

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

N050350030

FACILITY: LYON SAND & GRAVEL CO - RAP PLANT		SRN / ID: N0503
LOCATION: 51455 W 12 MILE ROAD, WIXOM		DISTRICT: Southeast Michigan
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Patrick Norwood , Plant Operator		ACTIVITY DATE: 08/21/2019
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self initiated inspection to determine compliance with PTI No. 199-09. Facility is currently located at 2747 Priemer Road, Ubly, MI 48475 (Huron County)		
RESOLVED COMPLAINTS:		

On Wednesday (8/21/19) I (Matt Karl) conducted a compliance inspection of the Lyon Sand & Gravel Co. portable crushing plant located at 2747 Priemer Road, Ubly, MI. 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 Environment, Great Lakes and Energy, Air Quality Division (EGLE-AQD) Administrative Rules; Permit-to-Install (PTI) No. 199-09.

Background:

PTI No. 199-09 is a general permit for a non-metallic mineral crushing facility. The facility operates as recycled asphalt (RAP) processing plant in support of the Ace-Saginaw Paving Co. – Plant 4 (SRN N5597) located at the same site.

PTI No. 199-09 covers the following equipment located at 2747 Priemer Road, Ubly, MI:

Device Description	Device ID	Make and Model	Serial Number	Manufactured Date (Year)	Maximum Rated Capacity (tons/hr)	Control Type	Subject to NSPS OOO?	VE Test Date
Feed Hopper	HOP35	Superior Industries	871608	2007	-	-	-	-
Stacker	SK12	McCloskey 36" x106'	-	1999	-	-	-	6/8/17
Conveyor	CV297	36" Conveyor	-	2006	200	-	Yes	6/8/17
Conveyor	CV298	36" Conveyor	-	2006	300	-	Yes	6/8/17
Conveyor	CV437	36" Conveyor	-	1995	400	-	Yes	6/8/17
Conveyor	CV443	36" Conveyor	-	1995	400	-	Yes	6/8/17
Conveyor	CV267-#9	36" Conveyor	-	1995	-	-	-	11/5/10
Grizzly Feeder	PF53	Simplicity Vibrating Feeder 45" x20"	GF-120-45-20-3992	1995	400	-	Yes	6/7/17
Under Crusher Conveyor	CV436	42" Conveyor	-	1995	400	-	-	6/8/17
Hazmag Crusher 1313	IC18	APSE-1313Q	HU-1632	1995	400	Water Spray	Yes	6/7/17
Screen Feed Conveyor	CV295	48" Conveyor	-	2007	400	-	Yes	6/8/17
Double Deck Screen	6DD25	Diester TFM3P-2620	1050690	2005	400	Water Spray	Yes	6/8/17
Radial Stacker	SK67	Superior 36" Telestacker	57981	2009	400	-	Yes	11/5/10
Conveyor	CV296	48"	-	2006	-	-	-	6/8/17

Site Inspection:

I inspected the crushing plant at approximately 3:00 pm. At the time of my inspection, the crushing plant was

operating. Two front end loaders were loading material into the plant. It was raining out, so there were no visible emissions observed. I spoke with one of the plant operators, who confirmed that the equipment present was the equipment listed in the relocation notice and the table above. I observed that there was a water tank present to provide water for the spray bar controls. The operator informed me that they fill the water tank 1-2x per day from one of the on-site ponds as needed. The operator informed me that they would be processing 35,000-40,000 tons RAP. I departed the site at approximately 3:20 pm.

Records Review:

I reviewed the Michigan Air Emissions Reporting System (MAERS) report for 2018. The company reports emissions for a diesel generator and the total plant equipment. The company uses MAERS emission factors (EF) for Source Classification Code (SCC) 2-02-001-02 for the diesel generator and SCC 3-05-025-01 for the total plant equipment.

In 2018, the company used 19,889 gallons of diesel fuel in the generator and processed 309,549 tons of material in the total plant equipment. The amount of material processed is well below the 2,000,000 tons per year material limit (Special Condition (SC) 1.4). I've included a summary of the MAERS 2018 emissions in the table below:

Diesel Generator Emissions SCC 2-02-001-02

Pollutant	Annual Emissions (lbs)	MAERS Emission Factor (lbs pollutant/1000 gallons diesel)	Amount Diesel Fuel Used (1/1000 gallons)	Control Efficiency (%)
CO	2,585.57	1.3 x 10 ²	19.889	-
NOx	12,012.96	6.04 x 10 ²	19.889	-
PM10, Filterable	845.28	4.25 x 10 ¹	19.889	-
PM2.5, Filterable	845.28	4.25 x 10 ¹	19.889	-
SO2	789.59	3.97 x 10 ¹	19.889	-
TOC	980.53	4.93 x 10 ¹	19.889	-
VOC	980.53	4.93 x 10 ¹	19.889	-

Total Plant Equipment SCC 3-05-025-01

Pollutant	Annual Emissions (lbs)	MAERS Emission Factor (lbs pollutant/ton)	Amount Material Processed (tons)	Control Efficiency (%)
PM10, Filterable	3,095.49	5 x 10 ⁻²	309,549	80

Based on reviewing the recent relocation notices for the company in 2019, it appears that the company has processed approximately 150,000 tons of material to date. The amount of material processed is well below the 2,000,000 tons per year material limit (Special Condition (SC) 1.4).

Summary:

At the time of my inspection it appeared that Lyon Sand & Gravel Co. was in compliance with PTI No. 199-09.

NAME Matthew R. Kord DATE 8/23/19 SUPERVISOR C. Helle