

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

B147731647

FACILITY: LAFARGE MIDWEST INC.		SRN / ID: B1477
LOCATION: 1435 Ford Ave., ALPENA		DISTRICT: Gaylord
CITY: ALPENA		COUNTY: ALPENA
CONTACT: Travis Weide , Area Environmental & Public Affairs Manager		ACTIVITY DATE: 10/05/2015
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Site visit with AQD's Gloria Torello, Melissa Byrnes, and Kurt Childs.		
RESOLVED COMPLAINTS:		

Site visit to Lafarge with AQD's Gloria Torello, Melissa Byrnes, and Kurt Childs.

Travis Weide met AQD staff at the facility for this planned visit. Travis provided safety training. The purposes of the visit included Melissa viewing the consent decree control equipment including the Wet FGD, DAA, and SNCR; and Kurt becoming more familiar with the facility as he is transitioning to the field inspector.

The tour included viewing the quarry, raw material storage, the raw mills, kilns, clinker coolers, finish mills part of the CKD handling, and fuel storage including plastic and coal and pet coke.

During the visit all five kilns operated. There was no plastic fuel in the storage building. Travis said the last time plastic fuel was burned was during the 2015 testing. Viewing the kilns, it appeared kilns 19 and 20 have no pipe/systems to convey plastic to kilns 19 and 20. There was a pile of shingles fuel in the coal/pet coke storage area.

Based on:

- PTI 106-08A, FG KG6, conditions III. 1, III.3, III.4, III.5, IV.3, and VI. 7 (PTI conditions to omit COMs and use Wet FGD operating parameters to assure compliance with visible emissions limits. See 126-86E Eval form which includes,
 - "As an alternative method of demonstrating (*visible emission*) compliance, the applicant shall monitor the operating parameters of the wet FGD. These operating parameters include outlet temperature, flow rate, and differential pressure. The range of acceptable parameters shall be confirmed during particulate and opacity testing." and the
- consent decree's MAP (the MAP is a requirement of the consent decree's amendment which includes:
 - ...Lafarge shall operate each Wet FGD in compliance with a malfunction abatement plan..."

these FG KG6 Wet FGD operating parameters were record from the control monitor during the site visit:

	Ranges in MAP approved by EPA/MI AQD for consent decree. Includes units of measurement in the approved MAP.	Lafarge's Monitors. Includes unit of measurement on Lafarge's monitor.	Is the reading within the MAP range?
1. Booster fan inlet pressure	-0.1 to -0.5 kPa	3.5 hPa ^{1, 2} Converts to 0.35 kPa	Yes
2. Scrubber differential pressure	0.15 to 1.00 kPa	1.3 hPa ^{1, 2} Converts to 0.13 kPa	<u>No</u>
3. Stack temperature	40 to 60 degrees C	53.3 degrees Celsius ³	Yes
4. Scrubber outlet flow	>134,000 scfm wet (greater than)	330.5 kwscfh ^{1, 4}	Unknown
5. pH:	4.0 to 6.0	5.28	Yes
6. Slurry density	1.08 to 1.17 kg/L	1095 g/dm ³ ^{1, 4}	Unknown
7. Absorber liquid level	60 to 90 % of maximum	70.87% ^{1 5}	Yes

¹The unit of measurement differs from the approved MAP. Request from Lafarge a resolution to Lafarge's monitors reading in units of measurement other than what is in the MAP. Two examples discussed during the site visit included:

- update Lafarge's monitors to include the units if measurements in the MAP; and
- update the MAP to include the units of measurement on Lafarge's monitors.

²Per Travis, to covert hPa to kPA, move the decimal point to the left one time.

³There are three temperature readings, they have similar temperatures, and serve as back-ups.

⁴Request conversion from Travis.

⁵The percent is calculated from the monitor reading as follows. The absorber liquid is held in a vessel containing 130 units. The monitor read 92 units. $92/130 = 70.8\%$. Travis did not know the definition of "units." Request from Lafarge a resolution to Lafarge's monitors reading.

Torello will follow up with correspondence to Lafarge to address these items.

On 7/21/15 Torello was at Lafarge and took monitor readings; see Activity Report B147730711, attached.

Torello and Travis talked about PTI 106-08A, FG KG6, conditions V.1, and IX.3. Annually the permittee shall test PM and VEs, and update the FG KG6 MAP's Wet FGD liquid flow rate, maximum and minimum differential pressure, and maximum and minimum temperature after completing the test. Back at the office Torello reviewed recent FG KG6 test protocols and found no VE readings as part of the test plan. Torello does not find any information indicating the VE testing has been completed in 2015.

Regarding incorporating PTIs 195-10B, 89-13A, and 106-08A into the ROP, Torello asked Travis if he had responded to the email from Kirsten Clemens, AQD, dated September 2, 2015, attached, and the draft ROP Travis said this is on his list of things to do.

AQD staff was on site from approximately 10:20 a.m. until 2:20 p.m.

NAME Gloria Torello

DATE 10-6-15

SUPERVISOR 

