



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

June 17, 2021

VIA E-MAIL

Mr. Roger Nash  
Carmeuse Lime & Stone  
23311 East Haul Road  
Drummond Island, Michigan 49726

SRN: B2362, Chippewa County

Dear Mr. Nash:

**VIOLATION NOTICE**

On June 8, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Carmeuse Lime & Stone located at 23311 East Haul Road, Drummond Island, Michigan. The purpose of this inspection was to determine Carmeuse Lime & Stone'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 Permit to Install (PTI) No. 15-20; and to investigate a recent complaint which we received on June 4, 2021, regarding fugitive dust attributed to Carmeuse Lime & Stone's operations.

During the inspection, staff observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
Truck traffic on haul road	Special Condition 1.2h	Visible emissions from truck traffic on the haul road exceeded the 6-minute average opacity limit of 5%.
Fugitive dust emissions	Special Condition 1.6, R 336.1901(b)	Fugitive dust emissions affecting multiple properties. The properties are located southeast of the facility on Parrish Point.

**Visible Emissions**

During this inspection it was noted that Carmeuse Lime & Stone's haul road processes were emitting opacity in excess of emissions allowed by Special Condition 1.2h of PTI No. 15-20.

Enclosed are copies of the instantaneous and six-minute average readings taken at Carmeuse Lime & Stone.

**Rule 901**

In the professional judgment of AQD staff, the dust fallout observed was of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 (and Special Condition 1.6 of PTI No. 15-20).

The AQD staff observed dust fallout on multiple properties located southeast of the facility on E Parrish Point Road. Multiple property owners were interviewed with reports of dust on houses, decks, and garages on multiple occasions during west and northwest wind conditions. There were also reports of intense dust plumes during strong wind conditions making it difficult to be outside at the time of occurrence.

**Conclusion**

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 8, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

In addition, please submit an updated fugitive dust plan that includes additional monitoring of fugitive dust on the haul roads, plant yard, and stockpiles, along with recordkeeping of all fugitive dust control activities. The updated fugitive dust control plan for the facility should identify the following:

- All potential sources of fugitive dust emissions. This includes but not limited to each storage pile, pond, truck traffic, plant yard, crusher, screen, conveyor, and transfer points.
- Frequency of monitoring for each potential source of fugitive dust emissions.
- Method of controlling fugitive dust emissions if observed or for prevention. Specifics should be included on equipment used, application rate, availability, capacity, and frequency of application for each potential source of fugitive dust.

- Keeping and maintenance of records consistent with the various activities implemented under the control plan. This includes keeping records of monitoring checks and methods used for controlling fugitive dust.

The updated fugitive dust control plan is subject to review and approval by the department. After approval by the department, the person who is responsible for the preparation of the control program shall begin implementation of the program pursuant to the schedule contained in the control program. Either the person who is responsible for the facility or the department may request a revision to a department-approved control program to meet changing conditions.

Please submit the written response and updated fugitive dust plan to EGLE, AQD, Marquette District Office, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Carmeuse Lime & Stone 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 violations cited above and for the cooperation that was extended to me during my inspection of Carmeuse Lime & Stone. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michael Conklin  
Environmental Engineer  
Air Quality Division  
906-202-0013

Enclosure

cc: Mr. John Abbitt, Carmeuse Lime & Stone  
Mr. Christopher Martin, Carmeuse Lime & Stone  
Dr. Vaughn McGraw  
Mr. Christopher Copping  
Mr. Charlie Parker  
Ms. Sharon Stiansen  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Ed Lancaster, EGLE