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

B554644798

FACILITY: Owosso Ready Mix Company, Inc.		**SRN / ID:** B5546
LOCATION: 441 Cleveland Street, OWOSSO		**DISTRICT:** Lansing
CITY: OWOSSO		**COUNTY:** SHIAWASSEE
CONTACT: Bob Ardelean , Owner		**ACTIVITY DATE:** 06/12/2018
STAFF: Julie Brunner	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Compliance inspections		
RESOLVED COMPLAINTS:		

On June 12, 2018, I conducted an unannounced, scheduled inspection of Owosso Ready Mix Co. located at 441 Cleveland Avenue, Owosso, MI 48857. This facility was last inspected on June 17, 2004.

Arrived: 1:10 PM
Departed: 2:05 PM
Weather: 75°F, SE 7 MPH, UV Index 5 moderate

No visible emissions (VEs) were observed from any of the facility exhaust stacks upon arrival. No odors were identified surrounding the facility.

Facility Contact:
Mr. Bob Ardelean, Owosso Ready Mix Co., Owner, Phone: 989-723-1295, Fax: 989-723-1658, OwossoReadyMix@yahoo.com

Facility Description:
Owosso Ready Mix Co. is a non-portable ready-mix concrete batch plant. Ready-mix concrete from this plant is sold in the local area. Owosso Ready Mix Co. is located northwest of downtown Owosso and north of M-21. Residential housing is located to the north and east, and an apartment complex is located to the south. To the west is agricultural, and commercial and industrial properties.

Owosso Ready Mix Co. is a minor source with one (1) active Permit to Install (PTI) No. 816-80 for two (2) Flex-Kleen Model 58 BV-16 baghouses (600 cfm) for control on the concrete trucks and concrete bins.

Commencement of Mfg. Operations: 1955, Mr. Ardelean purchased the plant in 1987.

Plant Production: 16,000 yards produced in 2017 (50 to 60 yards per day is a busy day)

Staff #: 6 drivers Shifts/Days of Operation/Week: 8 hrs/day, 5 days/week, sometimes Saturday during construction season

Regulatory Review:
The facility is a minor source of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program.

Michigan Air Emissions Reporting System (MAERS):
The facility is not required to report emission information to MAERS.

Inspection:
A pre-inspection meeting was conducted with Mr. Ardelean. The purpose of my visit and the status of the facility operations were discussed. Then a facility tour was taken.

The facility has a natural gas-fired boiler for process heat. It is a 1,825,600 Btu/hr water tube, Ray Pak boiler built in 1988. The boiler meets exemption from permitting Rule 282(2)(b)(i).

A 2,000 gallon diesel fuel tank with secondary containment is located on the south side of the facility. It contains on-road diesel for the facility trucks and the two (2) portable air compressors. The tank meets exemption from permitting Rule 284(2)(d).

To the west of the diesel fuel tank, large concrete blocks are stored. These are sold to farmers and other customers to use as barriers.

The ready-mix concrete batch plant is enclosed in a structure. The truck drivers pull into the loading bay, receive the ready mix, and pull out. The mixing and loading area is controlled by a Tri-Mer Corp. fabric filter baghouse (~600 cfm) that was new in 2004. The baghouse is cleaned out once a year and dust removed as needed for operation. The baghouse sits in a bay beside the loadout area. The loadout area has a lot of water dripping from the process. The floor is concrete and track out was not seen. There is a lot of dust coating everything. But, it did not appear that dust was escaping out the overhead doors in the area. The whole yard area is concrete and appeared fairly clean. There is a fugitive dust control program on file which was requested in response to a complaint in 2004. There have been no complaints since 2004.

The plant operates under PTI No. 816-80. The Flex-Kleen baghouses have been replaced with the Tri-Mer baghouse. PTI No. 816-80 has three (3) special conditions (SCs):

SC 12. Visible emissions are limited to an opacity of less than or equal to 20% except as specified in Rule 301.

SC 13. The particulate emission rate from the cement handling and storage equipment shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis.

SC 14. Applicant shall not operate this facility unless a continuous program of fugitive dust control for all plant roadways and the plant yard has been implemented. This fugitive dust control program must be approved, in writing, by the District Engineer.

For SC 12, operations are located enclosed in a structure. The facility did not load any trucks while I was inspecting, but it was operating. There were no visible emissions to observe.

