

M4671
MAWILA

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

M467141411

FACILITY: INTERNATIONAL PRECAST SOLUTIONS LLC		SRN / ID: M4671
LOCATION: 60 HALTNER, RIVER ROUGE		DISTRICT: Detroit
CITY: RIVER ROUGE		COUNTY: WAYNE
CONTACT: Mark Miller, Safety Coordinator		ACTIVITY DATE: 09/05/2017
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : September 5, 2017
 TIME OF INSPECTION : 11:00 am
 LEVEL OF INSPECTION : II
 NAICS CODE : 327390
 EPA POLLUTANT CLASS : PM
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Mark Miller, Safety Coordinator

FACILITY PHONE NUMBER : (720) 483-1250
 WEBSITE : www.psi-hci.com
 EMAIL ADDRESS : mmiller@theprecaster.com

FACILITY BACKGROUND:

International Precast Solutions, LLC (IPS) produces precast concrete for the construction and architecture industries. The company is part of The Prestressed Group, and the parent company, Prestressed Systems, Inc., is based in Windsor, Ontario. IPS took over ownership from Renaissance Precast in June 2008. This site covers about 40 acres with several buildings on-site.

The site is located in a mixed residential, commercial and industrial area near downtown River Rouge near Jefferson Ave. The facility operates one shift, Monday through Friday, with occasional weekends., typically between 6:00 am and 6:00 pm.

COMPLAINT/COMPLIANCE HISTORY:

On June 20, 2017, a complaint was made through MDEQ MI Portal System. The complainant stated that multiple complaints had been made to the local police department regarding dust in the roadway. I performed dust surveillance in the area before the onsite inspection, and I did not observe dust in the roadway. No additional complaints have been received.

REQUIRED PPE

During the onsite inspection, steel toed shoes, eye protection, a safety vest, and a hardhat were required to be worn.

PROCESS DESCRIPTION AND EQUIPMENT:

IPS produces large-sized precast concrete, which is used in the construction of buildings, parking structures, etc. The precast concrete can be categorized as either structural or architectural. Structural casts account for the majority of the product produced at the site and includes parking structure ramps, concrete barriers, beams, and columns. The other product produced on site is architectural cladding, which includes decorative brick facings and walls. Structural casting is done in Building 59 (aka, "Main Building"), while architectural product is made in Buildings 52 and 53.

There are several aggregate storage piles outside of the batch plants. Aggregate is moved via front-end loader onto a conveyor, which takes the aggregate to one of two enclosed batch plant and into the hopper for mixing. Cement is stored in one of three silos (90 ton, 60 ton, and 80 ton) and particulate emissions are controlled by a dust collector on the roof of the batch plant.

Cement is mixed and poured over steel cages and reinforcement rods into various large molds to make the cement casts, which cure for 12-24 hours. The cages and rods are used to strengthen the casts. Once cured,

the casts are lifted out of the molds via overhead cranes and are moved outside for final prep and storage. Some architectural brick casts are acid-washed to etch concrete. The acid-washing is performed outside in the center of the property using a 25% HCl solution diluted to 5% HCl and a power washer. The architectural casts are also sprayed with hot water to remove waxes off of the bricks.

On the south end of the property, there is an area where waste concrete is dumped, and unused structural pieces are being stored near the fence line along Haltiner.

Emissions from the batch plant storage silos are controlled by a fabric dust collector on top of the building. Fugitive emissions from roadways, aggregate piles, and waste piles are controlled by a water truck and a dry sweeper during the dry summer months. The yard is watered each morning and as needed for the rest of the day.

INSPECTION NARRATIVE

Initially I drove along Haltiner Road. I did not observe any dust along the roadway. The roadways at the facility were wet due to the rainfall from the previous night.

APPLICABLE RULES/ PERMIT CONDITIONS

Based on a file review, there are no permits associated with this facility. A review of production records shows 48,374 cubic yards of cement was produced in the past 12 months. Based on this production rate, the facility is exempt from permitting via R.289(d), which limits annual production to 200,000 cubic yards. To maintain this exemption, the company maintains monthly records of production and has a fugitive dust plan in place. The facility does not load cement trucks onsite since the concrete is precast onsite and set offsite as solid pieces of concrete. All the loading of the concrete takes place inside the buildings where the concrete is mixed and then poured into the casts. The concrete batch plant is located more than 250 feet from the fence line, where the nearest residential property is located. The facility appears to be following the fugitive dust plan. Production records from September 2016 through August 2017 are attached to this report.

The facility is treating the yard with water regularly. During my preinspection surveillance I did not see evidence of track out or fugitive dust effecting the properties surrounding this facility.

During my follow-up phone conversation with Mr. Miller, I was told that the HCl is stored in a 1,500 gallon double walled storage tank. Mr. Miller also stated that MiOSHA recently tested the worker exposure to HCl during a test in August. Although the results have not yet been received, at the time of the testing, he was told that the workers exposure to emissions was lower than allowable limits. The safety data sheet for the HCl is attached to this report. The storage tank for the HCl and emissions from the acid wash process will be further investigated during the next onsite inspection.

MAERS REPORT REVIEW

This facility is not required to submit emissions to MAERS.

FINAL COMPLIANCE DETERMINATION

At the time of the onsite inspection, it appears that this facility is operating in compliance with all state and federal regulations.

NAME

Jill Zimmerman

DATE

9/29/17

SUPERVISOR

JK