



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHER
DIRECTOR

September 12, 2017

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

SRN: B1945, Oakland County

Dear Mr. Robbins:

VIOLATION NOTICE

On August 1, 2017, 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 – Mixnbag	PTI No. 530-96D, IV.1, R 336.1301, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, and 40 CFR 52.21 (c) & (d).	The permittee operated EU – Mixnbag while the fabric filter dust collector was not maintained and operating in a satisfactory manner.
EU – Mixnbag	PTI No. 530-96D, VI.3, R 336.1301, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, and 40 CFR 52.21 (c) & (d).	The permittee failed to keep a daily record of the pressure loss (in inches of water column) of the gas stream through the fabric filter dust collector for the month of July 2017.
EU – Mixnbag	PTI No. 530-96D, VIII, R 336.1901, R 336.2803, R 336.2804, and 40 CFR 52.21(c) & (d).	Exhaust gasses from stack SV 002 are discharged horizontally. The permit requires the exhaust gases to be discharged unobstructed vertically upwards.

EU – Process	PTI No. 530-96D, III.1, R 336.1901, R 336.2803, R 336.2804, and 40 CFR 52.21 (c) & (d).	From November 2016 through August 2017, the permittee exceeded the process limit of 150,000 tons per 12-month rolling time period for ten consecutive months. The 12-month process limit exceedances ranged from 834 tons (0.6%) to 34, 946 tons (23.3%).
EU – Process	PTI No. 530-96D, III.1, R 336.1901, R 336.2803, R 336.2804, and 40 CFR 52.21 (c) & (d).	From January 6, 2015, through July 20, 2017, the permittee exceeded the daily process limit of 1,000 tons per day on 25 separate dates. The daily process limit exceedances ranged from 1 ton (0.1%) to 773 tons (77.3%).
EU – Process	PTI No. 530-96D, VI.2, R 336.1901, R 336.2803, R 336.2804, and 40 CFR 52.21 (c) & (d).	Permittee failed to maintain a belt scale on the C1 transfer conveyor portion of EU – Process. The belt scale has not been maintained since at least August of 2015.
EU – Process	PTI No. 530-96D, VI.4, R 336.1901, R 336.2803, R 336.2804, and 40 CFR 52.21 (c) & (d).	The permittee failed to keep daily and monthly records, in an acceptable format to the AQD District Supervisor, of the amount of material processed through EU – Process.

During this inspection, the AQD staff observed that the fabric filter dust collector was malfunctioning while of EU – Mixnbag was operating. This constitutes a violation of Special Condition number VI.3 of PTI number 530-96D, which states, “The permittee shall not operate EU - Mixnbag unless the fabric filter dust collector is installed, maintained, and operated in a satisfactory manner.” This noncompliance also constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

During this inspection, the AQD determined that Quikrete-Flint failed to keep a daily record of the pressure loss (in inches of water column) of the gas stream through the fabric filter dust collector for the month of July 2017. This is a violation of the recordkeeping specified in EU – Mixnbag, Special Condition number VI.3 of PTI number 530-96D. The conditions of PTI number 530-96D require maintenance of records for a period of five years in a format acceptable to the AQD District Supervisor, which shall be made available for review upon request by the AQD staff.

During this inspection, the AQD determined that the exhaust gasses from stack SV 002 of EU – Mixnbag are discharged horizontally in violation of the permit stack/vent restrictions. Section VIII of PTI number 530-96D requires the exhaust gases from the stack shall be discharged unobstructed vertically upwards to the ambient air.

Per records provided by Quikrete-Flint via email on August 30, 2017, the permittee exceeded the process limit of 150,000 tons per 12-month rolling time period for ten consecutive months from November 2016 through August 20, 2017. This is a violation of the process restriction specified in EU – Process, Special Condition number III.1 of PTI number 530-96D. The conditions of PTI number 530-96D restrict the processing of materials to not more than 150,000 tons per 12-month rolling time period.

Per records provided by Quikrete-Flint via email on August 30, 2017, the permittee exceeded the daily process limit of 1,000 tons per day on 25 separate dates from January 6, 2015, through July 20, 2017. This is a violation of the process restriction specified in EU – Process, Special Condition number III.1 of PTI number 530-96D. The conditions of PTI number 530-96D restrict the processing of materials to not more than 1,000 tons per day.

Per the inspection conducted on August 1, 2017, the Quikrete-Flint failed to maintain a belt scale on the C1 transfer conveyor portion of EU – Process which continuously shows the daily throughput rate for the conveyor. This is a violation of EU – Process special condition VI.2.

During this inspection, Quikrete-Flint was unable to produce daily and monthly production records in a format acceptable to the AQD District Supervisor. This is a violation of the recordkeeping specified in Special Condition number VI.4 of PTI number 530-96D. The conditions of PTI number 530-96D require maintenance of records for a period of five years in a format acceptable to the AQD District Supervisor, which shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and **submit a written response to this Violation Notice by October 3, 2017**. 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.

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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 August 1, 2017. 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. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Joyce Zhu, DEQ