



ROSEVILLE

— CRUSHED —

An Equal Opportunity Employer

July 15, 2024
Project No. 231039

Robert Joseph
Warren District Office
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, MI 48092

Response to the Violation Notice Dated June 11, 2024

Additional Information

Roseville Crushed, LLC (SRN N6658)

Roseville, Michigan

This letter is in follow-up to the response to the EGLE-AQD Violation Notice dated June 11, 2024 (VN) which was submitted on June 25, 2024. The VN suggests that Roseville Crushed, LLC (RC) is in violation of its permit (PTI 143-11A) and its Fugitive Dust Plan. The allegations cited in the VN are as follows:

Process Description	Rule/Permit Condition Violated	Comments
EU-PROCESS	PTI 143-11A, General Condition 1 R 336.1201	Roseville Crushed modified the process equipment by installing an unpermitted conveyor.
EU-PROCESS	PTI 143-11A, Section III.3 NSPS, 40 CFR 60, Subparts A and OOO	Roseville Crushed has not conducted a visible emissions performance test for the unpermitted conveyor.
EU-PROCESS	PTI 143-11A, Section IV.1	Roseville Crushed operated two conveyor belts without water sprays.
EU-PROCESS	PTI 143-11A, Section V.1 NSPS, 40 CFR 60, Subparts A and OOO	Roseville Crushed has not conducted a visible emissions performance test for the additional unpermitted conveyor.
EU-PROCESS	PTI 143-11A, Section VI.1	Roseville Crushed did not complete calculations by the 15th day of each calendar month, for the previous month.
EU-PROCESS	PTI 143-11A, Section VI.2	Roseville Crushed did not maintain monthly calculations of the material processed by tracking the equipment's monthly operational hours using the maximum rated



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Process Description	Rule/Permit Condition Violated	Comments
		capacity of the crusher, nor was the 12-month rolling throughput calculated.
EU-PROCESS	PTI 143-11A, Section VI.3	Roseville Crushed did not keep daily calculations of the amount of material processed using the maximum rated capacity of the crusher.
EU-PROCESS	PTI 143-11A, Section VI.4	Roseville Crushed did not conduct visible emission readings once per calendar operating day during maximum routine operating conditions.
EU-PROCESS	PTI 143-11A, Section VI.5	Roseville Crushed did not record the condition of the process equipment and control devices each calendar operating day.
EU-PROCESS	PTI 143-11A, Section VI.6	Roseville Crushed did not maintain records of all visible emission observation readings.
EU-PROCESS	PTI 143-11A, Section VI.7	Roseville Crushed did not maintain a log of the maintenance activities and repairs to the control devices, nor were daily inspection records for the fugitive dust control equipment maintained.
EU-PROCESS	PTI 143-11A, Section IX.1	Roseville Crushed did not label all equipment using the ID numbers in Appendix A.
EU-TRUCKTRAFFIC	PTI 143-11A, Section VI.1	Roseville Crushed did not conduct visible emission readings once per calendar operating day during maximum routine operating conditions.
EU-STORAGE	PTI 143-11A, Section VI.1	Roseville Crushed did not conduct visible emission readings once per calendar operating day during maximum routine operating conditions.
Fugitive Dust Nuisance Minimization Plan	PTI 143-11A, Appendix B, Section III.B	Roseville Crushed did not maintain records of all storage pile dust suppression applications.
Fugitive Dust Nuisance Minimization Plan	PTI 143-11A, Appendix B, Section VII	Roseville Crushed did not maintain detailed daily records of fugitive dust control equipment inspections, nor the dust control activities on travel surfaces.



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The letter submitted on June 25th provides some information regarding the referenced citations but this letter specifically addresses the items listed above, including: the date the alleged violations occurred; an explanation of the causes and duration of the alleged violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations; the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. This letter is intended to provide additional information requested by EGLE since the June 25th letter was submitted.

First, the most egregious allegation is that a conveyor was installed without a Michigan Permit to Install. (PTI). This is not true. As part of the site reconfiguration, equipment has been moved but no additional conveyors have been installed. We think that the confusion may stem from Conveyor 3 (also known as RC-615) had a separate Conveyor 3 blue label and it was knocked off. It did have its RC 615 label, though. The Conveyor 3 label has been replaced since you were at the site. We have included a photo of Conveyor 3 in Attachment 1 taken last year. We have other photos of the site and there are no additional conveyors besides the ones there last year. We also have a copy of the original application. All labels are on the equipment now and clearly indicate the equipment designation as included in PTI 143-11A. It should be noted, though, that with the acquisition of the parcel next door, RC may store unpermitted equipment at the site. As long as it is not in use, it seems like this would be acceptable.

As we noted in our prior letter, RC purchased the old motel next door, had it demolished, removed the debris from the site, and is now expanding the RC yard onto this property to improve traffic flow. Unfortunately, the additional work needed to finish the yard cannot be completed until additional permits are issued by the City of Roseville. We included a photo of the proposed truck exit as this will allow better traffic flow and should eliminate concerns over track-out from the site. You may have seen there are traffic cones on that driveway which cannot be removed until permits are issued, and some additional site work is completed. Piles are still being moved and traffic patterns are likely to change until all the site changes are implemented, which may have resulted in equipment labels being visible from different vantage points than usual. Were you to visit again in a couple months, we should have the layout complete and the equipment in its final location, which will resolve your issues with labeling and understanding of the equipment at the site.

