

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

N665860260

FACILITY: ROSEVILLE CRUSHED CONCRETE		SRN / ID: N6658
LOCATION: 29765 Groesbeck, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Lesli Perfili , President/Operations Manager		ACTIVITY DATE: 09/09/2021
STAFF: Robert Joseph	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of Non-Metallic Mineral Processing Plant		
RESOLVED COMPLAINTS:		

On September 9, 2021, I, Michigan Department Environment, Great Lakes, and Energy-Air Quality Division staff Robert Joseph, conducted an on-site scheduled inspection of Roseville Crushed Concrete Company (SRN: N6658) located at 29765 Groesbeck Highway, Roseville, Michigan 48066. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, conditions of the facility's Permit to install (PTI) 143-11A, and the facility's Consent Judgement 15-676-CE.

Opening Introduction

The facility is a non-metallic mineral processing site and supplies aggregate material for construction projects primarily in southeast Michigan. The facility supplies the material to a number of trucking companies who then transport the material to their destination.

The facility's current PTI, 143-11A, was issued on August 23, 2019, after the facility contacted the AQD in May 2019 indicating that they intend to replace the facility's 75-ton/hr maximum capacity crusher with the current 300-ton/hr maximum capacity crusher. I informed the facility that a new permit would be required, and I directed the facility to the EGLE-AQD permit application web page. The facility submitted the permit to the EGLE-AQD Permits Division in June 2019 and then it was ultimately issued. Consent Judgement, 15-676-CE, was issued in April 2016 due to the facility's non-compliance in its original permit, 143-11, after violation notices were issued regarding its recordkeeping and fugitive dust practices.

Facility Tour

I arrived on-site at approximately 1 p.m. and met with the facility's owner, Ms. Lesli Perfili. The facility generally operates primarily from 7 a.m.-4 p.m. Monday-Saturday during the construction season, and there are approximately 6 employees employed by the facility.

PTI 143-11A:

EUPROCESS

The facility's permit references the following infrastructure in Appendix A:

Equipment Description	ID Number	Opacity Limit (Percent)	Control Device
Crusher	Eagle Crusher – E1	10	Water Spray
Crusher	Diamond Crusher #2	10	Water Spray
Screen	Simplicity Screen #02 – S02	10	Water Spray
Conveyor	Conveyor #001	10	Water Spray
Conveyor	Conveyor #008	10	Water Spray
Conveyor	Conveyor #003	10	Water Spray
Conveyor	Conveyor #005	10	Water Spray

I. EMISSION LIMITS

There were no visible emissions from the drop point and transfer point portions.

II. MATERIAL LIMITS

The facility does not process any asbestos or asbestos containing waste within their operations. According to the facility's records, there is no evidence the facility produces more than 3,000 tons of material per day, nor 150,000 tons of material through EUPROCESS per 12-month rolling time period as determined at the end of each calendar month.

III. PROCESS/OPERATIONAL RESTRICTIONS

The opacity requirements appear to be met for each portion of EUPROCESS. It appears the facility has implemented the fugitive dust control plan for all plant roadways, plant yard, and material storage piles as stated in Appendix B. The facility utilizes two 16' x 10' rubberized track-out mats to minimize and control sedimentation from depositing on the roadway due to truck traffic leaving the site. Neither the facility nor the records indicate the facility has experienced any malfunctions or created unsafe operating procedures.

IV. DESIGN/EQUIPMENT PARAMETERS

Water sprays appear to be installed and maintained for all listed infrastructure of EUPROCESS.

V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility is compliant with the testing requirements for EUPROCESS per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO. Visible emissions tests were completed last year September 2020. The EGLE-AQD has not required additional testing since.

VI. MONITORING/RECORDKEEPING

The facility is maintaining monthly calculations of the amount of material processed through EUPROCESS by tracking the daily hours of EUPROCESS by using the maximum rated capacity of the crusher (300 tons/hr), as well as on a monthly basis for the yearly throughput rate based upon the most recent 12-month rolling time period. Records indicate 600 tons to 3,000 tons have been produced daily with monthly totals varying between 2,200 tons to 16,800 tons. The facility's current 12-month rolling total through August 2021 is 81,513 tons.

In addition, the facility provided daily inspection records of the process equipment and the associated control devices prior to process start-up for each calendar operating day, and visible emission limit readings from EUPROCESS at a minimum of once per calendar operating day during maximum routine operating conditions. There did not appear to be any issues with the equipment or visible emission exceedances. Also, facility records indicate repairs were conducted in April on the concrete crusher between April 19-29, 2021.

The facility has all equipment labeled with marker indicating that using affixed labels kept becoming loose and falling off.

EUTRUCKTRAFFIC

I. EMISSION LIMITS

There did not appear to be any visible emissions from all wheel loaders or truck traffic.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility has implemented and maintained the fugitive dust control plan for all plant roadways, plant yard, and material storage piles. The facility's sedimentation track-out is controlled by two rubberized rumble strip pads. The remaining plant requirements relating to drop height, dust suppressant applications, and trucks covering their loads appears to be occurring.

V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility met the testing requirements for EUTRUCKTRAFFIC in 2012 per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO.

VI. MONITORING/RECORDKEEPING

The facility provided records for visible emission readings conducted once per calendar day for EUTRUCKTRAFFIC.

EUSTORAGE

I. EMISSION LIMITS

There did not appear to be any visible emissions from the material storage piles.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility appears to be implementing and maintaining the fugitive dust control plan for all material storage piles. In addition, the plant requirements relating to drop height, dust suppressant applications, and trucks covering their loads appears to be occurring.

V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility met the testing requirements for EUSTORAGE in 2012 per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO.

VI. MONITORING/RECORDKEEPING

The facility provided records for visible emission readings conducted once per calendar day for EUSTORAGE.

APPENDIX B - Nuisance Minimization Plan for Fugitive Dust

I. Site Roadways / Plant Yard

The facility maintains two calcium chloride tanks on site for dust suppression for the facility's roadways. In addition, the employs a water truck to apply water to all truck traffic surfaces. Records indicate the facility applies this daily. There was little fugitive dust on on-site but none appeared to be leaving the site during the inspection.

The facility maintains a sign posted on-site indicating the speed limit to be under 4 miles per hour. All input roadways appear to be paved with asphalt and crushed concrete surrounds the process equipment and material storage piles.

The facility exit contains two rubberized rumble strips, 16' x 10' wide.

II. Plant

The drop distance at each transfer point appears to be reduced to the minimum the equipment can achieve.

III. Storage Piles

The stockpiles did not appear to be generating fugitive dust.

IV. Truck Traffic

The facility maintains a posted sign informing all out-going trucks to cover their loads with tarps prior to leaving the site. There did not appear to be any issues with on-site vehicles.

V. Management of Front-End Loader Operations

While on-site, it appears the facility front-end loader equipment was attempting to minimize drop height to avoid spillage.

VI. Process Equipment

There did not appear to be any excessive fugitive emissions or malfunctions from any transfer system, storage bin, mixer or hopper, and the water spray systems appear to be maintained.

Conclusion

It appears that Roseville Crushed Concrete Company is in compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, conditions of the facility's Permit to install (PTI) 143-11A, and the facility's Consent Judgement 15-676-CE.

NAME Robert Joseph

DATE 09-30-21

SUPERVISOR Joyce