

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : CARMEUSE LIME Inc, RIVER ROUGE OPERATION	SRN : B2169
Location : 25 MARION AVE	District : Detroit
	County : WAYNE
City : RIVER ROUGE State: MI Zip Code : 48218	Compliance Status : Compliance
Source Class : MAJOR	Staff : Stephen Weis
FCE Begin Date : 2/13/2018	FCE Completion Date : 2/13/2019
Comments : FY 2019 FCE for the Carmeuse Lime and Stone facility in River Rouge.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
02/13/2019	Scheduled Inspection	Compliance	Compliance inspection of the Carmeuse Lime and Stone facility in River Rouge. The Carmeuse facility is scheduled for inspection in FY 2019.
02/13/2019	Stack Test Observation	Compliance	Review of stack test report.
12/04/2018	Stack Test Observation	Compliance	Review of stack test report.

11/20/2018	ROP Semi 1 Cert	Compliance	<p>Carmeuse Lime, Inc. submitted their ROP Compliance Certification Report for the semi-annual period from January 1, 2018 through June 30, 2018. Seven deviations were reported, six of which are the same deviations that have previously been reported in past ROP Compliance Certification Reports.</p> <p>Six of the reported deviations are associated with the Source-Wide Conditions portion of the ROP, which addresses fugitive dust management requirements put forth by the ROP, as well as by Consent Order SIP No. 22-1993. The Consent Order is attached to the ROP in Appendix 9. It is a site-specific fugitive dust control plan that is part of Michigan's State Implementation Plan (SIP), and it is one of several SIP Consent Orders in place since 1993-94 for facilities along or near the Detroit River in Wayne County to control fugitive dust.</p> <p>The deviations reported by Carmeuse are for items such as: not flushing paved roads with water during periods of sub-freezing ambient temperatures; not flushing the public roads with water during periods of sub-freezing ambient temperatures; not operating the truck wheel wash during periods of sub-freezing temperatures; not water washing the employee parking lots; not operating the truck wheel wash during periods of sub-freezing temperatures. Regarding the employee parking lot, Carmeuse provided information regarding how when the facility's modular office building was constructed in 2012, it was built on the location of the former employee parking lot, which is referenced in the fugitive dust plan. The employee lot was moved to a location on the south side of Marion Street across from the facility. This location was formerly a field, and it was covered in crushed gravel to utilize the space for parking. The gravel surface cannot be washed and swept, a dust control method that is</p>
------------	-----------------	------------	---

11/20/2018	ROP Semi 1 Cert	Compliance	<p>typically applied to paved surfaces.</p> <p>Also, as in past ROP certification reports, there are two additional reported deviations that have been reported to DEQ in the past that also relate to an aspect of the SIP fugitive dust plan; the requirement to maintain a limestone moisture content of 3%, and the requirement that the lowest 10-20 section of the outdoor limestone conveyors be covered with a 210 degree enclosure. Carmeuse reports that the limestone is washed prior to being loaded on the boats that deliver it to the facility, which removes the fine material – this removes the portion of the limestone that is most susceptible to becoming airborne, and also takes away the portion that holds moisture the most. Carmeuse reports that, based on daily visible emission (VE) readings, there were no reported occasions of significant VEs from the stockpiles. Regarding the conveyor, Carmeuse has reported that the covers are not in place at the lowest section to safely maintain the belt.</p> <p>Carmeuse has demonstrated that the fugitive dust control plan in place at the River Rouge facility is equal to or more stringent than the requirements in the SIP fugitive dust plan (Consent Order SIP No. 22-1993). Carmeuse regularly monitors fugitive dust and they have not observed issues. I do not consider the reported deviations to be compliance issues at this time. There have been discussions for some time with the company regarding changing the SIP fugitive dust plan, and I have provided the procedure for doing so to Carmeuse (Special Condition IX.3 of the Source-Wide Conditions section of the ROP references the procedure for revising the plan).</p> <p>The 7th deviation involves two dates during the semi-annual period for which a daily Method 9 visible emission reading was not recorded. According to</p>
------------	-----------------	------------	--

11/20/2018	ROP Semi 1 Cert	Compliance	Carmeuse, the visible emission reader filled out the form for those two days, but they did not note the opacity readings. Carmeuse states that a review of operational information for those days does not indicate that there were any issues with the kilns.
11/20/2018	MACT (Part 63)	Compliance	40 CFR Part 63, Subpart AAAAA - Carmeuse Lime, Inc. submitted their certification report for the applicable MACT regulation (40 CFR Part 63, Subpart AAAAA - Lime Manufacturing Plants). It was reported that all of the required Method 9 readings and processed stone handling (PSH) operation visible emission readings were conducted during the semi-annual period from January 1, 2018 through June 30, 2018, with the exception of the two days (January 2 and April 13, 2018) that were described in the semi-annual ROP deviation report during which a visible emission reading was reported as being taken, but not recorded.
06/20/2018	Other	Compliance	Review of RY2017 MAERS submittal.
04/12/2018	MACT (Part 63)	Compliance	Carmeuse Lime, Inc. submitted their certification report for the applicable MACT regulation (40 CFR Part 63, Subpart AAAAA - Lime Manufacturing Plants). It was reported that all of the required Method 9 readings and processed stone handling (PSH) operation visible emission readings were conducted during the semi-annual period from July 1, 2017 through December 31, 2017, except for the four days identified in the deviation report for the semi-annual period on which visible emission readings were performed and recorded, but the opacity reading was not noted.

04/12/2018	ROP SEMI 2 CERT	Compliance	<p>Carmeuse Lime, Inc. submitted their ROP Compliance Certification Report for the semi-annual period from July 1, 2017 through December 31, 2017. Seven deviations were reported as occurring during the semi-annual period.</p> <p>Six of the reported deviations are associated with the Source-Wide Conditions portion of the ROP, which addresses fugitive dust management requirements put forth by the ROP, as well as by Consent Order SIP No. 22-1993. The Consent Order is attached to the ROP in Appendix 9. It is a site-specific fugitive dust control plan that is part of Michigan's State Implementation Plan (SIP), and it is one of several SIP Consent Orders in place since 1993-94 for facilities along or near the Detroit River in Wayne County to control fugitive dust.</p> <p>Some of the deviations reported by Carmeuse are for items such as: not flushing paved roads (including the public roadway and the employee parking lot) with water at time intervals required by 3.D.1 of Exhibit A of the Order on dates that the company reported as being a period of sub-freezing ambient temperatures; and not operating the truck wheel wash during periods of sub-freezing temperatures. Regarding the employee parking lot, Carmeuse provided information regarding how when the facility's modular office building was constructed in 2012, it was built on the location of the former employee parking lot, which is referenced in the fugitive dust plan. The employee lot was moved to a location on the south side of Marion Street across from the facility. This location was formerly a field, and it was covered in crushed gravel to utilize the space for parking. The gravel surface cannot be washed and swept, a dust control method that is typically applied to paved surfaces.</p> <p>Also, as in past ROP certification reports, there are two additional</p>
------------	-----------------	------------	---

04/12/2018	ROP SEMI 2 CERT	Compliance	<p>reported deviations that have been reported to DEQ in the past that also relate to an aspect of the SIP fugitive dust plan; the requirement to maintain a limestone moisture content of 3%, and the requirement that the lowest 10-20 section of the outdoor limestone conveyors be covered with a 210 degree enclosure. Carmeuse reports that the limestone is washed prior to being loaded on the boats that deliver it to the facility, which removes the fine material – this removes the portion of the limestone that is most susceptible to becoming airborne, and also takes away the portion that holds moisture the most. Carmeuse reports that, based on daily visible emission (VE) readings, there were no reported occasions of significant VEs from the stockpiles. Regarding the conveyor, Carmeuse has reported that the covers are not in place at the lowest section to safely maintain the belt.</p> <p>Carmeuse has demonstrated that the fugitive dust control plan in place at the River Rouge facility is equal to or more stringent than the requirements in the SIP fugitive dust plan (Consent Order SIP No. 22-1993). Carmeuse regularly monitors fugitive dust and they have not observed issues. I do not consider the reported deviations to be compliance issues at this time. There have been discussions for some time with the company regarding changing the SIP fugitive dust plan, and I have provided the procedure for doing so to Carmeuse (Special Condition IX.3 of the Source-Wide Conditions section of the ROP references the procedure for revising the plan). Carmeuse sent a draft revised fugitive dust plan to me for my review on March 25, 2019. I provided feedback to the company, and I am awaiting the final version of the revised plan.</p> <p>The seventh deviation involves four dates during the semi-annual period for which a daily Method 9 visible emission reading was not recorded. According to</p>
------------	-----------------	------------	---

04/12/2018	ROP SEMI 2 CERT	Compliance	Carmeuse, the visible emission reader filled out the form for those four days, but they did not note the opacity readings. Carmeuse states that a review of operational information for those days does not indicate any issues with the kilns.
04/12/2018	ROP Annual Cert	Compliance	This report includes the total deviations for both semi-annual periods of 2017.

Name: Steve Weber Date: 8/13/19 Supervisor: JK