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DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

A133724009

FACILITY: Central Concrete		SRN / ID: A1337
LOCATION: 1277 N. Bridge Street, ALMA		DISTRICT: Lansing
CITY: ALMA		COUNTY: GRATIOT
CONTACT: Steve Findsen, Alma Plant Manager		ACTIVITY DATE: 12/12/2013
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self initiated compliance inspection in conjunction with inspection of portable crusher associated with SRN P0156, which is primarily located in the Saginaw Bay District.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Steve Findsen (sfindsen@fishercompanies.net), Alma Plant Manager

**Purpose:**

Perform an unannounced self-initiated compliance inspection of Central Concrete in conjunction with an inspection of Fisher Sand & Gravel's portable crusher located at the Central Concrete site.

**Facility Background/Regulatory Overview:** Central Concrete, Alma Plant, was previously named Alma Concrete Products, and is a member of the Fisher Companies. Fisher Sand & Gravel is also a division of the Fisher Companies. S. Findsen said Central Concrete is a "ready mix," batch concrete facility that also takes in commercial, industrial, and residential concrete to be crushed and recycled for gravel roads, driveways, parking lots, etc. S. Findsen explained to me that Fisher Sand & Gravel's portable crusher (P0156 on this occasion) comes every 1 to 2 years to Central Concrete to crush the commercial/industrial/residential waste concrete.

This facility was last inspected in 2002, prior to the development of exemptions for obtaining a permit to install for concrete production equipment. Concrete production equipment is now exempt per Rule 336.1289 (Rule 289). Central Concrete has a "Permit to Operate", 695-83, for a fabric filter collector on the concrete batch plant covering the cement silos. Central Concrete was informed of the option to void permit 695-83 and to use the exemptions in place of the permit for their equipment, and has decided to keep their permit in lieu of the permit exemptions.

**Inspection:** This was an unannounced self-initiated compliance inspection. On December 12, 2013 I met with Steve Findsen, Alma Plant Manager and provided him with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure onsite. I also emailed S. Findsen a copy of Central Concrete's permit and a link to the electronic copy of the permit to install exemption handbook.

S. Findsen described each part of the plant to me: there are two silos used for Portland Lafarge Cement and St. Mary's Cement from Detroit; a heated building/enclosure for the concrete components (2NS [sand], 6A, and limestone); a storage silo for fly ash (some of which comes from the LBWL Erickson Station in Lansing); and a conveyor system that carries the aggregate component up to the enclosed, heated building.

PTI 695-83 condition 11 requires that visible emissions from the cement handling and storage equipment not exceed 20% opacity, based on Method 9. I saw no signs of opacity during the inspection and therefore Central Concrete is in compliance with condition 11.

S. Findsen said there is a baghouse to control dust from the loadout area of the plant: there are air intakes on either side of the loadout tubes that are connected to the baghouse. Condition 12 of the permit requires that the fabric filter collector be installed and operated properly, but I was not able to verify the baghouse operating as there were no loadouts of the readymix at the time of the inspection.

Condition 13 requires that the fugitive emissions control program for plant roadways, material storage piles, and material handling operations in Appendix A be maintained:

I. Plant Maintenance

B. The baghouse shall be shaken at regular intervals. S. Findsen said, via email, that the 64-bags in the baghouse are shook at least twice per day, in addition to being shaken a couple of times when receiving a load of cement. He said that it is also programmed to cycle after it has been running for a period of time. Central Concrete is therefore in compliance with Appendix A condition I.B.

C. This condition requires that any spillage and residual material at the plant shall be removed daily. S. Findsen said that spillage is rare, but when it does happen, is cleaned up immediately to control any

tracking of the material on- and off-site. He estimated that spillage may happen only about once per year. He said that the residual material originates from the loading of trucks when business gets busier (every couple of weeks) as a result of the aggregate over running. Central Concrete is in compliance with Appendix A condition I.C.

II. Yard Maintenance

A & B. Roadways at Central Concrete must be maintained to prevent fugitive dust and oils used to control dust must not contain chemicals or metal contaminants. S. Findsen said that the dust is either swept up and/or water is sprayed to control fugitive dust on parking areas and the concrete portion of Central Concrete's driveway. Water is used as needed and is applied using the mixer trucks. S. Findsen also said that if the water is not sufficient to control dust they also apply calcium chloride once or twice a year. Central Concrete is in compliance with these two conditions.

III. Storage Piles

A & B. During stockpiling, the free fall drop should be minimized and all piles should be maintained to prevent fugitive dust. I did not check for free fall drop distances to the stock piles during the inspection (no equipment appeared to be out for stockpiling purposes). S. Findsen said that to minimize fugitive dust from the piles, smaller piles are kept during the warmer months; water is also sprayed from sprinklers onto the piles, but this is more used as a temperature control mechanism. Central Concrete is in compliance with these two conditions.

Central Concrete is also in compliance with the conditional permit exemptions of Rule 289, only a concern if Central Concrete decides to void their permit in the future. S. Findsen said that for 2013 (up through the date of inspection), Central Concrete produced 25,042.26 cubic yards of concrete, with the highest production in October 2013 at 4,520.26 cubic yards. As previously mentioned, a 64-bag baghouse is used to control emissions from the load-out area. The load-out spout is located approximately 10' off the ground, which would leave a minimal amount of space between the spout and the truck, and thus reduce any fugitive dust that would be generated during load-out. All of the cement handling operations (cement hoppers, silo loading) are enclosed within the heated building. Because they are enclosed, Central Concrete does not have to meet the condition of being more than 250 feet from residential or commercial establishments, or places of public assembly.

Central Concrete is located adjacent to the city's leaf waste site and is also in close proximity to the city's waste water treatment plant. During the inspection, odors from the leaf waste site were distinctly present, and S. Findsen explained that they occur more during the summer months and when the leaf piles are being overturned. The odors could probably be characterized as a 2 or 3, "distinct and definite odor" to "distinct and definite objectionable odor," respectively, and are characteristic of manure or methane.

Potential hazards onsite include slips and falls from the ice. Hard hats and safety glasses must be worn onsite.

NAME

Michelle Duplan

DATE

1-2-14

SUPERVISOR

M. McCulloch