It was also suggested that two conveyors were operating without water sprays and it was suggested that the water sprays were removed from the conveyors. This is not correct and there may have been some confusion. Water sprays in place during the previous ownership are still in place today. And, as you noted in your inspection report, the materials was adequately wetted and there were no fugitive emissions. Water was applied to the material as needed to control dust. It should be noted that on the day you inspected we had a new yard manager as the previous yard manager is no longer with the company. Since there was mostly construction going on at the site, he was not familiar with many of the topics that you discussed. He may have indicated that he had not been responsible for the site activities you discussed until just recently. It is portable and can be moved to areas of the plant where its needed and it has been used to spray conveyor belts. It was not in use the day that you inspected but it was available. When you asked about the spraying system, he likely assumed you were asking about the water cannon and he then indicated that it had been moved to another area of the plant where it was needed. No spraying equipment has been removed from the conveying system though, as you recall, we have purchased additional equipment like the water cannon included in Attachment 1. An additional water well was installed last year and provides an additional 40 gpm water to the site.



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Because the site is undergoing construction, very little crushing has been done at the site. For example, crushing was only done on two days in May. While it may have appeared the site had not kept records for the other 29 days in May, there were only two days in May that crushing was performed. Several months during the winter, no crushing was done at all. Even when the site is crushing, it has been in very limited amounts. Because only a small amount of crushing has been done in the last several months, we have far fewer records than we would if the site was operating on a normal summer day. In addition, when you were at the site, we only had records for the last few months, as older records had been transferred to the Bruce Township site. We have additional records and can forward you older records for review. It should be noted that the format and content of the records was the same as it was during the last full compliance evaluation in 2021, it was just not very obvious that the days where there were no records were because there was no crushing performed.

As we indicated in our previous letter though, we have modified the record keeping to improve compliance and to make it more obvious to records needed on days that the facility is not operating. The existing record keeping sheets are fine for days the facility had been crushing, but not as effective on days they are not. For example, staff is required to record visible emissions during maximum operating conditions. On days the facility was not crushing, there were no maximum operating conditions. The list of questions on the record keeping form included the following:

- Is the equipment operating in a satisfactory manner?
- Is the drop transfer point minimized?
- Is the water spray installed, operated and maintained?
- Are fugitive dust problems controlled?
- Repairs or maintenance completed?

There was also an additional page that detailed equipment condition, notes and a third page that included material throughput for that particular day. But on days there was no crushing, they just recorded (separately) there was no crushing that day.

We are proposing to add a page that will be included in the electronic record keeping system where the operator would start his day by recording the wind speed and direction, site conditions and the proposed weather for the day. Information on equipment inspections and whether equipment will be operated can also be recorded at this time. At this point, he would evaluate EUSTORAGE and EUTRUCKTRAFFIC for visible emissions. It should be noted that the electronic record keeping system also prompts employees to sweep the yard and water the yard periodically throughout the day. This would encourage compliance with the conditions associated with those two emission groups and avoid the confusion afforded by the questions that they currently answer.

On days that crushing takes place, additional records are required and has been collected using the existing system. This information includes:"

- Whether equipment is operating correctly
- Whether drop points are being minimized



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- Check for fugitive emissions as well as the visible emissions observations required for the equipment that is operating
- Whether any repairs or maintenance is needed and then notes associated with any corrective action performed
- Number of hours that the crusher was operated (to compute the throughput as indicated in the permit).

Changes to the record keeping system should eliminate the confusion encountered during your recent inspection.

Please note that many improvements have been made at the site and we will continue to work diligently to establish an effective fugitive dust program. We would appreciate EGLE's patience while we finish the remaining action items. In addition, we appreciate any information on complaints you can forward, as we would like to address them as soon as possible. We appreciate that you informed us that you hadn't received any recent complaints and can share information we received from the City of Roseville indicating that they had not received any complaints since we began making these changes. The City of Roseville had received dust complaints last year and in previous years and has indicated they are very pleased with activities at the site. Were you to contact the City of Roseville, as I know you have spoken to them in the past, you would find that the site modifications will completely address any concerns they may have had with nuisance particulate.

We look forward to our meeting on July 29, 2024, and are anxious to discuss the letter, the inspection and our site modifications. Our company has made a considerable effort to reduce nuisance particulate and it feels like our efforts have gone unnoticed. Last year we received correspondence from your office indicating that operations at the site left "grit in your teeth". In addition, most everyone associated with the site has agreed that the site seemed too small for operating a crushing facility. Now we get a letter complaining mostly that records associated with days the facility is not operating are not complete. This seems unfair. Even the photo of the wind screen he had taken does not seem to fairly represent the installation of the screens and their effectiveness at reducing nuisance particulate. We included the photo in Attachment 1.

Please let us know of a couple dates your office is available to discuss this issue. It is our hope that after discussing the new facility layout, this entire situation can be effectively resolved. If you have any questions, please contact me at 586.405.7774 or (Arau@rauhornelec.com).

Sincerely,

Anthony Rau
Operations, Roseville Crushed, LLC

Attachments

By email and USPS

Attachments

Copy: Jenine Camilleri – EGLE-AQD, Lansing