



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 7, 2013

Mr. Eric Brandon
Quikrete-Flint
14311 CMI Drive
Holly, Michigan 48442

SRN: B1945, Oakland County

Dear Mr. Brandon:

VIOLATION NOTICE

On August 13, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Quikrete-Flint located at 7072 E Grange Hall Road, Holly, Michigan. The purpose of this inspection was to determine Quikrete-Flint's 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 administrative rules and the conditions of Permit to Install (PTI) number 530-96D.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|---|
| EU - Dryer | PTI No. 530-96D, Special Condition VI.2. | The permittee failed to maintain a device that measures the pressure loss of the gas stream through the wet scrubber. |
| EU – Mixnbag | PTI No. 530-96D, Special Condition VI.3. | The permittee failed to keep a daily record of the pressure loss (in inches of water column) of the gas stream through the fabric filter dust collector for EU – Mixnbag. |
| EU – Process | PTI No. 530-96D, Special Condition VI.3. | The permittee failed to keep daily records of visible emissions, in percent opacity, to show compliance for the opacity limits specified in Appendix B. |

On August 13, 2013, the AQD staff observed operation of EU - Dryer while the device that measures the pressure loss of the gas stream through the wet scrubber was inoperable. This constitutes a violation of PTI No. 530-96D, Special Condition VI.2., which requires the permittee to maintain a device that measures the pressure loss of the gas stream through the wet scrubber.

During this inspection, Quikrete-Flint was unable to produce daily records of the pressure loss (in inches of water column) of the gas stream through the fabric filter dust collector for EU – Mixnbag. This is a violation of the recordkeeping specified in EU – Mixnbag, Special Condition number VI.3 of PTI number 530-96D, which requires the permittee to keep a daily record of the pressure loss (in inches of water column) of the gas stream through the fabric filter dust collector for EU – Mixnbag. The conditions of PTI number 530-96D require these records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.

During this inspection, Quikrete-Flint was unable to produce daily records of visible emissions, in percent opacity, to show compliance for the opacity limits specified in Appendix B. This is a violation of the recordkeeping specified in EU – Process, Special Condition number VI.3 of PTI number 530-96D, which requires the permittee to keep a daily record of of visible emissions, in percent opacity, to show compliance for the opacity limits specified in Appendix B. The conditions of PTI number 530-96D require these records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 30, 2013. The written response should include:

- The dates the violations occurred;
- An explanation of the causes and duration of the violation;
- Whether the violations are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violations and specify the dates by which these actions will take place; and
- Identify what steps are being taken to prevent a reoccurrence.

Additionally, the daily records of the amount of material processed through EU – Process were not kept in a format acceptable to the AQD District Supervisor. The records provided on August 13, 2013, did not display a single daily value of the amount of material processed through EU – Process. Instead, additional calculation was required to determine the daily amount of material processed through EU – Process. Please format the records of the amount of material processed through EU – Process to show a single value that may be used to determine compliance with the process restriction specified in EU – Process, Special Condition III.1. Please provide the AQD a copies of the daily records of the amount of material processed through EU – Process, in a format acceptable to the AQD District Supervisor, by **October 14, 2013**.

If Quikrete-Flint 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 my inspection of Quikrete-Flint. 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,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

RE/DC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