

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

P079872306

FACILITY: Palmer Farms, Inc.		SRN / ID: P0798
LOCATION: 2779 Ruth Road, DECKERVILLE		DISTRICT: Bay City
CITY: DECKERVILLE		COUNTY: SANILAC
CONTACT: Jarret Palmer , Plant Manager		ACTIVITY DATE: 06/20/2024
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection as further follow up on a recent complaint.		
RESOLVED COMPLAINTS:		

On June 20, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an unannounced inspection of a portable mineral processing plant owned and operated by Palmer Farms, Inc. The inspection was done as further follow up to a recent complaint.

The complaint was as follows:

C-24-01253, received at the end of June 19, 2024, alleged that fugitive dust was blowing through a residential neighborhood, blanketing trees, cars, and their kids with dust. The complainant reported that they had driven by the Michigan Landscape Supply site today and although the crusher was not running at that time, they suspected it to be the source of the dust.

As initial follow up to the complaint, the AQD inspector Dan McGeen immediately called the company on June 19, 2024. Plant Manager Jarrett Palmer indicated that they had used 4,000 gallons of water that day on the crusher but had witnessed gusty winds stir up a lot of dust at the site of Michigan Landscape Supply/Michigan Concrete Recycling. He indicated the site owners were currently applying asphalt millings to resurface their dirt roadways, and that Palmer Farms would apply water with the site owner's hydro seeder if conditions were still dusty on June 20, 2024.

Environmental contacts:

Jarret Palmer, Plant Manager; 989-513-2561; palmerfarmsinc61@gmail.com

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; mcgeend@michigan.gov

Facility description:

This facility is a portable, nonmetallic mineral processing plant.

Emission units:

No emission units* are specified in General PTI No. 41-17, but the following equipment is listed in the General PTI 41-17 application:

- Impactor, CEC 133 X 115; max. rated capacity: 116 tons per hour (TPH); Device ID: 05452-022.
- Screener, CEC 5 X 1200; max. rated capacity: 100 TPH; Device ID: 1A.
- Conveyor, Marco; max. rated capacity: 100 TPH; Device ID: 1B.
- Conveyor, Finlay 524; max. rated capacity: 100 TPH; Device ID: IC; not present at this site.
- Conveyor, Superior 36 X 125PS125; max. rated capacity: 100 TPH; Device ID: 1D

*An emission unit is any part of a stationary source that emits or has the potential to emit an air contaminant.

Flexible groups:

Flexible Group	Flexible Group Description	Permit to Install (PTI) No.; Federal Requirements	Compliance Status
FGCRUSHING	A nonmetallic mineral crushing facility consisting of crusher(s) and associated process equipment including grinding mills, drills, screening operations, bucket elevators, belt conveyors, loading and bagging operations, storage bins, enclosed truck or railcar loading stations and any other material handling equipment operated at the site. Each crusher and screen shall be equipped with a water spray. A baghouse dust collector may alternatively be installed in lieu of water spray for any particular piece of equipment. Operation of the control equipment is required only when necessary to meet applicable emission limits.	General PTI 41-17; <u>not</u> considered subject to 40 CFR Part 60, Subpart OOO due to max rated capacity below 150 TPH.	Compliance

Regulatory overview:

This facility is considered a minor source of criteria pollutants, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A major source of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or area source for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

This facility is considered not subject to 40 CFR Part 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants, because the maximum rated capacity is identified as below 150 tons per hour.

Fee status:

This facility had been identified in the Michigan Air Compliance Enforcement System (MACES) database as a Category D fee-subject source. This appeared to be inaccurate, because the relocation notice received by the AQD for the move to 380 S. Fenway Drive indicated it does not have a maximum rated capacity of 150 TPH or above. Therefore, it is not subject to 40 CFR Part 60, Subpart OOO, and is not fee-subject. The AQD Lansing District Office informed the AQD Bay District Supervisor Gina McCann of this, and she advised the AQD's Emissions Reporting & Assessment Unit, who removed the fee category designation.

The facility submits an annual air emission report to the AQD. Because the facility is no longer considered fee-subject, it is at the discretion of the Bay City District Office if they continue to submit the annual air emission report.

Location:

- Address: 380 S. Fenway Drive, Fenton, 48430, Genesee County.
- Description: This site is the location of both Michigan Concrete Recycling and Michigan Landscape Supply. To the immediate north, south, east and west are other industrial sites. Further east is a residential neighborhood.

Recent testing:

The plant is not considered subject to 40 CFR Part 60, Subpart OOO, and therefore has not been required to undergo visible emission testing.

