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

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FACILITY: SRM Concrete	SRN / ID: F0034
LOCATION: 48000 HIXSON, UTICA	DISTRICT: Warren
CITY: UTICA	COUNTY: MACOMB
CONTACT: Mitch Kurkowski, Plant Manager	ACTIVITY DATE: 07/17/2024
STAFF: Jillian Cellini COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Determine the facility's compliance status with the requirements of the federal Clean Air Act; Article II, Part 55, Air	
Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended (Act 451), and the	
AQD administrative rules.	
RESOLVED COMPLAINTS:	

On July 17, 2024, I (Jillian Cellini, EGLE-AQD) and Owen Pierce (EGLE-AQD) conducted an inspection at SRM Concrete located at 48000 Hixson, Ave., Utica, Michigan. The purpose of the inspection was to determine the facility's compliance status with the requirements of the federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended (Act 451), and the AQD administrative rules.

We arrived at SRM concrete at around 10:00 AM. Before entering the facility, I noticed some dust track out on the road in front of SRM Concrete. However, upon entering the facility, I observed that the road leading into and out of the facility was wet and currently being watered by sprinklers. After closer investigation, it did not appear the track out was being generated from SRM concrete, but rather the facility next door, Wiegand's. As we drove to the front office of the facility, I noticed that any roads that were being actively driven on by cars and trucks were wet. When we arrived at the main office, we met with Mitch Kurkowski (Plant Manager). We introduced ourselves and stated the purpose of the inspection. Mitch then began showing us around the grounds of the facility.

SRM Concrete or Smyrna Ready Mix Concrete, is a national company that produces various cement products and owns concrete plants, quarries, and cement terminals. They operate in 19 states and run 16 concrete plants,1 quarry, 2 pumping stations, and 1 harbor operation in the state of Michigan. Mitch explained that they primarily mix concrete for construction at this plant. This SRM Concrete is in Utica, Michigan and is surrounded by mostly residential properties. The closest residential property is ~0.05 miles away from the batch plant. There are several lakes in the area, each located ~0.15 miles to the north, south, and southwest of the batch plant.

First, we stopped at the boiler room. Mitch showed us a natural gas fired boiler manufactured by the Kewanee Boiler Company. Mitch explained it was used for hot water and steam for one of their batchers so they can operate in the colder months. The boiler had a nameplate capacity of 200 MBTU/hr (0.2 MMBTU/hr). As this boiler is used to provide hot water to the facility, has a rated heat input capacity of less than 50,000,000 BTU/hr and runs on natural gas, the boiler is exempt from the requirement to have a PTI under R 336.1282 (b)(i). This boiler also has a rated heat input capacity of under 10 MMBTU/hr, so it is not subject to 40 CFR Part 60 Subpart Dc. This boiler runs only on natural gas and per 40 CFR 63.11195(e) is not subject 40 CFR Part 63, Subpart JJJJJJ. The boiler room also contained 6 large containers (4 containers of 1000 gallons and 2 containers of 1900 gallons) of Admix. All containers were closed and properly labelled. Mitch explained that this chemical is added to the concrete to trap air (bubbles). This makes the concrete more resilient to freeze/thaw cycles.

Next, Mitch showed us to one of the two concrete batchers they have on site. This batcher was fully enclosed, so the silos cannot be seen from the outside. Mitch explained that the hot water and steam from the boiler mainly goes to this batcher as it is totally encapsulated and can retain heat. He showed us into the batcher, where we observed where the aggregates and cement are weighed before they are mixed and loaded into the cement trucks. Mitch also explained that the aggregates and cement are transferred to this batcher by conveyer that is connected to hoppers full of the various materials (aggregates, sand, etc.) used.

After we exited the encapsulated batcher, we observed a concrete truck being loaded. The drop distance from the batcher to the truck was covered by a shroud, which Mitch explained keeps the dust contained for longer so the dust collector attached to the batcher can remove the dust. The dust collector is attached to a bag house full of fabric filters. Mitch explained that they haven't changed the filters in about 5 years, but the bag house is equipped with a shaker system, and they shake the dust out frequently as it is pumped back into the batcher and can be reused. This meets the requirements for dust control measures for truck loading operations and cement handling operations to be exempt from obtaining a permit to install (Rule 289(2)(d)(ii -iii)). I did not observe any dust being generated from the weighing and loading process at this batcher.

