

Via US Mail

October 25, 2019

Mr. Shane Nixon
Mr. Rob Dickman
EGLE-AQD
Cadillac District Office
120 East Chapin Street
Cadillac, Michigan 49601



Re: **Violation Notice -St Marys Cement SRN: B1559**

Dear Mr. Nixon and Mr. Dickman:

The St. Marys Cement Charlevoix Plant (the "Plant") acknowledges receipt of the Violation Notice dated October 2, 2019. The Violation Notice relates to certain deviations from applicable requirements reported by the Plant as required, semi-annually, under 40 CFR Part 63, the Plant's ROP, and PTI 140-15 for the period January 1, 2019-June 30, 2019 (the "reporting period"). This response addresses the violations noted in the Violation Notice as requested by EGLE-AQD.

Violation 1 – Failure to maintain records associated with the Fugitive Dust Control Plan

As noted in the required reporting, the Plant has identified that not all records contemplated by the fugitive dust control plan were maintained throughout the reporting period. This was due to an oversight in assigning personnel responsible to assure records were maintained following the departure of the Plant's environmental manager during the reporting period. Once the oversight was identified, recordkeeping was resumed. The Plant believes that all necessary records have been maintained since August 24, 2019.

Violation 2 – Failure to Maintain Data Files for Bag Leak Detection Systems (BLDS)

The Plant failed initially to recognize that the data archiving system for the BLDS installed on the Coal Mill and Finish Mill 4 would only store data for 90 days before overwriting the data. This issue was corrected by May 28, 2019. However, there was an issue with a sensor for the BLDS on Finish Mill 4 that prevented accurate data recording. This issue was resolved by September 4, 2019.

Violation 3 – Failure to Install a BLDS on the Blending Silo

The Plant failed to recognize that installation of the BLDS was required by the PTI as an alternative means of monitoring compliance with the applicable opacity limitations under 40 CFR Part 63, subpart LLL. The Plant did

conduct visual monitoring as allowed under subpart LLL. The required BLDS was installed and became operational the week of October 20, 2019.

Violation Number 4 – Excessive Hg Monitoring “Downtime”

To meet the Hg monitoring requirements of 40 CFR Part 63, subpart LLL, the Plant employs sorbent trap methodology under PS 12B to sample kiln exhaust gas. When kiln exhaust gas flow to the trap is interrupted or impaired, the resulting data cannot be relied upon as valid. Gas flow interruption or impairment occurred during the reporting period and the Plant identified periods where it was necessary to consider the data invalid or unavailable. This resulted in having excessive monitor downtime during the reporting period.

The Plant identified that material employed in the desiccant trap was interrupting flow. This condition has been corrected and the Plant is confirming flow on a daily basis to assure the collection of valid data.

Violation Number 5 – Excess HCl emissions

The kiln system at the Plant includes an in-line raw mill system. The raw materials within the raw mill have the inherent ability to “scrub” acid gases including HCl. Consistent with industry practice, compliance with the HCl emission limitations within subpart LLL at the Plant relies upon this inherent capacity of the raw mill to reduce HCl present in kiln gases passing through the raw mill. During the reporting period, the Plant encountered multiple issues with the raw mill that were unanticipated. The resulting excessive downtime of the raw mill reduced the capacity of the raw mill to scrub HCl from kiln gas. This resulted in higher HCl average emissions that translated in an initial exceedance of the 30-day rolling average emission limitation and additional time required for the rolling average to return to compliance. The Plant has expended significant resources to address issues with the raw mill and is no longer experiencing unusual raw mill downtime. The Plant believes that with current normal operation of the raw mill compliance will be maintained.

St Marys hopes the above responses demonstrate that the Plant has taken necessary action to address the violations noted and that compliance is expected to continue into the future. If you have any questions, please do not hesitate to contact us.

Sincerely,



Matthew Simon
Operations Manager

cc: Jenine Camilleri, EGLE AQD Enforcement
Fabio Garcia
Ruben Plaza