



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

July 21, 2016

Mr. Paul Robbins
Quikrete-Flint
14311 CMI Drive
Holly, MI 48442-9752

SRN: B1945, Oakland County

Dear Mr. Robbins:

VIOLATION NOTICE

On June 29, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Quikrete-Flint located at 14311 CMI Drive, Holly, Michigan. The purpose of this inspection was to determine Quikrete-Flint'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; and the conditions of Permit to Install (PTI) number 530-96D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU - Dryer	PTI No. 530-96D, EU – Dryer, Special Condition IV.1 and R 336.1910.	Permittee operated EU - Dryer while wet scrubber was not operated nor maintained in a satisfactory manner.
EU - Dryer	PTI No. 530-96D, EU – Dryer, Special Condition VI.4.b.	Permittee failed to record the wet scrubber liquid flow rate.
EU – Process	PTI No. 530-96D, EU – Process, Special Conditions VI.2 and VI.4 .	Permittee failed to maintain the belt scale and keep daily records of the throughput rate from the belt scale.
Small Buzzi raw material silo exempt from R336.1201 per R336.1284(k).	R 336.1201(1) and R 336.1910.	Permittee failed to maintain and operate fabric filter collector system associated with the silo.

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During the inspection of June 29, 2016, the AQD observed that Quikrete operated EU – Dryer while the wet scrubber was not operated nor maintained in a satisfactory manner. The observed operation of the wet scrubber was unsatisfactory because approximated ¼ of the wet scrubber spray nozzles were either clogged or exhibited a reduced flow. This is a violation of PTI No. 530-96D, EU – Dryer, IV.1, which states, “*The permittee shall not operate EU - Dryer unless the cyclone and wet scrubber in series are both installed, maintained, and operated in a satisfactory manner.*” Per R 336.1911, Quikrete’s compliance program for the cyclone and wet scrubber in series shall include a malfunction abatement program. A copy of R 336.1911 is attached for your reference. **The Malfunction Abatement Program for the cyclone and wet scrubber in series is due by close of business on August 15, 2016.**

During the inspection of June 29, 2016, Quikrete was unable to produce records of the wet scrubber liquid flow rate. This is a violation of the recordkeeping requirement specified in Special Condition number VI.4.b of PTI number 530-96D, EU - Dryer. The conditions of PTI number 530-96D, EU – Dryer, VI.4.a. specify “*The permittee shall keep a daily record of the wet scrubber pressure drop in inches of water column*”.

During the inspection of June 29, 2016, the AQD determined that the belt scale, required per PTI number 530-96D, EU – Process, VI.2 had not been calibrated in about one and one-half years and had not been used to measure the daily throughput rate from EU – Process for approximately two years. This is a violation of EU – Process, VI.2, which states, “*The permittee shall install and maintain a belt scale on the C1 transfer conveyor portion of EU – Process which continuously shows the daily throughput rate for the conveyor.*” Furthermore, failure to maintain and use the belt scale to determine the daily throughput rate appears to be in violation of EU – Process, VI.4, which states in part, “*The permittee shall keep daily and monthly records (at the site in an acceptable format to the AQD District Supervisor) of the amount of material processed through EU – Process.*” A program for compliance may include belt scale maintenance and throughput recordkeeping or applying for a permit modification in which another means of measuring the daily throughput is approved by the AQD.

During this inspection, it was noted that Quikrete-Flint had installed and commenced operation of raw material storage silos at this facility that have the potential to operate per the R 336.1284(k) exemption from the R 201.336.1201(1). During the inspection of June 29, 2016, the AQD observed visible emissions from the small Buzzi silo that appear to indicate particulate emissions were not controlled with an appropriately designed and operated fabric filter collector system or an equivalent control system. The AQD staff advised Quikrete on June 29, 2016, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the raw material storage silos. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

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Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant. Per R 336.1911, Quikrete's compliance program for the raw material storage silos shall include a malfunction abatement program. **The Malfunction Abatement Program for the raw material storage silos is due by close of business on August 19, 2016.**

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 12, 2016. 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.

If Quikrete-Flint 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 June 29, 2016. 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,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ
Mr. Jay Owens, Quikrete