

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

P138370229

FACILITY: BULK GUYS LLC		SRN / ID: P1383
LOCATION: 2530 VICKSBURG STREET, MARYSVILLE		DISTRICT: Warren
CITY: MARYSVILLE		COUNTY: SAINT CLAIR
CONTACT: Dustin Hurd , Plant Manager		ACTIVITY DATE: 12/19/2023
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Follow up on R201 VN.		
RESOLVED COMPLAINTS:		

On Tuesday, December 19, 2023, I, Michigan Department of Environment, Great Lakes and Energy-Air Quality Division staff Sebastian Kallumkal, conducted an onsite unannounced inspection at Bulk Guys (SRN P1383) located at 2530 Vicksburg St., Marysville, Michigan. The purpose of the inspection was to follow up on the violation notice sent to Bulk Guy on June 26, 2023, for allegedly violating EGLE-AQD Administrative Rule 201 (R336.1201) by installing the sand dryer and the screener without getting a permit to install.

On June 20, 2023, EGLE-AQD staff had observed heavy dust from this location, visited the facility and discussed the operations with General Manager, Dustin Hurd. Based on the discussion, a violation notice (Date: June 26, 2023) pursuant to Michigan Administrative Rule R336.1201 (Rule 201) was sent for installing two sand dryers and two screeners without getting a permit to install (PTI). EGLE-AQD received a response on July 19, 2023, indicating that the heavy dust was due to an issue with the dust collector, and it has been resolved; both sand roasters and screeners are exempt from R201 requirements pursuant to R336.1282(2)(a) and R336.1285(t), respectively. During a follow up visit to the facility, I explained to Dustin about the exemptions told him that the roasters do not appear to be exempt.

I sent a couple of emails on October 23, 2023, and November 28, 2023 to Dustin requesting to submit the permit application for the roasters by November 30, 2023 and left a couple of voice messages (November 28 & December 5, 2023) reminding him of submitting the application. AQD did not received any response from the facility.

For the current inspection, I arrived at the facility at about 12:15 PM. I observed visible emissions which appeared to be condensed water vapors. I entered the office building; met the secretary, identified myself and requested to speak to the plant manager, Dustin Hurd. He came over to office. I introduced myself and stated the purpose of the inspection.

Initially, I inquired him about their decision on submitting the permit application. He informed me that he wasn't sure whether he needed to submit PTI application. I informed him that the roasters are not exempt from the requirement to get a permit and they need to submit an application.

He requested a copy of the rule that requires this process to get a permit. I offered to email the rule to him (sent on 12/26/2023) and explained to him that all processes that generate air pollution need to obtain a permit unless the process is exempt from this requirement. He said he is aware of the exemption rules, and he has a copy the exemption booklet.

Regarding the process, they have 10 small sand storage silos, and all these are being used (active). They have another seven large silos. One of these seven silos is used as a dust collector control. Three of these large silos are not active.

I informed him that failure to submit the permit application may cause further enforcement actions. He told me he understood the requirement and inquired how long they to have submit the application. I extended the submittal date to January 30, 2024. He agreed to discuss the requirement with the owner, Jon Strauchman and will decide.

On Wednesday, December 27, 2023, Jon emailed me requesting to sent Rule 278 through Rule 291. I emailed him Part 2 Rules, PTI exemption booklet, MIGUIDE for Air Use Permit to Install and PTI workbook.

Conclusion: Bulk Guys agreed to evaluate and follow up on the permit to install requirement for the roasters and respond by January 30, 2024. AQD will evaluate compliance and further actions after this date.

NAME Sebastiany Kalleemkal

DATE 12/27/2023

SUPERVISOR Joyce