A 471020220

## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

| FACILITY: ADVANCE CONCRETE PRODUCTS CO |                               | SRN / ID: A4710              |
|--|-------------------------------|------------------------------|
| LOCATION: 975 N MILFORD RD, HIGHLAND   |                               | DISTRICT: Southeast Michigan |
| CITY: HIGHLAND                         |                               | COUNTY: OAKLAND              |
| CONTACT: Steve Kirchner, President     |                               | ACTIVITY DATE: 05/01/2015    |
| STAFF: Sebastian Kallumkal             | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR          |
| SUBJECT: Onsite Inspection             |                               |                              |
| RESOLVED COMPLAINTS:                   |                               |                              |

On Friday, May 1, 2015, I conducted scheduled annual inspection at Advance Concrete Products Co. located at 975 N. Milford Road, Highland, Michigan. The purpose of the inspection was to verify facility's compliance with the requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994 and Permit to Install No. 867-78.

I arrived at the facility about 2:00 PM. At the facility I met with Mr. Steve Kirchner, President. I introduced myself and stated the purpose of my visit. I provided him a copy of the MDEQ Brochure for Environmental Inspections: Rights and Responsibilities. During the pre-inspection meeting we discussed the facility operations. The facility manufactures precast concrete products including precast pavement slabs, underground utility vaults (electricity distribution and telephone junction boxes), etc.

The application for the permit to install (PTI No. 867-78) was submitted for the installation of a baghouse (Model No. 36KS Dusty Dustless Baghouse) for an existing cement silo. The PTI was issued on September 27, 1978, AQD inspection was conducted on May 5, 1981 and the Permit to Operate No. 867-78 was approved and issued on June 17, 1981. This silo equipped with baghouse is still operating at the facility. Mr. Kirchner told me that the facility had installed an additional cement silo equipped with baghouse. Michigan Administrative Rule R336.1284(k) exempts "storage containers of noncarcinogenic solid material, including silos, which only emit particulate matter and which are controlled with an appropriately designed and operated fabric filter control system or an equivalent control system" from the requirement to obtain permit to install pursuant to R336.1201.

Later Mr. Kirchner accompanied me for an inspection of the facility. The silo was not being loaded, so I did not observe any visible emissions. In the building they were making various precasts. He informed me that occasionally when the silos are loaded from the delivery trucks, there are some visible emissions for few minutes. I informed him about the visible emissions limits specified in the Special Condition 12 of their PTI and R336.1301 and if visible emissions can be seen during the loading operations, it may cause a violation of the permit condition and the rule. I advised him to have the driver load the silos properly. One silo is loaded once per week and the other one about once per month depending the usage. Each loading takes about 45 minutes and light visible emissions can be during for few minutes during loading. I requented him contact me about the loading schedule, so I can observe it. He agreed to comply with my request. He also told me that they may replace baghouse which was installed per PTI No. 867-78.

Permit to Operate No. 867-78

<u>Special Condition 10: Rule 331</u>- Limits the particulate emission rate from the cement handling and storage equipment to 0.1 pounds per 1000 pounds of exhaust gases, calculated on a dry gas basis. A properly operated baghouse would comply with this PM emissions limit.

<u>Special Condition 11:</u> Requires that the facility shall not be operated unless a continuous program of fugitive dust control for all plant roadways and the plant yard is maintained. Mr. Kirchner told me that the unpaved plant yards are treated with calcium chloride solution and the paved yards and the road in front of the facility are swept regularly. I did not observe excessive dust on the main road or on the paved yard.

Special Condition 12: Limits the visible emissions from the cement handling and storage equipment to 20% opacity except for 1 6-minute average per hour of not more than 27% opacity (R336.1301(1)(b)). I did not observe any visible emissions from the silos during my inspection of the facility.

Conclusion: The dust collector operations will be verified in the future. Based on the inspection the facility appears to be in compliance with the applicable air quality requirements.

NAME <u>Schooling Kallim</u> (2)

DATE 5/11/15

SUPERVISOR