



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 5, 2019

Mr. Tim Arendsen
High Grade Concrete Products
540 Maple Street
Spring Lake, Michigan 49456

SRN: N7541, Oceana County

Dear Mr. Arendsen:

VIOLATION NOTICE

On June 27, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of High Grade Concrete Products (High Grade) located at 3653 North State Street, Hart, Michigan. The purpose of this inspection was to determine High Grade's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 370-76.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Redi-Mix Concrete Batch Plant	Rule 201	Failure to obtain a permit to install.
	PTI No. 370-76, Special Condition (SC) 11 and Rule 301	Opacity greater than 20 percent.
	Rule 910	Improper operation of a control device.
	PTI No. 370-76, SC 10	No fugitive dust plan.

During this inspection, it was determined that High Grade had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised High Grade on June 28, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the Redi-Mix Concrete Batch Plant. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page). Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

During this inspection, the filling of the cement silo emitted opacity in excess of the 20 percent emissions allowed by PTI No. 370-76, SC 11 and Rule 301 of the administrative rules promulgated under Act 451. Opacity was determined to be 48 percent.

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The cause of the opacity was determined to be due to an unattached baghouse filter(s). Operating in this manner is not considered to be proper maintenance, which constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451. Rule 910 requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The facility was unable to provide a Fugitive Dust Control Plan. This constitutes a violation of PTI No. 370-76, SC 10. The AQD is requesting that High Grade submit this plan by August 4, 2019. Elements of a fugitive dust plan can be found in Rule 372 which has been enclosed for reference.

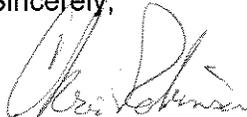
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 26, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If High Grade believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of High Grade Concrete Products. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-356-0259

Enclosures

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE