

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N628945539

FACILITY: Bradley Sand & Gravel Inc.		SRN / ID: N6289
LOCATION: 8540 Indian Hill Road, HONOR		DISTRICT: Cadillac
CITY: HONOR		COUNTY: BENZIE
CONTACT:		ACTIVITY DATE: 08/02/2018
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection and review of records		
RESOLVED COMPLAINTS:		

On Thursday, August 2, 2018, Caryn Owens of the Department of Environmental Quality (DEQ)-Air Quality Division (AQD) conducted a scheduled field inspection of Bradley Sand & Gravel (SRN: N6289), located at 8540 Indian Hill Road in Honor, Michigan. The inspection was to determine compliance with Permit to Install (PTI) #250-97. The facility is considered a minor source for particulate matter (PM) criteria air pollutants. The equipment, including the crushers are not subject to New Source Performance Standards (NSPS) of Performance for Nonmetallic Mineral Processing Plants under 40 CFR, Part 60, Subpart OOO because the capacity of the equipment is less than 150 tons per hour.

### Evaluation Summary

The activities covered during this scheduled field inspection and records review appears to be in compliance with PTI 250-97. Specific permit conditions that were reviewed are discussed below.

### Source Description

During the field inspection it was cloudy with calm winds from the north, and 75 degrees Fahrenheit. No equipment was operating at the time of the inspection and it looks like it hasn't operated in a while. According to Mr. Mark Bradley, the Property owner, it is not operated very often and he will be selling the equipment within the next year so he can retire. Mr. Bradley stated that he only uses the equipment for beach sand for homeowners, and with the high water table, the demand for beach sand is really low. Mr. Bradley indicated that majority of his workload is completing excavations for people and that keeps him pretty busy right now.

At the time of the inspection the equipment consisted of a feeder, feed conveyor, crusher (primary and secondary) stacking conveyor, and a portable diesel generator. There were two screening locations at the site, one on the northeastern and one on the northwestern portions of the site. The screening processes were separate from the crusher plant and both locations consisted of a screen and conveyors. I observed a dump truck parked next to the office pole building on the southeastern portion of the site, and one dozer near the crusher plant. Mr. Bradley pulled up in a semi-truck and came out to talk to me. Other than that, no other large equipment was observed onsite. Mr. Bradley questioned about the PTI for this source. He thought a consulting firm that he hired had it voided for him, since he produces so little. I informed him that he used to have to report to the Michigan Air Emissions Reporting System (MAERS), and possibly the consulting firm he hired to input the information to MAERS was no longer necessary, since he doesn't have to report to MAERS, but that didn't void out the PTI, the site is still considered a minor source of air pollution. Mr. Bradley thought that sounded understandable.

### Review of PTI:

#### Visible Emission Limits:

During the inspection, the equipment was not operating, and therefore, no visible emissions were observed.

#### Material Usage Limits:

Based on discussions with Mr. Bradley, the facility processed about 8,000 tons per year in 2017, which was below the permitted 100 tons per hour and 310,800 tons per year. Mr. Bradley tracks the amount of material processed based on his sales records. Only earth material (currently only beach sand) is processed, screened and separated at this location. No asbestos containing materials are crushed at this pit.

#### Process/Operational Parameters:

Bradley Sand & Gravel appears to follow the fugitive dust plan for the site, the haul roads were in good condition. I observed no visible emissions from the small storage piles at the site.

#### Design/Equipment Parameters:

According to the previous inspection reports, water lines are connected to the plant area for the stackers, screens, crusher, and/or conveyors to minimize fugitive emissions if needed. However, the material is typically wet enough where the water sprays are not necessary. As previously stated, the equipment was not operating during the inspection.

**Testing:**

As of the date of this inspection report, AQD has not requested a verification of visible emission rates from the equipment located at the site.

**Monitoring/Recordkeeping/Reporting:**

The equipment at this site, even though portable, stays at this site.

**Other Requirements:**

There are no other requirements associated with this facility.

NAME Caryn Owens

DATE 8/2/18

SUPERVISOR ON