

B6450  
FY 2018 InspDEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

B645043424

FACILITY: CARLESIMO PRODUCTS INC		SRN / ID: B6450
LOCATION: 29800 E EIGHT MILE RD, FARMINGTON		DISTRICT: Southeast Michigan
CITY: FARMINGTON		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 01/23/2018
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2018 inspection of Carlesimo Products		
RESOLVED COMPLAINTS:		

**Carlesimo Products (B6450)**  
**29800 West 8 Mile Road.**  
**Farmington, Michigan 48336-5506**  
**Phone: 248-474-0415**

On January 23, 2018, I conducted level 2 self-initiated **FY 2018 inspection** of Carlesimo Products, a manhole manufacturing plant with concrete batch plant, located at 29800 West 8 Mile Road, Farmington, Michigan 48336-5506. The inspection was conducted to determine compliance with the requirements of federal Clean Air Act; Article II, Air Pollution Control, Part 55 of Act 451 of 1994; and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) rules.

During the inspection, Mr. George Roest (Phone: 248-474-0415-ext. 14; Fax: 248-474-5199; E-mail: ccpi1928@sbcglobal.net) assisted me.

Principal purpose of this inspection is to observe Portland Cement loading and confirm proper operation of two (2) silo baghouses via absence of visible emissions at the top of silos, where the baghouses (2) are located. Detectable (opacity > 5-10%) visible emissions (VE) at the top of silos indicates a defect in the bags (e.g. leak due to torn bag).

The manhole manufacturing plant, Carlesimo, used to generate numerous dust complaints. The plant has both unpaved and paved yard. After rains, mud and dirt gets tracked out to concrete paved yard from unpaved muddy surface. During dry days, paved yard when not swept generates nuisance dust due to truck traffic or winds. Carlesimo owns a dry sweeper (Griffin Environmental Dusty Dustless) that it uses to clean the paved yard. Upon my request Carlesimo is maintaining a sweeping log. Due to frequent sweeping the dust complaints have reduced.

AQD conducts random inspections for nuisance dust when ambient (post-rain) conditions are conducive to nuisance dust at this plant. Upon request, Carlesimo sweeps the paved yard to prevent dust nuisance.

On October 26, 2004, I talked to Mr. George Roest regarding compliance with Rule 336.1279 (now Rule 336.1289) exemption conditions for a concrete batch plant. On November 11, 2004, Mr. Roest sent a fax letter dated November 8, 2004, stating Carlesimo's intent to comply with Rule 336.1279 exemption conditions for the concrete batch plants.

This plant manufactures concrete manholes for sewer service. The plant was installed in 1953 (before August 15, 1967) and, hence, grandfathered pertaining to Rule 336.1201 (Permit-to-Install. Carlesimo makes about 150 different products; all related to manholes. It makes its own concrete using a concrete batch plant. Concrete mix is never sold. From a cement truck, cement (dry powder) is pneumatically conveyed into a cylindrical steel silo and a square silo; each silo is equipped with its own baghouse. When possible, I observed cement transfer from a truck and I did not detect any opacity. Aggregates are stored in bin. Water, cement, aggregates, sand are mixed in the mixer or batch plant, which is enclosed. There are several bins to store aggregates and sand.

The finished mix is poured into a manhole mold, which is shaken and steamed to ensure homogenous concrete. Wall thickness of the manholes varies from 6 inches to 12 inches depending upon a size of a manhole.

Cement, aggregates, sand and water are mixed to make a concrete batch. Two silos are present; each is equipped with its own dedicated baghouse: two square baghouses. Also, one baghouse is present for the

concrete batch process. In all there are three (3) baghouses: two (2) square baghouses for two (2) cement silos and one (1) square baghouse for the concrete batch plant. Each cement baghouse is equipped with 36 bags (6 feet height and 4 inches diameter). The batch baghouse is equipped with 12 bags (3 feet height and 4 inches diameter). All bags are cleaned using shaker (vibration) mechanism.

Mechanic checks bags biannually. Bags are cleaned but not replaced biannually. About one half one dozen spare bags are kept in case bag replacement is needed during biannual inspection.

During the loading of cement silos, I did not detect visible emissions indicating proper operation of the baghouses. On January 23, 2018, cement loading occurred (Hill Transit, Inc. of New Haven, MI; Trailer License No. D755066 MI). Collected dust in the baghouses is dropped into silos upon shaking baghouses at the end of the process.

Per Mr. George Roest, annual production (before 2008 economic crisis) was about 50,000 cubic yards per year (<< 200,000 cu. yards per year). Therefore, the plant is exempt from Permit-to-Install requirements (336.1201) subject to conditions pursuant to Rule 336.1279 memo dated March 28, 2002 or Rule 336.1289; Rule 336.1279 is rescinded effective July 01, 2003. I asked Mr. Roest to keep proper records and implement fugitive dust plan according to the Rule 289. Also, the plant was installed before August 15, 1967 (1953) qualifying for grandfather clause.

### Concrete production

1. CY 2014: 19,995 sand and stone plus 3,794 cement = 23,789 concrete, tons per year
2. CY 2015: 30,159 sand and stone plus 5,083 cement = 35,242 concrete, tons per year
3. CY 2016: 24,373 sand and stone plus 4,103 cement = 28,476 concrete, tons per year
4. CY 2017: 25,076 sand and stone plus 4,581 cement = 29,657 concrete, tons per year

Concrete conversion: 1 cubic yard = 2.03 tons ≈ 2 tons.

**During August 12, 2005, complaint investigation, Carlesimo was not keeping production records, sweeping records, CaCl<sub>2</sub> application records, watering records. I asked Mr. Roest to keep such records.**

See the attached sweeping records.

About 2005, Mr. George Roest stated that a neighbor filed a law suit alleging noise, dust; plaintiff also claimed that his property could not be sold. Carlesimo's insurance company, Frankenmuth Insurance Company, was involved. Frankenmuth hired an independent third-party contractor to monitor dust near plaintiff's house. The monitoring company was reporting the results to the insurance company. This complainant complained to other governmental agencies as well.

Carlesimo has dust potential if paved yard is not swept promptly after rains due to mud track-out from unpaved areas, which need CaCl<sub>2</sub> application during summer months.

### Conclusion

The paved yard needs to be swept promptly after rains due to mud track-out from the unpaved yard.

NAME B. L. K. K. K. K. K. DATE 08/27/2018 SUPERVISOR Joyce ZL