



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

VIA ELECTRONIC MAIL

Mr. Craig Gordinier
Plant Manager
Lhoist North America of Alabama, LLC
7444 AL-25
Calera, Alabama 35040
craig.gordinier@lhoist.com

Dear Mr. Gordinier:

Re: Lhoist North America of Alabama, LLC – Calera, Alabama
Notice of Potential Violation and Opportunity to Confer

Dear Mr. Gordinier:

Information currently available to the U.S. Environmental Protection Agency suggests that Lhoist North America of Alabama, LLC (LNA) may have committed violations of the Clean Air Act (CAA) and its implementing regulations. By this letter, the EPA is extending to you an opportunity to advise the Agency, in person, via a conference call, or in writing, of any further information the EPA should consider with respect to the potential violations.

Specifically, on December 17, 2020, LNA submitted a request for an extension of the January 20, 2021, compliance date for the National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants, 40 C.F.R. Part 63, Subpart AAAAA, for its Montevallo facility located at 7444 AL-25, Calera, Alabama (the facility) to allow it time to install Continuous Opacity Monitoring Systems (COMS) on Kilns 3 and 4. On May 21, 2021, the EPA issued a letter denying that compliance extension request. It is the EPA's understanding that Kilns 3 and 4 at the facility continue to operate without a COMS. The EPA therefore alleges that LNA may be in violation of Section 112 of the CAA, 42 U.S.C. § 7412, and the implementing regulations found at 40 C.F.R. § 63.7090(e) and Table 2 of Subpart AAAAA, which require all lime kilns to install, maintain, and operate a COMS to meet a 15% opacity standard during periods of startup and shutdown.

The EPA has authority under Section 113 of the CAA, 42 U.S.C. § 7413, to pursue enforcement actions, including the issuance of compliance orders, the assessment of administrative penalties and/or the initiation of civil or criminal actions. To resolve the potential violations identified above, the EPA requests that a representative of the facility contact Steve Rieck, of my staff at (404) 562-9177, or via email at rieck.stephen@epa.gov, within **seven (7) calendar days** of receipt of this letter to make arrangements to discuss the potential violations and the EPA's possible enforcement action. Please note that the EPA will have legal representation during these discussions. Please inform Mr. Rieck if you intend to have legal representation present as well.

You may voluntarily submit any documentation or information that you would like the EPA to review in advance of any in person meeting or teleconference on the matter as to why you believe the EPA should not take an enforcement action with respect to the above-mentioned potential violations. If you have questions regarding the type of information that should be submitted to the EPA or any other questions regarding this matter, please contact Mr. Rieck at the contact information identified above.

Sincerely,

**JASON
DRESSLER**



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Jason Dressler
Chief
North Air Enforcement Section

cc: Doug Carr, ADEM