



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 7, 2021

Mr. Thomas Downs
Great Lakes Aggregates - Taylor Plant
5699 Ready Road
South Rockwood, Michigan, 48179

SRN: B4686, Wayne County

Dear Mr. Downs:

VIOLATION NOTICE

On August 11, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Great Lakes Aggregates located at 6873 Inkster Road, Taylor, Michigan. The purpose of this inspection was to determine Great Lakes Aggregates' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Michigan Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 81-00; and the federal Standards of Performance for Nonmetallic Mineral Processing Plants (40 CFR Part 60 Subpart OOO).

During the inspection and from follow-up conversations with facility contacts, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Nonmetallic mineral crushing facility	PTI No. 81-00, Special Condition (SC) IV.2	During the inspection on August 11, 2021, equipment was not labeled.
	PTI No. 81-00, SC V.2	10 days before installing new process equipment, which occurred around June of 2020, the facility did not update the general permit by submitting a new Process Information Form (EQP5756).
	PTI No. 81-00, SC V.3 40 CFR Part 60 Subparts A & OOO	The site's two current crushers and their associated process equipment were installed around June of 2020. All new or additional equipment subject to 40 CFR Part 60 Subpart OOO, which has not been previously tested, has not complied with the testing requirements of the subpart.
	PTI No. 81-00, SC V.4 40 CFR Part 60 Subparts A & OOO	Within 15 days after initial startup of the two crushers and the associated process equipment installed around June of 2020, the facility did not notify the AQD of the actual date of initial startup.

Mr. Thomas Downs
Great Lakes Aggregates - Taylor Plant
Page 2
October 7, 2021

Regarding PTI No. 81-00, SC V.3, Great Lakes Aggregates did not test the new or additional equipment via Method 9 within 180 days of initial startup (startup occurred in the summer of 2020). Method 9 appears to be the test required per 40 CFR 60.672(b) and 40 CFR 60.675(c).

Please be advised that if the affected facility commenced construction, modification, or reconstruction on or after April 22, 2008, and does not meet the exemption in 40 CFR 60.670(d)(1), then the facility would be subject to additional requirements based on amendments to 40 CFR Part 60 Subpart OOO that were finalized on April 28, 2009. The additional requirements include performing monthly periodic wet suppression system inspections to check that water is flowing to discharge spray nozzles per 40 CFR 60.674(b), along with the recordkeeping for those inspections per 40 CFR 60.676(b)(1). Additionally, fugitive emissions from grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations, or from any other affected facility have a 7 percent opacity limit per Table 3 of the subpart. Fugitive emissions from crushers have a 12 percent opacity limit per Table 3 of the subpart.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 28, 2021 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Great Lakes Aggregates 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.

Mr. Thomas Downs
Great Lakes Aggregates - Taylor Plant
Page 3
October 7, 2021

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Great Lakes Aggregates in Taylor. 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,

A handwritten signature in black ink, appearing to read "Sam Liveson". The signature is fluid and cursive, with the first name "Sam" and last name "Liveson" clearly distinguishable.

Sam Liveson
Environmental Engineer
Air Quality Division
313-405-1357

cc: Mr. Jordan Stol, Great Lakes Aggregates
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE