



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 28, 2020

Ms. Sue Hanf
Environmental Engineer
Cadillac Asphalt, LLC
7555 Whiteford Rd
Ottawa Lake, MI, 49267

SRN: B4287, Oakland County

Dear Ms. Hanf:

VIOLATION NOTICE

On July 9, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Cadillac Asphalt, LLC, located at 4751 White Lake Road, Clarkston, Michigan. The purpose of this inspection was to determine Cadillac Asphalt'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 443-82H.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-SILO	PTI No. 443-82H, EUSILOS Condition 4.1; Rule 910	The plant operated the Hot Mix Asphalt production process throughout the month of July 2020 and into the month of August 2020 without the operation of the blue smoke emission capture system on the storage silos.

On July 9, 2020, the AQD staff observed operation of hot mix asphalt (HMA) plant while the blue smoke system was offline and in the process of being replaced.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, 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

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existing law. This is also a violation of PTI No. 443-82H, Condition 4.1, which states that EUSILOS shall not be operated unless the emission capture system on top of each silo is installed, maintained, and operated in a satisfactory manner.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 19, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

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 Cadillac Asphalt 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 violation cited above and for the cooperation that was extended to me during my inspection of Cadillac Asphalt. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-249-6505

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE