation issued by EGLE on June 3, 2018 for failure to continuously monitor opacity on EU KILN 21, during the first quarter 2019. Following is a written description of the findings that contributed to the excess monitor downtime on EU KILN 21 (EU Kiln 21, SV25-291).

Through investigation it has been determined that multiple circumstances contributed to the abnormal amount of downtime. The first observation is that the process equipment operating time was reduced by nearly seventeen percent during the quarter due to annual planned maintenance activities. This limited operating time is a contributing factor as the reduced hours impacts the results of the monitor downtime calculation.

The second observation is that the majority of the monitor downtime was the result of instrumentation malfunctions during the month of January. These malfunctions could not be addressed timely due to extreme weather that created conditions that were determined too unsafe to access the stack to perform the necessary corrective maintenance. Corrective maintenance was performed as soon as facility personnel could gain safe access to the instruments.

Because it was known that the instrument was faulted and corrective maintenance could not be safely performed, certified plant personnel performed Method 9 visible emissions observations to verify compliance with the opacity standard during operating days without continuous

HOLCIM (US) INC. D/B/A LAFARGE ALPENA PLANT  
1435 Ford Avenue, Alpena, MI 49707  
OFFICE: (989) 354-4171 FAX: (989) 354-2223

monitoring. A copy of these observations was provided with the quarterly downtime and excess emissions report dated April 19, 2019.

From this investigation, it is believed that this was a unique situation that does not justify any modification to current preventative maintenance or malfunction abatement plans.

If you have any questions or would like to discuss, please contact Travis Weide at (989) 358-3321 or by e-mail [travis.weide@lafargeholcim.com](mailto:travis.weide@lafargeholcim.com).

**Certification:**

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Signature: 

Date: 6/24/19

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Name (Print): Michael Nixon

Position: Plant Manager

## Howe, Jeremy (EGLE)

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**From:** Travis Weide <travis.weide@lafargeholcim.com>  
**Sent:** Monday, June 24, 2019 7:45 AM  
**To:** Howe, Jeremy (EGLE)  
**Cc:** Nixon, Shane (EGLE); Michael Nixon; Travis Weide  
**Subject:** B1477 NOV Response June 3, 2019  
**Attachments:** B1477 NOV Response June 3\_2019 EU KILN 21.pdf

Mr. Howe:

Please find attached the written response for the violation notice that you issued dated June 3, 2019.

Please let me know if you have any questions or would like to discuss.

Respectfully,

Travis

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**Travis B. Weide** | Area Environmental & Public Affairs Manager | LafargeHolcim

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