



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



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

April 30, 2019

Mr. Michael Nixon
 Holcim - Lafarge Alpena
 1435 Ford Avenue
 Alpena, Michigan 49707

SRN: B1477, Alpena County

Dear Mr. Nixon:

VIOLATION NOTICE

On October 16-26, 2018, Lafarge Alpena conducted emissions testing of EU KILN 19, EU KILN 20, and EU KILN 21 to demonstrate initial compliance with the Title 40 of the Code of Federal Regulations, Part 60 - *Standards of Performance For New Stationary Sources*, Subpart DDDD - *Emission Guidelines and Compliance Times for "Commercial and Industrial Solid Waste Incineration Units"* (CISWI) emission limits, as referenced in Michigan Air Pollution Control Rule R 336.1974 (Rule 974).

Testing was conducted according to the test plan dated October 4, 2017 which indicated the purpose of the test was to demonstrate compliance with CISWI emission limits. Results of the emission test were provided to the Air Quality Division (AQD) in a report received on December 26, 2018. The AQD has completed our review of the emission test report and AQD staff have determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EU KILN 19	R 336.1974(9)(d)	Exceedance of Carbon Monoxide emission limit.

The records provided in the report demonstrate that actual emissions of Carbon Monoxide (CO) from the EU KILN 19 process equipment are 161 parts per million dry volume @7% O2 which exceeds the CISWI CO emission limit, as referenced in Rule 974, of 110 parts per million dry volume @7% O2.

Additionally, the NOx and SO2 parts per million dry volume results were not reported in the units of the standard for Rule 974/CISWI (not corrected to 7% O2).

Rule 974 has an effective date of January 2, 2019. On February 26, 2019 the AQD received notification from Lafarge Alpena of a "waste to fuel" switch resulting in the termination of waste burning activities as of December 13, 2018, and the intent to switch to regulation under "40 CFR Part 63, Subpart LLL- National Emissions Standards for Hazardous Air Pollutants for Portland Cement Manufacturers" (PC NESHAP). As a result, Rule 974 requirements are applicable to Lafarge Alpena from January 2, 2019 to June 13, 2019. Though the CISWI guidelines allow up to 180 days from the compliance

Mr. Michael Nixon
Page 2
April 30, 2019

date to complete the initial compliance demonstration testing, any testing conducted for this purpose, such as the October 2018 testing, is considered credible evidence to establish a violation.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 21, 2019 (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 reoccurrence.

Please submit the written response to EGLE, AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lafarge Alpena 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. 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,



Kurt Childs
Senior Environmental Quality Analyst
Air Quality Division
231-878-2045

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Shane Nixon, EGLE