

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

P128064208

FACILITY: MEG'S HAULING		SRN / ID: P1280
LOCATION: 67401 BRIAN DRIVE, RAY TWP		DISTRICT: Warren
CITY: RAY TWP		COUNTY: MACOMB
CONTACT: Lyle Fleischmann ,		ACTIVITY DATE: 08/17/2022
STAFF: Adam Bognar	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Self-initiated inspection		
RESOLVED COMPLAINTS: C-22-01279		

On August 17, 2022, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bognar conducted a self-initiated inspection of Meg's Hauling (the "facility") located at 67401 Brian Drive, Ray Township, MI. The purpose of this inspection was to determine the facility's compliance status 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 Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules; 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants (NSPS OOO); and Permit to Install No. 100-22.

This inspection was conducted in response to complaint # C-22-01279. The complainant alleges that fugitive dust has been an ongoing air quality concern due to the concrete crushing operations of Meg's Hauling. The complainant alleges that no dust suppression is utilized.

I arrived at the area near Meg's Hauling at 11:20 am. I parked in a parking lot where I could observe the operations at Meg's hauling. I observed the operations at Meg's hauling between 11:20 am and 11:50 am. I observed a loader at Meg's Hauling picking up aggregate from a pile and loading it into a screener. I did not notice any fugitive dust leaving the site or an exceedance of the facility's opacity limits. Meg's Hauling was not operating the concrete crusher during this observation.

I called the owner of Meg's Hauling, Lyle Fleischmann, at around 11:55 am. I informed Lyle that I needed to perform an unannounced inspection of Meg's Hauling in response to a recent complaint. Lyle accommodated me for an on-site inspection.

Meg's Hauling receives concrete & asphalt chunks from various demolition/construction projects. These chunks are fed to a crusher that reduces the size of the chunks to a uniform size. There is also a screener on-site that is used to screen aggregate out of dirt/debris.

I observed that the screening operation was being controlled by water sprays. The water is currently obtained from the neighbor across the street. This involves running a hose across the street. This hose has wooden planks on top of it so that traffic does not crush the hose as it drives by. Lyle stated that he is in the process of getting quotes to install a well on-site at Meg's Hauling.

Permit to Operate No. 100-22

PTI No. 100-22 was issued on July 26, 2022 for a nonmetallic mineral crusher and associated process equipment.

FGCRUSHING

This emission unit consists of crushing process equipment including screens, crushers, feeders, conveyers, ect. Emissions from crushing and drop points are controlled using water sprays.

Special Condition 1.1: NA since no baghouse dust collector is used.

Special Condition 1.2 (a through j): Establishes opacity limits for equipment in FGCRUSHING. I did not notice any exceedances of the stated opacity limits. The screener and loader were operating during my inspection. I did not notice any dust from the screener. There was a small amount of dust generated from the loader driving around

the plant grounds. Lyle stated that he applied a brine dust suppressant in July and provided the receipt for this application to AQD at that time. Lyle stated that he plans to have the company come out once per month to apply the dust suppressant to the facility grounds. Lyle has a water truck on-site that is used to water the facility grounds as needed.

Special Condition 1.3: States that the permittee shall not process more than 2,000,000 tons of any non-metallic mineral through FGCRUSHING per year per site. I could not verify compliance with this condition because Meg's Hauling has not maintained records of the amount of material crushed since this permit was issued. I observed a large pile of crushed aggregate that Lyle said is everything he has crushed this year. A violation notice will be sent to Meg's Hauling for failing to maintain these records. Lyle estimates he will crush around 50-70 thousand tons of aggregate in a year.

Special Condition 1.5: States that the permittee shall not process any asbestos tailing or waste materials containing asbestos in FGCRUSHING. Lyle stated that no asbestos materials are processed. Only concrete & asphalt material is crushed. I did not see any evidence of crushed materials other than concrete.

Special Condition 1.6: States that the permittee shall not operate FGCRUSHING unless the program for continuous fugitive emissions control for all facility roadways, the facility yard, all storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained.

Based on my observations during this inspection, the fugitive dust control plan outlined in Appendix A is being followed. Drop distances from the conveyers to the storage piles were minimized. Dust from site roadways is controlled with a calcium chloride solution that is applied once per month. Lyle has records of the 1st brine application in July. Lyle stated he will have more brine applied soon. I asked Lyle to send me the receipt of the next brine application.

Storage piles did not need watering since the material was still wet from the water jets on the screening process. I notified Lyle that he needs to main records of all dust suppressant applications, including plain water applications, to the plant grounds and storage piles.

Special Condition 1.7: States that each crusher and screen shall be equipped with a water spray. The screener operating during this inspection was equipped with a water spray. The water is supplied from a garden hose hooked up to a neighbors well. The garden hose splits into two sprays on the screener. Based on the fact that I did not observe any dust coming from the screener, this water spray is working properly.

I asked Lyle to show me how the water could be routed to the crusher. I wanted to see if there would be enough water pressure to have adequate water sprays on both the crusher and screener simultaneously. Lyle turned a valve to allow water to the crusher sprayers. I observed that the crusher and screener sprayers operating simultaneously. Since the crusher was not operating at this time, I cannot determine if the current water spray system is adequate to control emissions from the crusher.

