



STATE OF MICHIGAN
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER
 GOVERNOR

DAN WYANT
 DIRECTOR

July 24, 2015

Mr. Mark Danhausen, President
 Paragon Concrete Company
 4389 Lessing Drive
 Waterford, Michigan 48329-1425

SRN: B6269, Oakland County

Dear Mr. Danhausen:

VIOLATION NOTICE

On July 21, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Paragon Concrete Company (Paragon) located at 4389 Lessing Drive, Waterford, 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 administrative rules; and the conditions of Permit to Install (PTI) number 715-80.

During the July 21, 2015, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Transit mix concrete plant	PTI No. 715-80, SC 14 Dust collectors shall be installed and operating properly.	Paragon Concrete Company (Paragon) or previous owner (Waterford Block & Ready Mix, Nagy Paving, etc.) removed dust collectors that controlled fugitive dust due to transit mix truck loading (cement, sand, aggregates, slag, fly ash, etc.) operation.
Transit mix concrete plant	Rule 336.1910 (Air cleaning devices)	Paragon or previous owner removed dust collectors that controlled fugitive dust due to transit mix truck loading (cement, sand, aggregates, slag, fly ash, etc.) operation.

On July 21, 2015, the AQD staff observed operation of a transit mix concrete plant while the dust collector (or a baghouse) was completely removed resulting in visible emissions of opacity up to 50 percent and thus causing neighborhood dust nuisance.

This constitutes a violation of Act 451, Rule 910, 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. Tampering with or removing an air pollution control device may be a criminal offence under Clean Air Act.

Please initiate actions necessary to correct the cited violations and **submit a written response to this Violation Notice by August 14, 2015** (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.

If Paragon Concrete Company 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 Paragon. 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,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-753-3741 or konanahalli@michigan.gov

IK/DC

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