

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

P014640680

FACILITY: Arden Shell Trucking & Excavating LLC		SRN / ID: P0146
LOCATION: East Lily Lake Rd - Sec 28, T19N, R4W, HARRISON		DISTRICT: Saginaw Bay
CITY: HARRISON		COUNTY: CLARE
CONTACT: Jo Shell		ACTIVITY DATE: 07/12/2017
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled site inspection of small portable crusher plant in Gladwin County. Note that the crusher is reported to be less than 150 tons/hr and would therefore be exempt from Subpart 000. sgl		
RESOLVED COMPLAINTS:		

On Wednesday, July 12, 2017, AQD District Staff arrived onsite to conduct a scheduled site inspection for the Arden Shell Trucking & Excavating, LLC non-metallic mineral crushing plant (SRN P0146). The referenced crusher plant is permitted under General Permit No. 168-10 issued on September 1, 2010. The site inspection was conducted with the intent of confirming operational status as well as compliance with the referenced permit.

Ms. Jo Shell answered questions regarding the referenced permit and associated activities. The equipment was reported not to have been operated recently due to continued rains in the area.

FACILITY DESCRIPTION

Arden Shell Trucking & Excavating, LLC provides construction materials (i.e. sand & gravel) as well as transport and other construction related services. The main yard for the company is located at 2596 Weber Rd, Gladwin, Michigan. The equipment is presently in a small gravel pit located on Eaton Road, approximately 1/4 mile west of Bard Road in Sage Township, Gladwin County and is reported to have been located at this location for the past 2-3 years. At the time of permitting, the crusher plant had been located at the Krchmar Pit on East Lily Lake Road, in Harrison, Michigan.

The water source for the facility is a small pond located on the south side of the pit. Roadways were unpaved, but damp due to recent rains. Limited stockpiled materials were onsite. Per Ms. Shell, the equipment is operated to produce contracted volumes, and is not operated to generate large quantities of product for future sales.

In addition to the portable crusher, Staff noted the presence of a screening plant consisting of one conveyor and vibrating screen. The referenced equipment is not operated in conjunction with the crusher plant, and as a screening plant only is believed to be exempt from permitting under existing Rule 285 (2)(t) which exempts equipment used for the mining, loading, unloading and screening of uncrushed sand, gravel and other inorganic soil-like materials.

PROCESS EQUIPMENT

Equipment permitted under General Permit No. 168-10 includes:

- Hewitt Robins Twin Apache (ID no. 50)
- Hartman Fabco Feed Hopper (ID no. 51)
- Hartman Fabco Conveyor (35 ft length) (ID no. 35)
- Homemade conveyor (80 ft length) (ID no. 80)
- 50 ft long Conveyor (ID no. 50)
- 82 ft Conveyor (ID no. 82)

The referenced material is all reported to be pre 1983 equipment, and as such would not be considered an affected facility under 40 CFR part 60 Subpart 000 (NSPS for Non-Metallic Mineral Processing Plants). As an unaffected facility with respect to the referenced NSPS the facility is not subject to VE Testing required as part of the subpart.

At the time of the site inspection all but the Hartman fabco feed hopper were identified as part of the plant set-up.

COMPLIANCE HISTORY

In 2010, P0146 was a newly permitted facility with no complaints of record. Permitting was conducted as a result of a report of unpermitted crushing equipment received by the District Office. Since that time no complaints have been received by the department.

COMPLIANCE EVALUATION

The facility was not operating due to rainy weather for the past couple weeks.

Material Use – Condition I.3 of General Permit 260-10 limits the facility to a maximum of two million tons per site for the portable plant. Business for the facility is limited to small local private or commercial and county jobs, and that they were well under the permit limit. At the time of the inspection, the equipment had most recently been used to prepare a 10K ton job for Gladwin County.

No significant stockpiles of graded sands and gravel were noted onsite. No concrete debris or RAP potentially for future processing or sale was noted onsite were identified onsite.

Condition I.9 requires that records of daily and annual records of the amount of material the plant processes be kept. AQD staff confirmed that volumes are recorded by use of a weight scale on conveyer #82 and by individual job/contract records. Records are kept at the main office.

Condition I.5 restricts the permit to non-asbestos containing material, and specifically restricts the crushing of any asbestos tailings and asbestos containing materials. Materials processed onsite are limited to sand and gravel from the pit.

Visible Emissions –Condition I.2 limits VE from the various components of the portable crusher plant. VEs could not be evaluated at the time of the inspection, as the equipment were not operating. However spray bars and a water source were present indicating the VEs should not be an issue for the plant.

Condition No. I.6 requires the plant to have a program to control fugitive emissions and implement conditions in Appendix A. Recent rains had dampened the area, and no fugitive dust was noted with respect to the roadways or stockpiles.

Other - Special condition I.13 covers limitations and requirements with respect to the location and relocation of the portable plant. No relocation notice was submitted for the relocation to the present location. Discussions with Ms. Shell indicated that she was unaware that a notice/form was required, and would be sending a notification should the equipment be relocated again. District Staff will provide an electronic copy of the form to the company, and as an attachment to the site inspection report.

Condition I.12 requires notification of changes to the portable crusher plant, however, no changes in equipment or control equipment appear to have occurred at the time of the inspection. In addition, all of the permitted equipment was marked with it's ID No. in compliance with condition 1.11.

SUMMARY

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notification, and a relocation notice has been submitted after the fact for the relocation. No other compliance issues were noted at the time of the inspection.

NAME Travis J. C. Bane

DATE 7/24/2017

SUPERVISOR C. Bane