



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



PHILLIP D. ROOS  
DIRECTOR

July 27, 2023

VIA E-MAIL AND U.S. MAIL

Reza Eizadkhah  
Carmeuse Lime, Inc.  
River Rouge Operation  
25 Marion Avenue  
River Rouge, Michigan 48218

SRN: B2169, Wayne County

Dear Reza Eizadkhah:

**VIOLATION NOTICE**

On June 29, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the Carmeuse Lime, Inc. – River Rouge Operation located at 25 Marion Avenue, River Rouge, Michigan. The purpose of this inspection was to determine Carmeuse’s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Permits to Install (PTI) numbers 193-14A and 128-17; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2169-2013.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two horizontal rotary lime kilns, designated in the facility’s permit as EUKILNNUMBER1 and EUKILNNUMBER2. The kilns vent to a common reverse-air baghouse and stack.	40 CFR Part 63, Subpart AAAAA, §63.7113(a) and (g), and in Table 2.  ROP No. MI-ROP-B2169-2013, FG-MACT AAAAA-LIME MANUFACTURING PLANTS, Special Condition (SC) IX.1.	The company has not installed, maintained, calibrated and operated a continuous opacity monitoring system (COMS) for the lime kilns, as required by Subpart AAAAA.

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Lime Manufacturing Plants. These standards are found in 40 CFR Part 63, Subpart AAAAA. 40 CFR 63.7090(c) requires that, on or after the relevant compliance date for the facility, the applicable startup and shutdown period emission limits in Table 2 to Subpart AAAAA must be met. Per the provisions put forth in 40 CFR 63.7083(e)(1), the compliance date for the Carmeuse River Rouge facility with the requirements of 40 CFR 63.7090 was January 20, 2021.

Table 2 to Subpart AAAA requires that for all existing lime kilns that are equipped with a fabric filter, during periods of startup and shutdown emissions must not exceed 15 percent opacity. The compliance demonstration for this requirement put forth in Table 2, and in 40 CFR 63.7113(a) and (g), is the installation, maintenance, calibration, and operation of a COMS, as required by 40 CFR Part 63, Subpart A, General Provisions, and according to PS-1 of Appendix B to Part 60, except as specified in 40 CFR 63.7113(g)(2). The requirement to comply with all applicable provisions of Subparts A and AAAA is incorporated into the ROP at SC IX.1 of FG-MACT AAAA-LIME MANUFACTURING PLANTS. As of the date of the inspection of the River Rouge Operation, a COMS for the lime kilns has not been installed.

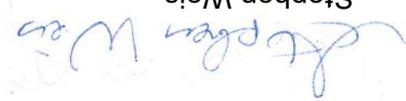
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 17, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; 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; and what steps are being taken to prevent a recurrence.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Blvd., Suite 2-300, Detroit, Michigan 48202 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Carmeuse believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of the Carmeuse Lime, Inc. – River Rouge Operation. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis  
Senior Environmental Engineer  
Air Quality Division  
313-720-5831

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Dr. April Wendling, EGLE  
Jeff Korniski, EGLE