



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

June 25, 2014

Ms. Lesli E. Snyder-Perfili, President - Operations Manager
Roseville Crushed Concrete Company
29765 Groesbeck Highway
Roseville, Michigan 48066

SRN: N6658, Macomb County

Dear Ms. Snyder-Perfili:

VIOLATION NOTICE

On June 10, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Roseville Crushed Concrete Company located at 29765 Groesbeck Highway, Roseville, Michigan. The purpose of this inspection was to determine Roseville Crushed Concrete Company's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; Permit to Install (PTI) No. 143-11; and in response to previous complaints of fallout alleged against this facility.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPROCESS	PTI No. 143-11; Appendix B, I.A.	Permittee failed to keep unpaved roadways wet at all times as specified in Permit to Install (PTI) No. 143-11, Appendix B, I.A.
EUPROCESS	PTI No. 143-11; EUPROCESS, Special Condition III.2.	Permittee failed to comply with PTI No. 143-11, EUPROCESS, III.2, by operating EUPROCESS while the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B was not maintained.

EUPROCESS	PTI No. 143-11; EUPROCESS, Special Condition VI.2.	The permittee failed to calculate the daily amount of material processed through EUPROCESS as specified per PTI No. 143-11, Special Condition VI.2. The permittee failed to multiply the daily hours of operation by the maximum rated capacity of the crusher.
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During this inspection, it was noted that Roseville Crushed Concrete Company failed to keep unpaved roadways wet at all times as specified in Permit to Install (PTI) No. 143-11, Appendix B, I.A.

During this inspection, it was noted that Roseville Crushed Concrete Company failed to comply with PTI No. 143-11, EUPROCESS, III.2 by operating EUPROCESS while the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B was not maintained.

During this inspection, Roseville Crushed Concrete Company provided copies of the production log spreadsheets and hand-written production logs. PTI No. 143-11, EUPROCESS, Special Condition VI.1 states in part, "The permittee shall keep daily and monthly calculations of the amount of material processed through EUPROCESS by tracking the daily and monthly hours of EUPROCESS equipment operation and using maximum rated capacity of the crusher." Roseville Crushed Concrete Company maintained records of daily hours of EUPROCESS equipment operation but failed to use the maximum rated capacity of the crusher to calculate the amount of material processed through EUPROCESS. Per Table 6 of Roseville Crushed Concrete Company's permit to install application dated September 14, 2011, the throughput of the crusher is 75 tons per hour. The values recorded by Roseville Crushed Concrete Company appear to indicate that a value less than the maximum rated capacity of the crusher was used to calculate the amount of material processed through EUPROCESS.

During this inspection, it was noted that hostile conditions created by Mr. Nick Perfili actively prohibited the Air Quality Division from completing an inspection as authorized per Act 451, 324.5526. Section 5526 states in part that the department may enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with this part, rules promulgated under this part, the clean air act, a permit issued under this part, or any determination or order issued under this part. Please be advised that repeat interference with inspections as authorized by Act 451 of 1994, 324.5526 may result in legal action authorized by this section.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 17, 2014. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Roseville Crushed Concrete Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and observed during my inspection of June 10, 2014. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

RE/DC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