

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N674954633

FACILITY: Carrick Gravel and Crushing		SRN / ID: N6749
LOCATION: 7535 West Emery Road, HOUGHTON LAKE		DISTRICT: Gaylord
CITY: HOUGHTON LAKE		COUNTY: ROSCOMMON
CONTACT: Gail/Mark Carrick , V. President		ACTIVITY DATE: 06/23/2020
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-initiated site inspection of Carrick Gravel and Crushing at Wolf Pit, Marquadt Street, Gaylord, Michigan. Small pit with only 4 pieces of equipment onsite. Not operating at time of site visit. sgl		
RESOLVED COMPLAINTS:		

INTRODUCTION

On June 23, 2020, AQD District Staff conducted an unannounced, scheduled site inspection at the Wolf Pit, Marquadt Street, Gaylord, Otsego County, Michigan. The Office is located at 7535 W. Emery Road, Houghton Lake, Michigan is the location of record for Carrick Gravel and Crushing/Carrick Trucking and Gravel (N6749) and as well as Carrick Concrete (N1394).

The intent of the site inspection was to determine compliance with respect to the mobile crushing plant which operates under General Permit for Non-Metallic Mineral Crushers 36-00. The last inspection of records was conducted August 19, 2009. The equipment was not in operation at the time of the inspection.

Weather at the time of the inspection overcast with intermittent rains.

FACILITY

N6749 is a mobile crushing plant which operates in various districts throughout the calendar year. At the time of the June 23, 2020, site inspection, the most recent relocation notice had been received on November 6, 2019, for end of season relocation to the Wolf Pit, Gaylord, Otsego County, Michigan.

Upon arrival, it was noted that the Wolf Pit is a small pit, with limited maneuverability. Equipment onsite was limited to a portable diesel-powered generator, a hopper, one Nordberg Metso with internal screens and conveyors, a single conveyor equipped with weight scale, and a single stacking conveyor.

EQUIPMENT

Permitted equipment under 36-00 includes the following equipment:

Equipment ID	Equipment Description	Subject to NSPS
1	Fabtec 1330 -- incl. crusher, screen, feeder, feed conveyor, under screen conveyor and return conveyor	Yes
5	ExTec Turbo 5000 screening plant – incl. feeder, belt feeder, screen, oversize conveyor, underscreen conveyor and conveyor.	Yes
7	Cedar Rapids Wash Plant w/washer Drum	No
8	Telsmith 3042 – Portable Primary Jaw Crusher	Yes
2, 3, 9, 10, 11 & 12	Radial stackers (variety of manufacturers)	Yes
4 & 6	Discharge conveyors	Yes

It should be noted that the following pieces of equipment were added in a permit modification in 2002.

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Equipment ID	Equipment Description	Subject to NSPS	Test Date
13	Thor T 140-8 Telescoping Radial Stacker	Yes	

With the exception of equipment IDs 8 & 13, it appears that Method 9 testing was conducted for the above referenced equipment on August 29 and 30th, 2000. Equipment ID no. 13 was added to the plant after testing. The Nordberg Metzo is reported by Carrick Trucking Staff to have replaced another piece of equipment. District Staff have notified Facility staff of the need to update the permit, with a permit modification. This is anticipated to be completed prior to completion of the operating season.

PERMITTING

As previously indicated, two SRNs are associated with the W. Emery Road address. For the purposes of the June 23, 2020, site inspection, AQD District Staff was for the mobile crushing equipment permitted under 36-00 (SRN N6749).

Permitted non-mobile equipment associated with the address are under SRN N1394. These include the concrete batch plant permitted under 486-86 and 487-86 for water suppression of fugitive dust onsite. Ms. Gail Carrick confirmed during a site visit on August 15, 2018, that the plant and associated control devices were scrapped 4 years earlier.

REGULATORY

The permitted crusher is subject to Rule 201 permitting and is considered a true minor for particulate matter (PM). In addition, the mobile plant is subject to Federal Regulations under 40 CFR Part 60 Subpart OOO, Standards of Performance for New Stationary Sources; Nonmetallic Mineral Processing Plants. The referenced subpart is applicable to most components of the permitted crusher plant, with the exception of following:

Equipment ID	Equipment Description	Reason for non-Applicability
7	Cedar Rapids Wash Plant w/ Washer Drum	Wet Material Operations 40 CFR 60.670(a)(2)

COMPLIANCE

Compliance status for the facility had been based on observations during the June 23, 2020 site inspection, as well as on supplemental data and reports submitted upon request or to meet permit requirements identified under 36-00. The referenced permit was issued in 2000, prior to the revisions of the General Permit for nonmetallic mineral crushers in 2002.

OPERATION LIMITS - Each crusher and screen is required to be equipped with a water spray or a bag house dust collector (Special Condition (SC) I.B and SC IV.3) The required equipment is reported to be equipped with water spray as required by permit. As the equipment was not in operation, functioning water sprays could not be confirmed.

SC IV.2 requires all equipment to be labeled within 45 days of initial startup. At the time of the June 23, 2020, site inspection, labeling was noted on the stacker and weight conveyor. No ID number was noted on the Nordberg Metzo.

SC IV.5 does not allow the permittee to crush any asbestos tailings or asbestos containing waste materials. The Wolf Pit is a very small sand and gravel pit, owned by the Otsego County Road Commission. There was no sign of any natural asbestos, asbestos tailings or asbestos containing waste materials onsite. Material stock piles consisted of a coarse mix of native materials.

Appendix A of General Permit 36-00 contains a program for a continuous fugitive emission control that should be implemented for the facility yard, storage piles and all material handling operations. (SC IV.4) Implementation of which includes applications of water, calcium chloride or other acceptable dust control compounds, sweeping of yards and roadways and cleaning up of material spillage. Stockpiles are to be watered, trucks to be loaded to prevent their contents from escaping their vehicle. As previously indicated, there was no equipment operation at the time of the site visit, and do to recent rains, fugitive dust was not noted.

MATERIAL LIMITS - Processing limits for the plant are no more than 2 million tons per year per site (SC II.A.1 and SC IV.6). A weight scale was noted present on a post crusher/screen conveyor indicating that the plant had a method of monitoring production quantities. A review of annual emissions reports for the facility indicated that following annual production/processing rates:

Calendar Year	Total Material Processed (tons)	Permit Limit (SC II.a.1) (tons)
2019	148,484	2 million/year
2018	149,193	2 million/year
2017	108,707	2 million/year
2016	156,500	2 million/year
2015	168,573	2 million/year
2014	88,432	2 million/year

EMISSION LIMITS - Visible Emission (VE) limits are defined for all equipment associated with the portable crusher with the exception of wash screens and all subsequent equipment downstream up to the next crusher or storage bin (SC I.C.6). As previously indicated the equipment was not in operation at the time of the site visit, and VEs could not be confirmed by District Staff.

In addition, emission limits for exhaust from each exhaust from a baghouse dust collector. (SC II.B.1) The permitted equipment is reported to be equipped with spray bars, rather than a baghouse, and this condition is not applicable at this time.

TESTING ACTIVITIES – Testing activities required by permit for the crusher include Method 9 VE testing per NSPS OOO (SC III.B.1, 2,3 & 4). All new or additional equipment subject to the NSPS not previously tested is required to be tested per the NSPS. (SC V.3)

VE Testing of all but the two earlier referenced pieces of equipment were conducted on August 29th & 30th, 2000 by Gosling and Czubak Engineering Sciences, Inc.

MONITORING/RECORDKEEPING – By permit the Facility is required to keep daily and annual processing records for a minimum of 2 years (SC III.A.1&2). District Staff noted that a weight scale was present prior to stacking conveyors, which would indicate that the Facility has the ability to maintain daily processing records.

REPORTING - Notifications required by permit are limited to notification of testing (SC III.B.1), of initial startup (SC IV.1) and relocations. The Facility submits relocation notifications to the appropriate District Office prior to relocating equipment. As previously indicated prior to the June 23, 2020, site visit, the most recent relocation notification was submitted on November 5, 2019, notifying District Staff of relocation of

the equipment to the Wolf Pit.

OTHER REQUIREMENTS- General Permit 36-00 allows for replacement, installation and/or removal of equipment from the crusher plant without application for a new permit (SC V.1). Permit updating is conducted thru the submittal of a new form EQP5756, listing all new and existing equipment associated with the plant. (SC V.2)

Relocation of equipment from one location to another is limited to permitted equipment with no outstanding unresolved violations (SC V.5.a) and requires submittal of a relocation notice (SC V.5.b). Crusher locations are to be a minimum of 500 feet from any residential or commercial establishment as well as places of public assembly. (SC V.5.c). Review of arials indicated that the Wolf Pit, meets the minimum 500 feet requirement from residences. No commercial or public assembly locations were identified in the area.

SC V.5.d requires that a copy of the permit be posted in the operator's office or work station. As Carrick staff were not onsite, verification of a copy of the permit at the work site could not be conducted. Copy of the permit at the Carrick Office has previously been verified by the inspector.

SUMMARY

On June 23, 2020, AQD District Staff conducted an unannounced, scheduled site inspection at the Wolf Pit, Marquadt Street, Gaylord, Otsego County, Michigan. The Office is located at 7535 W. Emery Road, Houghton Lake, Michigan is the location of record for Carrick Gravel and Crushing/Carrick Trucking and Gravel (N6749) and as well as Carrick Concrete (N1394).

The intent of the site inspection was to determine compliance with respect to the mobile crushing plant which operates under General Permit for Non-Metallic Mineral Crushers 36-00 (most recently modified in 2002). The last inspection of records was conducted August 19, 2009. The equipment was not in operation at the time of the June 23, 2020, inspection.

Upon arrival, it was noted that the Wolf Pit is a small pit, with limited maneuverability. Equipment onsite was limited to a portable diesel-powered generator, a hopper, one Nordberg Metso with internal screens and conveyors, a single conveyor equipped with weight scale, and a single stacking conveyor. The Nordberg Metso is not listed as a permitted piece of equipment on the most recent version of the General Permit in the District Office, and the Facility has been notified that they need to update their existing permit to include the equipment. Discussions with Carrick Staff indicate that as soon as appropriate staff have returned to the office, District Staff will be contacted and the modifications to the permit submitted. No other compliance issues were noted at the time of the June 23, 2020, site inspection.

NAME _____

DATE _____

SUPERVISOR _____

Sharon LeBlanc Digitally signed by Sharon LeBlanc
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EGLC OU = AQD
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