



August 1, 2023

David Bowman
Environmental Quality Analyst
Air Quality Division
2100 West M-32
Gaylord, MI 49735-9282

Re: Holcim (US) Inc, 1435 Ford Ave, Alpena MI, 49707
AQD Source ID (SRN) - B1477

Dear David Bowman:

The Holcim, Alpena facility is in receipt of the Violation Notice dated July 20, 2023 regarding the results of the fall out sampling on private property, completed June 14, 2023, as a part of an investigation conducted from a recent complaint ("Violation Notice"). The Holcim Alpena plant is submitting this letter in response to the Violation Notice.

Specifically, the Violation Notice identifies the collected dust as originating at Holcim's quarry operations. The Violation Notice further contains lab reports providing the chemical analysis of two dust samples, taken from a "Bucket Lid" and "Trash Bin" located on private property. The samples contain 70% calcite and 60% calcite respectively, as well as smaller amounts of quartz, pollen and other particles.

The Alpena plant conducted an internal investigation of the complaint and is providing factual information to demonstrate the fall out is not from the onsite quarry operations. The Limestone quarried at the plant and processed by the plant has a calcium carbonate content average content of 87% for June 2023 and average silica content of 6%. These results are produced by our ASTM Certified in house lab and are consistent with years of limestone analysis. This calcium carbonate content is substantially higher than the result that you provided. Even assuming the addition of other impurities, such as pollen and plant fibers, dust emitted from Holcim's quarry would have a higher percentage of calcite in relation to silica (quartz). We also reviewed our records from the date of your sample collection back to the beginning of June and found no potential dusting events recorded for our quarrying operations¹.

Based on analysis conducted onsite, Holcim has proven the chemistry of the limestone analyzed from the quarry (87% calcium carbonate) differs from the results obtained by EGLE in a fall out sample (60 – 70% Calcite) collected during the investigation on private property.

¹ The Violation Notice contained some suggestion that the dust source could be a cement producer because "dust from Calcium Hydroxide (CaOH₂) can rapidly convert to Calcite upon exposure to CO₂ in air." Holcim disagrees with this conclusion, based on the sample results. Cement will typically have no more than 10% calcite, and once hydrated, Ca(OH)₂ concentrations would be much lower. Ca(OH)₂ will only convert to CaCO₃ at high temperatures, humidity, and with CO₂ concentrations that are higher than ambient levels. In such an instance, the chemical process results in another mineral form of CaCO₃, Vaterite.

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There are numerous other sources of dust in the area, including gravel roads that could have created the dust collected by EGLE. Please note that gravel roads contain limestone as well and there are many gravel roads to the east of the Alpena facility. Dust from gravel roads and the shoulders of roadways can also migrate onto private property.

We trust the information has provided in this letter will nullify and void the Violation Notice.

Please feel free to contact with Lisa Strbik at 989-657-5087 or Mallory Miller at 225-517-6896.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Scott", with a long horizontal flourish extending to the right.

Jeffrey Scott
Plant Manager
Holcim (US) Inc.