Special Condition 1.8: Requires Meg's Hauling to perform a visible emission reading on FGCRUSHING (and all equipment covered by NSPS OOO) within 180 days of initial startup of FGCRUSHING. I informed Lyle of this requirement. Lyle stated that he is in the process of hiring someone to come do a visible emissions reading. Lyle stated that he will notify AQD at least 7 days in advance of this test date.

Special Condition 1.9: Requires the permittee to keep daily and annual records of the amount of material processed in FGCRUSHING. This must keep kept separately for each site the facility operates. Meg's Hauling did not have these records during my inspection. Lyle stated that the crusher has operated since the issuance of permit to install No. 100-22. A violation notice was sent to Meg's Hauling for failing to maintain these records.

I explained to Lyle that I would need to send a violation notice for failing to maintain these records. Lyle stated that he would start maintaining these records; however, there is no scale on-site to weigh the aggregate. I asked

Lyle to come up with a reasonable way to estimate the amount of material he crushes. I suggested using the volume of the loader bucket and the density of pure concrete/asphalt (rather than large chunks). This would be a conservative approach since it would overestimate the amount of material crushed.

Special Condition 1.10: Requires that Meg's Hauling notify AQD within 15 days after the initial startup of FGCRUSHING, of the actual date of startup. Lyle notified me on the date of this inspection (August 17, 2022) that the first day he operated the crusher since PTI No. 100-22 was issued was August 5, 2022. I asked Lyle sent me an email stating the day he started the crusher.

Special Condition 1.11: States that the permittee shall label all equipment associated with FGCRUSHING within 45 days of initial startup according to the IDs specified in the permit application. I did not observe equipment labels during this inspection. I informed Lyle of this requirement and that the labels need to match what was stated in the permit application. It has not been 45 days since the date of initial startup.

Special Condition 1.12: States that the permittee shall not replace or modify any portion of FGCRUSHING unless certain conditions are met: The permittee must update the general permit by submitting a new EQP5756 form to the AQD Permit Section and District Supervisor, identifying all existing and new or additional equipment added to the process a minimum of 10 days before the equipment is replaced or modified. The permittee must continue to meet all permit conditions while operating the new equipment. The permittee shall keep records of the date and description of the replacement or modification. The permittee shall notify the AQD within 15 days after startup of any new or additional equipment, of the actual date of initial startup. All new or additional equipment that is subject to the federal NSPS Subpart OOO, which has not been previously tested, shall comply with the testing requirements of the NSPS.

During this inspection, Lyle stated that he installed and commenced operation of a screener that was not identified in the permit application. This screener was the only equipment operating on this date. I explained to Lyle that he needed to notify AQD and send in an EQP5756 form to the AQD Permit Section and District Supervisor. AQD received this EQP5759 form from Meg's Hauling on August 22, 2022. The form shows that the crusher will be labeled "01" and the screener will be labeled "02".

This screener may be exempt from the requirement to obtain a permit to install pursuant to Rule 285(2)(t) which exempts "Equipment for the mining, loading, unloading, and screening of uncrushed sand, gravel, soil, and other inorganic soil-like materials." If the screener is only used to screen uncrushed material, then the screener will be exempt from permitting requirements based on my observations of the equipment. If the screener is not exempt (and used to process crushed material), then Meg's Hauling has submitted the proper notifications to AQD to have the screener covered by general PTI 100-22.

Special Condition 1.13: States that the permittee shall not relocate FGCRUSHING to any new geographical site in Michigan unless the following criteria are met: The facility shall have no outstanding unresolved violations, the facility shall submit a relocation notice form (EQP5757 form) along with copies of the original permit forms, the crusher shall be a minimum of 500 feet from any residential or commercial establishment or place of public assembly, and a copy of this general permit and conditions shall be clearly posted in the operators office or workstation.

I informed Lyle of these requirements. Lyle stated that he may want to move the crusher across the street eventually.

This 500' setback from any residential or commercial establishment was required for general PTI No. 100-22 to be issued to Meg's Hauling. The complainant noted that there is a building across the street from Meg's Hauling which is closer than 500'. Based on what I can see on Google maps, this building is approximately 200-300 feet from the crushing operations at Meg's Hauling. I looked up the zoning map in Ray township. The area surrounding Meg's Hauling (including the building across the street) is zoned "Industrial". I called the owner of the building across the street from Meg's Hauling (Dan Teller). The owner stated that the

building is used for storage and there are no full time employees at that warehouse. For these reasons, the building across the street from Meg's Hauling does not meet the definition of "commercial establishment", "residential establishment", or "place of public assembly".

I left the facility at around 12:30 pm

Compliance Determination

Meg's Hauling failed to record and maintain records of the amount of material processed. This is a violation of PTI No. 100-22 Special Condition 1.9. A violation notice was sent to the facility to address this issue.

Based on my observations and record review, Meg's Hauling is in compliance with all other applicable AQD requirements. I was not able to verify the fugitive dust noted by the complainant. Complaint # C-22-01279 will be resolved as a result of this inspection.

NAME Adam Bogner

DATE 8/26/2022

SUPERVISOR K. Kelly