



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

November 7, 2017

Mr. Brad Hillard, General Manager
Cadillac Asphalt, LLC - Rawsonville Division
1785 Rawsonville Road
Belleville, MI 48111

SRN: B4280, Wayne County

Dear Mr. Hillard:

VIOLATION NOTICE

On August 11, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Cadillac Asphalt located at 1785 Rawsonville Rd., Belleville, Michigan. The purpose of this inspection was to determine Cadillac Asphalt'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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 216-06.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUHMAPLANT	PTI No. 216-06, S.C. 1.13	Facility failed to perform burner tune-ups prior to the start of the 2016 and 2017 paving seasons.
EUHMAPLANT	PTI No. 216-06, S.C. 1.20	Facility failed to perform CO monitoring at the startup of the 2016 and 2017 paving seasons.

PTI No. 216-06, Special Condition 1.13 requires the facility to perform burner tune-ups upon the start of each paving season. Based on production records, the facility started production on April 15, 2016, for the 2016 paving season and May 8, 2017, for the 2017 paving season. Burner tune-ups were not performed until June 28, 2016, for the 2016 paving season and July 18, 2017, for the 2017 paving season.

PTI No. 216-06, Special Condition 1.20 requires the facility to perform CO monitoring upon the start of each paving season. Based on production records, the facility started production on April 15, 2016, for the 2016 paving season and May 8, 2017, for the 2017

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paving season. CO monitoring was first performed on June 28, 2016, for the 2016 paving season and July 18, 2017, for the 2017 paving season.

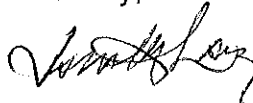
In addition, it was noted during the inspection that Cadillac Asphalt replaced several liquid asphalt tanks permitted in PTI No. 216-06 under EUACTANKS without obtaining a permit to install. AQD is requesting that Cadillac Asphalt provide a potential to emit demonstration to determine NSPS Subpart Kb and permit exemption applicability for these tanks to determine if the facility was required to obtain a permit to install prior to installing these tanks.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 28, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Cadillac Asphalt 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 violations cited above and for the cooperation that was extended to me during my inspection of Cadillac Asphalt. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