

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

A243764748

<b>FACILITY:</b> Quikrete	<b>SRN / ID:</b> A2437
<b>LOCATION:</b> 20 N PARK ST, COMSTOCK PARK	<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> COMSTOCK PARK	<b>COUNTY:</b> KENT
<b>CONTACT:</b> Jeremy Burt , Plant Manager	<b>ACTIVITY DATE:</b> 08/18/2022
<b>STAFF:</b> Michael Cox	<b>COMPLIANCE STATUS:</b> Compliance
<b>SUBJECT:</b> Scheduled Unannounced Inspection	<b>SOURCE CLASS:</b> MINOR
<b>RESOLVED COMPLAINTS:</b>	

Air Quality Division (AQD) staff Michael Cox (MTC) arrived at the Quikrete facility located at 20 N. Park St., Comstock Park, Michigan on August 18, 2022, at 9:00am to complete a scheduled unannounced inspection. Prior to entering the facility, offsite odors and emission observations were completed. No odors were noted; however, some minor fugitive dust emissions were noted coming from facility road traffic prior to the watering truck that is used by the facility on an as needed basis

### Facility Description

Quikrete is a cement manufacturing facility. Wet and raw sand is loaded into the “wet feed” hoppers. The sand is then delivered to the rotary dryer via covered conveyor. After the sand is dried, it is then delivered into hoppers located inside the building. Once inside the building the cement powder housed in an exterior silo is mixed to the dried sand and then batched into bags. After the final product is bagged, it is then covered and wrapped for storage outside. The product is then shipped to customers.

The site currently is in operation with four permits to install (PTI’s). PTI No’s. 22-72, PTI No. 219-72, PTI No. 417-75, and PTI No. 74-80. The four PTIs are for various onsite operations including a bin mounted bag filter for dust control, Wheelabrator Fry Ultra Jet Dust Collector, which serves the interior mixing and bagging operation, a Type A Dynaclone which also serves the interior mixing and bagging operation, and a H&B rotary dryer with an H&B Mo. D86150 fabric filter dust collector. The layout of the facility included Building 1, which was utilized as the main production facility, Building 2 is used by Quikrete for production of their sand line, and Building 3 which is office and storage areas.

### Compliance Evaluation

Upon arrival on site AQD staff MTC met with Mr. Jeremy Burt, Production Manager who provided a walkthrough of the facility, answered site specific questions, and provided records.

### PTI No. 22-72

PTI No. 22-72 was issued for a bin mounted bag filter for dust control. After a discussion with Mr. Burt, it was stated that this equipment was no longer on site and had been upgraded to a more efficient dust collection system. The new dust collectors serving the dryer and plant was noted to be rated for 21,000 acfm and 24,000 (actual cubic feet per minute) acfm and are labeled by the facility as Bin Vent C-1 and C-2 respectively. The replacement of the dust collector is exempt from Rule 201 permitting per Rule 285(2)(d). Visible emission evaluations (VEEs) are conducted by the facility daily on the bin vents. Records of VEES were requested and provided for the time period of January 2021 through July 2022. After a review of the records, it appears that no visible emissions were seen coming from either Bin Vent C-1 or C-2, which are the two bin vents serving the facility. No visible emissions were noted coming from either Bin Vent C-1 or C-2 during the site visit.

#### PTI No. 219-72

PTI No. 219-72 was issued for a Wheelabrator Fry Ultra Jet Dust Collector, which serves the interior mixing and bagging operation. After a discussion with Mr. Burt, it was stated that this equipment was no longer on site and had been upgraded to the more efficient dust collection system (Bin Vent C-2), which also replaced the Type A Dynaclone permitted under PTI No. 417-75. As mentioned above, the replacement of the dust collector is exempt from Rule 201 permitting per Rule 285(2)(d).

Per the facility's MAP, daily, weekly, monthly, quarterly, and annual inspection of the control equipment will be conducted. Maintenance records were reviewed for the time period of January 2021 through July 2022 and were concluded to be acceptable. All bags for the baghouses are replaced each year and for the 2022 year they had been completely replaced by March 2022.

