

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

D204427757

FACILITY: Superior Materials LLC		SRN / ID: D2044
LOCATION: G-5300 N. Dort Highway, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Brady Glomski , Area Manager		ACTIVITY DATE: 11/12/2014
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Self-initiated inspection of concrete batch plant.		
RESOLVED COMPLAINTS:		

On 11/12/2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an unannounced, scheduled inspection of the Superiors Materials, LLC concrete batch plant located at G-5300 N. Dort Highway, in Flint. The purpose was to determine compliance with the conditions of their air use permit, applicable state rules, and to determine why this facility and other concrete batch plants belonging to the company had each recently reported an estimated 0.5 tons per year lead emissions to the Toxic Release Inventory (TRI) for the most recent reporting year.

**Environmental contact:**

Brady Glomski, Area Manager; [btglomski@superiormaterials.net](mailto:btglomski@superiormaterials.net)

**Facility description:**

This facility is a stationary concrete batch plant, equipped with baghouses/fabric filters for dust control purposes.

**Emission units:**

Emission unit	Control equipment	Permit to Install	Operating status, at time of inspection
9 drive-over hoppers	NA	417-97	Compliance
8 aggregate bins	Covered	417-97	Compliance
Main aggregate conveyor	Covered	417-97	Compliance
4 cement silos	4 baghouses	417-97	Compliance
Weigh hopper	Enclosed within building	417-97	Compliance
Central mixing drum	Exhaust ducted back to aggregate bin	417-97	Compliance
Plant yard/roadways	Area paved with concrete, swept and watered as needed	417-97	Compliance

**Regulatory overview:**

This facility has an existing air use permit for the concrete batch plant, Permit to Install No. 417-97. They are classified as a minor source for particulate matter, not having a Potential to Emit (PTE) of 100 tons per year for particulate matter smaller than 10 microns (PM-10), or particulate matter smaller than 2.5 microns (PM 2.5). The facility is not known to be a source of any Hazardous Air Pollutants (HAPs). A facility would be considered a major source for HAPs if it had either PTE of 10 TPY of a single HAP, or 25 TPY of all HAPs combined.

**Fee status:**

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III. The facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

**Location:**

The facility is located in an industrialized area of Flint, along North Dort Highway. The nearest residences are over 2,000 feet to the west of the batch plant.

**Recent history:**

In 2006, Superior Materials purchased this facility from Kurtz Gravel Co. The AQD does not have any records of any complaints having been made against this facility.

**Arrival:**

I arrived at 12:01 PM. Weather conditions were cloudy, and 35 degrees F, with winds out of the northwest at about 10-15 miles per hour. The plant yard and roadways, which were paved with concrete, appeared very clean. The plant appeared to be running, with no fugitive dust from any part of the plant.

In the onsite office, I met with Mr. Dean Schluckbier, Fleet Manager, and explained the reason for my visit. He indicated that the person to contact regarding an inspection would be Mr. Brady Glomski, Area Manager, and contacted him by phone. Mr. Glomski was not planning on visiting this site today, but made a half hour drive out to the site, in order to meet with me. I provided him with a copy of the DEQ brochure: *Environmental Inspections: Rights and Responsibilities*, per AQD procedure.

When I described the emissions estimates of 0.5 TPY of lead from this and other sites, Mr. Glomski was not sure why lead emissions were reported to the TRI. He indicated that they do not work with any lead containing materials. I was informed that the air emissions reporting for the company is handled by Mr. Matt Woloszyk, whose phone number is 248-521-9949. I indicated that I would call him, and see if the 0.5 TPY of lead reported for this, and other Superior Materials LLC facilities, is in error.

**Inspection:**

Mr. Glomski explained that the plant operates year round, but business is considerably reduced, during the winter, as there are less construction projects going on. He added that they do a lot of maintenance work, in the winter.

**9 drive-over hoppers; PTI No. 417-97:**

The drive-over hoppers have grates above them, and trucks unload their aggregate through these grates. A tunnel conveyor carries desired types and quantities of aggregate to the main aggregate conveyor.

**Main aggregate conveyor; PTI No. 417-97:**

The aggregate conveyor from the aggregate bins to the batch plant is covered/enclosed. There were no fugitive emissions of dust observed from it, during the inspection. The height is 90 feet, according to the original permit application.

**4 cement silos, with baghouses, PTI No. 417-97:**

There are 4 cement silos, located atop the roof of the batch plant, along the south end of the roof. Each silo is equipped with a baghouse. No visible emissions were observed. The baghouses have a shaker-style mechanism for cleaning the bags, the original permit application indicates. Mr. Glomski indicated that they do monthly inspections of the baghouses, and replace bags as needed.

**Central mixing drum; PTI No. 417-97:**

The central mixing drum has a green box-like structure which, I was informed, is a dust collector. Air

draws particulate matter in, and I was shown where a duct routes the air and entrained particulate back into an aggregate/stone bin. The permit application indicates the air flow is 1,450 cfm, powered by a 15 horsepower fan. I was able to watch the mixing drum as it loaded its contents into a cement mixing truck. No fugitive dust was observed, only wisps of steam.

Mr. Glomski indicated they would like to add a small 5th baghouse to the plant. It would replace the current dust collector from the paragraph above, which currently routes collected dust back to a stone bin. The replacement unit would collect the dust in a hopper, then route that dust into their flyash silo, using an existing blower. The flyash silo is one of the 4 silos already controlled by a baghouse. I explained that the new baghouse should satisfy the criteria for Rule 285(f), which exempts from the requirement to obtain a permit to install:

(f) Installation or construction of air pollution control equipment for an existing process or process equipment if the control equipment itself does not actually generate a significant amount of criteria air contaminants as defined in R 336.1119(e) or a meaningful quantity of toxic air contaminants.

They have a small water boiler onsite, Mr. Glomski informed me, and they use it to heat water during the winter, so the concrete will cure properly. The water temperature this morning was 62 degrees F, he indicated.

Plant yard/roadways, PTI No. 417-97:

As noted earlier in this report, the plant yard and roadways were paved with concrete. The area looked extremely clean. Mr. Glomski indicated it had just been swept, this morning. He showed me their recordkeeping for dust control activities for the plant yard and roadways for 2013, and for 2014, kept in the control room of the batch plant.

Note: there is only one weigh hopper at the plant, as opposed to the two indicated in the permit engineer's notes for PTI No. 417-97.

TRI reporting:

The day after the inspection, I called Mr. Matt Woloszyk, and explained I was calling to inquire why this facility and a number of other concrete batch plants owned by the company each reported 0.5 TPY of lead to the TRI, in the most recent reporting year. Mr. Woloszyk explained that this was due to an error in his calculations, and that two weeks ago, he submitted corrections/revisions to the TRI, showing that none of the plants have any lead emissions. He mentioned that he had spoken with an EPA contact named Bradley, but could not recall the last name at the moment. I subsequently updated AQD's Air Monitoring Unit Supervisor, Craig Fitzner, on this error in the emission calculations, so he was aware it had been addressed.

Conclusion:

I could not identify any instances of noncompliance. The question about lead emissions which were erroneously reported to be coming from this and other Superior Materials LLC sites was satisfactorily resolved. The facility appeared to be well controlled, from a dust standpoint, and appeared to be in compliance with PTI No. 417-97. Mr. Glomski and his employees were very helpful and professional.

NAME [Signature]

DATE 12/9/2014

SUPERVISOR [Signature]

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