



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 18, 2024

Dave Gaedcke
Cadillac Asphalt LLC
51777 W 12 Mile Road
Wixom, Michigan 48393

SRN: B1960, Oakland County

Dear Dave Gaedcke:

VIOLATION NOTICE

On October 15, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor investigation at Cadillac Asphalt LLC located at 51777 W 12 Mile Road, Wixom, Michigan. The purpose of this investigation 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 to investigate a recent complaint which we received on October 12, 2024 regarding foul asphalt-like odors attributed to Cadillac Asphalt's operations.

During the investigation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Hot Mix Asphalt (HMA) Plant	R 336.1901 PTI 476-94F GC 6	A distinct and definite objectionable asphalt-like odor - strong enough at times to cause a person to attempt to avoid it completely (odor intensity ranging from a level 3 to level 4 on the odor scale) was detected downwind of the facility for multiple 1 – 5-minute intervals.
Fugitive Emission Capture System	R 336.1910	The fugitive emission capture system (i.e. blue smoke system) was not properly capturing HMA fugitive emissions. Steady fugitive emissions were observed emanating from the top of the HMA storage silos. At times, dense fugitive emission puffs of smoke were observed coming from the top of the HMA storage silos.

In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency, and duration to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 and General Condition number 6 of PTI number PTI number 476-94F.

AQD staff detected odors approximately 4,500 ft (0.85 miles) downwind of the facility on 11 Mile Road.

On October 15, 2024, AQD staff observed HMA storage silos being filled while the fugitive emission capture system (i.e. blue smoke system), in place atop the HMA storage silos, was not properly capturing HMA fugitive emissions.

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 existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 8, 2024 (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 Owen Pierce at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or pierceo@michigan.gov and submit a copy to 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.

Dave Gaedcke
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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 Cadillac Asphalt LLC. 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 "Owen Pierce". The signature is fluid and cursive, with a long horizontal stroke at the end.

Owen Pierce
Environmental Engineer
Air Quality Division
586-854-3244

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Kerry Kelly, EGLE