

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

N065065527

<b>FACILITY:</b> St. Marys Cement, Inc		<b>SRN / ID:</b> N0650
<b>LOCATION:</b> 555 SECOND ST, FERRYSBURG		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> FERRYSBURG		<b>COUNTY:</b> OTTAWA
<b>CONTACT:</b> TJ Kennealy , Terminal Manager		<b>ACTIVITY DATE:</b> 11/15/2022
<b>STAFF:</b> Chris Robinson	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> FY '23 inspection to determine compliance with respect to PTIs No. 655-83, PTI No. 63-86, and all other applicable air quality rules and regulations.		
<b>RESOLVED COMPLAINTS:</b>		

On November 22, 2022, an onsite inspection was conducted at St. Mary's Cement (SRN N0650) by Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD). The AQD staff conducting the inspection was Chris Robinson (CR) and the purpose of the inspection was to determine this facility's compliance status with respect to Permit to Install (PTI) No. 655-83, PTI No. 63-86, and all other applicable air quality rules and regulations. The facility is a Portland Cement storage and distribution facility located at 555 Second Street in Ferrysburg, Michigan.

Prior to entering the facility an odor and visible emissions evaluation was conducted with nothing being observed. Upon entering the facility CR met with TJ Kennealy, Manager; proper identification was presented, and Mr. Kennealy was informed of the purpose of the inspection. CR discussed the PTIs and was informed that no changes have taken place since the last inspection conducted in 2009.

The facility receives Portland cement from vessels which is then stored and later dispensed from one of three silos. Total holding capacity is approximately 17,000 tons. There are seven fabric filter collectors (baghouses) in use that are on annual maintenance schedules. All systems use return air to recirculate any collected particulate back into the silo. This facility leases its site from Verplank Trucking Co., who utilizes a water truck to address any fugitive dust or track out issues.

The facility consists of a vessel unloading area which includes enclosed conveyors for unloading Portland cement from vessels to one of the three silos. Fugitive emissions from the vessel unloading is controlled by two pulse jet fabric filters, which are covered under PTI no. 63-86. This PTI has three special conditions. Particulate Matter (PM) emissions from the bucket elevators shall not exceed 0.10 lbs. per 1,000 lbs. of exhaust gases; no visible emissions from the bucket elevators; and bucket elevators are not allowed to be operated unless the baghouse is installed and operating properly. No vessels were being unload during the inspection; therefore, operation of the bucket elevators and fabric filter were not observed. However, the area was clean, the conveyors are enclosed, and Mr. Kennealy indicated that the system is programmed so that the conveyors will not operate without control. Based on observations the two baghouses appeared to be well maintained. Therefore, it would appear that the facility would mee the emission limit specified.

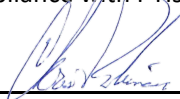
Once the Portland Cement is offloaded it is stored in one of three silos, each with their own fabric filter control for PM. PTI 655-83 covers the single 400-ton storage bin and the truck load out for that bin. Since the permit was issued in 1983 the facility has replaced the 3,400 CFM shaker type baghouse with a pulse jet baghouse and added a second pulse jet baghouse to the process. Rule 285(2)(d) allows for the installation or replacement of air pollution control equipment with equivalent or more efficient equipment. CR discussed this with Mr. Kennealy and the system is more efficient than before now that it is equipped with two baghouses.

This PTI has four Special Conditions (SC) associated to the 400-ton bin only. The first restricts PM emissions from the storage bin and truck loading to 0.10 lbs. of PM per 1,000 lbs. of exhaust gases and visible emissions from these processes are limited to 20%. Although loadout was not taking place at this location during the inspection, the area appeared clean and well maintained. The facility is also required not to operate the 400-ton cement storage bin unless the fabric filter collector is installed and operating properly. Maintenance is conducted as needed to keep them in good working order and the systems programming prevents the operations from

proceeding without the use of the baghouse. Per the permit AQD may also request verification of PM emissions. That request is not being made at this time.

Additional equipment installed in 2000 consists of air slides a bucket lift two storage silos and a second load out area. This load out area is enclosed on all sides except for the ends and is controlled by a separate dedicated baghouse, as is each of the two silos. CR was able to observe a truck being loaded. The truck pulls into the property next to the elevated rack. The driver gets out and climbs up to open the hatches in the truck. Then the truck and driver proceed into the load out area where the dispensing device lowers into the truck opening. An outer "tube" drops down and creates a vacuum seal and recirculates the exhaust through a baghouse and back into the silo. Upon receiving the specified load, the driver pulls up to the exit rack and then closes the truck hatches before leaving the property. This equipment appears to be exempt from Rule 201 permitting requirements per Rule 284(2)(k).

Based on the observations and discussions made during the inspection St. Mary's Cement appears to be operating in compliance with PTIs 655-83, PTI No. 63-86, and all other applicable air quality rules and regulations.

NAME 

DATE 12/2/2022

SUPERVISOR 