

B3291
Mawika

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

B329145970

FACILITY: GIBRALTAR NATIONAL CORP / QUIKRETE DETROIT		SRN / ID: B3291
LOCATION: 8951 SCHAEFER, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Paul Robbins ,		ACTIVITY DATE: 09/04/2018
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : September 4, 2018
 TIME OF INSPECTION : 10:00 am
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Paul Robbins, Plant Manager
 FACILITY PHONE NUMBER : 313-491-3500
 EMAIL CONTACT : probbins@quikrete.com

FACILITY BACKGROUND

Gibraltar National Corporation (GNC) manufactures ready mix concrete and mortar, operating as a supplier to home improvement stores. GNC operates a sand dryer that prepares the sand and gravel for the mixing and bagging operation. The facility began operating at this location in 1960. Currently the facility is operating one shift per day, five days per week.

PERSONAL PROTECTION EQUIPMENT

During the onsite inspection I wore safety shoes, a safety vest, safety glasses and a hardhat.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility.

OUTSTANDING VNs

No Violation Notices have been issued regarding this facility since the last time the facility was inspected, which was August 31, 2015.

PROCESS EQUIPMENT AND CONTROLS

Wet sand of approximately 6% moisture is fed via a wet feed hopper to a bucket elevator. The elevator discharges into the inlet side of a counter-flow natural gas fired rotary kiln drier. The dust laden exhaust gas is ducted into a pulse jet baghouse. The bags are visually inspected about every other week, replacing any damaged bags. A black light inspection of the bags occurs about once per quarter. The baghouse has 144 bags. A second baghouse is a dust hog that collects the plant air. This baghouse is exempt from permitting by Rule 285 (f) and operates with 48 cartridges.

INSPECTION NARRATIVE

I arrived at the facility to perform a scheduled inspection. The purpose of my inspection was to verify that the facility was operating according the Opt-Out permit that was recently issued. No changes have been made to the process since the last inspection.

Next, we walked through the facility. The drying was operating at the time of the inspection. The dryer was installed in 1960, and no modifications have been made to the dryer since it was installed. Some dust was observed on the roadways at the plant, though there was no track out of note onto Schaefer Road. The facility has a contact with a sweeping

company to sweep the street about once or twice per week as well as the lot.

APPLICABLE RULES/PERMIT CONDITIONS

The facility is currently operating under Wayne County Permits C-11033, C-11034 and C-11035 for the installation of a wet scrubber for calcium chloride bagging stations and the installation of a sand dryer with a baghouse dust collector. These permits were issued on March 18, 1996. The special conditions for these permits are:

Calcium Chloride Bagging Station

Conditions 17 through 24 were not evaluated because this equipment has been removed from the facility.

Sand Dryer

25. Compliance – Based on the review of the 2017 MAERS, the facility emitted less than 1 ton of NOx in 2017.
26. Compliance – During the onsite inspection, the dryer was operating and no VE's were observed coming from the dryer.
27. Compliance – The facility operates a baghouse. This baghouse was replaced in February 2015. The bags are inspected regularly, including a black light inspection about once per quarter. The facility keeps some replacement bags onsite.
28. Compliance – The stacks have not been modified. According to what is reported in MAERS, the stack was built to acceptable height and diameter.
29. Undetermined – Daily records are typically kept showing the hours in which the dryer operates. However, during the onsite inspection, these records were not reviewed.
30. Undetermined – Typically, the facility has maintained processing records showing the amount of material dried hourly, monthly and in a 12-month time period. However, these records were not reviewed during the onsite inspection. Based on the MAERS for 2017, the facility processed less than 36,000 tons of sand, which is less than the 156,520 tons per year.
31. Compliance – During the onsite inspection, opacity was not observed from the feed hopper. The facility has an employee who is certified for reading opacity who monitors the process onsite.
32. Compliance – Based on the emissions reported in MAERS for 2017, the facility emitted less than 0.6 tons PM during 2017, which is less than the permitted limit of 2.34 tons per year.
33. NA – No stack testing is requested at this time.
34. Compliance – Dust was present on the roadways of the facility, though no clouds of dust were observed as vehicles traveled on these roadways. The facility hires a third-party company to sweep the roadways.
35. Compliance – The facility is aware of the dust potential at this location. The facility hires a water truck to sweep the lot at least once per week, or more frequently as needed.
36. Undetermined – During the onsite inspection, I did not review the fugitive dust records. In the past, the facility has maintained these records. During the next inspection, these records will be reviewed.

