



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 22, 2019

Mr. Thomas Downs, General Manager
Rock Recyclers
5699 Ready Road
South Rockwood, MI 48179

SRN: N6837, Oakland County

Dear Mr. Downs:

VIOLATION NOTICE

On January 10, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Rock Recyclers located at 225 East Columbia, Pontiac, Michigan. The purpose of this inspection was to determine Rock Recycler'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; the conditions of Permit to Install (PTI) number 217-00; and to investigate a recent complaint which we received on January 4, 2019, regarding fugitive dust attributed to concrete crushing operations.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|------------------------|---------------------------------------|--|
| Compliance Evaluation | PTI 217-00, Special Condition III. A1 | Daily records of the amount of material processed. The daily records were not made available to the department upon request. |
| Operational Parameters | PTI 217-00, Special Condition IV.2 | The permittee shall label all equipment associated with the nonmetallic mineal crushing operation. Labels shall be in a conspicuous location. Equipment was not labeled at the facility. |
| Operational Parameters | PTI 217-00, Special Condition IV.3 | Each crusher and screen shall be equipped with a water spray. The screen was not equipped with water. |

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|----------------------------|---|--|
| Allowed Modifications | <p>PTI 217-00, Special Condition V.2.</p> <p>PTI 217-00, Allowed Modifications, Special Condition V.3.</p> <p>40 CFR, Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants.</p> | <p>The permittee shall update the general permit by submitting a new Process Information form listing all existing, new, or additional equipment added to the process. Equipment has been added and replaced, but a process information form has not been submitted.</p> |
| Allowed Modifications | <p>PTI 217-00, Special Condition V.3.</p> <p>40 CFR, Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants.</p> <p>R 336.2001.</p> | <p>All new or additional equipment shall comply with the testing requirements of 40 CFR, Part 60, Subpart OOO. All new and replaced equipment has not been tested.</p> |
| Fugitive Dust Control Plan | PTI 217-00, Section III.B | <p>A record of all watering shall be kept on file and made available to the AQD upon request. Rock Recyclers indicates water was used but the records are incomplete to verify this.</p> |

This process is also subject to the federal Standards of Performance for New Sources (NSPS) for Nonmetallic Mineral Processing Plants. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart OOO.

During this inspection, Rock Recyclers was unable to produce the daily amount of material processed and watering records. This is a violation of recordkeeping specified in Special Condition III. A1 and the Fugitive Dust Control Plan of PTI number 217-00.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 12, 2019 (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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Mr. Thomas Downs

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Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Rock Recyclers 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.

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,



Robert Joseph
Environmental Engineer
Air Quality Division
586-506-9564

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ
Ms. Diane Kavanaugh Vetort, DEQ