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

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FACILITY: Cardinal Aggregates		SRN / ID: P0167
LOCATION: 3660 Carpenter Rd, YPSILANTI		DISTRICT: Jackson
CITY: YPSILANTI		COUNTY: WASHTENAW
CONTACT: Phil Eisel, Vice-President		ACTIVITY DATE: 06/11/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-Initiated Inspe	ction	
RESOLVED COMPLAINTS:		

SRN: P0167 COMPANY: Cardinal Aggregate, Inc. COMPANY ADDRESS: 8026 Fremont Pike; Perrysburg, OH 43551 PURPOSE OF INSPECTION: Self-Initiated CONTACT PERSON: Mr. Phil Eisel, Vice-President (Ph: 419-872-4380; Cell: 419-392-4878; Email: phileisel@cardinalaggregates.com) COMPANY PHONE NUMBER: 419-872-4380

On June 11, 2014, AQD staff, Erik Gurshaw, conducted an unannounced, self-initiated inspection of a portable non-metallic mineral processing plant owned and operated by Cardinal Aggregate at Cadillac Asphalt located at 12345 23 Mile Road in Shelby Twp., Michigan. The company's corporate office is located at 8026 Fremont Pike in Perrysburg, Ohio. The company was contracted by Cadillac Asphalt to crush 60,000 tons of recycled concrete at the Shelby Twp. 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) #33-13 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. Ivan Zenk, Plant Foreman. Mr. Zenk assisted AQD staff during the inspection. The plant operates from 6:00 AM until 6:00 PM Monday through Thursday while on the road. A 3 man crew runs the crusher when it is being operated. The plant is currently producing 21AA road aggregate, but is capable of producing 411, Ohio 6s, 1" x 3", and industrial sand aggregate by switching out screens. Equipment at the location includes the following: 1 impact crusher; 1 double deck screen; 1 stacker; 7 conveyors; 1 CAT 980H wheel loader; 1 Linkbelt 330 excavator; 1 CAT 442 skidsteer; and a water wagon. Crushing was taking place at the time of the inspection.

As previously mentioned, the plant was processing recycled concrete at Cadillac Asphalt's Shelby Twp. location. Concrete is broken up by an excavator and loaded into the impact crusher with a wheel loader. After being crushed, the material is conveyed to a double deck screen. 21AA aggregate is filtered out in the screen and conveyed to a storage pile via a stacker. Any material larger than 21AA is caught up in the first deck of the screen and continuously recirculated to the crusher until it is broken down to 21AA aggregate.

This crushing plant is not equipped with a baghouse. Special Condition 1.1 of its permit is, therefore, not applicable to its operations. Potential fugitive dust production is being controlled by applying water to the material directly into the crusher, at the outlet to the crusher, and prior to the screen. The plant is capable of installing more spray bars at various points of the crushing process when necessary. Water was being supplied from a water wagon connected to a fire hydrant. No visible emissions were observed from the crushers, 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. One of the plant's conveyors is equipped with a belt scale which the company uses to compile daily production logs. The company's 2013 MAERS report indicated that 65,000 tons of material was

processed by the plant during the 2013 construction season. This is well below the 2,000,000 ton per year processing limit established in its PTI. According to Mr. Zenk, the plant does not process any material containing asbestos. The plant is abiding by the Fugitive Dust Control Plant contained in Appendix A 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 visible emission evaluation required by NSPS Subpart OOO and Special Condition 1.8 of the company's PTI was performed by Sue Hanf of Midwest Environmental Consulting. The plant's crusher, screen, conveyors, and stacker were labeled as required by Special Condition 1.11 of its permit. According to Mr. Zenk, 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 in the operator's office, but Mr. Zenk indicated that he would contact Vice-President, Phil Eisel, and ask him to provide a copy of the PTI to be kept on-site. The company sent a Relocation Notice to the AQD for the operation of the plant in Shelby Twp., but a site map was not attached to the relocation notice. AQD staff instructed Mr. Zenk to begin attaching a site map with future relocation notices. No residences or commercials establishments were within 500 feet of the plant. Therefore, the plant is maintaining the setback distances required under Special Condition 1.13c of its PTI.

As a result of this inspection, it was determined that Cardinal Aggregate is not maintaining a copy of the crusher's PTI on-site and did not include a site map with its relocation notice for the crusher. Mr. Zenk indicated that the company would correct these deficiencies immediately. Other than the two aforementioned issues, Cardinal Aggregates' portable crushing plant (SRN: P0167) 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 Shelby Twp. is attached to this report.

NAME Trik Durshaw

DATE 6/6/14 SUPERVISOR