Safety attire required:

For being around any crusher, the AQD staff should wear safety glasses with side shields, hard hat, high visibility safety vest, and steel-toed boots, and should bring hearing protection, in case it is needed.

Arrival:

This was an unannounced inspection. The AQD was represented by Dan McGeen, inspector.

- Arrival time in area: 12:32 PM.
- Visible emissions: None observed.
- Odors: A distinct and definite odor of composting wood from the Michigan Landscape Supply wood pile to the north.
- Weather conditions: Sunny, 88 degrees F, and humid, with winds 5-10 mph out of the N or NNE.
- Arrival at site: 12:35 PM, approx.

The plant was not running at the time of D. McGeen's initial arrival at the site. Plant Manager Jarret Palmer explained that it was undergoing repairs for a spray nozzle on one of the spray bars. He explained that they stopped running the plant when the nozzle broke. He estimated the repair might take about 30 minutes.

D. McGeen left the site and returned a short while later, to give the company time to fix the spray nozzle.

- Return to site: 1:21 PM.
- Visible emissions: None observed.
- Weather conditions: Partly sunny, 88 degrees F, and humid, with winds 5-10 mph out of the NNE.

Note: During the morning today, J. Palmer had emailed photos to D. McGeen of the crusher to show that water had been in use at the plant on June 13, 2024, the day of the recent complaint.

Inspection:

At 1:21 PM, the plant was not yet running, so D. McGeen waited at the site. The new spray nozzle fitting for the plant became stripped, as they were working with it. They eventually started up the plant with one of the 14 spray nozzles not working. The 14 nozzles were distributed among 5 spray bars. The failure of the one nozzle did not appear to result in any excessive visible emissions.

The crusher's water supply source at the site is a well. However, when the site owner began drawing on the well to fill their hydro seeder tank for fugitive dust control, this lessened the water available for the crusher. The crusher therefore shut down until the hydro seeder had received all the water it needed.

Although the relocation notice to move to this site gave the duration of the stay as May 13 - June 14, 2024, J. Palmer indicated that the plant had recently been idled for days while they rebuilt a motor for the screen back in their shop. Therefore, they would probably be at this site until after July 4, 2024.

Compliance check with Special Conditions (SC) of General PTI 41-17:

General PTI 41-17 SC	Requirement	Comments	Complies?
FGCRUSHING, SC I.1	The particulate matter (PM) emissions from each baghouse dust collector portion of FGCRUSHING shall not exceed 0.04 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis.	NA	NA
FGCRUSHING, SC 1.2	Visible emissions from FGCRUSHING shall not exceed the limits in the following table:	Please see below.	See below
FGCRUSHING, SC 1.2a	Any equipment enclosed within a building: No visible emissions.	NA	NA
FGCRUSHING, SC 1.2b	All crushers: 15% opacity.	The facility was meeting this requirement. Even backlit by the sun, the intermittent opacity appeared to be 5-10%. There did not appear to be a	Yes

		<p>safe viewing location where the sun would be at one's back, due to loader traffic.</p> <p>Note: Morning would be the best time for opacity readings at this site.</p>	
FGCRUSHING, SC 1.2c	Screens: 10% opacity.	The facility was meeting this requirement, at 0% opacity.	Yes
FGCRUSHING, SC 1.2d	Rock drills: 5% opacity.	NA	NA
FGCRUSHING, SC 1.2e	Conveyors/Transfer points: 10% opacity.	The facility was meeting this requirement, at 0% opacity.	Yes
FGCRUSHING, SC 1.2f	Wash screens and all subsequent equipment downstream up to the next crusher or storage bin: No visible emissions.	NA	NA
FGCRUSHING, SC 1.2g	All equipment controlled by a baghouse dust collector: 7% opacity.	NA	NA
FGCRUSHING, SC 1.2h	Wheel loaders and truck traffic: 5% opacity.	The facility was meeting this requirement.	Yes
FGCRUSHING, SC 1.2i	Material storage piles: 5% opacity.	The facility was meeting this requirement.	Yes
FGCRUSHING, SC 1.2j	Any other process equipment which is part of the nonmetallic mineral crushing facility or related processes: 10% opacity.	NA	NA

