DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

DA1	$\Omega \Omega A$	0670

FACILITY: GREAVES TRUCKING INC		SRN / ID: P0190
LOCATION: BUZZELL RD PIT 3/4 MILE W OF M18, GLADWIN		DISTRICT: Saginaw Bay
CITY: GLADWIN		COUNTY: GLADWIN
CONTACT: mike greaves , President		ACTIVITY DATE: 07/12/2017
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On Wednesday, July 12, 2017, AQD District Staff arrived onsite to conduct a scheduled site inspection for the Greaves Trucking Inc. Buzzell Road Pit. The referenced facility contains one non-metallic mineral crushing facility located off Buzzell Road, Gladwin County, Gladwin, Michigan (SRN P0190). The equipment associated with the location is permitted under General Permit No. 260-10 issued on January 19, 2011. The site inspection was conducted with the intent of confirming operational status as well as compliance with the referenced permit.

The facility was open upon arrival. Mr. Mike Greaves, answered questions regarding the permitted equipment and pit operations.

FACILITY DESCRIPTION

Greaves Trucking, Inc. provides construction materials (i.e. sand & gravel) as well as transport and other construction related services. The permitted equipment is located at Greaves Trucking, Inc. Buzzell Road Pit. Two entrances exist, one approximately ¾ of a mile west of M-18 on Buzzell Road and the other approximately ½ mile south of the intersection of Buzzell and McCulloch Roads (NW ¼ of Section 11, T18N, R2W), Gladwin County, Gladwin, Michigan. At the time of permitting the main office and yard were located at 2839, Pratt lake Road, Gladwin, Michigan. Since the time of permitting, the main office has been relocated to 395 James Robertson drive, Gladwin, Michigan.

The existing Buzzell Road pit, from equalization records appears to consist of approximately 200 acres. Excavation activities onsite confirm that the pit has been active for a number of years. Activities appear to consist of removal of overburden, as no excavation to the water table or below was noted during the site visit. The site is reported to receive regular inspections from the Mining Safety and Health Administration (MSHA) staff.

Drives associated with the pit are unpaved, and are suited for truck traffic. There is a sign at each of the two pit entrances. It should be noted that both McCulloch and Buzzell Roads are unpaved roadways. Properties in the immediate vicinity consist predominantly of residential and agricultural. The water source for the facility is a water tank transported onsite during crushing activities. No ponds have been created onsite to provide a water source.

PROCESS EQUIPMENT

Equipment permitted under General Permit No. 260-10 includes:

- One Cedar Rapids Jaw Crusher rated at <150 tons/hr (ID No. 885)
- · One Extec Turbo 5000 Screen (ID No. 5000)
- One 50 ft Barber Green Scale Conveyor (ID No. 50)
- One 80 ft Barber Green Radial Stacker (ID No. 80)
- · One 100 ft Radial Stacker (ID No. 100)

It should be noted that at the time of the July 6, 2011, site inspection, that it was the inspector's understanding that the cedar rapids jaw crusher and the extec turbo screen were separate units. However, based on discussions during the July 12, 2017 site inspection, it was clarified that the two units are a combined unit. With the exception of transport back to the "yard" for repairs the referenced equipment has not been relocated from the Buzzell Road Pit since the last inspection.

At the time of the inspection, visible emissions (VEs) were noted coming from the combined crusher-screen unit above VE allowed by the general permit under condition I.2(a) –I.2(j). When questioned Mr.

Greaves reported that the overburden being processed consisted of too much clay, that when wetted created problems with the screen unit. District Staff indicated that other crushers thruout the state are operating with appropriate dust control as required under Condition I.7, and that intent is not to saturate the soils, but to place the spray bar such that the mist captures the dust before it escapes the unit and that over the crusher seems in general to be the most effective. Mr. Greaves indicated that he knew where he could locate the bar to control the dust.

COMPLIANCE HISTORY

In 2011, P0190 was a newly permitted facility with no complaints of record. Permitting was conducted as a result of a report of unpermitted crushing equipment received by the District Office. Since that time no complaints have been received by the department.

The facility is not subject to NSPS 000 based on a capacity for the crusher of 150 tons per hour or less. As a result no VE testing or annual reporting is required of the facility.

COMPLIANCE EVALUATION

The facility was open and operating upon arrival. Determination of compliance is based on observations as well as information provided by Mr. Mike Greaves during the inspection activities.

<u>Material Use</u> – Condition I.3 of General Permit 260-10 limits the facility to a maximum of two million tons per site for the portable plant. Mr. Greaves reported that business for the facility is limited to small local commercial and county jobs, and that they were well under the permit limit. At the time of the inspection, the equipment was being used to prepare a 30K ton job for Gladwin County.

No significant stockpile of graded sands and gravel were noted onsite. Some concrete debri and RAP potentially for future processing or sale was noted onsite, as well as a limited amount of smaller piles of sand were identified onsite.

Condition I.9 requires that records of daily and annual records of the amount of material the plant processes be kept. AQD staff confirmed that volumes are recorded by use of a weight scale on conveyor #50 and by individual job/contract records. Records are kept at the main office.

Condition I.5 restricts the permit to non-asbestos containing material, and specifically restricts the crushing of any asbestos tailings and asbestos containing materials. Mr. Greaves indicated that the materials processed onsite were limited to sand and gravel from the pit...however as commented upon previously, some concrete rubble and asphalt (potentially RAP) was noted onsite.

<u>Visible Emissions</u> – As previously noted Condition I.2 limits VE from the various components of the portable crusher plant. VEs above permit limits were noted at the time of the inspection and were discussed with Mr. Greaves at that time and are referenced above.

Condition No. I.6 requires the plant to have a program to control fugitive emissions and implement conditions in Appendix A. Recent rains had dampened the area, and no fugitive dust was noted with respect to the roadways or stockpiles.

Other - Special condition I.13 covers limitations and requirements with respect to the location and relocation of the portable plant. As previously noted the portable plant with the exception of relocation to the yard for repairs has historically only been relocated within the Buzzell Road Pit.

Condition I.12 requires notification of changes to the portable crusher plant, however, no changes in equipment or control equipment appear to have occurred at the time of the inspection.

SUMMARY

On Wednesday, July 12, 2017, AQD District Staff arrived onsite to conduct a scheduled site inspection for the Greaves Trucking Inc. Buzzell Road Pit. The referenced facility contains one non-metallic mineral crushing facility located off Buzzell Road, Gladwin County, Gladwin, Michigan (SRN P0190). The equipment associated with the location is permitted under General Permit No. 260-10 issued on January 19, 2011. The site inspection was conducted with the intent of confirming operational status as well as compliance with the referenced permit.

The facility was open upon arrival. Mr. Mike Greaves, answered questions regarding the permitted equipment and pit operations.

At the time of the inspection, visible emissions (VEs) were noted coming from the combined crusherscreen unit above VE allowed by the general permit under condition I.2(a) -I.2(j). When questioned Mr. Greaves reported that the overburden being processed consisted of too much clay, that when wetted created problems with the screen unit. District Staff indicated that other crushers thruout the state are operating with appropriate dust control as required under Condition I.7, and that intent is not to saturate the soils, but to place the spray bar such that the mist captures the dust before it escapes the unit and that over the crusher seems in general to be the most effective. Mr. Greaves indicated that he knew where he could locate the bar to control the dust. A VN will be issued to Greaves Trucking with regards to failure to install and operate dust control for the portable plant.