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

P129772229

FACILITY: TITAN CONCRETE		**SRN / ID:** P1297
LOCATION: 6497 EAST 10 MILE ROAD, CENTER LINE		**DISTRICT:** Warren
CITY: CENTER LINE		**COUNTY:** MACOMB
CONTACT: Mark Fletcher , Director of Environmental Compliance		**ACTIVITY DATE:** 06/13/2024
STAFF: Noshin Khan	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MINOR
SUBJECT: scheduled on-site inspection		
RESOLVED COMPLAINTS:		

On Thursday, June 13, 2024, I, Noshin Khan, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, performed a scheduled, on-site inspection of Titan Concrete LLC, located at 6497 East 10 Mile Road, Centerline, Michigan 48015 (SRN: P1297). The purpose of the inspection was to determine the facility's compliance status with the requirements of the federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended (Act 451); the AQD administrative rules, and the conditions of Permit to Install (PTI) 98-23A.

I arrived at the facility at 1PM and met with Mark Fletcher, Director of Environmental Compliance for Crown Enterprises LLC, and Eric Orinski (Crown Enterprises). Jason Reiss, Plant Manager for Titan Concrete, joined us for the inspection.

Titan Concrete is a concrete batch plant. The facility receives a variety of aggregates which are stored in piles in the yard. The aggregate is conveyed into a mixer and then directly into mixer trucks as concrete. Concrete is purchased by various customers including MDOT. According to Mark, the facility generally operates from 5:30AM to 6PM, Monday through Friday for half the year and Monday through Saturday for the other half depending on production needs. Titan Concrete has 39 employees, including drivers.

While walking on to the site, Mark pointed out track-out pads/rumble strips which had been put in place in the spring around March or April of 2024. He said that the rumble strips have improved capture of material from truck tires and has prevented track-out. I did not observe track-out from the facility on to 10 Mile Road. I also observed sprinklers which were operating and kept the plant yard wet. In response to a previous dust complaint, the facility committed to posting speed limit signs to remind drivers to maintain a speed of 5 mph to reduce the amount of dust kicked up by trucks. I observed a sign in a conspicuous spot at the truck entrance. Mark and Jason confirmed that wet sweepers are brought on site on Monday, Wednesday, and Friday for about 3 hours. The sweepers cover the site and a portion of 10 Mile Road.

Adjacent to the concrete loading building, I also observed a washout pit consisting of three pools. Mark explained that the station was used to clean out the concrete trucks in between concrete loads.

Jason explained that the main building consists of 6 pneumatically loaded material silos at the top, from which material is dropped down on a scale, weighed, and conveyed into a mixer. From the mixer, concrete is loaded into mixer trucks. There are two lanes for loading concrete. According to Mark, there is only one set of scales which the batch mixer needs for each load, so only one lane can be used at a time. The second lane functions as a backup if one is not operating. A dust collector controls particulate emissions from the material silos and the mixer. Jason said the dust collector has 25 bag filters. A pressure drop gauge on

the dust collector indicates whether the bags need replacement. When the reading nears 8" of water, the bags are replaced according to Jason.

In the portion of the yard behind the loading building are aggregate piles. I observed concrete walls constructed around the piles to prevent material from blowing off the site. Sprinklers are positioned over each pile and Jason said that the sprinklers operate in 20-minute intervals. A truck carries material from each pile into a loading bin a short drop from the truck. From here the material is carried up to the silos on two covered conveyor belts. I did not observe visible emissions from the piles or from the drop point at the conveyor loading bin.

After the plant walkthrough Jason walked us to the office where staff keep maintenance and inspection records. Jason showed me work orders dating back to January 2023 for the wet sweepers that are brought on to site on Mondays, Wednesdays, and Fridays. The sweeping activities and other dust suppression activities including changing bag filters are recorded in a log, and I reviewed records dating back to January 2023. I also reviewed daily, weekly, monthly, and yearly inspection/maintenance logs which contain action items for staff to check off for dust collectors, blowers, and lifts. These records are discussed further below as they apply to recordkeeping requirements.

Permit Compliance Evaluation
PTI 98-23A was issued in November 2023 and contains conditions pertaining to Flexible Group FGPLANT, which includes Emission Units EU-PROCESS and EU-YARD. Previously, the site claimed and operated under Michigan Air Pollution Control Rule 289(2)(d) which did not require a permit for concrete batch plants meeting the rule's conditions. The facility obtained a permit for a concrete production limit higher than the 200,000 cubic yards/year allowed under the exemption.

