

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

P117664976

FACILITY: Albrecht Sand and Gravel Co		SRN / ID: P1176
LOCATION: 3790 West Sanilac Road, SNOVER		DISTRICT: Bay City
CITY: SNOVER		COUNTY: SANILAC
CONTACT: Laura Franzel , Vice President		ACTIVITY DATE: 06/14/2022
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection		
RESOLVED COMPLAINTS:		

An onsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Albrecht Sand and Gravel Co. (AG) company specifically while in operation at the 6000 block of Ritter Road Cass City, MI location. Applicable records were requested and later received on June 15, 2022, to verify compliance with General Permit to Install (PTI) No. 197-19. An in-person inspection was completed on June 14, 2022.

### Facility Description

AG is a crusher company with a portable crusher that travels to various sites. The crusher is in operation under PTI No. 197-19. The facility is a true minor source for all criteria pollutants. The facility is also under Administrative Consent Order (ACO) AQD No. 2020-12. Additionally, the facility is subject to New Source Performance Standards (NSPS) Subpart 000.

### Offsite Compliance Evaluation

Based on the timing of the inspection, the 2021, Michigan Air Emissions Reporting System (MAERS) was submitted on March 24, 2022, and later reviewed. Significant changes in throughput and emissions were reported when compared to the previous year. The company uses MAERS emission factors when calculating emissions. After further review, the 2021 MAERS Report appears acceptable.

### Compliance Evaluation

A request was sent to Ms. Laura Franzel, Vice President, for various records required by PTI No. 197-19. The records were later received on June 15, 2022 and will be discussed further in this report. An onsite inspection of the crusher at the 6000 block of Ritter Road Cass City, MI location was completed on June 14, 2022. AQD staff AS arrived in the area at 9:17am. Weather conditions at the time were sunny skies, temperatures in the low 70's degree Fahrenheit and winds to the west at 5-10mph. AG staff Mr. Mark Albrecht, Supervisor, provided a tour of the site and answered site specific questions. AG staff Ms. Franzel provided the requested records.

As mentioned above, AG is a crushing company. The various stages of the onsite processes were reviewed during the inspection and will be discussed further below.

### PTI No. 197-19

#### **FGCRUSHING**

This flexible group is for a nonmetallic mineral crushing facility consisting of a crusher and associated process equipment as well as control equipment which can be a water spray or

baghouse dust collector. Operation of the control equipment is required only when necessary to meet applicable emission limits.

Per Special Condition (SC) 1.1, 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. AG does not have a baghouse dust collector installed for the crusher but instead uses a water spray control. Water spray control was observed to be installed for the crusher and was in use during part of the inspection. After further review, this appears acceptable.

Per SC 1.2a-j, there are various opacity emission limits for applicable equipment onsite. During the inspection, one transfer point right after the crusher was noted to have minor opacity and company staff were observed turning on the water spray which reduced any opacity. Based on observations made at the time of the inspection, the applicable emission limits appeared to be being met.

Per SC 1.3, the permittee shall not process more than 2,000,000 tons of any non-metallic material through FGCRUSHING per year per site. Records were requested and reviewed for select time periods. Upon review of the records provided and the records reported in the 2021 MAERS Report, discrepancies were noted. Upon speaking with the company about the discrepancies, it appears that there had been a computer issue after completing the MAERS production records and that the 2021 MAERS Reported values, which were noted to be higher, would be more accurate. The 2021 records that would be more accurate were no longer available. Additionally, company staff stated that this would only be for the 2021 year. Taking the difference in production records noted and applying it to each month in the 12-month rolling time period, the 2,000,000-ton material limit did not appear to have been exceeded. After further review of additional records, it appears that AG is meeting this material limit.

Per 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. No site-specific permits are currently issued to AG. All sites AG crushes at appear to meet the criteria where only a general permit is needed.

Per 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. It was verified by company staff that no asbestos containing materials are crushed.

Per 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 maintained. Based on the observations made at the time of the inspection, AG appeared to be adequately following the Fugitive Dust Plan per Appendix A. Additional information regarding the specifics observed at the time of the inspection is discussed further below.

Per 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 operated as necessary to comply with all emission limits. As mentioned previously, AG uses a water spray as a control for PM from the crusher. The water spray was noted installed and was also observed in operation during part of the inspection.

