DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection

N097631482

FACILITY: CLAWSON CONCRETE CO		SRN / ID: N0976
LOCATION: 6700 SIMS DR, STERLING HTS		DISTRICT: Southeast Michigan
CITY: STERLING HTS		COUNTY: MACOMB
CONTACT: Matt Woloszyk , Area Manager/Environmental		ACTIVITY DATE: 08/24/2015
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled inspection	n of a minor source.	
RESOLVED COMPLAINTS:		

On August 24, 2015, I conducted an unannounced, scheduled, level 2 inspection of Superior Materials, LLC, dba Clawson Concrete Company (Clawson Concrete), located at 6750 Sims Drive in Sterling Heights, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the conditions of Permit to Install (PTI) No. 195-85A.

I arrived on site around 10:45 AM. I met with Mr. Woloszyk, Area Manager/Environmental. Mr. Woloszyk provided records and explained operations during a site walkthrough. I provided Mr. Woloszyk with my contact information and a copy of the pamphlet "DEQ Environmental Inspections: Rights and Responsibilities."

Facility Walkthrough

Clawson Concrete is a concrete batch plant that produces ready-mix concrete in wet batches. This means the concrete is mixed with water before entering a concrete truck. The facility has approximately 12 employees.

No opacity was observed during my inspection per PTI No. 195-85A Special Condition (S.C.) 14 and S.C. 15. The facility operates a central dust collector for all silos. This central dust collector contains circular cloth fabric bags with cages. We visited the central dust collector. It appeared to be operating properly per S.C. 17. Mr. Woloszyk demonstrated that the facility is under negative pressure via a fan motor so that silo emissions flow to the central dust collector. According to Mr. Woloszyk, bags are cleaned twice a year and are replaced as needed per S.C. 18. Extra bags were available on site. Silos on site contain cement, fly ash, and slag cement.

According to Mr. Woloszyk and from observing plant operations, the fugitive dust plan in Appendix A and the malfunction abatement plan in Appendix B appear to be followed properly per S.C. 19. Aggregate is surrounded on three sides by walls that appear to be eight feet high as required by the fugitive dust plan. According to Mr. Woloszyk, aggregate and slag piles are watered. The facility hires a water sweeper twice per week from May through October to sweep the facility grounds and the road in front of the drive. The facility does not have any complaints on record.

The facility has boilers on site. These are replaced and cleaned in the spring after being used throughout the winter. The boilers appear to be exempt from R201 requirements per R 282(b) (i). The Air Quality Division (MDEQ-AQD) has not accepted delegation for 40 CFR Part 63

Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

The facility does not operate a concrete crusher on site per S.C. 20.

Closing Discussion

The facility would like to void PTI No. 195-85A and to operate under R 289(d). The plant does not appear to produce more than 200,000 cubic yards of concrete per year. Mr. Woloszyk provided records of concrete production from January of 2014 through December of 2014. According to facility records, the facility produced 50,912 cubic yards of concrete in 2014.

Conclusion

Based on the AQD inspection and records review, it appears that Clawson Concrete is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of PTI No. 195-85A. I will discuss voiding PTI No. 195-85A with the facility.

NAME San L

DATE 9/28/15

SUPERVISOR