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

A243729185

FACILITY: Quikrete		SRN / ID: A2437
LOCATION: 20 N PARK ST. COMSTOCK PARK		DISTRICT: Grand Rapids
CITY: COMSTOCK PARK		COUNTY: KENT
CONTACT: Jeremy Burt, Plant Manager		ACTIVITY DATE: 03/26/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, unscheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, self-initiated inspection and met with Jeremy Burt, Plant Manager. I informed Mr. Burt that the reason for the inspection was to conduct a follow-up to the 2014 inspection and because AQD staff saw dust from the facility the day before. Mr. Burt was offered the DEQ Environmental Inspections: Rights and Responsibilities brochure and its contents were discussed as not having been changed since the last inspection.

I offered historical information obtained from the file, including copies of the four active permits: 219-72, 22-72, 417-75 and 74-80. The equipment in 219-72, 22-72 and 417-75 has all been replaced over the years, and I suggested it may be exempt from permitting per Rule 290(a)(iii)(A) for noncarcinogenic particulate matter and showed him where on the R290 guidance document to read about it. I asked Mr. Burt to determine that this is accurate and I will void these permits. The permit for 74-80 covers a H & B Rotary Dryer with H & B Mo. DB-6150 fabric filter dust collector for sand and gravel dry mix operation. Due to the changes over the years to this equipment, it has likely gone through reconstruction. Staff asked Mr. Burt to conduct an evaluation on whether or not this unit has been reconstructed. Following receipt of this information, we will determine what is possibly needed to update this permit. Mr. Burt indicated he would contact his corporate engineer for assistance.

Mr. Burt was also provided with a copy of 40 CFR Part 60 Subpart UUU—Standards of Performance for Calciners and Dryers in Mineral Industries. We discussed that based on my file review and a U.S. EPA inspection in the 1990's this had been looked at, and it was determined that the sand dryer had not been reconstructed and was therefore not subject. As indicated above, the referenced reconstruction review could affect this determination. Additionally, there is question as to whether or not the type of sand and its end use definition is regulated by Subpart UUU. Mr. Burt has been asked to inform the AQD whether or not this facility is subject to Subpart UUU.

During the evaluation of activities as a part of the compliance determination, I looked on the internet for datasheets of the things manufactured at Quikrete to see all the ingredients. They did match up with the list of ingredients that Mr. Burt provided to me which include: masonry cement type N, Portland cement type I, washed #4 concrete sand and pea stone. They do not use lime in the products at this facility. The online datasheets listed the crystalline silica as a carcinogen. As I entered the CAS #'s into the AQD toxics screening level list to evaluate this, I saw that the CAS # of 14808-60-7 for silica quartz with a footnote of 31 does not have a listed IRSL or SRSL. The presence of a IRSL or SRSL usually means it is a carcinogen. Mike Depa in the AQD Air Toxics Unit was contacted and a discussion ensued where Mr. Depa confirmed that silica is one of two compounds that are in fact carcinogens, but do not have an IRSL or SRSL on the screening level list. We discussed that the footnote 31 should be changed to address this deficiency. In summary the facility cannot use the Rule 290(a)(iii)(A) one time demonstration for non-carcinogenic particulate matter in this case since silica quartz is a carcinogen. Due to the fact that there is no IRSL or SRSL, Rule 290(a)(ii)(C) is not an option. Therefore, Rule 290 as a whole cannot be used on any emissions point where silica quartz is in use.

The plant inspection included the external control devices that are in place. The facility staff has recently installed a new dry material storage bin vent. In addition, bin vent overfill alarm systems have been installed to prevent overfilling.

At the time, the dryer was not in operation due to staff illness. We accessed the operator's area where we looked at the pressure drop gauge that is used. Again, it was identified that the gauge had the alarm settings pegged high and low. This removes the alarm function from working during the operation of the equipment. I pointed this out to Mr. Burt and asked him what the normal pressure drop operating range is for this baghouse? He was unclear without looking at the records. Mr. Burt should review the operating protocol and be sure to identify what the proper operating range for this unit needs to be. In the future the alarm needles should be placed where they will work, and Mr. Burt agreed.

During the closing meeting we talked some more about using the Rule 290 exemption but as indicated above, it has been

determined that it is not an option when silica quartz is an emission.

Mr. Burt provided me with copies of the preventative maintenance/malfunction abatement plan and it will be placed in the file. After my initial review, I contacted Mr. Burt to get the information of his corporate engineer so I could contact him. Mr. Burt provided the information.


I contacted John Kehlbeck out of Columbus to discuss this plant. I explained what was needed- a site evaluation to determine the permitting status. He requested copies of the existing permits, and I emailed them to him. The permitting status needs to include a reconstruction evaluation, and NSPS UUU applicability determination. Also, a facility Potential to Emit demonstration should be included.

Additionally, I mentioned to Mr. Kehlbeck that Mr. Burt has been documenting his maintenance activities on the baghouse logs, including black lighting but that particulate emissions are seen from time to time both from the dryer and plant baghouses. He indicated he would look into this allegation as well. Utilizing the current pressure drop gauge would be one way to prevent emissions instead of reacting to emissions when a problem occurs.

We discussed a three month timeline for completion of this project. In an email (attached) the date of July 14, 2015 was detailed as the deadline.

At this time, the facility is considered in compliance. However, this will be reevaluated if necessary upon receipt of the information as detailed above.

NAME



DATE

4-20-15

SUPERVISOR

PAB