NE40260072

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

| NO 1830U7Z | | |
|--|--|---------------------------|
| FACILITY: Halliday Sand and Gravel, Inc PLANT #4 | | SRN / ID: N5183 |
| LOCATION: 866 EGYPT VALLEY ROAD, ADA | | DISTRICT: Grand Rapids |
| CITY: ADA | | COUNTY: KENT |
| CONTACT: | | ACTIVITY DATE: 08/26/2019 |
| STAFF: Sharon LeBlanc | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: MINOR |
| | lo. 82-01 ready to pull out of Payne & Dolan pit, Thi ning operations. Dust control for material storage pi | |
| RESOLVED COMPLAINTS: | | |

August 26, 2019, AQD District Staff conducted a self initiated site inspection for Halliday Plant #4 (N5183). The portable non-metallic mineral crusher was located in the Payne & Dolan sand & gravel quarry in Elmira, Michigan. A complaint regarding dust associated with screening activities had been received by the District on Friday August 23, 2019. The referenced crushing plant is operating under permit no. 82-01. Screening activities are also being conducted by Halliday, a different plant was brought onsite, and a number of unused conveyors were also noted to be staged along the western property boundary.

The referenced plant was operating at the time of inspection. all 7 permitted components of the plant were onsite, and had the required equipment ID numbers on each individual piece (condition 1.11). No visible emissions were noted from the crusher, screen or drop points (condition 1.12) The equipment had the ability to apply water as a dust suppressant should it be required (condition 1.7). Materials being generated were described as road grade gravel, and were noted to be dark from moisture. Uncrushed/screened materials were generated in the pit, and were crushed and screened, the screened sands were conveyed back into the pit, the desired gravel mix was stacked onsite.

A copy of the permit was available for review (condition 1.13(d)), as was the daily total records, which are recorded on a spiral bound calendar (conditions 1.9). A weight scale was located on a post crusher conveyor, and was used to document production totals on a daily basis. Staff reported that a total of 2,200 tons was produced the previous Friday (a slow day), a total of 16-17K tons will have been produced upon job completion, which was anticipated to be Tuesday, August 27, 2019. Permit conditions limit the plant to no more than 2 million tons per location (condition 1.3). In addition no asbestos is associated with the quarry, and only native materials are being processed (condition 1.5).

With respect to dust control, both the permitted plant, as well as the neighboring payne & dolan asphalt plant (N0436) have fugitive dust plans associated with their permits (appendix A, and condition 1.6). Upon arrival, all the roadways in use had been wetted. Payne & Dolan staff was in the process of applying flaked brine to all the roadways. General observations not only while onsite, but from various points along thrum road, before arriving onsite, indicated that it was obvious that material piles are a point of concern, as are unused, bare portions of the property, where the dry weather conditions and 26 mph wind gusts were aggravating conditions and creating dust clouds. This was discussed with both the Payne & Dolan plant operator (Dan) as well as the Halliday plant operators. The operators were reminded that material piles also needed to be included in the dust control activities, and that the piles needed to be watered. Halliday staff indicated that they could get a water truck with a cannon to wet down the dust piles. AQD Staff indicated that they had best get the truck and be prepared to wet down the piles daily, as well as areas of the pit that are bare and the wind is picking up the dust. Dust suppressant records were not reviewed as part of this inspection.

Using a measuring app on Google Earth it appears that the crushing and screening activities are located approximately 900 feet from the nearest residential property. A review of the permit indicates that relocated equipment must be no closer than 500 feet from the nearest residential or public gathering location (condition 1.13(c)).

A review of records indicate that no relocation notice is in the MACES database. It appears that 3-4 relocation notices were submitted by Halliday for the plant on 8/14/2018, for multiple relocations, the last one expiring in November 2018.

With respect to compliance with the referenced general permit, the facility appears to be in general compliance with two exceptions; 1) being no relocoation notification and 2) Dust control of storage piles. At the time of the inspection the temperatures were in the mid to upper 70's, with winds from the S -SE of 15-17 mph and gust of mid to upper 20s. Rain has not been reported in the area for the last month -plus. The conditions make dust control on bare ground and material storage piles challenging. But as discussed with onsite staff, the permitee is required to conduct dust control activities while the plant is active onsite. The onsite staff indicated that they would request a water truck with sprayer to better control material storage pile dust. The onsite situation will continue to be monitored.

NAME Shalon Lo Blowe DATE 8/24/2019 SUPERVISOR