

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

P116668387

FACILITY: BRUCE WALDRON EXCAVATING		SRN / ID: P1166
LOCATION: 8340 Parks Road, ELWELL		DISTRICT: Lansing
CITY: ELWELL		COUNTY: GRATIOT
CONTACT: Bruce Waldron , Owner		ACTIVITY DATE: 07/06/2023
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Onsite compliance inspection to determine compliance with site-specific PTI 58-23, for Double Eagle Dairy farm operations.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author) and David Rauch (AQD LDO)

Personnel Present: Bruce Waldron, Owner (brucewaldron1911@gmail.com)

Rick Eerdmans, Consultant, Network Environmental

Purpose

Conduct an announced, onsite compliance inspection to determine compliance with Bruce Waldron Excavating's (Bruce Waldron) Site Specific Permit to Install (PTI) No. 58-23 for a non-metallic mineral crushing facility, which was issued May 2, 2023 for operating the crushing equipment at Double Eagle Dairy, 5742 Pendell Rd, Middleton, MI.

Facility Background/Regulatory Overview

Bruce Waldron processes (crushes and screens) asphalt and concrete from various demolition projects across the state. Bruce Waldron also maintains a General Permit to Install for non-metallic mineral crushing (PTI 58-21).

Bruce Waldron owns a diesel-fired engine, EUGENERATOR, that is used to power the crushing, screening and conveying equipment.

The crushing equipment is subject NSPS Subpart OOO for non-metallic mineral crushers. NSPS Subpart OOO conditions are incorporated into the PTI. Bruce Waldron is required to report to the crushing emissions and diesel emissions to MAERS.

Inspection

At approximately 9:00 a.m. on July 6, 2023, David Rauch and I arrived onsite and met with Bruce Waldron and his crew to conduct the onsite inspection. It had rained earlier in the morning and several days prior and the unpaved plant yard was saturated with water. Minimal track-out was observed at on the Double Eagle paved road leading into the crushing yard.

Bruce Waldron had planned to conduct NSPS Subpart OOO Visible Emissions testing on the equipment the day of the inspection; however, the equipment was having mechanical issues causing excessive dust to be released from the crusher area of the process. Bruce Waldron shut the process down once it was identified by AQD staff as well as Bruce Waldron's consultant, Rick Eerdmans, from

Network Environmental. Bruce Waldron began troubleshooting onsite and planned to test the equipment for the NSPS once they determined the cause and fixed the issue.

During the inspection Bruce Waldron was processing concrete from the Double Eagle Dairy farm.

EUPROCESS

EUPROCESS consists of 3 conveyors, a crusher, and a screen. Water spray is used to control fugitive dust from these processes.

Visible Emission Limits & Equipment, Design/Equipment Parameters, & Testing/Sampling

There are visible emission limits for the crusher with screen, conveyor, and 2 stacking conveyors, based on a 6-minute average, per the listing below. Device ID’s listed below were confirmed onsite. Bruce Waldron was using water spray for dust control on their crusher (input and output) and the screen discharge, as well as the conveyors. The water spray was operating on all equipment during the inspection. The conveyors and screen all appeared to have 0% opacity; however, an area below the crusher was creating dust in excess of the 10% opacity standard, based on observation only (no official Method 9 reading was taken). Bruce Waldron shut the process down when AQD brought this to his attention. He plans to fix this issue before starting up for production again.

Bruce Waldron plans to test for compliance with the NSPS Subpart OOO once the fugitive dust issue has been corrected.

A belt scale is required to be installed on the Sch 32x46 conveyor. During this inspection I confirmed that a scale is installed on the conveyor and that it was being utilized and shows a running total tonnage as material is processed throughout the day

Conveyors (7% Opacity Limit):

- Shop Built Conveyor with Scales (Device ID Sch 32x46)
- Shop Built Stacking conveyor (Device ID STK 24x70)
- Shop Built Stacking conveyor (Device ID STK 36x70)

Crusher (10% Opacity Limit):

- Eagle 1000/15cc Impact Crusher (Device ID Crusher 1000)

Material Limits

EUPROCESS has a limit of 22,000 tons of non-metallic mineral processed per 12-month rolling period at this site. Bruce Waldron is required to keep daily and monthly records of the amount of material processed in tons, and calculate the 12-month rolling throughput rate on a monthly basis. I requested these records from the date of arrival to this site (July 3, 2023) – July 18, 2023. Bruce Waldron provided these records, see Table 1. Records indicate that a total of 1,647 tons was crushed between July 5 and July 18, 2023, in compliance with the 22,000-ton material limit. The 4 days of material crushed after I was onsite on July 6, 2023 were conducted to troubleshoot the fugitive dust issues from the crusher.

Table 1. Material Processed from July 3 - July 18, 2023.

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Date Crushed	Tons Crushed
July 5, 2023	75
July 6, 2023	35
July 10, 2023	240
July 12, 2023	565
July 14, 2023	399
July 18, 2023	333
TOTAL	1,647

Bruce Waldron is required to ensure that no asbestos tailings or asbestos-containing waste materials are crushed. Bruce Waldron said the materials being crushed at this site were concrete. While onsite, I did not see any indicators in the source pile that the concrete was contaminated with any suspect asbestos-containing materials.

Process/Operational Limits

EUPROCESS shall not operate unless the Fugitive Dust Control Program specified in Appendix B is implemented.

The following is an evaluation of compliance with Appendix A:

Site Roadways and the Plant Yard (EUTRUCKTRAFFIC)

The dust on the site roadways and plant yard are required to be controlled by applications of water, calcium chloride, or other approved fugitive dust control compounds. This shall be done as needed to ensure the 5% opacity limit is met. Bruce Waldron uses water at this site to control the unpaved plant yard. There were no visible emissions from truck traffic or loader traffic during the inspection. The ground was well-saturated with water.

Plant & Storage Piles

The drop distance at each transfer point throughout the plant should be reduced to the minimum the equipment can achieve. During the inspection I observed that all transfer points appeared to be maintained a minimum free-fall height to minimize emissions (there were no visible emissions from any of the transfer points or stockpile transfer points) and therefore Bruce Waldron is meeting this requirement.

Stockpiles shall be watered on an as needed basis to meet the opacity limit of 5%. I observed no opacity from the stock piles.

Truck Traffic

Onsite vehicles being loaded should have the loads be no higher than 6" below the top of any sideboard, side panel, or tailgate, otherwise the truck shall be tarped. I did not observe any loading of materials during the inspection.

Compliance Statement

Bruce Waldron appears to be in compliance with PTI 58-23 at this time, pending the troubleshooting efforts to address fugitive dust from the underside of the crusher.

NAME Michelle Lyplov

DATE 9/27/23

SUPERVISOR RB