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December 7, 2020

Mr. Adam Shaffer
EGLE
Air Quality Division, Permit Section
State Office Building
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, Michigan 49503-2341

Re: Michigan Paving & Material, Grand Rapids, SRN N6309
Permit Modification Request

Dear Mr. Shaffer:

This letter is in response to the Violation letter received November 23, 2020. As instructed in the letter, the following is MPM's response.

1. The dates the violations occurred; Stack test was conducted on September 9-10, 2020. Final Test Report dated October 14, 2020.
2. An explanation of the causes and duration of the violations; Michigan Paving and Materials completed testing to verify emission rates including particulate matter (PM) per PTI No. 66-84F on September 9-10, 2020. The PM emission rates exceeded the limits established in PTI No. 66-84F, EUHMAPLANT, SC I.1 and I.2. Additionally, the PM emission limit established by the New Source Performance Standards, 40 CFR Part 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities, was exceeded.

MPM conducted a blacklight test on October 13, 2020 and discovered that several bags in the baghouse had failed. MPM had no indication that there was a problem with the bags in the baghouse prior to testing. The pressure drop was within normal range for the facility and the visible emissions conducted during the compliance test days showed no opacity. The baghouse was blacklighted April 15, 2020 and no bags needed replaced. The bags in the baghouse were expected to last an additional 3-4 years.

MPM had some startup issues this spring after the plant modifications were completed. There may have been some unexpected stress placed on the bags in the baghouse due to airflow issues. MPM is not sure if this was the cause of

the bags failure. The bags were sent for testing to verify it was not a manufacture defect.

3. Whether the violations are ongoing; The baghouse was blacklighted on April 15, 2020 (no bags replaced) and again on 10/13/2020 (7 bags replaced). In addition, October 13, 2020 they cleaned the top side of the bag house and the testing ports to remove any residual dust. Another black light test was performed November 3, 2020 and no bags needed to be replaced.
4. A summary of the actions that have been taken and are proposed to be taken to correct the violations: See actions described above. MPM believes the issue has been corrected by replacement of the seven failed bags. Once testing results of the bags sent in for evaluation is received, MPM will evaluate the results to determine if additional bag replacements are necessary. MPM will be retesting the plant within 30 days upon achieving maximum routine production during the 2021-paving season.
5. Dates by which these actions will take place; See completed actions that have taken place above. The bag replacement will occur Spring 2021. Stack Testing will be completed within 30 days upon achieving maximum routine production
6. What steps are being taken to prevent a reoccurrence: MPM believes this was an isolated issue that was result of modifications to the plant or faulty bags. MPM feels the regular monitoring of the pressure drop and annual blacklight test will be sufficient to prevent reoccurrence. To demonstrated by successful completion of the stack test in 2021.

MPM will submit an Intent to test as soon as the paving schedule is known for Spring 2021. Please let me know if you need further information or have any questions, I can be reached at 734-777-3647.

Sincerely,



Susanne Hanf
Environmental Engineer

Cc Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE