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

N574645554

FACILITY: Holcim (US) Inc. d/b/a Lafarge Zilwaukee Terminal		**SRN / ID:** N5746
LOCATION: 900 N ADAMS RD, ZILWAUKEE		**DISTRICT:** Saginaw Bay
CITY: ZILWAUKEE		**COUNTY:** SAGINAW
CONTACT: Scott Anderson , Terminal Manager		**ACTIVITY DATE:** 08/09/2018
STAFF: Gina McCann	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Inspection of PTI 192-05		
RESOLVED COMPLAINTS:		

I (glm) performed a scheduled inspection at the Lafarge Midwest Terminal in Zilwaukee. Mr. Matthew Karl, MDEQ-AQD and I met with Mr. Bob Jurek, Facility Operator. The facility was not in compliance with PTI #192-05 at the time of the inspection. The facility had particulate over 50% opacity belching from the stack associated with EU-Cement Off-Loading. The cartridge collector appeared to malfunctioning and maintenance was not being done appropriately.

Lafarge Midwest is a Portland cement manufacturer and distributor. The production plant is located in Alpena, Gaylord District Office. The Zilwaukee site (N5746) is a portland cement storage facility, i.e. flat storage, consisting of the following emission units; an approximately 75,000 sq ft warehouse (EU-Cement Off-Loading) which can hold approximately 32,000 short tons, a 300 ton storage bin (EU-Storage Bin), a cement bulk truck loading operation (EU-Bulk Truck Loading) and truck traffic for the receiving and delivery of cement products (EU-Truck Traffic).

This site was built in response to the building of the Zilwaukee Bridge. EU-Cement Off-Loading was used to house pillars that now support the bridge. The site has since evolved into a flat storage/distribution plant. Material is then distributed, but truck, to local paving projects.

Rail cars or trucks deliver material which is then pneumatically transferred to storage inside the building (EU-Cement Off-Loading) or the 300 ton cement storage silo used for loading bulk trucks (EU-Storage Bin). The rail tracks unloading, which is controlled by a fabric filter baghouse and is located along the eastern edge of the property. Material is mainly delivered via trucks and pneumatically transferred to storage. The north end of the building has three inlets and the south side has two inlets. The north side only utilizes two of the inlets as the third is near the fan/exhaust housing and has the potential to be damaged by a truck driver that is not cautious. The exhaust stack nearest the ground was emitting particulate above 50% opacity upon arrival to the facility. Mr. Karl and I observed the activity for nearly 15 minutes, when the operators shut down the operation upon noticing us. Opacity readings exceeded the 6-minute, 20% opacity limit in R301.

PM emissions are controlled by a 255-cartridge collector system on the EU-Cement Off-Loading and fabric filter baghouses on EU-Storage Bin as well as on EU-Bulk Truck Loading. The collectors are turned on manually prior to an unloading or fill. At the time of the inspection there was a semi truck with a pup trailer that was loaded. We did not observe opacity from the EU-Bulk Truck Loading during the loading of the truck. Magnehelic for EU-Cement Off-Loading are inside the unit which is considered a confined space and we did not enter. We viewed the pressure gauge for EU-Storage Bin and discussed operating procedures. I do not have an optimal operating range. At the time of the inspection the gauge read 0.2 pounds per square inch.

EU-Bulk Truck Loading is equipped with a scale which determines material throughput for the unit. This data along with received data is passed along to Mr. Travis Weide who generates the annual MAERS report. The source reported 0.80 tons of particulate for 2017.

PTI 192-05 requires recordkeeping of fugitive dust control measures as well as a maintenance log of baghouse preventative maintenance. The last monthly maintenance check was January 9, 2018. Prior to that monthly maintenance checks were performed on July 12, 2107 with a note of "not bad", April 15, 2016 with a remark of "some dust" and "some dust" noted on March 11, 2016. No maintenance was performed on the equipment during this time.

EU-Truck Traffic requires a fugitive dust plan which includes controlling dust on the site roadways/plant yard by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. The application of dust suppressants shall be done as often as necessary to limit opacity to

5 percent. The majority of the site is gravel. There is cement pads located on both ends of EU-Cement Off -Loading. The facility does not have access to a sweeper, but maintains pads and scale with a push broom. No brine had been delivered to the site for 2018. We did not observe fugitive dust from the driveway.

At the time of the inspection the facility was not in compliance with PTI #192-05 or state regulations.

The facility was sent a violation notice on August 10, 2018 for the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Cement Off-Loading of FG-Process	S.C. 1.2, 1.3 and 1.4 (R301)	Visible emissions from associated stack more than 50% opacity.
EU-Cement Off-Loading of FG-Process	S.C. 1.6	PMP not maintained. Required monthly inspection and weekly visual inspection of fabric filters not timely completed.
EU-Cement Off-Loading of FG-Process	R910	Baghouse malfunctioning. Continued to operate in malfunctioning status.

NAME Nina R. McCann DATE 8/10/18 SUPERVISOR C. Hare