



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 13, 2020

Mr. Devin Kaufman
Plant Manager
Quikrete-Flint
14311 CMI Drive
Holly, MI 48442-9752

SRN: B1945, Oakland County

Dear Mr. Kaufman:

VIOLATION NOTICE

On September 11, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), 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 530-96E.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
New sand drying process equipment	R 336.1201(1)	The permittee commenced the installation of new sand drying process equipment without obtaining an authorized permit to install.
EU-Process	PTI No. 530-96E, General Condition 1, and R 336.1201(1)	The permittee modified the baghouse dust collector control device without obtaining an approved permit to install authorizing the modification.
EU-Process	PTI No. 530-96E, Special Condition IV.1, and R 336.1910	The permittee operated EU-Process after disconnecting the permit specified baghouse dust collector control device and rerouting exhaust gases to the EU-Dryer cyclone and wet scrubber in-series control devices.

During this inspection, it was noted that Quikrete-Flint had commenced the installation of new unpermitted sand drying equipment at this facility and had modified the emission control device for EU-Process. The AQD staff advised Quikrete-Flint on September 24, 2020, that installation of new unpermitted sand drying equipment, and modification of the EU-Process baghouse dust collector is a violation of Rule 201 of the administrative rules promulgated under Act 451. A program for compliance may include a completed PTI application for the new sand drying process equipment and modification of the EU-Process permit specified baghouse dust collector. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page). 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 this inspection and video conference on October 1, 2020, the AQD staff determined that Quikrete-Flint was operating EU-Process while the permit specified baghouse dust collector was disconnected and had rerouted exhaust gases from EU-Process to the EU-Dryer cyclone and wet scrubber in-series control devices. This constitutes a violation of PTI No. 530-96E, Special Condition IV.1 which states, "The permittee shall not operate any portion of EU-Process unless the equipment's specified control device is installed, maintained and operated in a satisfactory manner as listed in Appendix B of this permit." This also constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451. Rule 910 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 3, 2020 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of September 11, 2020. 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,

A handwritten signature in black ink, reading "Robert Elmouchi". The signature is fluid and cursive, with the first name "Robert" and last name "Elmouchi" clearly distinguishable.

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

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Andrew Drury, EGLE
Mr. Nicholas Carlson, EGLE
Mr. Paul Robbins, Quikrete-Flint