

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

FCE Summary Report

Facility : CARMEUSE LIME Inc, RIVER ROUGE OPERATION	SRN : B2169
Location : 25 MARION AVE	District : Detroit
	County : WAYNE
City : RIVER ROUGE State: MI Zip Code : 48218	Compliance Status : Compliance
Source Class : MAJOR	Staff : Stephen Weis
FCE Begin Date : 7/12/2016	FCE Completion Date : 7/12/2017
Comments : FY 2017 FCE for the Carmeuse Lime and Stone facility in River Rouge.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/12/2017	Scheduled Inspection	Compliance	Compliance inspection of the Carmeuse Lime and Stone facility in River Rouge. The Carmeuse facility is scheduled for inspection in FY 2017.
06/09/2017	MACT (Part 63)	Compliance	Carmeuse Lime, Inc. submitted their certification report for the applicable MACT regulation (40 CFR Part 63, Subpart AAAAA - Lime Manufacturing Plants). It was reported that all of the required Method 9 readings and processed stone handling (PSH) operation visible emission readings were conducted during the semi-annual period from July 1, 2016 through December 31, 2016.

06/09/2017	ROP SEMI 2 CERT	Compliance	<p>Carmeuse Lime, Inc. submitted their ROP Compliance Certification Report for the semi-annual period from July 1, 2016 through December 31, 2016. Six deviations were reported, which are the same deviations that have previously been reported in past ROP Compliance Certification Reports.</p> <p>All six of the reported deviations are associated with the Source-Wide Conditions portion of the ROP, which addresses fugitive dust management requirements put forth by the ROP, as well as by Consent Order SIP No. 22-1993. The Consent Order is attached to the ROP in Appendix 9. It is a site-specific fugitive dust control plan that is part of Michigan's State Implementation Plan (SIP), and is one of several SIP Consent Orders in place since 1993-94 for facilities along or near the Detroit River in Wayne County to control fugitive dust. The submittal references the initial ROP (No. 199700102) and the Special Conditions from that permit that address the fugitive dust plan. Carmeuse was reminded via an e-mail message to reference the current ROP (No. MI-ROP-B2169-2013) and the Source-Wide Conditions in future Compliance Certification Reports. A copy of the e-mail exchange is attached to the deviation report.</p> <p>The deviations reported by Carmeuse are for items such as: not flushing paved roads with water during periods of sub-freezing ambient temperatures; not sweeping roadways due to sub-freezing temperatures and snow/ice cover; not vacuum sweeping and water washing parking lots during periods of sub-freezing temperatures and ice/snow cover; not operating the truck wheel wash during periods of sub-freezing temperatures. Also, as in past ROP certification reports, there are two additional reported deviations that have been reported to DEQ in the past that also relate to an aspect of the SIP fugitive dust plan: the</p>
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06/09/2017	ROP SEMI 2 CERT	Compliance	<p>requirement to maintain a limestone moisture content of 3%, and the requirement that the lowest 10-20 section of the outdoor limestone conveyors be covered with a 210 degree enclosure. Carmeuse reports that the limestone is washed prior to being loaded on the boats that deliver it to the facility, which removes the fine material – this removes the portion of the limestone that is most susceptible to becoming airborne, and also takes away the portion that holds moisture the most. Carmeuse reports that, based on daily visible emission (VE) readings, there were no reported occasions of significant VEs from the stockpiles. Regarding the conveyor, Carmeuse has reported that the covers are not in place at the lowest section to safely maintain the belt.</p> <p>Carmeuse has demonstrated that the fugitive dust control plan in place at the River Rouge facility is equal to or more stringent than the requirements in the SIP fugitive dust plan (Consent Order SIP No. 22-1993). There have been discussions regarding changing the SIP fugitive dust plan, and I have provided the procedure for doing so to Carmeuse (Special Condition IX.3 of the Source-Wide Conditions section of the ROP references the procedure for revising the plan). However, the process for having one of these SIP Consent Order plans changed has been slow for other facilities. Carmeuse regularly monitors fugitive dust and they have not observed issues. I do not consider these reported deviations to be compliance issues at this time.</p> <p>There were two additional deviations reported for this semi-annual period. The required daily VE readings were not performed on November 12-13, 2016, which was a weekend. Carmeuse reported that the contracted consulting firm had a scheduling mix up. The facility reported that there no observed VEs on the days prior or after these dates.</p>
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06/09/2017	ROP SEMI 2 CERT	Compliance	Also, the facility performed compliance stack testing for PM on November 15 which showed PM emissions well in compliance with the permitted limit. The other reported deviation involved not treating the in-plant roadway within the required 6 week frequency.
06/09/2017	ROP Annual Cert	Compliance	This report includes the total deviations for both semi-annual periods of 2016.
06/05/2017	Other	Compliance	Review of RY2016 MAERS submittal.
10/20/2016	MACT (Part 63)	Compliance	Carmeuse Lime, Inc. submitted their certification report for the applicable MACT regulation (40 CFR Part 63, Subpart AAAAA - Lime Manufacturing Plants). It was reported that all of the required Method 9 readings and processed stone handling (PSH) operation visible emission readings were conducted during the semi-annual period from January 1, 2016 through June 30, 2016.

