

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

M378568226

<b>FACILITY:</b> Central Concrete	<b>SRN / ID:</b> M3785
<b>LOCATION:</b> 2221 E LUDINTON AVE, CLARE	<b>DISTRICT:</b> Bay City
<b>CITY:</b> CLARE	<b>COUNTY:</b> CLARE
<b>CONTACT:</b> Matt Bollman , Clare Plant Manager	<b>ACTIVITY DATE:</b> 07/18/2023
<b>STAFF:</b> Nathanael Gentle	<b>COMPLIANCE STATUS:</b> Compliance
<b>SUBJECT:</b> Scheduled On-site Inspection FY23	<b>SOURCE CLASS:</b> MINOR
<b>RESOLVED COMPLAINTS:</b>	

On July 18, 2023, AQD staff conducted a scheduled onsite inspection at Central Concrete – Clare Plant, SRN M3785. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment Great Lakes and Energy, Air Quality Division (AQD) and to determine compliance with the facility’s Permit to Install (PTI), PTI No. 570-80. AQD staff were assisted onsite by Mr. Matt Bollman, Clare Plant Manager. At the time of inspection, the facility was found to be in compliance.

### Facility Description and History

Central Concrete – Clare Plant is located at 2221 E. Ludington Rd Clare, MI 48617. Central Concrete is part of the Fisher Companies. The facility is a concrete batching plant. The plant consists of aggregate hoppers and cement silos. Components are mixed together with water to produce cement. The cement silo is equipped with a baghouse filter to control particulate emissions. The cement loadout is equipped with a dust collector with filter control.

Central Concrete – Clare Plant is minor source of all regulated pollutants. As a concrete batch plant, the primary pollutant of concern is particulate matter (PM). One Permit to Install is associated with the facility, PTI 570-80. Issued on November 24, 1980, PTI No. 570 -80 was issued to Rockcrete Transit Mix, Inc for the installation of a cement silo using a Dusty Dustless Model 36k baghouse. The facility was acquired by Central Concrete in the fall of 2015. The originally permitted cement silo and baghouse have since been replaced with a newer system. Staff report the new batch plant and its associated storage silos, and control equipment, were installed 4 years ago, following acquisition of the facility. Compliance evaluation of the facility was last completed in June 2011. At that time, the facility was owned and operated by Rockcrete Transit Mix. No complaints are on file for the facility.

### Compliance Evaluation

Permit to Install exemption Rule 336.1285(d) states the requirement to obtain a Permit to Install does not apply to the reconstruction or replacement of air pollution control equipment with equivalent or more efficient equipment. Using this exemption, the new cement silo pollution control equipment can operate under existing PTI 570-80 associated with the location. Additionally, Rule 336.1289(d) states a concrete batch plant meeting all the requirements of the exemption rule are exempt from the requirement to obtain a Permit to Install. As part of the onsite inspection, compliance with PTI No. 570-80 was evaluated, as well as potential subjectivity to exemption Rule 289(d).

## **PTI 570-80**

Visible emissions from the storage silo are limited to an opacity of less than or equal to 20% except as specified in Rule 301, Special Condition (S.C.) 12. Visible emissions were not observed at the time of inspection. The silo is equipped with an automatic shut-off to prevent over filling. Additionally, the silo is equipped with a CW dust collector and fabric filter system to control PM emissions, S.C.15. Staff report filters are visually checked a couple times each year and changed as needed to ensure proper dust control. Dust collected in the filters is fed back into the process equipment.

Special Condition 13 establishes the particulate emissions rate from the cement handling and storage equipment shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis. At this time stack testing has not been required for the facility.

Onsite roadways are a combination of paved and unpaved. The facility has procedures in place for controlling fugitive dust from the onsite plant roadways and plant yard, S.C. 14. The facility utilizes a sweeper to clear paved portions of the facility. Staff apply water with a large hose to unpaved portions to control dust. Staff report water is applied as often as needed to control dust.

## **Rule 289(d)**

Concrete plants producing not more than 200,000 cubic yards per year are eligible for exemption R.289(d). Central Concrete Clare produces approximately 25,000 cubic yards per year. Staff report records are maintained detailing the cubic yards of concrete produced.

The truck loading zone is equipped with a drop chute to minimize drop distance. The load out is equipped with a dust collection system with fabric filter control. Additionally, as previously discussed, the cement silo is equipped with fabric filter dust control.

R 289(d)(vi) states the concrete batch plant shall be located not less than 250 feet from any residential or commercial establishment or place of public assembly unless all of the cement handling operations, excluding the cement silo storage and loading operations, are enclosed within at least a 3-sided structure. The current location of the plant is more than 250 feet from any residential or commercial establishment or place of public assembly. Additionally, aggregate storage piles were observed to be enclosed with 3-sided structures.

Procedures are in place and implemented to minimize fugitive dust. Cement load-out is equipped with a drop chute to minimize drop distance during load out. Staff report drop distances are also minimized when loading aggregate hoppers with a front-end loader. Applications of water are applied as often as needed to control fugitive dust from site roadways. Paved roadways are swept as needed using an onsite sweeper. Material storage piles were observed to be maintained in 3 sided structures. Equipment is available onsite to water material stockpiles, if needed, to control fugitive emissions. Opacity from site roadways and material storage shall be no more than 5%.

## **Summary**

On July 18, 2023, AQD staff conducted a scheduled onsite inspection at Central Concrete – Clare Plant, SRN M3785. Located at 2221 E. Ludington Rd Clare, MI 48617, Central Concrete -Clare Plant is a concrete batching plant. The facility is a minor source of all regulated pollutants. One Permit to Install is associated with the facility, PTI 570-80. At the time of inspection, the facility was found to be in compliance.

NAME Matthew D. ShantaDATE 7/28/2023SUPERVISOR Chris Lane