

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

N640944479

FACILITY: HOLCIM		SRN / ID: N6409
LOCATION: 3443 VIADUCT, GRANDVILLE		DISTRICT: Grand Rapids
CITY: GRANDVILLE		COUNTY: KENT
CONTACT: Todd Bradford , Terminal Operator		ACTIVITY DATE: 05/24/2018
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled, unannounced inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility at 2:15 pm on May 24, 2018 to complete a scheduled, unannounced inspection. The weather conditions were sunny, winds from the southwest at 5-10mph, and low 80's°F.

### Facility Description

Holcim, now called Buzzi Unicem USA (BU) is a cement distribution terminal. This BU site operates 24 hours a day, seven days a week. The company does not operate with a permit; however, utilizes exemptions for all on site processes.

### Compliance Evaluation

Prior to entering the facility, offsite visible emissions observations were completed. No visible emissions were noted for the facility. Upon entering the facility, AQD staff AS met with Mr. Todd Bradford, Terminal Operator. Mr. Bradford provided a tour of the facility, answered site specific questions and provided requested data. During operation, materials are first brought on site via railcar. Four railroad lanes on site are used as railcar storage and unloading areas. Materials from each railcar are then transported via pipes to the two storage silos.

- **Silo 5** – This is the north hopper on site and is a 1,200-ton single bin storage silo with a 3,000 cubic feet per minute (cfm) dust collector on the top portion. The dust collector contains 56 bags and the last time the bags were changed was in the summer of 2016. At the time of the site inspection, the only material being stored was Portland 1 cement. A magnehelic gauge for the dust collector is used to verify satisfactory operation and was stated by Mr. Bradford to be located on the top of the hopper. Due to the difficulty in accessing the device (a 75ft climb up a ladder), the magnehelic gauge was not viewed at the time of the inspection. The normal operating range for the magnehelic gauge is 2-6" of water column. Monthly checks of the magnehelic gauge are completed by BU to verify satisfactory operation. The most recent monthly check that was readily available was April 2018, which was 2-3" of water column.
- **Quad Silo** – This is the south hopper on site and is a 1,200-ton quadrated bin storage silo with a 5,000-cfm dust collector on the top portion. The dust collector contains 64 bags. At the time of the site inspection, the materials being stored were Portland 1 cement and Portland 3 cement. A magnehelic gauge for the dust collector is used to verify satisfactory operation and was stated by Mr. Bradford to be located on the top of the hopper. Due to the difficulty in accessing the device (a 75ft climb up a ladder), the magnehelic gauge was not viewed at the time of the inspection. The normal operating range for the magnehelic gauge is 2-6" of water column. Monthly checks of the magnehelic gauge are completed by BU to verify satisfactory operation. The most recent monthly check that was readily available was April 2018, which was 4-5" of water column.
- **Spout** - Following storage of materials, the material is loaded into trucks via slides and a spout. PM management from the spout and slides was formerly controlled by a 1,500-cfm dust collector that has since then been replaced by a 3,400-cfm dust collector that has nine cannister style filters. The new dust collector was stated by Mr. Bradford to have been installed in January 2016. Particulate matter (PM) collected is recirculated back to the two silos. A magnehelic gauge is used for the dust collector to verify satisfactory operation and was concluded to be located at the top of the two hoppers. Due to the difficulty in accessing the device (a 75ft climb up a ladder), the magnehelic gauge was not viewed at the time of the inspection. The normal operating range for the magnehelic gauge is 2-6" of water column. Monthly checks of the magnehelic gauge are completed by BU to verify satisfactory operation. The most recent monthly check that was readily available was April 2018 which was 1-2" of water column. The low

reading was concluded to be due to the cannister filters recently being replaced.

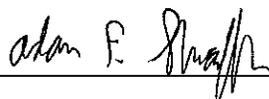
Safety Data Sheets were provided for Portland Cement at the time of the site inspection. Potential causes for concern were identified for carcinogenic components within Portland Cement, specifically crystalline silica. In an email to AQD staff dated July 5, 2018, the AQD Toxics Unit states that despite carcinogenic components; as a whole, Portland Cement is not carcinogenic. Based on this and the operations observed, the storage containers and transfer operations appear to be exempt per Rule 284(2)(k).

One 300-gallon diesel tank was stated by Mr. Bradford to be located in a storage structure on site. In a follow up phone conversation with Mr. Steve Dickerson, Terminal Manager, on May 30, 2018, it was concluded that the diesel is off road dyed and is used for onsite equipment. Additionally, BU goes through approximately 600 gallons a year. Based on this, the diesel tank appears to be exempt per Rule 284(2)(d).

### **Conclusion**

A final discussion was held between AQD staff AS and Mr. Bradford. Based on the facility walkthrough and observations made, BU appears to be in compliance with applicable air quality rules and regulations at this time.

NAME



DATE

07/05/18

SUPERVISOR