FGCRUSHING, SC 1.3	The permittee shall not process more than 2,000,000 tons of any non-metallic mineral through FGCRUSHING per year per site.	The facility was meeting this requirement, as the final total for the site was 7,500 tons.	Yes
FGCRUSHING, SC 1.4	The annual production limit of 2,000,000 tons per year per site shall not apply if FGCRUSHING is operated at a location that is covered by a site specific air use permit. At such a location, the annual material processed shall be in conjunction with the production limit contained in the permit for that location. All other conditions and restrictions of this permit shall apply when operating at such location.	NA	NA
FGCRUSHING, SC 1.5	The permittee shall not crush any asbestos tailings or asbestos containing waste materials, as defined by the National Emission Standard for Hazardous Air Pollutants regulations, in FGCRUSHING.	The facility was meeting this requirement.	Yes
FGCRUSHING, SC 1.6	The permittee shall not operate FGCRUSHING unless the program for continuous fugitive emissions control for all facility roadways, the facility yard, all storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained.	The facility was meeting this requirement. They applied water around the crusher itself. The site owner applied water to the crusher roadway and was applying asphalt millings to other site roadways.	Yes
FGCRUSHING, SC 1.7	Each crusher and screen shall be equipped with a water spray. A baghouse dust collector may be installed in lieu of water spray for any particular piece of equipment. The control equipment shall be properly	The facility was meeting this requirement.	Yes

	operated as necessary to comply with all emission limits.		
FGCRUSHING, SC 1.8	<p>Within 60 days after achieving maximum production rate, but not later than 180 days after initial startup of FGCRUSHING, verification of visible emission rates and particulate emission rates from all NSPS subject crushers, screens, all transfer points on conveyors, and all other miscellaneous equipment associated with FGCRUSHING and covered by the NSPS Subpart OOO, by testing at owner's expense, in accordance with 40 CFR Part 60 Subparts A and OOO, will be required. No less than 14 days prior to the anticipated test date, visible emission observation procedures must be approved by the District Supervisor. Also, no less than 7 days prior to the anticipated test date, the permittee shall notify the District Supervisor of the test date. If after the anticipated test date has been submitted to the District Supervisor, there is a delay in conducting the test, the permittee shall submit to the District Supervisor notice of the new test date. This notification shall be done a minimum of 3 days prior to the rescheduled test taking place. Verification of visible emissions includes the submittal of a complete report of opacity observations to the AQD within 30 days following the last date of the test.</p>	NA, as the facility is not considered to be subject to the NSPS.	NA
FGCRUSHING, SC 1.9	<p>The permittee shall keep, in a satisfactory manner, daily and annual records of the amount of material processed for each site at which the facility operates. All records shall be kept on file for a period of at least five years and made available to the Department upon request.</p>	The facility was meeting this requirement. On 6/20, only 398.3 tons were processed, due to mechanical issues.	Yes
FGCRUSHING, SC 1.10	<p>The permittee shall notify the AQD, within 15 days after initial startup of</p>	The facility is believed to have	Yes

	FGCRUSHING, of the actual date of initial startup.	met this requirement.	
FGCRUSHING, SC 1.11	The permittee shall label all equipment associated FGCRUSHING within 45 days of initial start up according to the company IDs specified in the application (Form EQP5756). Labels shall be in a conspicuous location on the equipment.	The facility was meeting this requirement, with the following IDs on their equipment: <ul style="list-style-type: none"> • Impactor: 05452-022 • Screener: 1A • Conveyor: 1B • Conveyor: 1D 	Yes
FGCRUSHING, SC 1.12	The permittee shall not replace or modify FGCRUSHING, or any portion of FGCRUSHING, including control equipment, unless all of the following conditions are met:	Please see below.	See below
FGCRUSHING, SC 1.12a	The permittee shall update the general permit by submitting a new Process Information Form (EQP5756) to the Permit Section and District Supervisor, identifying all existing and new or additional equipment added to the process a minimum of 10 days before the equipment is replaced or modified.	NA, as no new equipment has been added since 2/27/2017.	NA
FGCRUSHING, SC 1.12b	The permittee shall continue to meet all general permit to install applicability criteria after the replacement or modification is complete.	NA	NA
FGCRUSHING, SC 1.12c	The permittee shall keep records of the date and description of the replacement or modification.	NA	NA
FGCRUSHING, SC 1.12d	The permittee shall notify the Air Quality Division, within 15 days after startup of any new or additional equipment, of the actual date of initial startup.	NA	NA

