



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

February 14, 2019

Mr. Paul Robbins
Gibraltar National Corporation QUIKRETE - Detroit
8951 Schaefer Highway, Building #4
Detroit, MI 48228

SRN: B3291, Wayne County

Dear Mr. Robbins:

VIOLATION NOTICE

On September 4, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Gibraltar National Corporation QUIKRETE - Detroit located at 8951 Schaefer Highway, Detroit, Michigan. The purpose of this inspection was to determine 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 Opt-Out Permit to Install Number (PTI No.) 205-16.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY – All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	PTI No. 205-16 Special Conditions (SCs) VI. 1, 6, 7, 8, and 9	Proper records were not being maintained.

Records required for the Drying System, including the hours that this system operated and the monthly and 12-month rolling time period tons of aggregate dried, were not being maintained. This is a violation of the recordkeeping specified in SCs VI. 1 and 6 of PTI No. 205-16.

Records required for raw cement purchased monthly and on a 12-month rolling time period basis were not being maintained. This is a violation of the recordkeeping specified by SCs VI. 1 and 7 of PTI No. 205-16.

Records required for rock salt processed monthly and on a 12-month rolling time period basis were not being maintained. This is a violation of the recordkeeping specified by SCs VI. 1 and 8 of PTI No. 205-16.

Emission calculations for PM, PM₁₀, PM_{2.5}, and VOC emission rates from FGFACILITY monthly and for the preceding 12-month rolling time period using the tons of aggregate

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dried, the hours of operation of the Drying System, amount of cement purchased, the amount of rock salt processed, and appropriate emission factors (or another method acceptable to the AQD District Supervisor) were not being maintained. This is a violation of the recordkeeping specified by SCs VI. 1 and 9 of PTI No. 205-16.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 7, 2019 (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 the DEQ, AQD, Detroit District, at 3058 West Grand Blvd. Ste 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Gibraltar National Corporation QUIKRETE - Detroit 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 Gibraltar National Corporation QUIKRETE - Detroit. 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,



Ms. Jill C. Zimmerman
Environmental Engineer
Air Quality Division
313-456-4689

cc: Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