STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION

EVALUATION TYPE: On-Site Inspection

FACILITY: Crown Enterprises LLC (P1481)	**SRN / ID:** P1481
LOCATION: 3405 Gaylord	**DISTRICT:** Detroit
CITY: Detroit	**COUNTY:** Wayne
CONTACT: Mark Fletcher	**EVALUATION END DATE:** November 14, 2025
STAFF: Matt Heintz	**COMPLIANCE STATUS:** Compliance
EPA Class: Minor	

INSPECTION DETAILS

COMPANY NAME: Crown Enterprises LLC
STATE REGISTRATION NUMBER: P1481
DATE OF INSPECTION: November 14, 2025
REASON FOR INSPECTION: Targeted Inspection FY2026
INSPECTED BY: Matt Heintz
PERSONNEL PRESENT: Brady Peterson [Plant Manager]

SAFETY EQUIPMENT/ SAFETY TRAINING/ SECURITY

Hard hat, steel-toed boots, safety glasses, and high visibility vest are required in the facility near the equipment. After arriving at the site, check-in at the office located on the second floor adjacent to the cement mixer.

PURPOSE OF ACTIVITY

An announced, self-initiated inspection of the Crown Enterprise LLC – Kronos Concrete facility (hereinafter “Kronos”) was conducted on Friday, November 14, 2025 for FY2026. The purpose of the inspection was to follow-up on recent complaints and determine compliance of operations at the Kronos facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and with applicable Federal standards.

FACILITY BACKGROUND

The Kronos facility is a portable concrete batch plant with a business address of 3405 Gaylord Street in Detroit, just over a block northwest of the intersection of East McNichols and Conant. The facility property is owned by Crown Enterprises and is part of a 29-acre parcel located on the north side of East McNichols west of Moran Street. The portion of the property that is currently occupied by the concrete batch plant and its associated plant yard and material storage piles is bounded on the south by East McNichols, on the north by Jerome Street, on the east by Moran Street, and on the west by Gallagher Street.

The area around the Kronos facility is a mix of industrial, commercial/business and residential properties. A rough zoning map from the company website (www.herculesconcrete.com) that shows the facility and surrounding area is attached to this report for reference. The frontage properties along McNichols and Jerome are zoned industrial or commercial/business. There are residential neighborhoods to the north of Jerome and south of McNichols, as well as to the east

of the facility. The closest residential properties are on the east side of Moran, directly across the street from the Kronos facility.

Kronos Concrete, LLC is an affiliate of Hercules Material Holdings, LLC. From the company website, Hercules was formed in 2020 and is now one of the largest ready-mix concrete suppliers in the Detroit area. Hercules currently has six concrete production facilities in the metropolitan Detroit area that are classified as affiliates of the company, and Kronos Concrete is one of the six. The Hercules facilities serve a variety of projects ranging from road work, large continuous concrete pours, public works projects, and commercial and industrial projects.

The facility currently operates Monday through Friday from 6am until 6pm, and also on weekends and weekday nights as needed. The facility and batch plant operate seasonally, typically operating from mid-April to late November.

COMPLAINT/COMPLIANCE HISTORY

Occasional fugitive dust complaints for Kronos have been submitted to EGLE. In response to the fugitive dust complaints, surveillance monitoring and targeted inspection were conducted. During surveillance on October 27, 2025, a low level of fugitive dust (<20% opacity) was observed to be exiting the baghouse. During this event, Matt Heintz talked with the Plant Manager, Brady Peterson, at Kronos about the fugitive dust. Brady said that he would address the issue.

PROCESS DESCRIPTION/EQUIPMENT

The Kronos facility features a wet mix concrete batch plant and its associated ancillary operations and plant yard. The concrete batch plant serves to combine the ingredients that are used to produce concrete, which include cement, aggregate (stone, gravel, sand), water, and admixtures, which are combined and mixed in a central mixer. The batch plant consists of the mixer and two cement silos, which were manufactured by Erie-Strayer. The mixer can produce 100-200 cubic yards of concrete per hour, depending on the mix. The two silos, which hold cement, are a 100-ton silo with a Kronos label affixed to it, and a silo with an Erie label on it that can hold 70 tons of cement.

