

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

N680458614

FACILITY: KLETT RECYCLE, INC.		SRN / ID: N6804
LOCATION: 62994 TERRITORIAL ROAD, HARTFORD		DISTRICT: Kalamazoo
CITY: HARTFORD		COUNTY: VAN BUREN
CONTACT: Dale Klett , President/Owner		ACTIVITY DATE: 06/03/2021
STAFF: Rachel Benaway	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection to verify compliance with state and federal air use regulations.		
RESOLVED COMPLAINTS:		

Due to Covid-19 health and safety precautions, all AQD inspections are now announced prior to entry to a facility. The purpose of this inspection on 6/3/2021 by AQD staff, Rachel Benaway, was to verify Klett Recycling (N6804), a portable nonmetallic mineral crushing and processing plant, is in compliance with their General Permit to Install (PTI) #145-00 and all state and federal air use regulations. The facility is subject to New Source Performance Standard (NSPS) 40 CFR 60 Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants. The last inspection was completed at the facility on 11/5/2010. Dale Klett is the facility contact and owner. Andy Monrroy is the Plant Supervisor and was present for the on-site inspection.

The facility regularly submits Relocation Notices in a timely manner. The crushing operation was located at a Reith-Riley plant at 911 Hatfield Avenue in Kalamazoo, Michigan. Staff drove around the facility before entry to observe any visible emissions from the process equipment. No excessive emissions were observed. When processing asphalt, the facility will run 24 hours a day, five days a week, before relocating. Two employees were present on site at the time of the inspection. Relocation Notices typically list more equipment than is actually used at each location to ensure adherence to permit conditions in the event more equipment is needed than originally planned for each site. The equipment has been tested according to the requirements of the NSPS (40 CFR 60 Subpart OOO). Confirmation of the testing was sent by email and is included with this report.

The Relocation Notice listed equipment as follows:

#	Equipment at Facility	Control
	Hazmag 1313 Impact Crusher #360	Water Spray
	Hartman Fabco Conveyor #361	No
	Simplicity Screen Plant #362	Water Spray
3	Swift Conveyors #363, #364, #365	No
	Superior Conveyor #366	No
	Conveyor #367	No

	Deister Screen #181	Water Spray
3	Shop Built Conveyors #182, #183, #184	No
	Shop Built Stacker #185	No

Staff observed that the impact crusher, screen plant, stacker, and 3 conveyors were in use during the inspection. All equipment appeared very well maintained and in good working order. No visible emissions were observed as the front loader deposited material into the impact crusher.

As staff approached, Mr. Monnroy was watering the yard from a water tank pulled by a pickup truck. The yard appeared watered well and no fugitive dust was observed from the truck traffic. The water tank is equipped with a cannon sprayer for watering down the material piles and no visible emissions were observed from the piles at this time. Mr. Monnroy explained that watering is typically done as needed to the roadways and piles and usually consists of emptying half the tank for each application. As noted in the table above, multiple emission units are equipped with water spray attachments. Staff observed adequate water spray utilization along the process and no visible emissions from the impact crusher, screen, or conveyors. Mr. Monnroy explained that not all sprays are used at all times if the upstream application of water is adequate.

PTI #145-00

SC	CONDITION	COMPLIANT Y/N
1.1	PM emission from each baghouse dust collector portion of FGCRUSHING shall not exceed 0.04 lb/1,000 lb exhaust gases, calculated on a dry basis	Y*
1.2	VEs shall not exceed the following opacity limit %:	
	1.2b All crushers 15	Y
	1.2c Screens 10	Y
	1.2d Rock drills 5	Y
	1.2e Conveyors/Transfer points 10	Y
	1.2f Wash screens and all subsequent equipment downstream No VEs	Y
	1.2h Wheel loaders and truck traffic 5	Y

	1.2i Material storage piles	5	Y
	1.2j Any other process equipment which is part of the nonmetallic mineral crushing facility or related processes	10	Y
1.3	Shall not process more than 2 million tons of any non-metallic mineral per year per site		Y
1.5	Shall not crush any asbestos tailings or asbestos containing waste materials		Y
1.6	Shall not operate unless program for continuous fugitive emissions control for all roadways, yard, storage piles, and material handling operations (Appendix A) is implemented and maintained		Y
1.7	Each crusher screen shall be equipped with a water spray. Control equipment shall be properly operated.		Y Y
1.8	Verification of visible emission rates and particulate emission rates from all NSPS subject crushers, screens, all transfer points on conveyors, and all other miscellaneous equipment associated with FGCRUSHING and covered by the NSPS Subpart 000.		Y*
1.11	Label all equipment associated within 45 days of initial startup. Labels should be noticeable.		Y**
1.12	Shall not replace or modify any equipment, including control equipment unless a) update general permit by submitting new EQP5756 form 10 days before replacement b) continue to meet all permit requirements c) keep records of date and description or replacement/modification d) notify AQD w/in 15 days after startup of actual date of initial startup e) all new equipment is subject to subpart 000		Y
1.13	Shall not relocate unless a) no outstanding violations b) notice of intent to relocate has been submitted- all residential or commercial establishments and places of public assembly w/in 1,000ft or site and clearly identified on site plan c) crusher located at least 500ft from residential, commercial, or place of public assembly		Y

	d) copy of this permit and conditions shall be clearly posted in operators office or workstation	
--	--	--

*Method 9 VE testing was completed and passed on 11/13/2018 and 7/12/2001.

**At the time of inspection, the equipment labels could not be found. Mr. Klett explained that the labels have worn off over time and stated they would be replaced. Photos were sent to verify that the labels have been reapplied and a few are included with this report.

Monitoring/Recordkeeping:

SC	Condition	COMPLIANT Y/N
1.9	Keep daily and annual records of amount of material processed for each site	Y

The plant was processing asphalt at the time of the inspection. The plant can process an average of 300-350 ^{tons} ~~pounds~~ of material in an hour and projected to process 50,000 ~~pounds~~ at this particular site. PTI #145-00 limits the amount of material processed to 2,000,000 ^{tons} ~~pounds~~ annually. The facility is required to track the amount of material processed at each site. Records were requested for two consecutive years of processing. The records that were sent electronically indicated that 670,397 ^{tons} ~~pounds~~ of mineral was processed in 2020 and 200,830 ^{tons} ~~pounds~~ have been processed so far in 2021.

There is a portable 700kW Caterpillar generator on site for energy generation. The generator had an engine replacement approximately 3 years ago. The engine appears to qualify for exemption under R 336.1285(2)(g). The unit runs more when asphalt is being processed because of the continuous nature of process duration times unlike concrete production which is time limited.

No violations or cause for further permitting was discovered during the inspection. The facility appears to be in compliance with all Michigan state and federal air use regulations at this time.



Image 1(1) : #360 Impact Crusher



Image 2(2) : #181 Deister Screen



Image 3(3) : #183 Conveyor

NAME Rachel Bonaway

DATE 6/24/2021

SUPERVISOR RIL 7/21