Emission Limits
Per Special Condition (S.C.) I.1, there shall be no visible emissions from the silos or the dust collector. Per S.C. I.2, visible emissions from the drop point and transfer point portions of FGPLANT shall not exceed a six-minute average of 20 percent opacity. Monitoring condition VI.4 requires that the permittee take a six-minute visible emission reading at least once per calendar week that is used to verify compliance with the emission limits. Jason said that he performs these visible emissions readings in accordance with the instructions in the permit condition. I did not observe visible emissions from the silos, dust collector, or drop/transfer points during my inspection. My observations and discussions during the inspection indicate compliance with these conditions.

Material Limits
S.C. II.2 sets a concrete production limit of 310,000 cubic yards per 12-month rolling period as determined at the end of each month. Recordkeeping condition VI.2 requires that the facility calculate the monthly and 12-month rolling cubic yards of concrete production in FGPLANT. Mark provided the facility's concrete production tracking spreadsheet after the inspection. I noticed that the spreadsheet only tracks monthly production and does not contain 12-month rolling calculations for each month. This is a violation of the condition. I helped Mark correct the sheet and requested that the record be sent to me monthly for the next six months to ensure that the correction is maintained. From December 2023 through May 2024, the highest 12-month rolling concrete production in cubic yards was 241,228 in December 2023. This indicates compliance with the material limit. Because the current production levels indicate compliance with the limit and the spreadsheet has been corrected

with follow-up requested to ensure compliance, I am utilizing enforcement discretion and a violation notice will not be issued at this time.

Process/Operational Restrictions

S.C. III.1 and III.2 require that the facility implement and maintain the nuisance minimization plan in Appendix A and a malfunction abatement plan (MAP) for the facility's dust collector. Recordkeeping conditions VI.3 and VI.6 require the permittee to maintain records of all fugitive dust control equipment inspections, other dust control activities, and maintenance/repair/malfunctions of the dust collector. As discussed above, the facility maintains daily, weekly, monthly, and yearly records for inspections and maintenance of the dust collector. Records for sweeping and other dust suppression activities are also maintained in a log. During my inspection, I asked staff about the actions specified for wind events in the nuisance minimization plan. Jason said that there haven't been wind events of 20 mph for more than a 3 minute duration. He said that standard procedure is for operation to cease if winds reach speeds that high as it would not be safe. The records reviewed and observations during my inspection indicate compliance with these conditions.

Design/Equipment Parameters

S.C. IV.1 and IV.2 require that the facility not operate the silos or mixer and screen unless the fabric filter dust collector is installed, maintained, and operated in a satisfactory manner. During my inspection, Jason informed me that the pressure gauges for the dust collector are checked daily to ensure proper operation. I observed a pressure drop reading of about 5". The daily inspection log includes an item to check that the pressure supplying the collector is approximately 90 PSI. Staff also check that the pressure drop across the bag filters is between the marked gauge limits of 3-8". If the reading is outside of these bounds the bags are inspected and replaced. When reviewing records at the facility, I observed that maintenance logs note when the bags are replaced. The records reviewed and my observations during the inspection indicate compliance with these conditions.

Monitoring/Recordkeeping

S.C. VI.5 requires that the facility record the pressure drop across the dust collector once per day during operation. During my inspection I observed that the pressure drop reading is not recorded as required by the condition. However, the daily log indicates a check of the collector's gauges each day and the weekly log has a condition checking that the pressure drop is between 3-8". I asked Mark to have this weekly check moved to the daily log with a space to note the reading as required by the condition. After my inspection, Mark confirmed that the daily log was adjusted and sent me a copy of the adjusted checklist which will be used. Since the daily and weekly inspection logs show regular checks of the dust collector gauges and the daily log has been corrected to instruct staff to record the pressure drop reading, I am utilizing enforcement discretion and will not be issuing a violation at this time.

Titan Concrete is currently in violation of PTI 98-23A FGPLANT S.C. VI.2 and VI.5. However, the records associated with these conditions have been corrected. Other records and observations indicate compliance with the operating and material limits associated with these conditions. I am utilizing enforcement discretion and a violation notice will not be issued at this time. I have requested that the facility send me its concrete production calculations for the next six months to ensure that 12-month rolling calculations are maintained.

NAME Nooh Khan DATE 07/08/2024 SUPERVISOR