10/20/2016	ROP Semi 1 Cert	Compliance	<p>Carmeuse Lime, Inc. submitted their ROP Compliance Certification Report for the semi-annual period from January 1, 2016 through June 30, 2016. Six deviations were reported, which are the same deviations that have previously been reported in past ROP Compliance Certification Reports.</p> <p>All six of the reported deviations are associated with the Source-Wide Conditions portion of the ROP, which addresses fugitive dust management requirements put forth by the ROP, as well as by Consent Order SIP No. 22-1993. The Consent Order is attached to the ROP in Appendix 9. It is a site-specific fugitive dust control plan that is part of Michigan's State Implementation Plan (SIP), and is one of several SIP Consent Orders in place since 1993-94 for facilities along or near the Detroit River in Wayne County to control fugitive dust. The submittal references the initial ROP (No. 199700102) and the Special Conditions from that permit that address the fugitive dust plan. Carmeuse will be reminded to reference the current ROP (No. MI-ROP-B2169-2013) and the Source-Wide Conditions in future Compliance Certification Reports.</p> <p>The deviations reported by Carmeuse are for items such as: not flushing paved roads with water during periods of sub-freezing ambient temperatures; not sweeping roadways due to sub-freezing temperatures and snow/ice cover; not vacuum sweeping and water washing parking lots during periods of sub-freezing temperatures and ice/snow cover; not operating the truck wheel wash during periods of sub-freezing temperatures. Also, as in past ROP certification reports, there are two additional reported deviations that have been reported to DEQ in the past that also relate to an aspect of the SIP fugitive dust plan; the requirement to maintain a limestone moisture content of 3%.</p>
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10/20/2016	ROP Semi 1 Cert	Compliance	<p>and the requirement that the lowest 10-20 section of the outdoor limestone conveyors be covered with a 210 degree enclosure. Carmeuse reports that the limestone is washed prior to being loaded on the boats that deliver it to the facility, which removes the fine material – this removes the portion of the limestone that is most susceptible to becoming airborne, and also takes away the portion that holds moisture the most. Carmeuse reports that, based on daily visible emission (VE) readings, there were no reported occasions of significant VEs from the stockpiles. Regarding the conveyor, Carmeuse has reported that the covers are not in place at the lowest section to safely maintain the belt.</p> <p>Carmeuse has demonstrated that the fugitive dust control plan in place at the River Rouge facility is equal to or more stringent than the requirements in the SIP fugitive dust plan (Consent Order SIP No. 22-1993). There have been discussions regarding changing the SIP fugitive dust plan, and I have provided the procedure for doing so to Carmeuse (Special Condition IX.3 of the Source-Wide Conditions section of the ROP references the procedure for revising the plan). However, the process for having one of these SIP Consent Order plans changed has been slow for other facilities. Carmeuse regularly monitors fugitive dust and they have not observed issues. I do not consider the reported deviations to be compliance issues at this time.</p>
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Name: Andrew Wes Date: 9/26/17 Supervisor: JK