



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

August 29, 2022

VIA E-MAIL AND U.S. MAIL

James Plohg  
Vice President - Operations  
Titan Concrete LLC, an umbrella organization of Hercules Concrete LLC  
6497 East Ten Mile Road  
Center Line, MI 48089  
SRN: P1297, Macomb County

Dear James Plohg:

**VIOLATION NOTICE**

On July 21, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Titan Concrete, an umbrella organization of Hercules Concrete LLC located at 6497 East Ten Mile Road, Center Line, Michigan. The purpose of this inspection was to determine Titan Concrete LLC's, an umbrella organization of Hercules Concrete, 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 R 336.1901 and R 336.1289(2)(d).

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Roadways and parking lots	R 336.1901	Rule 901(b) states a person shall not cause or permit the emission of an air contaminant in quantities that cause unreasonable interference with the comfortable enjoyment of life and property. Fugitive dust was observed originating from the facility parking lots and roadways entering the atmosphere and onto residential property.
Roadways and plant yards	R 336.1289(2)(d)(vii)(C)	Per R 336.1289(2)(d)(vii)(C), the permittee did not apply dust suppressants on site roadways and plant yards.
Storage piles	R 336.1289(2)(d)(vii)(D)	Fugitive dust was observed originating from the stockpiles. Stockpiles were not watered. The facility was unable to provide the record of all watering on the roads and plant yards.

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In the professional judgment of AQD staff, the fugitive dust that was observed was of sufficient intensity, frequency, and duration to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451. Per R 336.1289(2)(d), the facility needs to submit a fugitive dust plan to the AQD Warren District Supervisor and follow the plan.

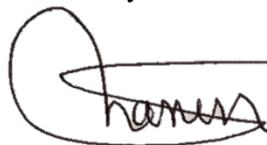
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 19, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of 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, Warren District, at 27700 McDonald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Titan Concrete, umbrella organization of Hercules Concrete LLC 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 Titan Concrete, umbrella organization of Hercules Concrete LLC. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Shamim", enclosed within a large, stylized circular flourish.

Shamim Ahammod  
Environmental Engineer  
Air Quality Division  
586-212-0508; [ahammod@michigan.gov](mailto:ahammod@michigan.gov)

cc: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE