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

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FACILITY: DETROIT BULK STO	RAGE	SRN / ID: P0431			
LOCATION: 115 Rosa Parks Box	ulevard, DETROIT	DISTRICT: Detroit			
CITY: DETROIT		COUNTY: WAYNE			
CONTACT: Mark Fletcher , Director, Environmental		ACTIVITY DATE: 06/29/2023			
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR			
SUBJECT: On-Site Inspection, FY 2023					
RESOLVED COMPLAINTS:					

INSPECTED BY: Jonathan Lamb and Jeff Korniski, EGLE-AQD

PERSONNEL PRESENT: Mark Fletcher, Director, Environmental – Crown Enterprises, Inc.; Shawn

Wells, Superintendent - Detroit Aggregate

CONTACT PHONE NUMBER: 586-467-1711, ext. 2276 (Mr. Fletcher)

FACILITY BACKGROUND

Detroit Aggregate, LLC operates two portable concrete crushers currently located at 115 Rosa Parks in Detroit. Detroit Aggregate, LLC is owned by Crown Enterprises, LLC, based out of Warren, Michigan. The facility operates within a 13.2-acre unpaved parcel of land along the Detroit River just north of the Ambassador Bridge. Facility operates from January through December.

INSPECTION NARRATIVE/PROCESS DESCRIPTION

AQD staff, Jeff Korniski and Jon Lamb (author), met with Mark Fletcher, Director, Environmental - Crown Enterprises, LLC to perform site visits/inspections of facilities owned by Crown Enterprises which are located at the following sites:

2791 West Jefferson Ave. (SRN: P1188). Hercules Concrete, LLC currently operates a concrete batch plant at this location, but may be relocating the batch plant to 4461 West Jefferson within the next two years.

115 Rosa Parks Blvd. (SRN: P0431). This address is listed under "Detroit Bulk Storage" in AQD's database. This property is contiguous with 2791 West Jefferson Ave. Detroit Aggregate, LLC., which is owned by Crown Enterprises, operates two portable concrete crushers currently located at this address but has submitted relocation notices to move both crushers to 4461 West Jefferson.

4105 and 4461 West Jefferson Ave. (SRN: P0434). The 4105 West Jefferson address is listed under "Nicholson Terminal & Dock Co., Port of Detroit" in AQD's database; 4461 West Jefferson was the address provided by Crown Enterprises, which is part of the same property and so is included in the P0434 SRN at this time. The property is owned by Ambassador Port and operated by Nicholson Terminal. Detroit Aggregate, LLC, which is owned by Crown Enterprises, currently has operations on this site.

In additional to performing inspections at each site, Mr. Korniski and Mr. Lamb discussed current and future operational plans and permitting issues with Mr. Fletcher, including the future relocation of two portable concrete crushers and potential relocation of the concrete batch plant, as well as recent complaints received by AQD regarding fugitive dust and general siting concerns relating to operations at these sites.

This report will focus on Detroit Aggregate's current operations at 115 Rosa Parks Blvd. (SRN P0431); separate reports will be written for the inspections performed at P1188 and P0434. Detroit Aggregate operates two portable concrete crushers which has been at this location since at least 2015. The crushers work in series, with the first crusher (2650 Jaw Crusher manufactured in 2015) crushing material down to 4", where it is then sent to a screener/crusher with a horizontal shaft impactor

(manufactured in 2019) to break the pieces down further. Both crushers are equipped with a water suppression system to keep dust down.

Facility personnel check the site daily for fugitive dust issues on a daily basis, including using a water truck to keep dust down from the unpaved lot. Written records show a water truck used almost daily. Facility maintains records of the amount of tons of concrete crushed by the two crushers on a daily basis. A review of these records show that the crushers operate most days, crushing between 500 and 1300 tons per day; no day exceeded 1300 tons.

Note: Neither crusher was processing during the inspection, so AQD staff could not observe crusher operations.

REGULATORY REVIEW

Detroit Aggregate, LLC operates under General Permit to Install (PTI) No. 95-23, issued on August 4, 2023.

To determine complaince, facility records from January 2022 through March 2023 were reviewed.

PTI No. 95-23, applicable Special Conditions:

FGCRUSHING

Emission Limits

1.1. NOT EVALUATED. Crushers use water suppression to control fugitive dust.

Visible Emission Limits

1.2a. through j. NOT EVALUATED. Crusher was not in operation at the time of inspection, but the crushers are equipped with water dust suppression and visible emissions are monitored by operaters during use.

Material Usage Limits

- 1.3. and 1.4. IN COMPLIANCE. Facility produced 204,950 tons of material from April 2022 through March 2023, well below the permitted limit of 2,000,000 tons per year.
- 1.5. IN COMPLIANCE. Facility does not process any asbestos tailings or abestos-containing materials in FGCRUSHING.

Process/Operational Restrictions

1.6. IN COMPLIANCE. Facility implements and maintains a fugitive dust plan as specified in Appendix A.

Equipment

1.7. IN COMPLIANCE. Each crusher is equipped with a water spray to control fugive particulate emissions.

Testing

1.8. NOT DETERMINED. AQD has not determined if testing had been performed for these crushers in accordance with NSPS Subparts A and OOO.

Monitoring

1.9. IN COMPLIANCE. Facility maintains records of the amount of material processed on a daily and annual basis, as required.

Recordkeeping/Notification

1.10: NOT DETERMINED. AQD was unable to verify that the facility notified AQD within 45 days of initial startup of FGCRUSHING.

Permit Dates

1.11. IN COMPLIANCE. Both crushers are labeled, as required.

Miscellaneous/Allowed Modification

- 1.12. NOT APPLICABLE. Facility has not modified the emission units in FGCRUSHING.
- 1.13. NOT APPLICABLE. Facility has not relocated the emission units in FGCRUSHING.

Appendix A - Fugitive Dust Control Plan

IN COMPLIANCE. Facility implements and maintains a fugitive dust plan in accordance with the requirements of Appendix A. Facility uses a water truch for dust suppression most days and records are maintained. AQD staff did not observe issues with fugivie dust during the inspection.

FINAL COMPLIANCE DETERMINATION

Based on AQD's inspection, Detroit Aggregate, LLC appears to be in substantial compliance with PTI No. 95-23 and other applicable air quality rules and regulations.

NAME	Alan	DATE 8-15-24	SUPERVISOR	JK	
NAME _	7/2015	DATE	SUPERVISOR		_