



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

November 19, 2020

Ms. Sue Hanf
Michigan Paving and Materials
1100 Market Street SW
Grand Rapids, Michigan 49503

SRN: N0758, Kent County

Dear Ms. Hanf:

VIOLATION NOTICE

On October 20 and October 23, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received emissions test data from Michigan Paving and Materials, located at 1100 Market Avenue NW, Grand Rapids, Michigan. The purpose of the testing was to determine Michigan Paving and Materials' 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 66-84F.

During the review of the test data provided, staff verified the following:

Process Description	Rule/Permit Condition Violated	Comments
EUHMAPLANT	PTI No. 66-84F, EUHMAPLANT, Special Condition (SC) I.1; 40 CFR Part 60, Subpart I	Exceeded 0.04 gr/dscf PM emission limit
EUHMAPLANT	PTI No. 66-84F, EUHMAPLANT, SC I.2	Exceeded 0.04 lb per ton PM emission limit

Michigan Paving and Materials completed testing to verify emission rates including particulate matter (PM) per PTI No. 66-84F on September 9-10, 2020. Upon review of the submitted test data, it was noted that PM emission rates exceeded the limits established in PTI No. 66-84F, EUHMAPLANT, SC I.1 and I.2. Additionally, the PM emission limit established by the New Source Performance Standards, 40 CFR Part 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities, was exceeded.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 10, 2020 (which coincides with 21 calendar days from the date of this letter). 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

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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.

In addition, Michigan Paving and Materials must retest EUHMAPLANT to verify compliance with PM emission rates per PTI No. 66-84F. Testing shall be completed within 30 days upon achieving maximum routine production during the 2021 paving season. All necessary notifications and reporting must be completed in accordance with PTI No. 66-84F.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Michigan Paving and Materials 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 for the cooperation that was extended to me during our phone conversations. 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,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
616-970-9077

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE