

H6483  
MANILA

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

H648350078

FACILITY: SUPERIOR MATERIALS LLC		SRN / ID: H6483
LOCATION: 20565 HOOVER STREET, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Tom Peters , Area Manager		ACTIVITY DATE: 09/26/2019
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled Inspection for FY 2019		
RESOLVED COMPLAINTS:		

AQD staff conducted a Scheduled Inspection for FY 2019 of Superior Materials, located at 20565 Hoover St. in the City of Detroit. The purpose of the inspection was to determine the facility's compliance with applicable state and federal air pollution rules and regulations, and Wayne County Air Quality permit numbers C-7496, C-7497, C-10001 and AQD's PTI 137-18. Area Manager, Tom Peters accompanied AQD staff during this inspection.

**BACKGROUND:**

Since 1987 there has been a concrete batch plant at this location. Wayne County Permits No. C-7496 and C-7497 were issued to Cornillie Fuel & Supply, Inc. for the installation of a Concrete Batch Plant with 2 Auxiliary Dust Collectors on January 22, 1987. Wayne County Permit No. C-10001 was issued for the installation of a Baghouse Dust Collector for Truck Loading Operations on March 5, 1993.

In the year 2000, Superior Materials purchased and continued the operation of this facility. On October 17, 2018 the DEQ/AQD issued PTI 137-18, an Operating Program fulfilling the requirements of MCL 324.5524.

**PROCESS DESCRIPTION:**

The primary industrial activity at this Site is the production and distribution of pre-mix batch concrete. Aggregates are delivered to the Site by truck, and the trucks unload into aggregate storage bins or stockpiles on site. Front-end loaders are used to load construction aggregates from storage bins and stockpiles into the concrete plant feed hopper. Cement, fly ash, and slag cement are delivered to the Site by truck and pneumatically conveyed to three storage silos.

Concrete production at the source is on a batch mixing basis, where aggregates, cement, additive chemicals and water are conveyed directly into a concrete mixer/hauling truck. The facility does not have a typical drum concrete mixer.

**OPERATING SCHEDULE:**

The Hoover Plant aka Plant #2 operates on an as-needed basis, up to 5 days/week in the winter months and 6 days/week in the summer. The plant shall not be operated more than 4,200 hours per year. Production of concrete shall not exceed 1,200 cubic yards per day nor 336,000 cubic yards per year.

**INSPECTION NARRATIVE:**

AQD staff attempted to conduct an inspection at this Site on 8/26/19 at approximately 4:00 p.m. At that time the plant was found closed (not vacant). On 9/18/19 at 8:20 a.m. and again at approximately 10:15 a.m. the plant was again found with the gates locked and no personal in site. By chance while driving by this Site on 9/26/19 at 5:30 p.m. the gates were found open. Staff entered the Plant and found Area Manager, Tom Peters on the site. The plant is not operating today however some repairs to equipment are underway.

Mr. Peters explained that this plant is only operated on an as-needed basis for example; records show this month the plant has only operated 6 days and produced 1,544 cubic yards of concrete, well below permitted limits. Records (attached) also show the plant did not operate January – April in 2019. Mr. Peters explained that when the main plant located on Jefferson in Detroit is near capacity is when this plant is called upon to supplement operations. A review of the company's monthly production records confirms sporadic operation.

A review of the Fugitive Dust Plan records required by WC PTI's and AQD's PTI 137-18 was also conducted, some sample records are attached. There were no visible fugitive emissions observed during this inspection, no track out or any other evidence of a fugitive dust concern. This facility also has the City of Detroit required permit regarding fugitive dust. Two City of Detroit inspectors conducted an inspection of the site about 6 weeks ago, no problems were identified.

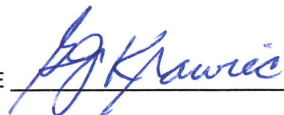
#### POST INSPECTION:

Upon closing this inspection, I suggested that Mr. Peters may want to have the company's environmental staff review the multiple WC permits. These PTI's each have somewhat different/redundant Fugitive Dust Plans/conditions. In addition, Rule 289(2)(d) of the Michigan Air Pollution Control Rules exempts concrete batch plants from the Permit to Install program if certain conditions are met. This Rule applies to this facility and could result in the voiding of the WC PTI's.

#### COMPLIANCE DETERMINATION:

Based on this inspection and the PTI conditions reviewed, SUPERIOR MATERIALS Plant #2 aka; HOOVER PLANT is operating in compliance with applicable air quality rules and regulations.

NAME



DATE

10/30/19

SUPERVISOR