For SC 13, because there is baghouse control and everything else was wet, it is assumed that the emissions of particulate are less than the emission limit.

For SC 14, it appears that the fugitive dust plan has been implemented. There was no dust blowing around the yard or piles of material exposed to the outside that could cause fugitive dust issues.

The plant could operate according to exemption from permitting Rule 289(2)(d) which requires the concrete batch plant to meet all of the following:
(i) The plant shall produce not more than 200,000 cubic yards per year.
(ii) The plant shall use a fabric filter dust collector, a slurry mixer system, a drop chute, a mixer flap gate, or an enclosure for truck loading operations.
(iii) All cement handling operations, such as silo loading and cement weighing hoppers, shall either be enclosed by a building or equipped with a fabric filter dust control.
(iv) The owner or operator shall keep monthly records of the cubic yards of concrete produced.
(v) Before commencing operations, the owner or operator shall notify the appropriate district supervisor of the location where the concrete batch plant will be operating under this exemption.
(vi) The concrete batch plant shall be located not less than 250 feet from any residential or commercial establishment or place of public assembly unless all of the cement handling operations, excluding the cement silo storage and loading operations, are enclosed within at least a 3-sided structure.
(vii) The owner or operator shall implement the following fugitive dust plan:
(A) The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve.
(B) On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing, or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within 6 inches of the top of any sideboard, side panel, or tailgate. Otherwise, the truck shall be tarped.
(C) All of the following provisions apply for site roadways and the plant yard:
(1) The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride, or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet an opacity limit of 5%.
(2) All paved roadways and plant yards shall be swept as needed between applications.
(3) Any material spillage on roads shall be cleaned up immediately.

(4) A record of all applications of dust suppressants and roadway and plant yard sweepings shall be kept for the most recent 5-year period and be made available to the department upon request.

(D) All of the following provisions apply for storage piles:

(1) Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.

(2) Stockpiles shall be watered on an as-needed basis in order to meet an opacity limit of 5%. Equipment to apply water or dust suppressant shall be available at the site or on call for use at the site within a given operating day.

(3) A record of all watering shall be kept on file for the most recent 5-year period and be made available to the department upon request.

(E) The provisions and procedures of this fugitive dust plan are subject to adjustment by written notification from the department if, following an inspection, the department determines the fugitive dust requirements or permitted opacity limits are not being met.

This exemption was discussed with Mr. Ardelean. It appears that the batch plan can perform according to all the requirements of the exemption. There is residential housing within 200 feet of the ready-mix concrete plant, but the plant is fully enclosed, and a fugitive dust plan has been implemented. Monthly records of the cubic yards of concrete produced and any usage of water/dust suppressant need to be kept. Mr. Ardelean requested that PTI No. 816-80 be voided and the plant will be operated per the requirements of exemption from permitting Rule 289 (2)(d).

Summary:
The facility appeared to be in compliance with all applicable air quality rules and regulations.

A request to void PTI No. 816-80 was made on June 20, 2018.