Aggregate that is used in the concrete batch plant is kept in storage piles located just to the south of the batch plant. The aggregate is stored on the ground, with cement blocks forming a wind barrier on three sides of the storage piles. Aggregate is fed to the batch plant via four weighing hoppers and conveyors that feed the aggregate to the mixing drum. Concrete is loaded from the mixer into ready mix concrete trucks via a chute.

The Erie-Strayer batch plant is equipped with a C&W dust collection system that controls dust emissions from the silos, the mixer and the aggregate weigh hopper. The dust collector is a CNW-RA200C-480 model reverse air central dust collector that has a total of 108 bag filters. The dust collector is located above the aggregate bin.

INSPECTION NARRATIVE

Air Quality Division (AQD) staff from the Detroit District Office, Matt Heintz, arrived to the Kronos neighborhood at 11:00am on November 14, 2025. Weather conditions were mostly sunny, 49°F,

and wind 7 mph from SSW. Prior to entering the facility, I conducted observations by driving around the facility perimeter to monitor for fugitive dust. No fugitive dust was observed from the facility during the initial monitoring. I entered the facility and met with the Plant Manager, Brady Peterson. He has worked at the Kronos site for less than 6 months but was familiar with the background of the facility.

Brady provided updates and records to demonstrate that all of the bag filters (n=108) were replaced at the end of October. Records from the Daily Log indicated that 54 filer bags in the right compartment of the baghouse were replaced on 10/27. Then after Kronos staff observed dust from the dust collector on 10/28, 54 filter bags in the left compartment of the baghouse were replaced. Brady also provided records related to Fugitive Dust Control. Brady said that this time of the year was about the normal time when the bag filters would be replaced and it was close to the end of their operating period. He explained that if temperatures drop below 25°F at night, then Kronos does not tend to operate the following day. Once temperatures are consistently below 28°F at night, then Kronos will shutdown for the season. Brady also mentioned the berms between Gallagher Street and Mitchell Street were recently seeded and I noticed grass growing on the berms when I drove around the perimeter of the facility prior to arriving.

I noticed that the letterhead used with the Daily Log had Hercules Concrete on the top of the page. Brady said that he ran out of Daily Log sheets with Kronos letterhead and he made copies of a blank log that he had available. I asked him to resume using the Kronos letterhead to avoid any confusion with the records.

Brady mentioned that he had already ordered and received additional bag filters to be ready in case there are any other issues with the bag filters. I requested to see the extra bags. As we walked to the maintenance shed, we observed a water truck applying water to the Kronos grounds. I was able to confirm that Kronos had another full set of new bag filters (n=108). The inspection ended at 11:40am.

APPLICABLE RULES/PERMIT CONDITIONS

There are no active permits to install (PTIs) associated with the Kronos facility. The concrete batch plant is a portable unit that was moved to the Gaylord Street site in March 2024. A relocation notice was sent to the AQD Warren District Office via email on April 26, 2024, and the information was in turn forwarded to the AQD Detroit District Office. The specific concrete batch plant that is located and is operating at the Kronos facility on Gaylord Street operates under the criteria put forth in Michigan Administrative Rule 289 (Permit to install exemptions; asphalt and concrete production equipment). The compliance of the Kronos facility with the provisions of Rule 289 that apply to the operations at the facility is as follows:

Rule 289(2)(a) exempts cold feed aggregate bins for asphalt and concrete production equipment.

- **MEETS REQUIREMENT**: The aggregate bin is located on the east side of the Kronos concrete batch under the dust collector.

Rule 289(2)(d) exempts a concrete batch plant the meets the following requirements:

- (i) – The plant shall not produce more than 200,000 cubic yards of concrete per year.
    - **MEETS REQUIREMENT**: Production records for November 2024 through October 2025 were provided for the Kronos concrete batch plant demonstrating that annual concrete production was less than the limit. According to the records, Kronos produced 100,491 cubic yards of concrete during this time period.
- (ii) – The plant is required to use a fabric filter dust collector, a slurry mixer system, a drop chute, a mixer flap gate, or an enclosure for truck loading operations.
    - **MEETS REQUIREMENT:** The Kronos plant utilizes a drop chute.
- (iii) - All cement handling operations, such as silo loading and cement weighing hoppers, shall either be enclosed by a building or equipped with a fabric filter dust control.
    - **MEETS REQUIREMENT:** The Kronos concrete batch plant utilizes a fabric filter (CNW-RA200C-480 model reverse air central dust collector).
- (iv) - The owner or operator is required to maintain monthly records of the cubic yards of concrete produced.
    - **MEETS REQUIREMENT:** Records are maintained for the Kronos site using the Erie-Strayer software and monthly logs.
- (v) – The owner or operator is required to notify the appropriate AQD District Supervisor of the location where the concrete batch plant will be operating under the Rule 289 exemption.
    - **MEETS REQUIREMENT:** Crown notified AQD that the Kronos concrete batch plant would be operating at the Gaylord Street location.
- (vi) – The concrete batch plant shall be located not less than 250 feet from any residential or commercial establishment or place of public assembly unless all of the cement handling operations, excluding the cement silo storage and loading operations, are enclosed within at least a 3-sided structure.
    - **MEETS REQUIREMENT:** The cement handling operations in question are enclosed within a 3-sided structure. In addition, the concrete batch plant is located more than 250 feet from the nearest property line (the east property line along Moran Street).
- (vii) – The owner or operator shall implement the following fugitive dust plan:
    - (A) The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve.
        - **MEETS REQUIREMENT:** The transfer point that is open to the ambient air includes aggregate handling, aggregate being placed on the conveyors, and delivered via the conveyors to the aggregate bin. The drop distances at these transfer points are minimal.
    - (B) On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing, or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within 6 inches of the top of any sideboard, side panel, or tailgate. Otherwise, the truck shall be tarped.

- **MEETS REQUIREMENT:** Loading of on-site vehicles is achieved via a chute, which serves to prevent the wet concrete product from spilling.

- (C) All of the following provisions apply for site roadways and the plant yard:
  - The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride, or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet an opacity limit of 5%.
    - **MEETS REQUIREMENT:** Kronos uses a variety of strategies including applications of watering and calcium chloride and sweeping to mitigate fugitive dust.
  - (2) All paved roadways and plant yards shall be swept as needed between applications.
    - **MEETS REQUIREMENT:** Kronos has the site and adjacent roads swept on a regular basis. Sweeping records are maintained as part of the fugitive dust control method log.
  - (3) Any material spillage on roads shall be cleaned up immediately.
    - **MEETS REQUIREMENT:** Kronos acknowledges that spillage is rare but would be cleaned up immediately if it occurred.
  - (4) A record of all applications of dust suppressants and roadway and plant yard sweepings shall be kept for the most recent 5-year period and be made available to the department upon request.
    - **MEETS REQUIREMENT:** Kronos applies dust suppressant as needed and sweeps the site and adjacent roads regularly. These records are maintained as part of the fugitive dust control method log.
- (D) All of the following provisions apply for storage piles:
  - (1) Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.
    - **MEETS REQUIREMENT:** The storage piles are in three-sided structures, and we were informed that material is delivered to the storage piles with a minimal drop height.
  - (2) Stockpiles shall be watered on an as-needed basis in order to meet an opacity limit of 5%. Equipment to apply water or dust suppressant shall be available at the site or on call for use at the site within a given operating day.
    - **MEETS REQUIREMENT:** The facility has a water supply for use on the storage piles. Stockpiles are routinely assessed, and water is applied as needed.
  - (3) A record of all watering shall be kept on file for the most recent 5-year period and be made available to the department upon request.

        - **MEETS REQUIREMENT:** Kronos has a full-time employee dedicated to watering. Watering records are maintained as part of the fugitive dust control method log.
    - (E) The provisions and procedures of this fugitive dust plan are subject to adjustment by written notification from the department if, following an inspection, the department determines the fugitive dust requirements or permitted opacity limits are not being met.
        - **MEETS REQUIREMENT:** Visual inspections of the Kronos site and documentation from Kronos provide support that the site is active with mitigating fugitive dust. There were not any fugitive dust issues observed during the targeted inspection on November 14, 2025.

SLEIS REPORT REVIEW

This facility is not currently required to report to SLEIS.

FINAL COMPLIANCE DETERMINATION

Based on observations during the on-site inspection and available records, the Kronos Concrete facility meets the exemption requirements for Rule 289.