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

FACILITY: BAILEY SAND & GRAVEL		SRN / ID: N8341
LOCATION: BOHNE RD, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Jerry Bailey , President		ACTIVITY DATE: 06/17/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: 2014 Targeted Insp	ection	<u></u>
RESOLVED COMPLAINTS:		

SRN: N8341

COMPANY: Bailey Sand & Gravel Company COMPANY ADDRESS: 6505 W. Michigan Ave; Jackson, MI 49201 PURPOSE OF INSPECTION: Targeted CONTACT PERSON: Mr. Jerry Bailey, President (Ph: 517-750-4889; Cell: 517-937-5258; Email: djmsg@gmail.com) COMPANY PHONE NUMBER: 517-750-4889

On June 17, 2014, AQD staff, Erik Gurshaw, conducted an announced, targeted inspection of a portable

non-metallic mineral processing plant owned and operated by Bailey Sand & Gravel at Concord Excavating & Grading, Inc. located at 13000 Homer Road in Concord, Michigan. The company's corporate office is located at 6505 Michigan Ave. in Jackson, Michigan. The company was contracted by Concord Excavating & Grading to crush 10,000 tons of recycled concrete and asphalt at the Concord location. 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) #251-09 for a non-metallic mineral crushing plant.

Upon arrival at the site, AQD staff introduced himself and stated the purpose of the visit to Mr. Jerry

Bailey, President. Mr. Bailey assisted AQD staff during the inspection. When operated, the plant runs from approximately 7:30 AM until 5:00 PM, but it runs very sporadically. A 2 man crew runs the crusher when it is being operated. At the time of the inspection, the plant was producing 1.5" minus aggregate from recycled asphalt, but it is capable of producing different sized material by changing screens. Equipment at the location includes the following: 1Eagle impact crusher; 1 Eagle double deck screen; 1 stacker; 2 conveyors; 1 Volvo L150C wheel loader; and 1 Volvo EC240 excavator. The company has a water truck when needed, but the plant roadways and lot were being watered by a truck owned by Concord Excavating & Grading at the time of the inspection.

As previously mentioned, the plant was processing recycled asphalt at Concord Excavating & Grading at

the time of the inspection. Asphalt was being loaded into the impact crusher with a wheel loader. After being crushed, the material was conveyed to a double deck screen. 1.5" aggregate was filtered out in the second screen deck and conveyed to a storage pile via a stacker. Any material larger than 1.5" in diameter was caught up in the first deck of the screen and continuously recirculated to the crusher until it was broken down to 1.5" minus

aggregate. The aggregate being produced was being stored at Concord Excavating & Grading to be used at future construction projects.

Potential fugitive dust production from the plant is being controlled by applying water to the material directly into the crusher and prior to the screen. The plant is capable of installing more spray bars at various points of the crushing process if necessary. No visible emissions were observed from the

crusher, screens, conveyors, transfer points, or storage piles at the time of the inspection. The plant yard and roadways were moist at the time of the inspection and only a minimal amount of fugitive dust was observed to have been produced from vehicle traffic. The plant's stacker is equipped with a belt scale which the company uses to compile daily production logs. According to Mr. Bailey, the plant processes far less than 2,000,000 tons of material per year. The plant does not process any material containing asbestos. The plant was found to be in compliance with the opacity limits listed in Appendix A of its PTI during the inspection. The plant is also abiding by the Fugitive Dust Control Plant contained in Appendix B of its PTI. 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; water is applied to roadways and the plant yard when necessary; the time and date of water applications to the plant yard and roadways is being recorded on the daily production logs; material spills are immediately cleaned up; and storage piles are watered when necessary. The plant's crusher, screen, stacker, and conveyors are not subject to NSPS Subpart OOO for Non-Metallic Mineral Processing Plants since the maximum rated capacity of the plant's equipment is less than 150 tons per hour. Therefore, a visible emission evaluation of the plant's equipment was not required. The plant's crusher, screen, conveyors, and stacker were labeled as required by Special Condition IX.1 under EUPROCESS. According to Mr. Bailey, no equipment has been replaced, modified, or added since the issuance of the PTI. A copy of the plant's PTI is not being maintained on-site, but Mr. Bailey indicated that he would make sure that it is posted at future crushing sites. The company sent a Relocation Notice to the AQD for the operation of the plant in Concord, but the notice was not received 10 days prior to the initiation of operation at the location. Mr. Bailey said that this was an oversight on his part and that he would ensure that it would not reoccur. No residences or commercials establishments were within 500 feet of the plant. Therefore, the plant is maintaining the setback distances required under Special Condition IX.2.d under EUPROCESS.

As a result of this inspection, it was determined that Bailey Sand & Gravel is not maintaining a copy of the crusher's PTI on-site and did not send a relocation notice 10 days prior to the start of operation in Concord. Mr. Bailey indicated that the company would correct these deficiencies immediately. Other than these issues, Bailey Sand & Gravel's portable crushing plant (SRN: N8341) was found to be in compliance with its PTI and all other applicable air rules and regulations. The relocation notice sent for the operation of the crushing plant in Concord is attached to this report.

NAME Erik Hurshaw

DATE 6/30/14

SUPERVISOR 6-