



March 12, 2021

Ms. Melissa Byrnes
 Environmental Engineer Specialist
 Air Quality Division, Permit Section
 Michigan Department of Environment, Great Lakes, and Energy
 525 West Allagen
 Constitution Hall
 Lansing, MI 48909-7973

RE: Air Permit Prevention of Significant Deterioration (PSD) Application Submittal

Dear Ms. Byrnes,

Graymont (MI) LLC (Graymont) is pleased to submit the attached modified PSD permit application for a lime manufacturing plant located in the Upper Peninsula (UP) of Michigan near Rexton, Michigan. This application is intended to serve as Graymont's most current permit application in process with Michigan's Department of Environment, Great Lakes, & Energy (EGLE). As such, Graymont requests withdrawal of permit application PTI 191-19 to allow for this updated application to be processed by EGLE in place of the original permit application.

This updated submittal is a culmination of the latest available technology, discussions with EGLE, and feedback from other project stakeholders. The attached application includes the following material changes:

- Replacement of the one rotary preheater kiln, and associated equipment, with three, more efficient, newly available model of Maerz Parallel Flow Regenerative (PFR) vertical kilns that align with Graymont's market demands,
- Removal of solid fuel as a primary kiln fuel based on EGLE discussions of stakeholder concerns with emissions and the availability of updated kiln technology, and
- Removal of the natural gas electrical generators and associated equipment as Graymont now intends to supply power to the site with a direct connection to the electric grid.

These updates have resulted in significant overall emissions reductions associated with the higher efficiency vertical kiln technology that will now utilize natural gas as a fuel. The following table summarizes the reduction of project Net Emission increases from the original submittal:

Pollutant	Annual Net Emission Reduction from Original Submittal	Units	% Annual Net Emission Reduction from Original Submittal
NO _x	-1027.4	Tons	-89.2%
CO	-1253.2	Tons	-91.9%
VOC	-280.2	Tons	-89.4%
SO ₂	-589.0	Tons	-97.7%
Total PM	-38.4	Tons	-25.1%
Total PM ₁₀	-29.4	Tons	-26.6%
Total PM _{2.5}	-21.6	Tons	-27.4%
Lead	-0.019	Tons	-95.0%
H ₂ SO ₄	-6.48	Tons	-98.8%
GHG (CO ₂ e)	-155,037	Tons	-22.6%
Mercury	-8.7	Pounds	-99.9%



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This lime manufacturing plant is designed to enhance Graymont's ability to meet demand for high-quality lime and limestone demand from its customer base in the Great Lakes region, while providing significant local economic benefit, addressing crucial environmental considerations and facilitating responsible use of the state's vital natural resources.

As you may know, Graymont's products serve a critical, essential, and cost-effective means of managing some of today's most pressing environmental issues. This includes flue gas treatment, drinking water treatment, wastewater treatment, waste stabilization, environmental remediation and rehabilitation. Beyond environmental applications, Graymont's products are also critical to manufacturing of steel, paper, and glass, construction of buildings and roadways, and supporting agricultural and food production.

Meanwhile, I should note that our Company has continued to make good on its pledge to provide additional economic benefits to the region by financing a Community Development Fund, administered by Lake Superior State University, in keeping with our commitment to transparency and to engaging in a meaningful way with key stakeholders such as governments, NGOs and communities, wherever we operate.

We welcome the opportunity to work with you as EGLE processes this application as Graymont seeks a pathway to deliver its lime products to market described above, in a commercially viable manner.

Please do not hesitate to contact me if you have questions with this updated application at 814-571-8126 or via email at jmaitland@graymont.com.

Kind regards,

John A. Maitland
US Manager, Health, Safety, and Environment

Enclosure

CC: Mark Mitchell – EGLE
Paul Stoll - Graymont
Chirag Patel – Graymont
Jim Donaldson – Trinity Consultants