

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

A243730060

FACILITY: Quikrete		SRN / ID: A2437
LOCATION: 20 N PARK ST, COMSTOCK PARK		DISTRICT: Grand Rapids
CITY: COMSTOCK PARK		COUNTY: KENT
CONTACT: Jeremy Burt , Plant Manager		ACTIVITY DATE: 07/06/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection to include visible emissions readings of the sand dryer and short site visit.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro and Kaitlyn DeVries arrived in the area at 9:00 AM on July 6, 2015, to conduct visible emissions observations of the sand dryer stack. Observations made the previous week in the afternoon of July 1, 2015 indicated that emissions of sand were occurring at an unacceptable level, and sand was observed on vehicles at an adjacent property. (photos attached) Due to the time of day, AQD staff was unable to observe the stack from the correct position as required by EPA Method 9 for visible emissions. Therefore, we came back in the morning of July 6, 2015, and were able to achieve the correct position from an adjacent property.

After achieving an acceptable location to take the visible emissions readings, AQD staff began recording opacity readings via EPA Method 9 at 9:18 AM. See attached AQD Visible Emission Observation Form that documents a violation of the Permit to Install No. 74-80 Special Condition No. 13 and the Rule 301 20% opacity limit. The two highest 6-minute averages observed were 25% and 22% opacity. This is also a violation of Rule 910, improper operation of an air cleaning device. A violation notice will be sent.

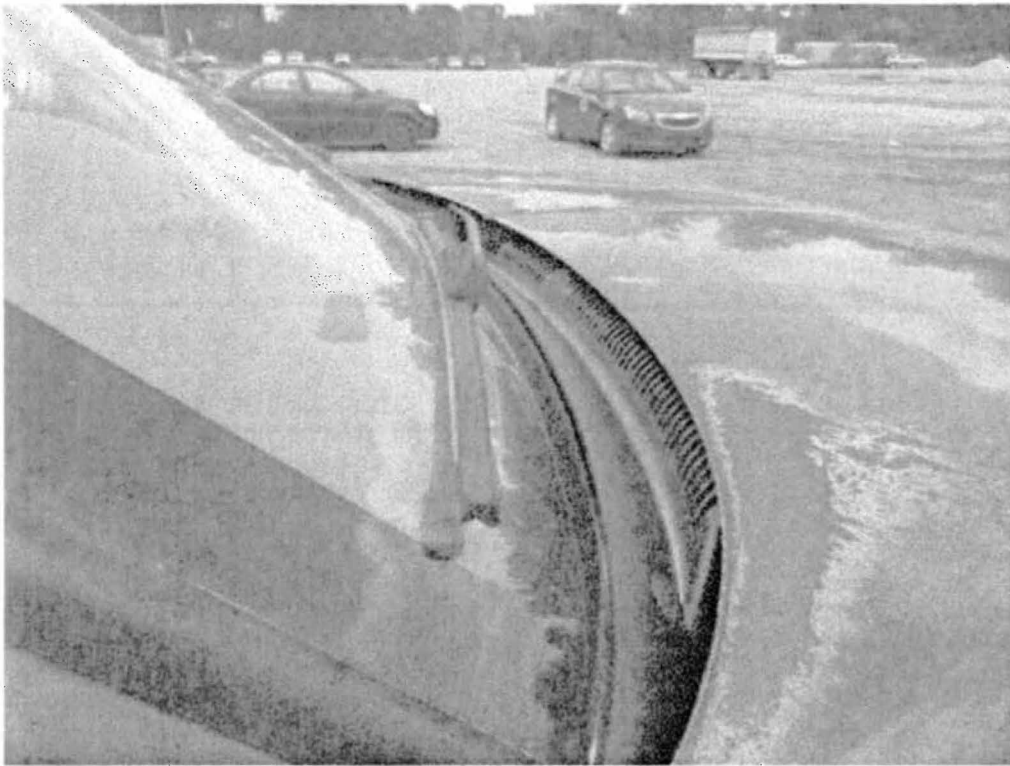
Following these readings, we arrived on-site around 10:00 AM and met with Jeremy Burt who met with us right away, and notified his corporate office of our arrival. Staff stated that the purpose of the visit was to do an inspection of the sand dryer due to visible emissions, to introduce Kaitlyn as the new inspector for the facility, and to remind him that AQD is expecting information from John Kehlbeck of the Columbus office by July 14th.