Per SC 1.8, the permittee shall verify visible emission rates and particulate emission rates from all NSPS subject crusher and other applicable parts of the unit. On August 23, 2021, EPA Test Method 9 readings were completed per this condition to verify compliance. The test results that were later provided and reviewed indicated that AG was in compliance at the time of testing.

Per SC 1.9, 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. Records were requested and reviewed for select time periods. Based on the records reviewed, AG appears to be keeping track of applicable records.

Per SC 1.10, the permittee shall notify the AQD, within 15 days after initial startup of FGCRUSHING, of the actual date of initial startup. Based on documents reviewed AG has been in operation as a crushing company since the late 1960s. No further action is necessary at this time regarding this SC.

Per SC 1.11, the permittee shall label all equipment associated with FGCRUSHER within 45 days of initial startup according to the company IDs specified in the application (Form EQP5756). Labels shall be in a conspicuous location on the equipment. Speaking with company staff at the time of the inspection, they appeared unaware of any labeling but had stated they only have the one crusher. A follow up call was made, and the labeling was discussed with Ms. Franzel. Moving forward AG will be adding magnetic labels to the appropriate equipment. In a follow up call with company staff on August 2, 2022, magnetic signs appeared to have been ordered for the crusher.

Per SC 1.12, the permittee shall not replace or modify FGCRUSHING, or any portion of FGCRUSHING, including control equipment, unless certain conditions are met. It was verified by company staff that no changes have occurred to FGCRUSHER since at least 2021.

Per SC 1.13, the permittee shall not relocate FGCRUSHER to any new geographical site in Michigan unless several criteria are met. For the 2022 crushing season, AG had provided a list of sites FGCRUSHING intended to be at for crushing. Previous relocation notices reviewed appeared to be in compliance with applicable requirements. After further review, it appears that AG is adequately following the requirements required when submitting a relocation notice.

## **Appendix A – Fugitive Dust Control Plan**

The various components of the fugitive dust control plan were reviewed during the course of the site inspection of PTI No. 197-19 for the AG site. The drop distances at each transfer point (10 transfer points were identified which is the same as observed during visible emission testing for FGCRUSHING in August 2021) noted appeared acceptable. Several trucks were observed driving onto the site to be loaded. No excessive drop distance was noted when loading and at least one truck was noted utilizing a cover upon being loaded with material. The company has a 2,000-gallon water truck for dust suppressant. The water truck was observed during the site inspection to be watering the immediate roadways and

parts of the site for dust mitigation. Company staff had stated they usually water at least twice a day and will apply calcium chloride if needed but primarily AG uses water. It was concluded that though AG staff stated they apply water / calcium chloride as needed, they are not keeping track of the days it is applied. It was discussed with and moving forward, AG shall keep records of days dust suppressant is used. In a follow up call with company staff on August 2, 2022, it appears the applicable changes to the recordkeeping formatting have been made. Since all roadways on and adjacent to the site were unpaved, no sweeping between applications and dust suppressants is necessary for this site. Speaking with company staff, it appears the only site with paved roads is the Bulgrien Pit location. The company has a broom tractor that is used as needed, although staff do not keep track of when it is used. Moving forward, it was discussed with company staff on keeping records on when the broom tractor is used. Any spillage around the crusher was stated to be cleaned when it builds up. Stockpiles of material observed appeared to be acceptable in height. Company staff had mentioned that dust issues were primarily from the roadways and crusher. When asked about watering of stockpiles to reduce fugitive emissions company staff had stated that stockpiles were not the main source of fugitive emissions. It was later discussed with company staff that if fugitive emissions were to occur from the stockpiles that they would need to apply dust suppressant, as necessary. No fugitive emissions were observed coming from the stockpiles during the inspection.

**Additional Observations**

A 400-kw generator was observed that is used to operate the crusher.

AG is currently under ACO AQD No. 2020-12. Per the consent order, AG is to comply with SC 1.7, 1.8 and 1.13(b) of PTI No. 197-19. As mentioned above, AG appears to be in compliance with PTI No. 197-19. After further review, AG appears to be in compliance with ACO AQD No. 2020-12.

**Conclusion**

Based on the facility walkthrough, observations made, and records received, AG appears to be in compliance with PTI No. 197-19, ACO AQD No. 2020-12, NSPS Subpart OOO, and applicable air quality rules.

NAME Adam J. Hoff DATE 08/02/22 SUPERVISOR Chris Stone