

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

P016745350

FACILITY: Cardinal Aggregates		SRN / ID: P0167
LOCATION: 3660 Carpenter Rd, YPSILANTI		DISTRICT: Jackson
CITY: YPSILANTI		COUNTY: WASHTENAW
CONTACT: Phil Eisel , Vice-President		ACTIVITY DATE: 07/26/2018
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of portable crusher on subleased land from StoneCo who leases it from Doan Companies.		
RESOLVED COMPLAINTS:		

**Minor Source****Facility Contact**

From Permit File:

Phil Eisel-Cardinal Aggregates, Inc 8026 Fremont Pike, Perrysburg, OH 43551.

Doan Companies:

Tom McCurry-General Manager 3670 Carpenter Road, Ypsilanti

Email: tmccurry@doancompanies.com

StoneCo:

Austin Anson-Operations Manager

ph 734-777-6485

Cardinal Aggregates:

Dustin Boger-Foreman

ph 419-906-9521

**Purpose**

On July 26, 2018, I conducted an unannounced compliance inspection of Cardinal Aggregates Inc. (Company) located in Ypsilanti, Michigan. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and conditions of Permit to Install (PTI) 56-16.

**Facility Location**

The facility is located in a commercial area in between Ann Arbor and Ypsilanti. The portable crusher is located more than 500 feet from the closest commercial or residential building. See attached aerial photo.

**Facility Background**

The Company was issued a PTI 56-16 for a portable nonmetallic mineral crushing facility on April 6, 2016. The facility is occasionally located at 3660 Carpenter Road. There is no record that this facility has been inspected at this location before.

The facility consists of a Lippman 4800 crusher manufactured in 2015 with a maximum rated capacity of 300 tons per hours. The facility also consists of a screen and several conveyors. The plant is referred to as the Lippman 4 facility or Lippman 2015.

Note: Doan Companies(B6016) is a concrete batch plant also located at this location. They own land and lease a section of it to StoneCo. StoneCo allows Cardinal Aggregates to crush concrete on their leased property. (Other crushers have historically been at the same location.)

### **Regulatory Applicability**

PTI 56-16 covers the whole facility.

New Source Performance Standards (NSPS), Subpart OOO, for Nonmetallic Mineral Processing Plants is applicable for the crusher, screen and associated conveyors.

Facility is a CAT II Fee source and reports to MAERS.

### **Arrival & Facility Contact**

Visible emissions were not observed upon my approach to the Company's facility. I arrived at approximately 9:15 am and met with Tom McCurry (TM) is the General Manager of Doan Companies who owns the property that Cardinal Aggregates is operating their crusher. I informed TM of my intent to conduct a facility inspection and to review the various records as necessary.

### **Pre-Inspection Meeting**

TM offered to bring me out to the site and first introduce me to a manager for StoneCo. (Note: Doan Companies concrete batch plant was operating. They fall under a PTI exemption Rule 289 (2) (d) as they only produce about 80,000 cubic yards per year. No dust was noted. They have a truck wash station that all trucks pass through prior to exiting the facility on Carpenter Road that was doing an excellent job at avoiding any track out.)

Austin Anson-Operations Manager for StoneCo located a foreman who was onsite who worked for the Company. I spoke briefly with Dustin Boger. I asked him about the facility. He verified that the portable plant was their newest plant that was manufactured in 2015. All the equipment is attached into one portable plant.

### **Onsite Inspection**

The portable plant was in operation, so I elected not to get too close to it. See attached photo. The plant was equipped with water sprays supplied by a water tank. However, the tank had run out of water and was in the process of being refilled during my inspection. The lack of water spray was resulting in excessive opacity being generated from the crushing. I estimated opacity to vary between 25 and 50%. When the water spray was turned back on, opacity dropped to less than ten percent. Dustin explain that it takes an hour to fill up the water tank so they have trouble keeping water supplied to the facility. They get their water from nearby Doan Companies facility.

Otherwise, the only significant dust was noted was on the haul road to the top of the waste concrete dump pile. See attached photo. There was no evidence that water or dust suppressant was being used on this part of the haul road possibly because there was some confusion on who was responsible to apply it. (StoneCo, Doan, Cardinal?) Every time a truck went up this part of the haul road, excessive dust was noted.

### **Recordkeeping Review**

None provided.

### **Post-Inspection Meeting**

I held a brief meeting with Dustin Boger and TM. I requested that Dustin provide me with information on the crusher to verify it was the same crusher in their permit application, to provide me with the required monthly crushing records and to provide any evidence that the Company has conducted required NSPS OOO opacity testing. Dustin indicated that he would email this information later in the day. (No information was received.) I thanked both gentlemen for their time and cooperation and left the facility at 10:45 am.

### **Compliance Summary**

The facility appears to be out of compliance with the following:

PTI Condition # 1.6 Company not complying with their Fugitive Dust Plan Section III. Dust suppressant not be applied to concrete pile haul road.

PTI Condition # 1.7 Water spray not being properly operated. Water supply to water spray not adequate to maintain enough water for continuous production.

PTI Condition # 1.8 No evidence that required NSPS OOO opacity testing has been conducted.

PTI Condition # 1.9 Daily and Annual records of the amount of material processed at this location not provided.