While standing near the encapsulated batcher, we also observed a truck loading the hoppers connected to the conveyors. The truck loading the hoppers was covered by a tarp to keep dust down during loading. This meets the requirements for dust control measures for truck loading operations to be exempt from obtaining a permit to install (Rule 289(2)(d) (vii)(B)). I did not observe any dust being generated from this process.

We then headed to the reclaim building. Mitch explained that when the trucks are washed out at the end of the day, the water is pumped into a tank in this building, which is equipped with mixers, so the cement does not settle and harden. The water can then be siphoned off from this tank and reused to make more cement.

Mitch then showed us where aggregates and sand are stored on the facility. He explained they only use this storage when they are running low on materials. Otherwise, the hoppers are loaded with material directly as it comes in. The aggregates and sand are enclosed on three sides, and I observed that the materials looked wet. To be exempt from obtaining a permit to install, the storage piles must be enclosed on 3 sides if the plant is located less than 250 feet from residential or commercial properties (Rule 289(2)(d)(vi)). Mitch also explained that he had just applied chloride to the piles as well. He explained that he applies the chloride at least once a year, sometimes twice depending on the weather. The aggregates and sand that are stored on the farthest edge of the property are not watered as much. Mitch explained that they cannot run water lines close enough to install sprinklers there. To make sure they are watered regularly, Mitch explained that a truck will move the aggregates to one of the piles closer to the sprinklers. I observed that there were less materials in the 3-sided enclosures on the side that does not receive as much water. Mitch also noted that it makes better cement if the materials are not too dry, which is another incentive to keep the aggregates watered. I did not observe any dust being generated from the aggregate and sand storage piles. This meets the requirements for dust pile watering to keep opacity below 5% to be exempt from obtaining a permit to install (Rule 289(2)(d)(D) (2)).

While we were standing close to the aggregate storage, Mitch pointed out the second batcher. He explained this batcher was not fully encapsulated and therefore not heated. He explained this batcher can only be used in the warmer months, but the silos and the whole process is still fully enclosed. This meets the requirements for dust control measures for truck loading operations and cement handling operations to be exempt from obtaining a permit to install (Rule 289(2)(d)(iii)).

Mitch then showed us to where the aggregate and sand hoppers are loaded. These hoppers are built into the ground and are therefore enclosed. He explained that if a silo needs more material, the system turns on and a conveyor moves the material from the aggregate and sand hoppers to the silos in the encapsulated batcher. While we were there, we observed limestone being moved into the silo on the conveyor. I did not observe any dust being generated from this process.

I did not see any dust spills on roadways. Throughout the site, I did not observe any trucks driving on dry roads. Though I did not observe a sweeper at the time of inspection, Mitch mentioned that the roads on the facility are swept periodically. This meets the requirements for dust control measures for roadways at the facility to be exempt from obtaining a permit to install (Rule 289(2)(d)(vii)(C)(1-3). I did not see any dust being generated from the roadways on site.

After we observed the aggregate and sand hoppers, we headed back to the main office at the site. There, Mitch provided me with hard copies of monthly and annual production records from June 2023 – June 2024, as requested previous to the inspection. The records state that the total throughput for the year from July 2023 to June 2023 was 71,660.75 cubic yards of cement. To be exempt from obtaining a permit to install, the concrete batch plant must not produce more than 200,000 cubic yards per year (Rule 289(2)(d)(i)). I did not request watering activity records from this site. Mitch stated that he is watering "almost constantly" and, I observed that a sprinkler was always running for the duration of our visit.

Based on the above observations, SRM concrete is operating in accordance with the requirements in Rule 289(2)(d).

## Conclusion

Observations made during the inspection and record review indicate that SRM Concrete is operating in compliance with all 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); and Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE -AQD) Administrative Rules.

Jillian Calture DATE 7/18/2024 SUPERVISOR Kelly