

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

P141470174

FACILITY: ATLAS CONCRETE LLC		SRN / ID: P1414
LOCATION: 14219 C DRIVE NORTH, MARSHALL		DISTRICT: Kalamazoo
CITY: MARSHALL		COUNTY: CALHOUN
CONTACT: Harley Maize , Director of Production/Operations		ACTIVITY DATE: 11/30/2023
STAFF: Rachel Benaway	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection, initiated after a complaint filed by phone, to verify compliance with PTI 94-23 and all state and federal air use regulations.		
RESOLVED COMPLAINTS:		

AQD received a complaint by phone on 11/30/2023 about concrete dust and silica sand in the air and on the garage doors of a Calhoun County resident's private property. The complainant believed the dust to have originated from construction activities at the future site of Ford Motor Company's Blue Oval Battery Park. In May of this year, Ford Motor Company requested and was granted a construction waiver to commence construction of equipment and processes prior to final action on their application for a Permit to Install (PTI). Walbridge has been hired to manage the construction project for Ford. Atlas Concrete, LLC, has been hired to handle concrete operations for the project and has installed a concrete batch facility located at 14219 C-Drive North. Atlas Concrete also applied for and was granted a construction waiver in June of this year prior to approval of their PTI, which was issued in August.

AQD staff (Rachel Benaway, Jared Edgerton, Mariah Scott) conducted an investigation of the complainant's property to verify the complaint. The winds were approximately 13 mph out of the SSW, which is the approximate location of the construction site. It is reasonable that fugitive dust could originate from the construction activities to be deposited at the complainant's location but during this particular investigation and in the professional judgement of AQD Staff, no significant accumulation of fugitive dust could successfully be verified.

AQD Staff then conducted an inspection of Atlas Concrete, LLC (P1414). The purpose of this inspection was to assess operational status of the Atlas Concrete plant and to verify compliance with PTI #94-23 and all state and federal air use regulations. Atlas is considered a minor source of particulate matter (PM) emissions. The facility is not subject to any New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAPs). Harley Maize (Director of Production/Operations) is responsible for submitting requested records. Dave Bortels is the Plant Manager for Atlas and was present for the on-site inspection. Two Senior Superintendents from Walbridge, Mike Doonan and Ryan Bennett, were also present.

The facility is currently operating from approximately 6 am to 7 pm, 5 days a week with the occasional 6-day work week. Personal protection equipment includes a hard hat, safety glasses, and safety shoes. There are no cold cleaners or emergency generators on site.

#	Permitted Equipment at Facility
8	Pneumatically loaded silos for temporary storage of cement, slag, and fly ash -fabric filters, conveyors, and scales (EU-PROCESS, FGPLANT)
	Roadways, yard, storage piles, material handling operations (EU-YARD, FGPLANT)

Since August, a smaller 100 yd/hr plant was being utilized and in the Spring the plant will be upgraded to the full permitted silo number to accommodate a larger workload. The current setup only recently come online the week of this inspection and is capable of producing 240 yd/hr. The facility reported that 3 test batches were run on 11/28 and a final test batch was run on 11/29. The facility reported:

"On 11/28/2023 Atlas Concrete LLC. was blowing/filling cement powder into the plant silo #1. During this filling event, the plant was unaware that the silos high limit alarm had malfunctioned. The malfunction caused cementous dust to briefly blow from the top of the silos thus breaking the baghouse containment. Upon realizing the malfunctioning event, the plant immediately stopped the flow of cement into silo. It was estimated the breach of the silo lasted than less 1 minuet in duration. A root cause analysis was preformed and it was determined that the high limit indictor and sirens were wired incorrectly due to manufactures error. Plant personnel immediately called in their sub-contractors to make the proper repairs. The repair work was completed on 11/30/2023. As an additional measure, the plant will now be required to have a laborer stationed at the ground near the silo when blowing/filling into the Plant."

No violation notice will be issued for this isolated incident of equipment malfunction.

The following is a summary of information obtained from the on-site inspection and the submittal of requested records. Where applicable, compliance determinations are indicated for each special condition established in the PTI, organized by emission unit (EU) or flexible group (FG).

FGPLANT

The yard consists of aggregate piles of sand, gravel, and stone that have been trucked in from suppliers. A frontend loader transfers the aggregate from the storage piles to holding bins that supply the conveyor belt system that leads to the elevated storage bins and weigh hoppers. The weigh hoppers execute the required constituents based on the job specifications. A 30,000-gallon boiler trailer supplies heated water for the mix. Cement, fly ash, ash, and cement supplements are pneumatically loaded into the silos for storage and then added to the mix as needed. The elevated storage bins, weigh hoppers, mixer and baghouse are contained within a walled unit that is heated.

