

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

N637436529

FACILITY: Iron Horse		SRN / ID: N6374
LOCATION: 27120 HASS RD, WIXOM		DISTRICT: Southeast Michigan
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Rodney Burrell, Owner		ACTIVITY DATE: 08/16/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Self initiated inspection and compliance evaluation.		
RESOLVED COMPLAINTS:		

## Background

Iron Horse SRN: N6374 is a non-metallic mineral crushing operation located at 27120 Haas Road, Wixom, MI 48393. The permit for this location was previously held by Waterland Trucking Service. Iron Horse purchased this property and the associated crushing equipment approximately one year ago. MACES will be updated to reflect the change in ownership. Iron Horse is located in a primarily rural area with the nearest residential structure approximately 1900 feet south of the facility. The facility was inspected on Tuesday, August 16th 2016 by Tyler Salamasick of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules; and PTI No. 421-97. Iron Horse inherited permit No. 421-97 (the permit). The site contact is the owner, Rod Burrell. Iron Horse purchased this property with the intent of crushing and removing the existing concrete. Rod informed the AQD that they were not bringing additional concrete or other debris to the site. This facility also mines topsoil, but the MDEQ AQD does not regulate top soil mining. Iron Horse's hours of operations vary.

## Inspection

Upon arriving on site I was greeted by Rod Burrell. Upon meeting I presented my State of Michigan identification card, informed the facility representative of the intent of my inspection and was permitted onto the site. I provided the facility representative a copy of the "Michigan Department of Environmental Quality- Environmental Inspections: Rights and Responsibilities" pamphlet. I also provided Rod with a copy of permit No. 421-97. Rod gave me a tour of the yard and showed me the crushing equipment. He informed me that Iron Horse had purchased the property approximately one year ago and that they were in the process of cleaning and removing debris in order to prepare the site to be developed into a sub division. Pursuant to R 336.1219(1) the new owner may notify the department that there has been a change in ownership. The MDEQ AQD does not appear to have record of this, though it is not obligated by law. Iron Horse was mining some top soil for sale as well as collecting metals to be recycled. There were a few large piles of concrete and asphalt remaining, which Rod estimated would be gone in approximately one year.

## Permit Conditions

S.C 16 of the permit requires the concrete storage piles not emit any opacity in exceedance of 5% for a 6 minute average. During my inspection I did not observe any emissions from the piles. The aggregate appeared to be damp.

S.C 20 of the permit requires the equipment is equipped with water sprays on all of the crushers, and that they must be operated when the plant is in operation. Rod showed me both of the water sprays attached to the primary and secondary as well as the additional water sprays located at the drop points of the conveyors.

S.C 21 of the permit requires the permittee to not operate the facility unless a continuous fugitive emission control for all plant roadways, yard and material storage piles as specified by appendix A is implemented.

Appendix A part A state the facility is to uses applications of water and chloride (or other approved dust control compounds) to control fugitive dust. When I was on site the area had previously been watered and was still wet. Rod also showed me recent receipts for the purchase of chloride.

Appendix A part B and D reference sweeping and road spillage. These do not appear to apply to Iron Horse, due to the fact that both the road and the site are gravel. Sweeping either would not control dust but most likely generate fugitive emissions.

S.C 22 of the permit requires the equipment be labeled in accordance to Appendix B. During the inspection we did not see any labels. I informed Rod that this is a requirement of the permit and that the AQD would use enforcement discretion so long as the equipment is labeled in the future.

NSPS OOO requirements were assessed by RAMCON Environmental Corporation. RAMCON performed the required opacity test on the associated crushing equipment. These tests were done prior to Iron Horse's ownership of the equipment.

S.C 19 of the permit sets the total yearly production rate at 200,000 tons per year. Rod supplied the AQD records of the materials crushed in 2015 and up to September 2016. These records indicate the facility crushed 35,000 tons in 2015 and 45,000 tons in 2016. These are under the permitted limits. When I was on site Rod showed me the print out records from the scale. These records were used to determine the yearly total.

#### Conclusion

It appears that Iron Horse is in compliance with permit No. 421-97 as well as the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. There are no apparent recommendations for this facility.

NAME  DATE 9/21/16 SUPERVISOR SK