



Via e-mail

October 30, 2020

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

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Re: Response of St. Marys Cement U.S. LLC to Violation Notice October 9, 2020

Dear Mr. Nixon and Mr. Dickman:

St. Marys Cement U.S. LLC acknowledges receipt by its Charlevoix Plant of EGLE's Violation Notice dated October 13, 2020. Pursuant to the Violation Notice, the Charlevoix Plant submits this response.

The Charlevoix Plant acknowledges that it is subject to the requirements of 40 CFR Part 63, Subpart 63 (PC MACT) and that it is obligated to conduct and submit results of emission testing demonstrating compliance with the alternative OHAP limits established under the PC MACT. As EGLE is aware, prior to September 2020 the Charlevoix Plant had on two separate prior occasions conducted OHAP emission testing in September 2018 and September 2019.

In September 2020, the Charlevoix Plant again initiated emission testing for OHAPs for purposes of complying with the PC MACT's requirements. However, the plant was experiencing some process issues with the operation which was later found to be related to buildup in the preheater tower. The Charlevoix plant made a decision to abandon emission testing, assess process operation, and resume emission testing at a later date, subject to availability of a qualified stack testing firm.

The Charlevoix Plant was able to engage Mostardi Platt and initiated emission testing for OHAPs on October 27, 2020. As of the date of this response, the Charlevoix Plant anticipates this emission testing, which is now completed, will demonstrate compliance with the PC MACT's OHAP requirements. The Charlevoix Plant expects to timely submit a test report to EGLE demonstrating compliance.

Please contact the undersigned if you have any questions or concerns.

Sincerely,



Matthew Simon  
Operations Manager  
231-237-1343

cc: file  
Rob Dickman - EGLE  
Jeff Ouhl – VP Cement Operations  
Ruben Plaza – Corporate Environmental Manager