Emission Limits:

SC	Pollutant	Limit	COMPLIANT?
I.1	PM	No visible emissions from silos and the mixer dust collector	Yes
I.2	PM	Visible emissions from drop point and transfer point portions of FGPLANT shall not exceed a 6-minute average of 20% opacity	Yes

During this inspection, the frontend loader was operating. No fugitive emissions were observed from the piles or loader operations. The parking lot was wet, and no fugitive dust was observed from the yard or the material piles.

SC	CONDITION	COMPLIANT?
II.1	Shall not produce more than 310,000 cubic yards of concrete per 12MRT. <i>(12-month rolling time will not be relevant until 2024.)</i>	NA
III.1	Shall not operate unless nuisance minimization plan for fugitive dust for roadways, yard, material storage piles, and material handling (Appendix A) has been implemented and is maintained.	Yes
III.2	Shall not operate FGPLANT unless MAP for dust collector has been submitted within 45 days of permit issuance. (Due: September 17 th)	No
IV.1	Shall not operate silo portion unless fabric filters are installed and operated properly	Yes
IV.2	Shall not operate mixer and screen unless mixer dust collector is installed/operated properly	Yes
Appendix A	2.2.2 Storage Areas: The stockpiles will be covered to limit wind erosion and cover materials from direct sunlight. The stockpile moisture will be measured at a minimum of once per day by examination of material. The stockpiles will remain wet with either a sprinkler system or hose.	No

The facility was required to submit a Malfunction Abatement Plan within 45 days of permit issuance. That date would have been September 17th. A violation notice will be issued for the lack of submittal. A violation notice will also be issued because the stockpiles are not being covered to reduce wind erosion and over exposure to sunlight as required by section 2.2.2 of the fugitive dust plan in Appendix A and special condition III.1 of PTI 94-23.

Monitoring/Recordkeeping:

SC	Condition	COMPLIANT?
VI.2	Monthly and 12-month rolling time records of cubic yards of concrete produced. <i>(12-month rolling time will not be relevant until 2024.)</i>	Yes
VI.3 and Appendix A	Records of all fugitive dust control equipment inspections (Appendix A): 2.1.2 Daily Inspection log sheet: 1. Checking filter regulator unit that supplies air to dust collectors to ensure automatic draining. 2. Checking air pressure that supplies dust collector is maintained at approximately 90 PSI. 2.2.3 Daily Inspection Maintenance: 1. Ensure fan is functioning before plant operation begins 2. Observe fan outlet for VE before operations begin 3. Ensure no noise from fan 4. Emptying of hopper 5. Tilt mixer slide shall be inspected and cleaned of material and dust 6. Moisture check of air regulators moisture trap 7. Check drain valve of air compressor to ensure no moisture present 8. Trained staff to do VE inspection throughout the day- filter bag connections, weathering of bags, inspection of gaskets	Yes

<p>VI.3 and Appendix A</p>	<p>Records of all watering/dust suppressant applications (Appendix A): 2.2.2 Storage Area Dust Suppression A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request. 2.3.2 Street/Truck Traffic Dust Suppression Application -Duration and location of sweeping of streets that directly border facility -Application of dust suppressant to site roadways and plant yard to maintain 5% opacity limit -Application of calcium chloride during freezing weather conditions</p>	<p>Yes</p>
<p>VI.5</p>	<p>Records of pressure drop across baghouse once per calendar day during operation.</p>	<p>No</p>
<p>VI.6</p>	<p>Keep records of inspections, maintenance, repair, and malfunctions of dust collector as required by MAP.</p>	<p>Yes</p>

The facility submitted daily, weekly, and monthly inspection sheets for the silo dust collector and the central pulse jet dust collection system. No pressure drop readings are being recorded oncer per calendar day while the plant is operating. A violation notice will be issued for this lack of recordkeeping. Monthly totals were submitted for the amount of concrete produced but 12-month rolling totals are no applicable until August of 2024. Monthly logs were also submitted noting water application dates and times. The facility will be purchasing an on-site water truck in the Spring of 2024 but is subcontracting a third-party water truck for stockpile and yard dust suppression purposes in the meantime.

The facility was not considered in compliance with all permit conditions at the time of this inspection. The facility has since submitted their malfunction abatement plan as requested.

NAME *Rachee Baraway*

DATE 12/19/2023

SUPERVISOR *Monica Brothers*