

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

P119664120

FACILITY: Elmer's Cran and Dozer, Inc.		SRN / ID: P1196
LOCATION: 3600 Rennie School Road, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT: Tom Wolf , Compliance Manager		ACTIVITY DATE: 07/28/2022
STAFF: Caryn Owens	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: On-Site Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Thursday, July 28, 2022, Caryn Owens and Rob Dickman of the Department of Environment , Great Lake, and Energy (EGLE) – Air Quality Division (AQD) conducted a scheduled field inspection and records review of Team Elmer's – McCloskey 5165 Crusher and associated equipment (SRN: P1196). At the time of the inspection the crusher and associated equipment were located at St. Mary's of Charlevoix, located at 16000 Bells Bay Road in Charlevoix, Michigan. The field inspection and records review were to determine compliance with Permit to Install (PTI) 20-21. Team Elmer's – McCloskey 5165 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 000.

Evaluation Summary

The activities covered during this scheduled field inspection and records review appears to be in violation with PTI 20-21. Specific permit conditions that were reviewed are discussed below.

Source Description

The McCloskey 5165 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 March 14, 2022. The operations during the inspection was for crushing limestone for the St. Mary's processing operations. The associated equipment to the crusher were conveyors separating the different size earth material. The facility operates Monday through Friday. The crusher typically operates 8 hours per day, four to five days a week.

On-site Inspection:

During the field inspection it was really dry conditions, sunny with calm winds between 5 to 10 miles per hour, and approximately 70 degrees Fahrenheit, and winds from the north. AQD met with Mr. Tom Wolf of Elmer's at this site. Mr. Wolf was in the process of taking visible emission reading on some of the associated crushing equipment. 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:

- 2100: McCloskey 5165 Crusher, No record of NSPS testing
- 2101: Screen deck, No record of NSPS testing
- 2102: Conveyor, No record of NSPS testing
- 2103: Conveyor Stacker, No record of NSPS testing
- 1128: Stacker conveyor
- 1134: Conveyor
- 1136: Conveyor
- 1167: Stacker Conveyor

Conveyors 1128, 1134, 1136, and 1167 were not listed in the PTI, and therefore no test date was noted.

There was fugitive dust around the loaders, and while loading the earth material into the crusher. The fugitive emissions dissipated with the water sprays as the earth material was crushed. The fugitive emissions did not travel off site, but it was pretty dusty where the loader was driving. Visible emissions were not taken by the AQD at the time of the inspection. I observed minimal fugitive emissions from the drop point of conveyors 2102 and 2103.

Review of PTI 20-21:

Visible Emission Limits:

During the inspection, I observed visible emissions greater than the 5 percent for the wheel loaders and truck traffic, but the crusher, screener, conveyors and transfer points and material storage piles appeared to be within the visible emission limits of the PTI. The visible emissions did not travel off-site, and water sprays were connected to crusher which minimized the fugitive emissions from the crushing operations. I requested Mr. Wolf to have a water truck come and water the area to minimize the visible emissions from the loader traffic. 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 June 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, but there were very dry conditions around the site. Dust trails were observed when driving on the haul roads and around the plant. No visible emissions were observed from the storage piles at the plant. As previously stated, I requested the plant area to be watered to minimize fugitive emissions in the area of the plant. The dust on the site roadways and the plant yard were not controlled in accordance with the Fugitive Dust Plan in Appendix A of the PTI to meet an opacity limit of five percent and is a violation of the PTI.

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. According to Mr. Wolf, he was conducting visible emissions for the equipment at the plant. However, proper notification was not given to AQD prior to this date. 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 March 11, 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 four conveyors No. 1128, 1134, 1136, and 1167 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 20-21.

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 _____