

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

P037723442

FACILITY: FLORENCE CEMENT COMPANY		SRN / ID: P0377
LOCATION: 12585 23 MILE ROAD, SHELBY TWP		DISTRICT: Southeast Michigan
CITY: SHELBY TWP		COUNTY: MACOMB
CONTACT: Donald Riddell , Vice President		ACTIVITY DATE: 10/18/2013
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: 2104 Targeted Inspection		
RESOLVED COMPLAINTS:		

SRN: P0377

COMPANY: Florence Cement Plant #721

COMPANY ADDRESS: 12585 23 Mile Road, Shelby Twp., MI 48315

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Don Riddell, Vice-President (Ph: 586-997-2666; Fax: 586-997-3966; Email: donriddell@florencecement.com)

COMPANY PHONE NUMBER: 586-997-2666

On October 18, 2013, AQD staff, Erik Gurshaw, conducted a targeted, unannounced inspection of Florence Cement Plant #721 operating north of Sibley Road and east of Wahrman Road in Huron Twp., Michigan. Florence Cement is headquartered at 12585 23 Mile Road in Shelby Twp., Michigan. Plant #721 is being operated under the Rule 289(d) exemption for concrete batch plants. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department Environmental Quality, Air Quality Division (MDEQ-AQD) Rules.

Florence Cement sent a relocation notice with a site map to the AQD on August 21, 2013, indicating that this plant would be operating at the Huron Twp. location for 8 or 9 days beginning on September 3, 2013. AQD staff originally attempted to conduct an inspection of the plant on September 6, 2013, but Curt VanHooser, Project Supervisor for the Wayne County Field Engineering Department (Cell: 734-363-7986), indicated upon AQD staff's arrival at the location that the Florence Cement's paving project was delayed due to an issue with the issuance of the subgrade contractor permit. Upon his return to the office, AQD staff called Florence Cement and asked them to inform the AQD of when their portable concrete batch plant would begin operating at the location. Mr. Don Riddell of Florence Cement called AQD staff during the afternoon of October 13, 2013, to notify him that Plant #721 would begin operating at the Huron Twp. location during the week of October 13<sup>th</sup>.

Upon arriving at the location, AQD staff introduced himself and stated the purpose of the visit to Mr. Bob Wright, Plant Mechanic. Mr. Wright said that Mr. Jeff Holtz, Plant Foreman (Cell: 810-560-4144) would normally be the contact person for this plant, but Mr. Holtz was not on location on the day of the inspection. Mr. Wright indicated that the plant is making concrete for Wayne County to pave Wayne Road between Sibley Road and Pennsylvania Road in Huron Twp. As previously mentioned, the plant is being operated under the Rule 289(d) exemption for concrete batch plants. Equipment at the location includes the following: 1 980 CAT wheel loader; 1 Katmatsu WA200 wheel loader; 1 CAT 12G road grater; 2 admix tanks; 1 water truck; 1 cement silo; and 7 cement trucks. Mr. Wright assisted AQD staff during the inspection. Batching was occurring at the time of the inspection.

According to the company's 2012 MAERS Report, Plant #721 produced 19,720 cubic yards of concrete during the 2012 construction season. This is well below the 200,000 cubic yard processing limit established in the Rule 289(d) exemption. The plant controls fugitive dust emissions from truck loading operations with a baghouse. Fugitive dust emissions from cement handling operations are controlled by the same baghouse. The plant is equipped with a computerized system which records daily concrete production. Daily production records are sent to the company's headquarters in Shelby Twp. and are used to compile monthly and yearly production records. As previously mentioned, the

plant sent a relocation notice indicating that it would be operating at the location for 8 or 9 days beginning on September 3, 2013, but the project was delayed due to a problem with the subgrade contractor permit. The September 3, 2013, relocation notice contained all of the information required by the Rule 289(d) exemption. AQD staff verified during the inspection that the plant is not operating within 250 feet of any commercial establishment, residence, or place of public assembly. The facility is abiding by the majority of the conditions of the fugitive dust plan of the Rule 289(d) exemption. No fugitive dust was observed to have been produced from vehicle traffic on the plant's roadways and yard at the time of the inspection. The roadways and plant yard were observed to be wet during the inspection. The plant has a water truck which it uses to apply water to the roadways and plant yard when necessary. The plant cleans up any material spillage immediately, waters down storage piles with a hose when necessary, is minimizing drop distances at transfer points, and is keeping loads 6" below the top of its cement trucks. The plant is not maintaining daily records of water applications to the plant yard, roadways, and storage piles, however. AQD staff asked Mr. Wright to inform Mr. Holtz that records of water applications to the plant yards, roadways, and storage piles needed to be added to the plant's daily production log sheet.

Based on this inspection, it was determined that Florence Cement Plant #721 needs to begin recording instances in which water is applied to the plant yard, plant roadways, and storage piles. Other than maintaining watering records, the plant is in compliance with the conditions of the Rule 289(d) exemption. The relocation notice provided by the company is attached to this report.

NAME Erik A. Guroshaw DATE 10/18/13 SUPERVISOR CJE