

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

P106864514

FACILITY: Elmer's Crane & Dozer, Inc.		SRN / ID: P1068
LOCATION: 3600 Rennie School Rd, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT: Tom Wolf , Compliance Manager		ACTIVITY DATE: 06/01/2022
STAFF: Caryn Owens	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Wednesday, June 1, 2022, Caryn Owens of the Department of Environment , Great Lake, and Energy (EGLE) – Air Quality Division (AQD) conducted an on-site field inspection and records review of Team Elmer’s – Lippmann #931 Crusher and associated equipment (SRN: P1068). At the time of the inspection the crusher and associated equipment were located at the Benzie County Road Commission CR669 Pit, just south of the Elmer’s 669 pit located at 10212 County Road 699 in Maple City, Leelanau County, Michigan. More specifically, the site was located on the west side of South Coleman Road (aka County Road 669), approximately, 2/3 Mile North of West Kasson Center Road (West Baatz Road) and South Coleman Road in Maple City, Michigan. The field inspection and records review were to determine compliance with Permit to Install (PTI) 120-19. Team Elmer’s – Lippmann #931 Crusher and associated equipment currently operate under a General permit and is considered a minor source for particulate matter (PM) criteria air pollutants. Majority of the equipment, including the crusher are subject to New Source Performance Standards (NSPS) of Performance for Nonmetallic Mineral Processing Plants under 40 CFR, Part 60, Subpart OOO.

Evaluation Summary

The activities covered during this scheduled field inspection and records review appears to be in violation with PTI 120-19. Specific permit conditions that were reviewed are discussed below.

Source Description

The Lippmann #931 Crusher and associated equipment are considered a portable source and moves from pit to pit on a “as needed” basis throughout the construction season, typically April through November. Based on the records reviewed this crusher began operating May 1, 2022. The operations during the inspection was for crushing earth material for local construction sand and gravel projects. The associated equipment to the crusher consisted of a screener and a few conveyors to separate the different size particles of earth material into piles.

On-site Inspection:

During the field inspection it was sunny with calm winds between 5 to 10 miles per hour, and approximately 60 degrees Fahrenheit, and winds from the north. AQD was not able to meet with onsite personnel because they were busy operating the onsite equipment and it was really loud. I inspected the equipment associated with the crusher, which were all labeled. I observed the following equipment connected to the crusher at the time of the inspection:

- 931: Lippmann #931 Crusher,
- 941: #6285 Feed Hopper Feeder
- 999: Conveyor, No record of NSPS testing
- 1159: Stacker Conveyor, No record of NSPS testing

Additionally, there were two trailers for workers and power, one loader tractor filling the crusher chute, one loader that had was being worked on, and one conveyor (#1126) on standby. AQD observed slight visible emissions, from the drop point onto conveyor 999, and the visible emissions quickly dissipated. AQD did not complete a Method 9 visible emissions test, but the emissions observed, appeared to be at most 5% opacity. No visible emissions were present from the drop point of the stacker conveyor (#1159) onto the storage pile, nor from the loader into the crusher feeder.

Review of PTI 120-19:

Visible Emission Limits:

During the inspection, no visible emissions greater than the 5 percent were present. The minimal visible emissions observed quickly dissipated and did not travel off-site. A method 9 visible emissions test was not conducted during the inspection. There were no buildings, rock drills, or equipment controlled by a baghouse located at the area of the crusher.

Material Usage Limits:

Based on the 2021 MAERS report and through records from Mr. Wolf, the crushing operation was below the 2,000,000 tons of non-metallic material through the crushers from January 2021 through May 2022.

Only earth material is processed, screened and separated at this location. No asbestos containing materials are crushed at this pit.

Process/Operational Parameters:

Team Elmer's has a fugitive dust plan for the site included in Appendix A of the PTI, the haul roads were in good condition. As previously stated, slight visible emissions from the drop point onto conveyor 999, but they quickly dissipated. No visible emissions were present from the remaining drop points, storage piles, and the loader into the crusher feeder.

Equipment:

I observed water sprays connected to the crushing and screening equipment at the site. No equipment contained a baghouse, and the equipment was in compliance with the visible emission limits during the inspection.

Testing:

The equipment that I observed at the plant is subject to the NSPS 40 CFR, Part 60, Subpart OOO. AQD does not have record of the crusher and associated equipment at the plant tested for visible emissions. Since the crusher, screener and conveyors have not had visible emissions testing completed on the equipment, this is a violation of testing Condition SC 1.8 of the PTI.

Monitoring:

Daily and annual records were kept with onsite worker operating the loader. A records request was submitted to Team Elmer's for the actual amount of material crushed at the site. Daily and annual records are kept with the main operator on-site and then reported to Team Elmer's headquarters for record retention purposes.

Recordkeeping/Reporting/Notification:

Elmer's submitted a notification of start-up on April 21, 2022 which was proper notification of the plant.

Permit Dates:

All equipment at the facility was labeled with identifying numbers.

Miscellaneous/Allowed Modifications:

New or additional equipment added to the process shall be submitted to the permit section and District Supervisor within 10 days before installing the additional equipment. There were three conveyors No. 999, 1159 and 1126 (on standby) that were not covered on the EQP5756 forms for this PTI. This is a violation of PTI SC 1.12.a, c, d, and e of PTI 120-19.

The facility has had no outstanding, unresolved violations with AQD. Relocation notices have been submitted to AQD along with a geographical map with the portable equipment identified as well as residential and commercial establishments identified and distances between the two noted. The crusher is located further than 500 feet from residential and commercial establishments. During the field inspection, a copy of the permit was with Mr. Tom Wolf.

NAME *Camp Owens* DATE _____ SUPERVISOR _____