During the facility walk-through, the pressure drop gauge for the plant baghouse was observed, with a pressure drop reading of 3.6 inches of water. Mr. Burt stated that the operating range for this baghouse was between 3 to 6 inches of water. Based on observations made during the site visit, the baghouse appeared to be operating in an acceptable manner. No visible emissions were observed from the baghouse exhaust.

#### PTI No. 417-75

PTI No. 417-75 was issued for a Type A Dynaclone which also serves the interior mixing and bagging operation. After a discussion with Mr. Burt, it was stated that this equipment was no longer on site and had been upgraded to the more efficient dust collection system. The replacement of the dust collector (Bin Vent C-2) as mentioned is exempt from Rule 201 permitting per Rule 285(2)(d).

Per the facility's MAP, daily, weekly, monthly, quarterly, and annual inspection of the control equipment will be conducted. Maintenance records were reviewed for the time period of January 2021 through July 2022 and were concluded to be acceptable. All bags for the baghouses are replaced each year and for the 2022 year they had been completely replaced by March 2022.

During the facility walk-through, the pressure drop gauge for the plant baghouse was observed, with a pressure drop reading of 3.6 inches of water. Mr. Burt stated that the operating range for this baghouse was between 3 to 6 inches of water. Based on observations made during the site visit, the baghouse appeared to be operating in an acceptable manner. No visible emissions were observed from the baghouse exhaust.

#### **PTI No. 74-80**

PTI No. 74-80 was issued for a H&B rotary dryer with an H&B Mo. D86150 fabric filter dust collector. After a discussion with Mr. Burt, it was stated that this equipment was no longer on site and had been upgraded to the more efficient dust collection system (Bin Vent C-1). As mentioned, the replacement of the dust collector is exempt from Rule 201 permitting per Rule 285(2)(d).

Per the facility's MAP, daily, weekly, monthly, quarterly, and annual inspection of the control equipment will be conducted. Maintenance records were reviewed for the time period of January 2021 through July 2022 and were concluded to be acceptable. All bags for the baghouses are replaced each year and for the 2022 year they had been completely replaced by March 2022.

During the facility walk-through, the pressure drop gauge for the rotary dryer baghouse was observed, with a pressure drop reading of 3.2 inches of water. Mr. Burt stated that the operating range for this baghouse was between 3 to 6 inches of water. Based on observations made during the site visit, the baghouse appeared to be operating in an acceptable manner. No visible emissions were observed from the baghouse exhaust.

#### **Additional Observations/Information:**

The facility appears to be exempt from Rule 201 permitting per Rule 289(2)(d)(i)-(vii). At the time of the inspection fugitive dust was observed and appeared minimal. A fugitive dust plan pursuant to Rule 289(2)(d)(vii) is in place. The facility utilizes water trucks, using brine and sweeping by a third party, Sanisweep Inc., to mitigate fugitive dust. After a review of the records, Quikrete is implementing an adequate fugitive dust plan to minimize emissions from the plant.

Pursuant to Rule 289(2)(d)(1) and Rule 289(2)(d)(iv), the facility shall not produce more than 200,000 cubic yards per year and shall keep monthly records of cubic yards produced to be exempt from Rule 201 permitting. Production records for the facility were requested and provided for the time period of January 2021 through July 2022. It was noted that the facility is keeping track of production in tons instead of cubic yards. 200,000 cubic yards of concrete production equates to 54,000 tons of concrete production per year. Total tonnage of concrete produced during the 2021 calendar year was 42,848.85 tons, which is below the 54,000 tons or 200,000 cubic yards production. Total tonnage of concrete produced so far during the 2022 calendar year was 22,686.83 tons, which is below the 54,000 tons or 200,000 cubic yards production.

The facility is utilizing an adequate dust collector for truck loading operations and cement handling operations, which appears to meet the requirements of Rule 289(2)(d)(ii) and Rule 289(2)(d)(iii).

The facility appears to be meeting the distance requirements of the concrete operations pursuant to of Rule 289(2)(d)(vi).

### Conclusion

Based on the review of the records provided and the facility walk through, Quikrete appears to be exempt from Rule 201 permitting per meeting the requirements of Rule 289(2)(d). PTI No's. 22-72, 219-72, 417-75, and 74-80 could be voided. The facility appears to be in compliance with all applicable air quality rules and regulations.

NAME Michael T. Cox

DATE 9/22/2022

SUPERVISOR HH