

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

N754149344

FACILITY: High Grade Concrete Products		SRN / ID: N7541
LOCATION: 3653 N. STATE ST., HART		DISTRICT: Grand Rapids
CITY: HART		COUNTY: OCEANA
CONTACT: Tim Arendsen , Plant Manager		ACTIVITY DATE: 06/27/2019
STAFF: Chris Robinson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY '19 on-site inspection		
RESOLVED COMPLAINTS:		

Chris Robinson (CR) from the Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) arrived in the area of High Grade Concrete Products (High Grade) located at 3653 North State Street in Hart, Oceana County, Michigan on June 27, 2019 to conduct an unannounced scheduled inspection. The purpose of the inspection was to determine the facility's compliance status with respect to Permit to Install (PTI) No. 370-76 and any other applicable State and Federal Air Quality Rules and Regulations.

Upon arrival to the area (~12:00pm), dust (opacity) was observed exiting the top of the cement silo. Therefore, a method 9 visible emission (VE) observation was conducted from approximately 12:14pm to 12:21pm. See attached AQD Visible Emission Observation Form.

CR moved onsite at approximately 12:30pm to conduct the inspection. Upon entering the property, CR observed that the facility was transferring cement from a delivery truck to the cement silo which was causing the opacity noted above. Based on the results of the VE observation, the six-minute average opacity was 48%, which is a violation of PTI Special Condition (SC) 11 and Rule 301 of the Michigan Air Pollution Control Rules. Opacity is limited to 20%.

CR met with Mr. Seth Vanderkooi. Intent of the inspection was relayed, and identification provided. Observed opacity was discussed and Mr. Vanderkooi asked that the AQD contact the Plant Manager who was offsite. CR spoke with the plant manager, Tim Arendsen, by phone on June 28, 2019. CR and Mr. Arendsen discussed plant operations. High Grade is a Redi-Mix concrete batch plant that produces approximately 10,000 cubic yards of concrete per year. Aggregate is stockpiled and moved to individual covered hoppers via an unenclosed conveyor. From here the aggregate is dispensed along with the required amount of cement from the cement silo and water as it's loaded into trucks. The facility also utilizes a second silo for foundry slag which previously contained fly ash. Per Mr. Arendsen, the facility stopped using fly ash in 2018.

Mr. Arendsen indicated that the cement silo is equipped with a built-in 24 filter baghouse and an air powered shaker. All of the bags were changed last year and are inspected monthly. The cause of the opacity was due to a loose bag(s). An opacity observation of greater than 20% indicates improper operation of the baghouse. This is a violation of Rule 910, which requires an air-cleaning device to be installed, maintained, and operated in a satisfactory manner.

The facility currently has one active permit, PTI 370-76. Based on the application for this permit the following equipment is included:

- ~~3-yd. Butler ready mix concrete batch plant~~
- ~~500 bbl. Cement storage silo~~
- ~~200 bbl. Fly ash storage silo~~
- ~~Air pollution Control equipment.~~

Per discussions with Mr. Arendsen, High Grade no longer operates a Butler ready mix concrete batch plant, the 52-filter baghouse is no longer onsite, and the fly ash silo is now being used to store foundry slag. In addition, the filters now being used are permanently attached to the top of the cement silo, which is different than what was included in the PTI application. Based on observations and discussions with Mr. Arendsen the cement silo has been replaced.

The emission unit for a concrete batch plant is considered to be the entire plant. A reconstruction of an emission unit is defined as:

Rule 118 (b) "Reconstruction" means the replacement of components of an existing facility so that the fixed capital cost of the new components is more than 50% of the fixed capital cost that would be required

to construct a comparable entirely new emission unit and so that it is technologically and economically feasible to meet the applicable requirement. "Fixed capital cost," as used in this subdivision, means the capital needed to provide all of the depreciable components.

With only the fly ash silo remaining, the facility is considered to be reconstructed, requiring a permit modification, a new permit or the use of a Rule 201 permit exemption. CR and Mr. Arendsen briefly discussed exemptions. Mr. Arendsen was unaware of any exemptions being used nor was he aware that a permit existed for this facility. Exemption Rule 289(2)(d) was briefly discussed but does not apply. Although the facility's production levels seem to be below the requirement of 200,000 cubic yards per year, the facility would be required to utilize, amongst other things, control or enclosures for truck loading and conveying, which High Grade does not have installed. Without proper enclosures the facility would also have to be located no less than 250-feet from any residential or commercial establishment. Proper enclosures are not installed and the plant is surrounded by residential property with the nearest being approximately 155-feet away from the plant. Rule 201 of the Michigan Air Pollution Control Rules states the following:

Rule 201. (1) Except as allowed in R 336.1202, R 336.1277 to R 336.1291, or R 336.2823(15) a person shall not install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment pertaining thereto, which may emit any of the following, unless a permit to install that authorizes such action is issued by the department.

Therefore, reconstruction of this Plant is considered a Rule 201 violation.

Special Condition No. 9 of the permit requires the facility to have a continuous program of fugitive dust control. Mr. Arendsen was not aware of such program nor is one available in AQD's file. Therefore, the AQD will be requesting that the facility prepare and submit a Fugitive Dust Control Program.

High Grade is not in compliance with applicable air quality Rules and Regulations, specifically PTI SC 10 and 11 and Rues 201, 301 and 910 of Michigan's Air Pollution Control Rules. A violation Notice will be sent along with a request for a Fugitive Dust Control Program.