Image 1(011) : Ray Pak Boiler

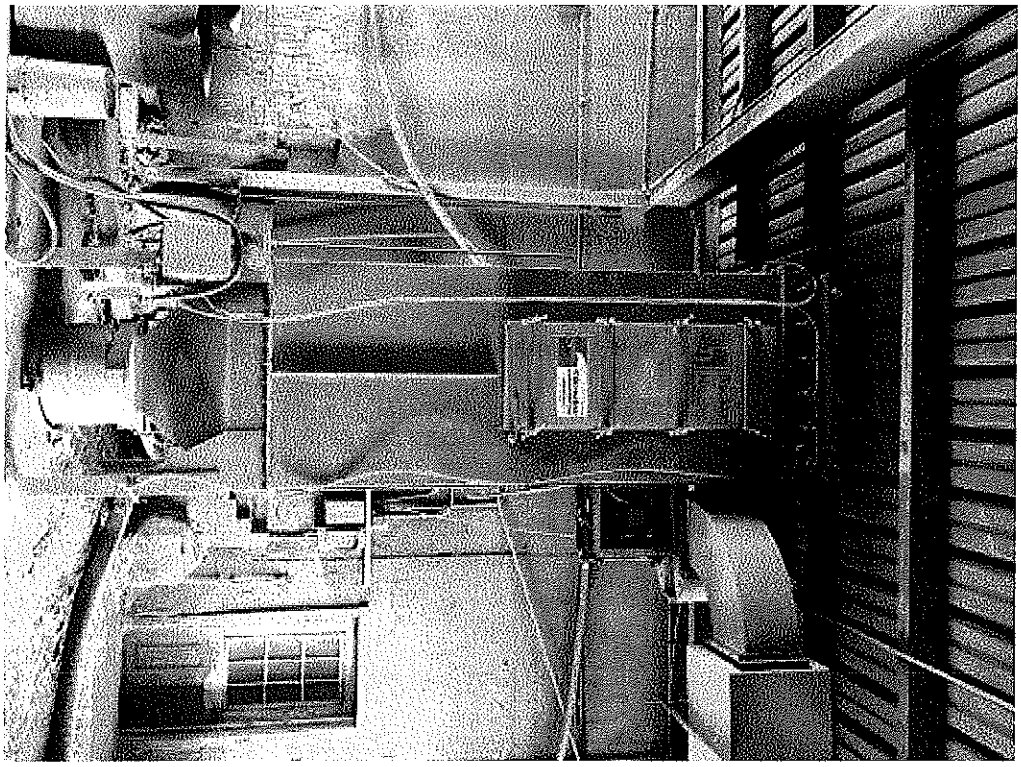

Image 2(012) : Tri-Mer baghouse

Image 3(014) : Fuel oil tank and concrete block storage

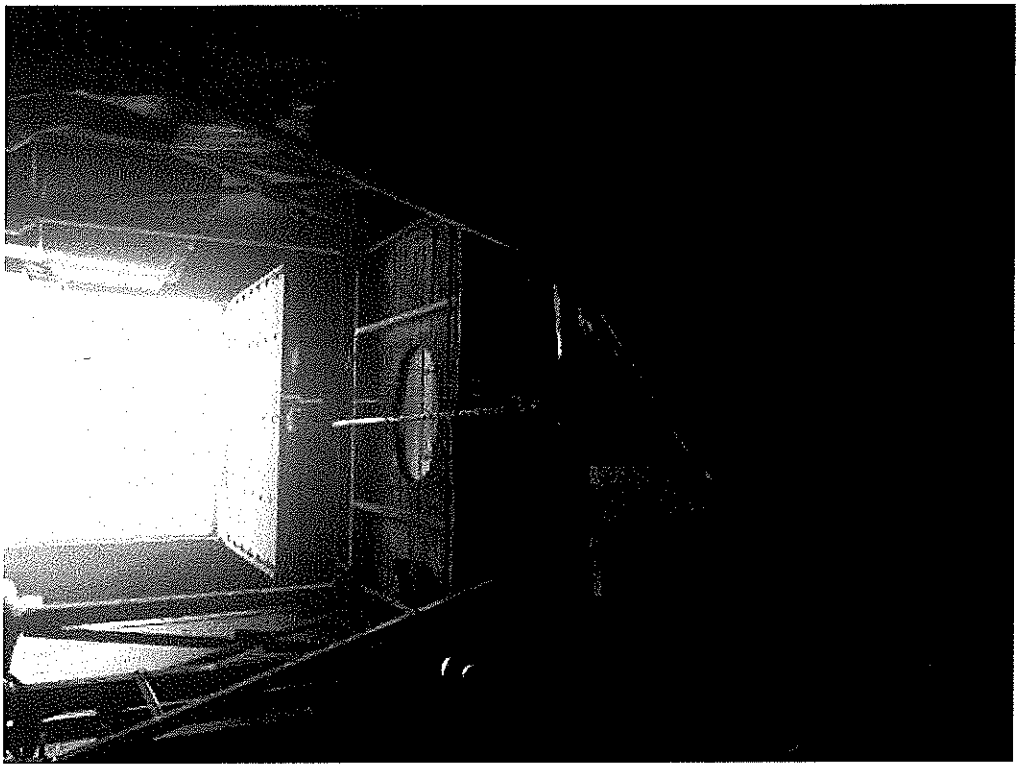

Image 4(015) : Loadout bay

NAME Julie L. Brunner DATE 6/20/18 SUPERVISOR B. M.