

Via Email and Certified Mail
7022 0410 0000 1229 1063

December 7, 2022

Mr. Shane Nixon
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Air Quality Division
120 West Chapin St
Cadillac MI 49601

RE: St Marys Cement, SRN: B1559, PM Compliance Testing Results, Response to Violation Notice of November 15, 2022

Dear Mr. Nixon,

In response to the VN dated November 15, 2022, please see the information requested below:

The dates the violation occurred;

- The violation occurred on August 30, 2022, which was the date of compliance testing for the clinker cooler.

An explanation of the causes and duration of the violation;

- It appears the violation occurred because PM data and the site-specific operating limit (SSOL) of 2.61 mg/m³ from 2021 was not linear with testing data obtained in 2020 and 2022. 2022 testing was conducted at a CPMS reading of 1.78 mg/m³, which should have been sufficient to pass the testing, based on the 2021 SSOL. SMC has conducted a review of the clinker cooler PM testing data and also CPMS maintenance records from 2019 to the present but has been unable to find any specific cause for a lack of linearity during the 2021 testing. At this time SMC believes that minor variations in the process from one testing event to the next may be associated with inconsistent linearity between the test values and CPMS outputs, and that this problem is further compounded by the very low level of PM output that must be achieved to demonstrate compliance. Ultimately the result is that the CPMS was not identifying that a bag replacement should be initiated.

Whether the violation is ongoing;

- It is the understanding of SMC that the violation is considered ongoing from the date of failed testing until the date of the next passing test.

A summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place;

- As you are aware, supply chain problems are ongoing for many industries and are affecting the time in which it will take to receive bags and cages. All 2,600 bags and cages in the clicker cooler baghouse will be replaced before retesting. Bags are due to be shipped in December, and the manufacturer anticipates a shipment date of February 28, 2023 for cages. In order to expedite the installation, new bags and cages will be replaced compartment by compartment as the kiln continues to operate. Given time for the shipment to arrive and then for installation, SMC anticipates retesting the cooler in March 2023, prior to our annual maintenance shutdown.

What steps are being taken to prevent a recurrence.

- All 2,600 bags and cages will be replaced, as is noted above.
- CPMS maintenance will be increased from quarterly to a monthly schedule.
- Bag samples will be sent for evaluation at least once per year, to be assessed for wear, remaining life, and other problems which may result in bag failure.

Please call me at 231.237.1387 if you have any questions or concerns.

Sincerely,



Laurie Leaman
Environmental Manager

cc:

Rob Dickman, EGLE
Matt Simon, Charlevoix Operations Manager
Ruben Plaza, Corporate Environmental Manager
Joe Frost, Corporate Environmental Specialist
Ann Straw, SMC Legal Counsel