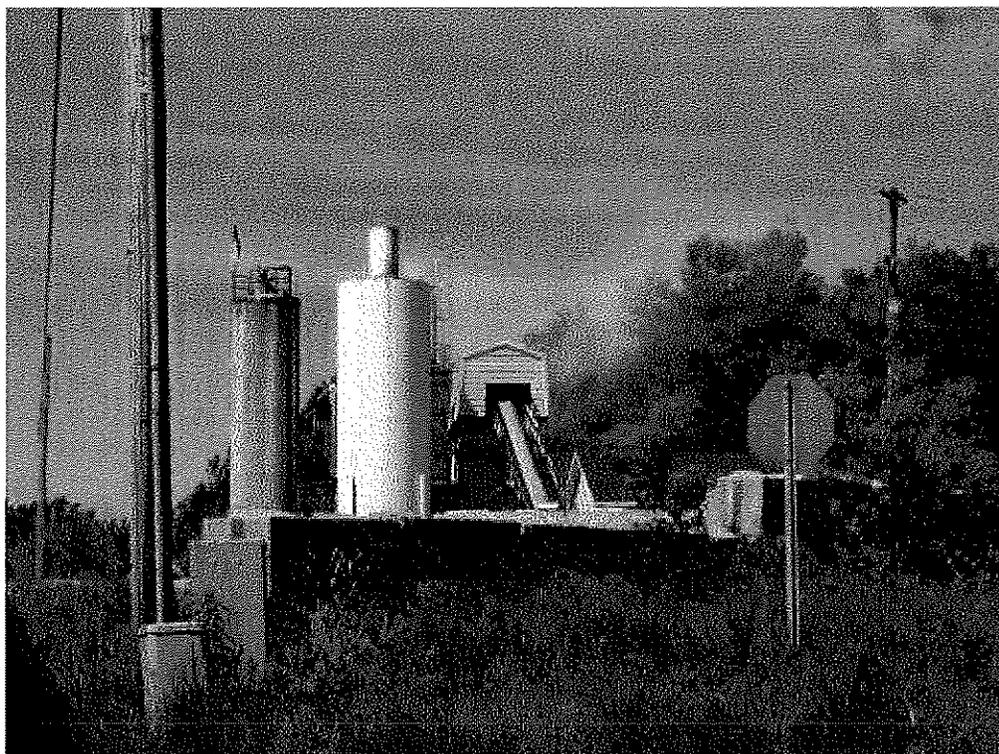


Image 1(High Grade) : Looking west. Dust from filling cement silo.



Image 2(High Grade) : Looking southwest. Dust from filling cement silo.

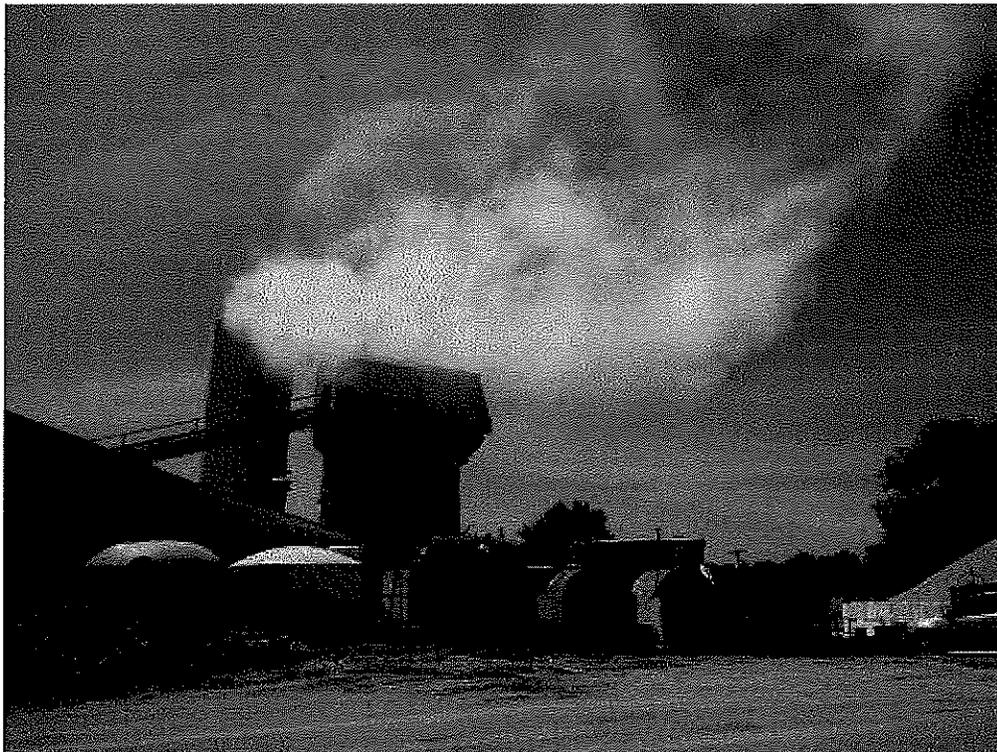


Image 3(High Grade) : Looking south. Dust from filling cement silo.



Image 4(High Grade) : Looking west. Dust from filling cement silo.

NAME Chris Robinson

DATE 7/3/2019

SUPERVISOR [Signature]