



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

June 14, 2023

VIA EMAIL ONLY

Alicia Ramsdell
Ace-Saginaw Paving Company – Plant 9
4711 Veterans Memorial Highway
Saginaw, Michigan 48601

SRN: N1580, Saginaw County

Dear Alicia Ramsdell:

VIOLATION NOTICE

On June 5, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Ace-Saginaw Paving Company - Plant 9 located at 4711 Veterans Memorial Highway, Saginaw, Michigan. The purpose of this inspection was to determine Ace-Saginaw Paving Company - Plant 9'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 178-87H.

Process Description	Rule/Permit Condition Violated	Date Exceeded	HMA feed Rate (tph)
EU-001	PTI 178-87H	5-9-2022	400.86
	II. MATERIAL LIMITS 6. The permittee shall not process more than 400 tons of HMA paving materials in EU-001 per hour based on a daily average, which shall be determined by dividing the daily HMA production by the daily operating hours. (R 336.1224, R 336.1225, R 336.1702)	5-23-2022	402.64
		5-24-2022	406.91
		6-2-2022	480.69
		6-3-2022	412.31
		7-12-2022	402.98
		7-25-2022	406.24
		7-26-2022	406.55
		8-2-2022	406.86
		9-1-2022	404.18
		9-9-2022	412.18
9-23-2022	411.73		

During the inspection, staff observed the following:

May, June, July, August, and September of 2022 have one or more days when the plant processed more than 400 tons of HMA paving materials per hour. This is a violation of the

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recordkeeping and emission limitations specified in Special Condition II.6 of PTI number 178-87H.

The conditions of PTI number 178-87H restrict the plant from processing more than 400 tons of HMA paving materials in EU-001 per hour based on a daily average, which is determined by dividing the daily HMA production by the daily operating hours.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 5, 2023 (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 reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ace-Saginaw Paving Company - Plant 9 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 Ace-Saginaw Paving Company - Plant 9. 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,



Gina L. McCann
Environmental Quality Specialist
Air Quality Division
989-439-2282

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE