



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

August 29, 2014

Mr. Alan Sandell  
Cadillac Asphalt, L.L.C.  
4751 White Lake Road  
Clarkston, MI 48346

SRN: B4287, Oakland County

Dear Mr. Sandell:

**VIOLATION NOTICE**

On July 1, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Cadillac Asphalt, L.L.C. located at 4751 White Lake Road, Clarkston, Michigan. The purpose of this inspection was to determine Cadillac Asphalt'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 443-82H.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUHMAPLANT	PTI No. 43-82H, special condition 1.18a.	Permittee failed to monitor, with a handheld CO monitor, the CO emissions upon start-up of the paving season.
EUSILOS	PTI No. 43-82H, special condition 4.1.	Permittee operated EUSILOS while the emission capture system for the top of each silo was not operating.
EUSILOS	PTI No. 43-82H, special condition 4.2.	Permittee operated EUSILOS while the emissions from the silo loadout activities were not controlled.

During this inspection it was determined that Cadillac Asphalt L.L.C. did not monitor CO emissions from EUHMAPLANT upon the start-up of the 2014 paving season. Cadillac Asphalt was unable to produce CO monitoring records required per PTI No. 43-82H, special condition 1.18a. Special condition 1.18a states in part, "The permittee shall monitor, with a handheld CO monitor, the CO emissions from EUHMAPLANT and the production data associated with the time the emissions data were collected. The CO emissions should be less than 500 ppmv to ensure EUHMAPLANT is operating properly. The permittee shall record one data set for each of the following occurrences: a) Upon start-up of each paving season." This is a violation of the monitoring requirement per PTI No. 43-82H, special condition 1.18a.

During this inspection Cadillac Asphalt L.L.C. operated EUSILOS while the emission capture system for the top of each silo was not operating. Specifically, the power to the loadout blower motor was switched off while the silos were being loaded. Mr. Mecham indicated that the loadout blower also controls emissions for the top of the storage silos. This is a violation of PTI No. 43-82H, special condition 4.1, which states, "The permittee shall not operate EUSILOS unless the emission capture system for the top of each storage silo is installed, maintained, and operated in a satisfactory manner."

During this inspection Cadillac Asphalt L.L.C. operated EUSILOS while the silo loadout emission capture system was not operating. Specifically, the power to the loadout blower motor was switched off during loadout activities. This is a violation of PTI No. 43-82H, special condition 4.2, which states, "The permittee shall not operate EUSILOS unless all the silo loadout activities occur in an area from which the emissions are controlled. Emissions collected from the truck loadout area shall be vented into the burning zone of EUHMAPLANT or controlled by equivalent means. The permittee shall not operate EUSILOS unless the silo loadout control system is installed, maintained and operated in a satisfactory manner."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2014. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; 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 the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Cadillac Asphalt 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 Cadillac Asphalt L.L.C.. 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. Mary Ann Dolehanty  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