

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

P024423299

FACILITY: KGL ASSOCIATES INC		SRN / ID: P0244
LOCATION: 6837 SCOFIELD RD, MAYBEE		DISTRICT: Jackson
CITY: MAYBEE		COUNTY: MONROE
CONTACT: Mark Kerr, President		ACTIVITY DATE: 10/02/2013
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted Inspection		
RESOLVED COMPLAINTS:		

SRN: P0244

COMPANY: KGL Associates

COMPANY ADDRESS: 1325 N. Wilmot, Tucson, AZ 85712

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Mark Kerr, President (Ph: 520-722-0240; Cell: 303-884-7074; Fax: 520-722-0248; Email: kglinc@qwestoffice.com)

COMPANY PHONE NUMBER: 520-722-0240

On October 2, 2013, AQD staff, Erik Gurshaw, conducted a targeted, unannounced inspection of a portable non-metallic mineral crushing plant owned and operated by KGL Associates. The plant was being operated at the Stoneco-Maybee Quarry located at 6837 Scofield Road in Maybee, Michigan. KGL Associates' corporate office is located at 1325 N. Wilmot in Tucson, Arizona. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; and General Permit-to-Install (PTI) #79-11 for a non-metallic mineral crushing plant.

Upon arrival at the site, AQD staff introduced himself and stated the purpose of the visit to Mr. Josh Gaines, Plant Superintendent (Cell: 918-541-6471). Mr. Gaines assisted AQD staff during the inspection. KGL Associates is crushing sandstone mined from the Stoneco-Maybee Quarry into a white silica sand for U.S. Silica. Mr. Gaines estimated that 80,000 to 100,000 tons of sandstone will be processed by the plant during the 2013 construction season. Mr. Gaines indicated that 9 people are employed by KGL Associates to assist with the mining and crushing operation at the location. The plant operates from Monday through Saturday from 7:00 AM until 8:00 PM from June until November. Process equipment at the location includes the following: 1 primary jaw crusher; 1 secondary cone crusher; 12 conveyors; 1 stacker; 1 triple deck screen; 1 Grizzly feeder hopper; 1 CAT 980K wheel loader; 1 CAT 966K wheel loader; 1 CAT 336 excavator; 1 CAT 257B skidsteer; 1 CAT D8T bulldozer; 2 CAT 730 haul trucks; and 1 water truck (a Ford F750). and 1 992 John Deere excavator. Crushing was taking place at the time of the inspection.

Sandstone is mined via blasting within the Stoneco-Maybee Quarry. Once the sandstone is mined, it is loaded into a Grizzly feeder hopper and conveyed to a Nordberg C116 jaw crusher. From the jaw crusher, the processed material is conveyed to a triple deck screen. 6" plus material is caught up in first deck of the screen, 3" to 4" material is caught up in the second deck, 7/8" plus material is caught up in the third deck, and silica sand falls through the third deck. The sand which falls through the third deck is sent via a conveyor to a stacker and to a storage pile. The material caught up in the three decks of the screen is conveyed to a cone crusher for further processing. From the cone crusher, the processed material is recirculated to the triple deck screen and the process repeats itself until all of the material has been converted into silica sand.

This portable crushing plant is not equipped with a baghouse. Special Condition 1.1 of its permit is, therefore, not applicable to its operations. Potential fugitive dust production is being controlled by applying water to the material at the end of the stacker when necessary. The sandstone which is mined is beneath the water table, but the sandstone is mined by breaking it up via blasting. For blasting to occur, the water must be removed from the mine. RGL Associates uses 2 sump pumps to

completely dewater the mine each construction season. Because the material is beneath the water table for a significant portion of the year, it is wet prior to be processed in the crushing plant. AQD staff did not observe any visible emissions from the jaw crusher, cone crusher, screen, conveyors, stacker, or material storage piles during the inspection. A minimal amount of fugitive dust was observed to have been produced from vehicle traffic, but the level of dust produced was not deemed to be excessive by AQD staff. Therefore, the facility is in compliance with the opacity limits established in Special Condition 1.2a through 1.2j of its PTI. The company's 2012 MAERS Report indicated that 75,221 tons of sandstone was processed by the plant during the 2012 construction season. This is well below the 2,000,000 ton processing limit established in the plant's PTI. The plant does not process any material containing asbestos. The plant is abiding by the Fugitive Dust Control Plan in Appendix A of its permit. The plant is abiding by the Fugitive Dust Control Plan contained in Appendix A of its PTI. Specifically, the following measures are being taken by the plant to control fugitive dust: the drop distance at each transfer point and storage pile is being minimize; all vehicles are tarped before leaving the site; water is applied to roadways and the plant yard when necessary; the date and time of water applications to the plant yard and roadways is being recorded in a daily operational log; material spills are immediately cleaned up; and storage piles are watered when necessary. The company added a conveyor and replaced a conveyor during this construction season. The plant's PTI was modified to reflect these equipment changes and Chip Tokar of Natural Resource Management conducted a visible emission evaluation on all of the plant's NSPS-subject equipment on September 29, 2013. The plant's crushers, screen, conveyors, and stackers were labeled as required by Special Condition 1.11 of its permit. Mr. Gaines maintains a copy of the plant's PTI in a binder in the operational office.

As a result of this inspection, it was determined that RGL Associates' portable crusher (SRN #P0244) is in compliance with its PTI and all other applicable air quality rules and regulations.

NAME Erik A. Durehaw DATE 10/3/13 SUPERVISOR CJE