DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated Inspection

FACILITY: Superior Materials, Inc.		SRN / ID: P0682
LOCATION: 1300 N. Range Road, PORT HURON		DISTRICT: Southeast Michigan
CITY: PORT HURON		COUNTY: SAINT CLAIR
CONTACT: Dion Turner, Plant Operator		ACTIVITY DATE: 02/05/2016
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced Lev	el 2 Self-initiated Inspection	
RESOLVED COMPLAINTS:	· · · · · · · · · · · · · · · · · · ·	

On 02/05/2016, I conducted an unannounced level 2 self-initiated inspection at Superior Materials, Inc. located at 1300 N. Range Road, Port Huron, Michigan 48060. The purpose of the inspection was to determine the facility'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), and the administrative rules. During the inspection, I was accompanied by Mr. Dion Turner, Plant Operator. At the pre-inspection conference, I showed to Mr. Turner my ID Badge, stated the purpose of my visit, and gave a copy of the pamphlet, "Environmental Inspections: Rights and Responsibilities".

The inspection was precipitated by a telephone call to AQD Warren office inquiring about a 2013 TRI data submitted by the facility to USEPA showing on-site release of 1,000 lb. of Lead and Mercury respectively. Upon further investigation, AQD staff has learned that the company committed an error with the reporting and has since corrected the submittal.

At the site, I observed the ground wet and did not see visible emissions from truck traffic. I observed a large building in the middle and some open box type three sided enclosed storage structures along the eastern side of the facility ground containing various sizes of aggregates and other materials. Mr. Turner informed me that the facility operates as a ready mix concrete batch plant. Pre-determined amount of raw materials such as cement, aggregates, sand, etc., including water and additives are conveyed and unloaded through a drop hopper into a vehicle/truck transit mix bin directly where mixing occurs. The control tower sets the amounts of each material to unload in the mixer bin based on the type of concrete mix required by the customer. A baghouse system controls the particulate emissions during unloading of cement to the transit mix bin. During the inspection, I observed that a control box was set up to ensure that the unloading of cement material will only occur when the baghouse system is on. I did not observe visible emissions during the unloading of cement into the truck transit mix bin.

The facility is using exemption from permit to install requirements (AQD Administrative Rule R 336.1201 (Rule 201)) based on R 336.1289. For this exemption to apply, the facility must meet the following conditions:

(i) The plant shall produce not more than 200,000 cubic yards per year.

(ii) The plant shall use either a fabric filter dust collector, a slurry mixer system, a drop chute, a mixer flap gate, or an enclosure for truck loading operations.

(iii) All cement handling operations, such as silo loading and cement weighing hoppers, shall either be enclosed by a building or equipped with a fabric filter dust control.

(iv) The owner or operator shall keep monthly records of the cubic yards of concrete produced.

(v) Before commencing operations, the owner or operator shall notify the appropriate air quality division district supervisor of the location where the concrete batch plant will be operating under this exemption.

(vi) The concrete batch plant shall be located not less than 250 feet from any residential or commercial establishment or place of public assembly unless all of the cement handling operations, excluding the cement silo storage and loading operations, are enclosed within at least a 3-sided structure.

(vii) The owner or operator shall implement the fugitive dust plan described in the Rule 336.1289

I obtained a copy of the monthly cement production yardage for 2015. The monthly records calculated to 47,147.50 cubic yards for Calendar Year 2015 and below the 200,000 cubic yards exemption limit. The facility property appeared to meet the 250 feet set back requirements. The cement handling is controlled by a baghouse filter system and operates a drop chute to convey material into the transit mix bin. I obtained a copy of yard sweeping schedules and dust suppressant application schedule. The materials are stored in three sided structures.

I found out later that the facility is using cement slag and fly ash in some production batches. I called and spoke with facility corporate contact and area manager, Brady Glomski. I requested and obtained fly ash and slag usage. The submitted facility usage for fly ash and slag for 2015 were 1,592.66 tons and 1008.14 tons respectively.

Overall, the facility appeared to meet the permit to install exemption requirements as discussed above and I did not observe any additional noncompliance issues during inspection.

MA

DATE 2/16/2016 SUPERVISOR