

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

P135966827

<b>FACILITY:</b> BREWER CITY DOCK REDI-MIX		<b>SRN / ID:</b> P1359
<b>LOCATION:</b> 3246 80TH AVENUE, ZEELAND		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> ZEELAND		<b>COUNTY:</b> OTTAWA
<b>CONTACT:</b> Phil Brewer , Owner		<b>ACTIVITY DATE:</b> 03/02/2023
<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 applicable air quality rules and regulations.		
<b>RESOLVED COMPLAINTS:</b>		

The Brewer City Docks Redi-Mix plant (SRN P1359), located at 3246 80<sup>th</sup> Avenue in Zeeland, Michigan was inspected on March 24, 2023, by Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff Chris Robinson (CR). The purpose of this inspection was to determine the facility's compliance status with applicable air quality rules and regulations. Weather conditions were partly cloudy, approximately 36oF with easterly winds at 9 mph ([www.weatherunderground.com](http://www.weatherunderground.com)).

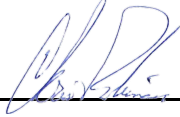
This facility is a stationary Redi Mix concrete batch plant. Portland cement is stored in silos and the aggregates are stockpiled onsite. Aggregate from the stockpiles are conveyed to a central hopper above the truck loading area where cement is added as it is loaded directly into the trucks along with water. The loading operations is conducted in an enclosed facility that is controlled by a baghouse.

Prior to entry CR surveyed the perimeter of the facility for odors and visible emissions and none were observed. No trucks were being loaded at the time of this inspection. CR then entered the facility and met with the operator, Ed Cech, in the control room and informed him of the purpose of the visit. Mr. Cech was not familiar with the inspection process and asked that Phil Brewer be contacted. CR agreed but asked if it was okay to discuss operations with him then follow up with Mr. Brewer, which he was okay with. The facility does not operate under a permit, so CR provided an exemption handbook and discussed some of the requirements necessary to use it, specifically in regard to the amount of concrete the plant generates since the exemption limit is 200,000 cubic yards per year which Mr. Cech indicated they were well below. Mr. Brewer later provided CR with annual totals for 2021 and 2022 and they are well below the 200,000 cubic yard limit.

The lot and roads appeared to be well maintained and per Mr. Cech they are inspected frequently and addressed when needed either by use of a sweeper truck or water spray. A log is kept inside the truck but is not always updated. Conveyor drop distances are kept to a minimum to reduce fugitive emissions and the baghouse is maintained as needed to keep it in good working order, which it appear to be in.

CR spoke with Phil Brewer on April 10, 2023, and discussed permitting requirements at which time CR was informed that the facility had claimed exemptions in the past and had notified the AQD. CR reviewed the facility's other file and located the notifications. In 1998 Mr. Brewer claimed the facility exempt from Rule 201 permitting requirements under Rule 290 and then under Rule 279 in 2002. Rule 279 has since been rescinded with the requirements being absorbed into Rule 289. This was discussed and Mr. Brewer is now claiming use of Rule 289, which seems appropriate.

The Brewer City Docks Redi-Mix plant appears to be operating in compliance with applicable air quality rules and regulations. Mr. Brewer will address any suppressant application and sweeping record keeping deficiencies.

NAME 

DATE 4/14/23

SUPERVISOR 