

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

N688054773

FACILITY: Carr Brothers & Sons Inc. - Plant 2		SRN / ID: N6880
LOCATION: 14555 Elm Row Road, ALBION		DISTRICT: Jackson
CITY: ALBION		COUNTY: CALHOUN
CONTACT: Sheila Siefert, Office Manager		ACTIVITY DATE: 08/26/2020
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled, announced inspection.		
RESOLVED COMPLAINTS:		

Inspection of Carr Brothers & Sons, Inc. Plant 1 SRN: N6880

Facility Contacts

Ms. Sheila Siefert, Office Manager
Ph: 517-629-3549; Fax: 517-629-3542; Email: sheila@carrbro.com)
COMPANY PHONE NUMBER: 517-629-3549

Purpose

On August 26, 2020, I conducted an announced, scheduled inspection of Carr Brothers & Sons-Plant 2 located at 14555 Elm Row Road in Albion, Michigan. Carr Brothers & Sons, Inc. is headquartered here. This inspection was announced due to increased caution caused by the COVID-19 pandemic. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; NSPS Subpart OOO for Non-Metallic Mineral Processing Plants; and General Permit-to-Install (PTI) Number 328-00 for a non-metallic mineral crusher and its associated equipment.

Facility Location

The Elm Row Road pit is located in Jackson County. It is surrounded by residential and agricultural properties. See photos for aerial view.

Arrival & Pre-Inspection Meeting

I arrived in the area of the site at approximately 9:30 AM. I started by driving up and down Elm Row Road to observe the site from a distance. No fugitive dust was observed.

Upon arrival at the site, I met with Sheila Siefert and stated the purpose of the visit. She explained that Naomi Carr would be to the office soon to accompany me during the inspection.

Once Naomie arrived, I inquired about which plants were onsite today, and what was operating. They explained that the equipment for Plant 2 is currently operating here at Elm Row Road. They explained that the associated conveyors and crushers were currently operating.

Naomi also explained that Plant 2 has 3 employees, and they typically work from 6AM to 5PM. She explained that their hours of operation can differ from site to site depending on the township and local ordinances.

Facility Background

Carr Brothers & Sons has 3 plants (under 3 different SRNs – N6883, N6880, and P0886). The equipment from these 3 plants is used for the mining, screening, and crushing of sand and gravel.

Carr Brothers & Sons-Plant 2 is not equipped with a baghouse. Fugitive dust from the plant's operation is controlled by applying water to the material directly into the cone crusher. A truck waters down the plant yard and roadways when necessary. Michigan Mineral Resources also applies a brine solution to the plant yard and roadways when necessary. The facility maintains daily processing records which are sent to company headquarters to compile yearly processing records. The plant's process equipment is either exempt from NSPS Subpart OOO or has previously been evaluated to verify that visible emissions are below the limits established in NSPS Subpart OOO. New equipment has 180 days from initial startup for testing.

Regulatory Applicability

This plant operates under general PTI 328-00.

They are subject to 40 CFR Part 60, Subpart OOO – New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing.

The facility reports their emissions to the Michigan Air Emissions Reporting System (MAERS).

Onsite Inspection

Upon the start of our onsite inspection we were joined by Don. Naomi and Don explained that the material processed from Plant 2 is used as base materials for roads and construction.

We began by observing some of the sorting and conveyors associated with the operation. Each piece of equipment was properly labeled with the label being easy to find and read.

We then observed the cone crusher (79945) and screen (176163). No fugitive dust was observed.

We then walked over to observe the mine area and the primary crusher. Again, no fugitive dust was observed.

The plant appears to be abiding by the the conditions in the Fugitive Dust Control Plan in Appendix A of its permit. Specifically, the following measures are being taken by the plant to control fugitive dust: the drop distance at each transfer point and storage pile is being minimize; all vehicles are covered before leaving the site; a truck applies water to the roadways and plant yard whenever necessary; material spills are immediately cleaned up; and storage piles are watered whenever necessary. All of the plant's equipment has been labeled. The labels correspond to the equipment listed in the plant's permit. AQD staff verified that the plant is not being operated within 500 feet of any residence or commercial establishment during the inspection.

Post-Inspection Meeting

After observing the site, I held a brief post-inspection discussion with Naomi and Don. I explained to them that I had no immediate concerns, and I thank them for their time and cooperation.

I left the site at approximately 10:20AM.

Records Review

The facility submitted the throughput records and the records for their dust control measures on August 20, 2020. These records appear to show compliance with the permit conditions.

Furthermore, the facility's MAERS report shows a total throughput of 338,894 tons in 2019 and a total throughput of 279,328 tons in 2018. This is well below the permitted limit of 2,000,000 tons per year.

Compliance Summary

As a result of this inspection, it appears that Carr Brothers & Sons-Plant 2 is in compliance at this time.



Image 1(1) : Aerial view.

NAME Stacy Allen

DATE 9.10.2020

SUPERVISOR [Signature]