PTI Condition # 1.10 AQD not notified about initial start-up.

PTI Condition # 1.13 No notice of intent to relocate facility forms being submitted.

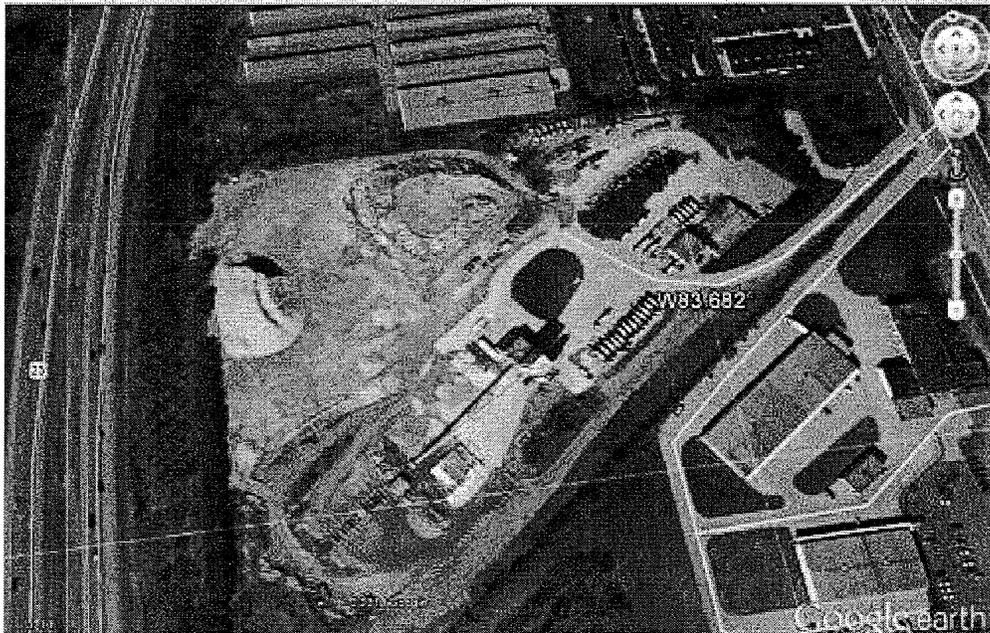


Image 1(Aerial photo) : Aerial photo.



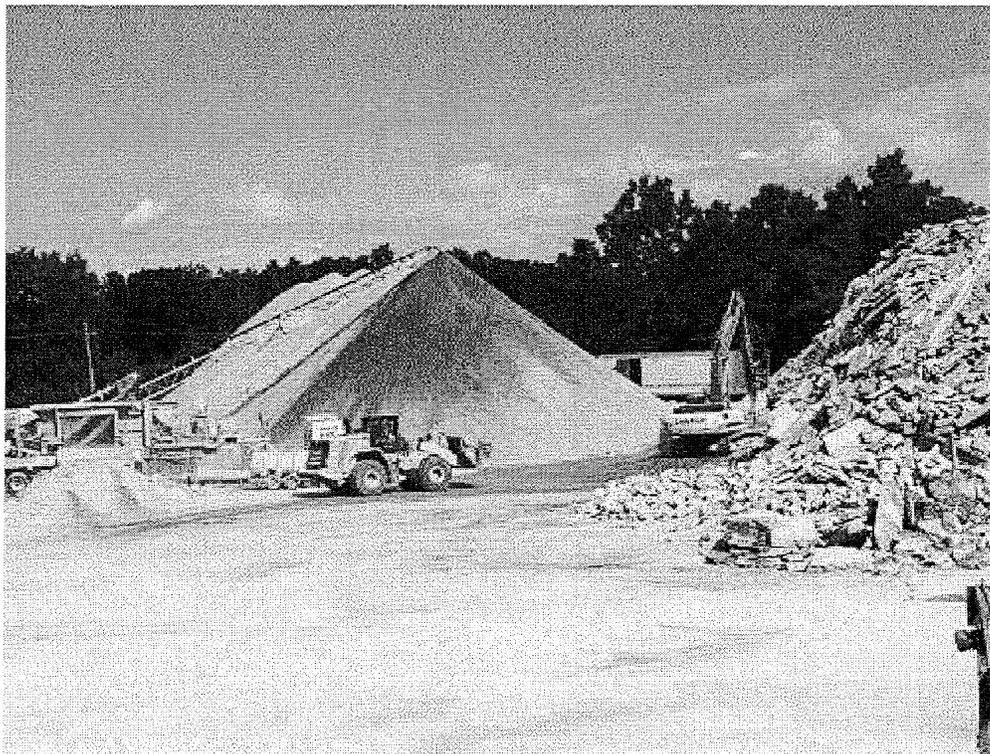
**Image 2(Crushing facility)** : Crusher on left, crushed pile in center, to be crushed pile on right. The truck wash station for Doan Companies can also be seen.



**Image 3(Crusher plant)** : Crusher plant



**Image 4(Dusty haul road)** : Dusty haul road on uncrushed concrete pile.



**Image 5(Water tank)** : Small water tank that supplies the water sprays can be seen just to the left of yellow

truck.

NAME M. Kovalchuk

DATE 7/30/2018

SUPERVISOR [Signature]