Mr. Burt stated that the facility is planning a shut down this Friday to replace all the bags (324) in the dryer baghouse, finish the install of a new pulse jet timer and look for whatever issue is causing emissions. We agreed after discussion that the emissions appear to occur after the bags are pulsed, and the emissions that should fall out and be collected are instead being emitted. They are also going to look into the damper positions to make sure they are seating properly. The dryer baghouse pressure drop was ~9" H<sub>2</sub>O. The plant baghouse was 4.4" H<sub>2</sub>O. The pressure drop gauge for the plant baghouse did not have the alarm pins pegged like they had been in the past. Mr. Burt stated that they don't have issues with the plant baghouse.

Initially, AQD staff was not going to cite the facility in violation, however after returning to the vehicle and seeing the sand on the windshield for the approximately one hour inspection, and after input from supervisory staff it was determined that a violation will be cited as identified above. Photos were taken on July 1 and July 6 which are included with this report.

Staff called Mr. Burt to let him know of this change, and identified that since the facility will have 21 days to respond to the VN it should give them time to evaluate the baghouse performance following the repair/bag replacement this weekend. Staff asked Mr. Burt to evaluate the performance of the unit prior to responding to the letter. This letter will be addressed to Mr. Burt with a CC to Mr. Kehlbeck.

The facility was in non-compliance at the time of the inspection.



**Image 1(Vehicle1) :** Sand on vehicle 1 adjacent property



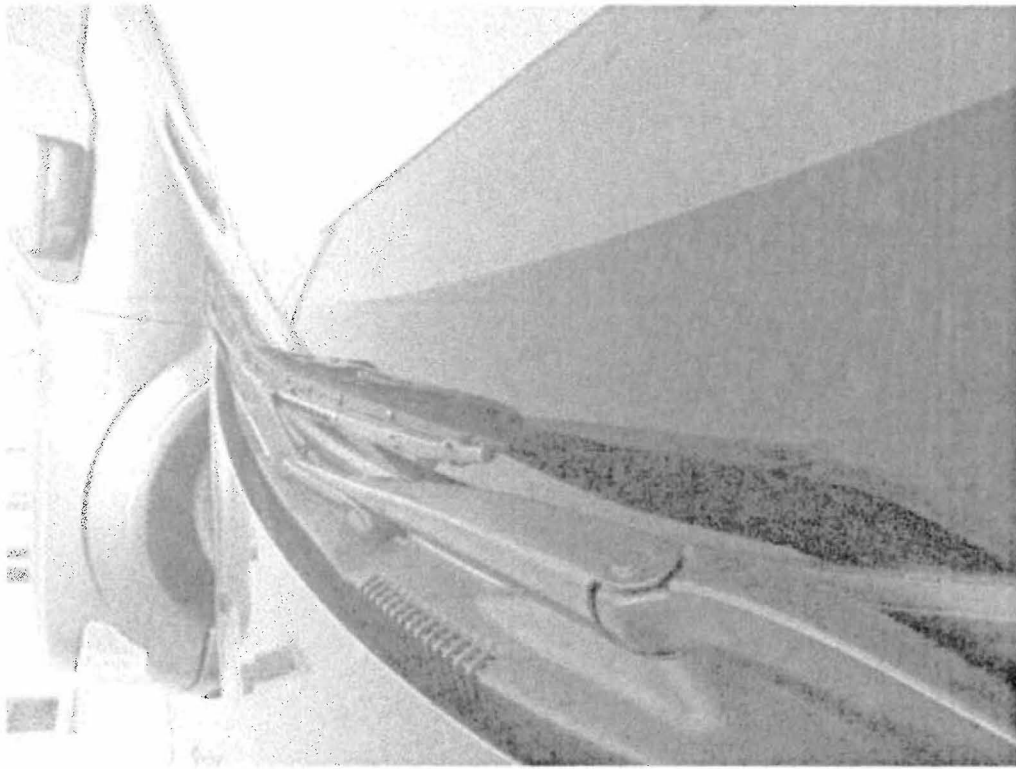
**Image 2(Vehicle 2) :** Sand on vehicle 2 at adjacent property



**Image 3(Vehicle 3) :** Sand on vehicle 3 at adjacent property



**Image 4(AQD after inspection) :** Sand on AQD vehicle following July 6, 2015 inspection



**Image 5(AQD vehicle before)** : Clean AQD vehicle before inspection July 6 2015

NAME

*April L. Lippard*

DATE

*7-7-15*

SUPERVISOR

*HL*



DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

VISIBLE EMISSION OBSERVATION FORM

Provided under authority of P.A. 451 of 1994.

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