Formerly, this facility limited emissions to remain out of the Title V program by Rule 208A. However, this rule has been rescinded since the inspection. The facility is currently operating under Opt-Out permit 205-16. The special conditions are evaluated below:

- I. Emission Limits – Compliance. Based on MAERS for 2017, the facility is well below

the source wide limits (PM emissions reported at less than 1 ton with a limit of 40 tons per year and VOC emissions reported at less than 1 ton with a limit of 25 tons per year.) However, the facility is not keeping the required records to show compliance.

II. Material Limits

1. Compliance – Based on the through put reported in MAERS for 2018, the facility processed less than 36,000 tons of aggregate in 2017, which is less than the permitted limit of 65,000 tons. Proper records were not being maintained to show monthly rolling throughputs.
2. Undetermined – The facility is not keeping records to show how much rock salt is being processed. The facility stated that rock salt is processed in smaller amounts a few months per year. Purchase orders are available for review of rock salt.

III. Process / Operational Restrictions – Compliance. The facility hires a third-party company to water the roadways as needed. The dust appeared to be well controlled during my onsite inspection and during surveillance on August 29, 2018.

IV. Design / Equipment Parameters

1. Compliance – Fabric filters were in place during the onsite. These filters are routinely maintained, and extra bags are located on site should a malfunction occur.
2. Compliance – The filters are in place and appear to be operating properly for the bagging station. The filters are inspected regularly with spare bags stored onsite for malfunctions.
3. Compliance – The fabric filters are installed and appear to be operating properly.
4. Undetermined – The pressure monitoring device on the dust collector was not inspected.
5. Undetermined – The pressure monitoring device on the cartridge filter was not inspected.

V. Testing / Sampling – NA

VI. Monitoring / Recordkeeping

1. Noncompliance – The facility was not maintaining the required records, so these records from the previous month were not available.
2. Compliance – The facility monitors the pressure once a month, though they were not recording this pressure drop. The facility was instructed to record the pressure drop at least once per month.
3. Compliance – The facility inspects all the dust collectors once a month and records any maintenance in a maintenance log.
4. Compliance – The facility records all maintenance activities associated with the dust collectors in a maintenance log.
5. Compliance – The facility hires a third-party to water and sweep the roadway and parking area. Billing statements were available for review to demonstrate the frequency of the roadway maintenance.
6. Noncompliance – The facility was not maintaining 12-month rolling time period. The facility has stated that these records will be collected and maintained moving forward.
7. Noncompliance – The facility has purchase orders that show how much raw materials were purchased. However, the 12-month rolling time period amounts are not being maintained. The facility has been instructed to begin keeping these records.
8. Noncompliance – The facility was unaware that this record was required. The facility does maintain purchase orders which show the amount of rock salt purchased. However, the 12-month rolling time period amounts are not being

maintained. The facility has been instructed to begin keeping these records.

9. Noncompliance – The facility was unaware that required to be kept for PM, PM10, PM2.5 and VOC emissions. The facility will begin keeping these records.

VII. Reporting – NA

VIII. Stack / Vent Restrictions – NA

IX. Other Requirements – NA

A permit was obtained in 1996 for a sand dryer that had previously installed and operated at this location. That permit, it appears, addressed all the requirements believed to be acceptable to the sand dryer, and these requirements did not include did not include the requirements for 40 CFR 60 subpart UUU. Equipment installed after April 23, 1986 would be subject to these requirements. Any changes and modifications made to the dry will be furthered evaluated during the next onsite inspection.

MAERS REPORT REVIEW

This report as received on March 8, 2018. All emissions appear to have been reported accurately. Documents were submitted to support the reported emissions.

FINAL COMPLIANCE DETERMINATION

Gibraltar National Corporation is not operating in compliance with permit 205-16. A Violation Notice will be issued to resolve these violations. I have attached an email which was sent to the facility informing them of the required recordkeeping.

NAME Jellcoz DATE 12/21/18 SUPERVISOR JK