FGCRUSHING, SC 1.12e	All new or additional equipment that is subject to the federal NSPS Subpart OOO, which has not been previously tested, shall comply with the testing requirements of the NSPS.	NA, as the plant is considered to not be NSPS-subject.	NA
FGCRUSHING, SC 1.13	The permittee shall not relocate FGCRUSHING to any new geographical site in Michigan unless all the following criteria are met:	Please see below.	See below
FGCRUSHING, SC 1.13a	The facility shall have no outstanding unresolved violations of any of the Michigan Department of Environmental Quality Air Pollution Control rules, orders, or permits; or Federal air quality regulations.	The facility was meeting this requirement.	Yes
FGCRUSHING, SC 1.13b	A notice of intent to relocate (Relocation Notice Form EQP5757); a copy of the original general permit forms (EQP5727, EQP5729 and EQP5756); any Process Information forms for previous modifications; and a proposed site plan identifying the proposed new geographical site and the probable duration at the new site shall be provided to the appropriate district office and the Permit Section not less than 10 days prior to the scheduled relocation. All residential or commercial establishments and places of public assembly within 1,000 feet of the proposed facility site shall be clearly identified on the proposed site plan.	The facility was meeting this requirement.	Yes
FGCRUSHING, SC 1.13c	The crusher(s) shall be located a minimum of 500 feet from any residential or commercial establishment or place of public assembly.	The facility was meeting this requirement. An industrial site to the west and one to the east were within 500 feet, but they were zoned industrial, not commercial.	Yes

FGCRUSHING, SC 1.13d	A copy of this general permit and conditions shall be clearly posted in the operator's office or workstation.	The facility was meeting this requirement. J. Palmer said they keep a copy of the general PTI in their tool trailer, and he has an electronic copy on his phone.	Yes
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APPENDIX A**Fugitive Dust Control Plan**

Fug. Dust Control Plan SC	Requirement	Comments	Complies?
SC I. Plant	The drop distance at each transfer point throughout the plant shall be reduced to the minimum the equipment can achieve	The facility was meeting this requirement.	Yes
SC II. Truck Traffic	On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within six inches of the top of any sideboard, side panel or tailgate, otherwise, the truck shall be tarped.	The facility was meeting this requirement.	Yes
SC III. Site Roadways and the Plant Yard	Please see below.	Please see below.	See below

SC III.a	The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet an opacity limit of five percent.	The facility was meeting this requirement. The site owner was applying water to the unpaved roadways and yard with a hydroseeder.	Yes
SC III.b	All paved roadways and the plant yards shall be swept as needed between applications of dust suppressants.	NA, as the roadways and plant yard were not paved.	NA
SC III.c	Any material spillage on roads shall be cleaned up immediately	NA, as no spillage was observed.	NA
SC III.d	A record of all applications of dust suppressants and roadway and the plant yard sweepings shall be kept on file for the most recent five-year period and be made available to the AQD upon request.	J. Palmer indicated that he had not been keeping a written log of watering, as the site owners for this and other sites they go to have been doing it, but he indicated he will keep a written log of those activities from this point forward.	No
SC IV. Storage Piles	Please see below.	Please see below.	See below
SC IV.a	Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.	The facility was meeting this requirement.	Yes
SC IV.b	Stockpiles shall be watered on an as needed basis in order to meet an opacity limit of five percent. Equipment to apply water or dust suppressant shall be available at the site, or on call for use at the site, within a given operating day.	NA, as stockpiles did not need to be watered today.	NA

SC IV.c	A record of all watering shall be kept on file for the most recent five-year period and be made available to the AQD upon request.	J. Palmer indicated that he had not been keeping a written log of watering, as the site owners for this and other sites they go to have been doing it, but he indicated he will keep a written log of those activities from this point forward.	No
SC V. AQD/EGLE Inspection	Please see below.	Please see below.	See below
SC V.	The provisions and procedures of this plan are subject to adjustment by written notification from the AQD, if following an inspection, the AQD finds the fugitive dust requirements and/or the permitted opacity limits are not being met.	NA, as no adjustments were needed at this time.	NA

(End of compliance check.)

Post-inspection follow up:

- On 7/5 and 7/8/2024, D. McGeen emailed a list of questions to an email address which was no longer in use and to a subsequent email address but received no immediate reply.
- On 8/6/2024, D. McGeen emailed a brand-new email address, palmerfarmsinc61@gmail.com, and received answers to questions on recordkeeping.

Compliance concern:

- A single water spray nozzle was not working on the crusher. Repairs were not successful, but the other water spray nozzles appeared to adequately control dust from the crusher.
- Records of watering roadways and yard areas were not being kept. J. Palmer explained they have not kept records because the site owners here and at other sites have been doing the watering. However, he indicated that going forward, he will keep a water log to document those activities.

Conclusion:

No instances of noncompliance were identified. The only noteworthy fugitive dust observed was from unpaved roadways at the site, which was quickly addressed by application of water from the site owner, Michigan Concrete Recycling/Michigan Landscape Supply.

NAME DATE 8/7/2024SUPERVISOR RB