

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

P131268158

FACILITY: MICHIGAN REAGG INC		SRN / ID: P1312
LOCATION: 2420 N Grand River Avenue, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Mike Busterna , Project Manager		ACTIVITY DATE: 07/12/2023
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Onsite, self-initiated compliance inspection to determine compliance with site-specific PTI 74-23.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author) and Craig Dechy (AQD TPU)

Personnel Present: Eric Kuznicki, Vice President (ekuznicki@asbestosabatementinc.com)

Michael Suty, President (msuty@asbestosabatementinc.com)

Mike Busterna, Project Manager (mbusterna@asbestosabatementinc.com)

Purpose

Conduct an unannounced, on-site compliance inspection with the AQD asbestos inspector, Craig Dechy, to determine compliance with Michigan ReAgg, Inc.'s Site Specific Permit to Install (PTI) No. 74-23 for a non-metallic mineral crushing facility, which was issued June 13, 2023, for operating the crushing equipment at 2420 Grand River Avenue, Lansing, Michigan. This address is Michigan ReAgg's "home base" which is also the home base for its sister company, Asbestos Abatement, Inc. (AAI), an asbestos abatement contractor.

This site is located in close proximity to many businesses in the City of Lansing, some located less than 500' from the property line; therefore, particular attention was paid to dust control, fugitive dust, and the source pile for crushing, to ensure the materials crushed did not contain asbestos-containing materials to ensure impacts to the surrounding community are minimized to the fullest extent.

Facility Background/Regulatory Overview

MI ReAgg processes (crushes and screens) concrete from various demolition and asbestos abatement projects across the state, some of the asbestos abatement projects are conducted by MI ReAgg's sister company, AAI. MI ReAgg maintains a site-specific PTI 74-23 for this site, as well as a General Permit to Install for non-metallic mineral crushing (128-22). This PTI expires 90 days after issuance (September 13, 2023). MI ReAgg will need to reapply for a PTI for this site if they choose to relocate to this site and crush in the future.

MI ReAgg owns a diesel-fired engine (<<10 MMBtu/hr), that is used to power the pumps.

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

Inspection

At approximately 1:30 p.m. on July 12, 2023, Craig Dechy and I arrived on site and met with Eric Kuznicki, Michael Suty, and Mike Busterna, as well as crushing operations staff, to conduct the on-site inspection.

Upon our arrival, the crushing equipment was shut down. M. Busterna explained they had operated that day up until they ran into equipment trouble and had to shut down. These types of occurrences are not uncommon for crushing facilities.

We were told that MI ReAgg's source pile consisted mostly of concrete from a GM facility that was demolished recently.

EUPROCESS

EUPROCESS consists of a conveyor, a crusher, and a screen to process materials from bulky, large materials to smaller sizes. Water spray is used to control fugitive dust from these processes. M. Suty said that the manufacturer's water sprays were not enough to control fugitive dust from the processes so MI ReAgg installed additional water sprays: in the hopper, on the conveyor leaving the crusher, and post-crusher.

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

There are visible emission limits for each piece of equipment in EUPROCESS, based on a 6-minute average, per the listing below. Device ID's listed below were confirmed on site – all equipment is labeled.

Evaluation of fugitive dust and compliance with visible emission limits from these processes will be monitored at a later date, likely during MI ReAgg's upcoming NSPS Subpart OOO testing.

A belt scale is required to be installed and maintained to show daily throughput on the conveyor. During the inspection I confirmed that a scale is installed on the conveyor.

Conveyors (7% Opacity Limit):

- McCloskey ST80 Stacker Conveyor (Device ID STACK01)

Crusher (10% Opacity Limit):

- McCloskey J50V2 (Device ID CRUSH01)

Screen (7% Opacity Limit)

- Tesab Screener TS1550 (Device ID SCREEN01)

Material Limits & Monitoring/Recordkeeping

EUPROCESS has a limit of 15,000 tons of non-metallic mineral processed per 12-month rolling period at this site. MI ReAgg 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 (June 14, 2023) – July 18, 2023. M. Busterna provided these records, see Table 1 & attached. Records indicate that a total of 3,061 tons was crushed between June 14 and July 18, 2023, in compliance with the 15,000-ton material limit.

Table 1. Materials Processed through crusher

Date Crushed	Tons Crushed
June 14, 2023	35
June 15, 2023	521
June 16, 2023	470
June 19, 2023	538
June 20, 2023	274
July 5, 2023	203
July 6, 2023	113
July 10, 2023	271
July 11, 2023	165
July 12, 2023	241
July 13, 2023	177
July 17, 2023	53
TOTAL	3,061

Asbestos

MI ReAgg is required to ensure that no asbestos tailings or asbestos-containing waste materials are processed in EUPROCESS.

While onsite, C. Dechy and I walked around MI ReAgg's source pile, evaluating whether any of the materials in the pile appear "suspect," i.e. may contain asbestos-containing materials. The presence of asbestos-containing materials in the source piles would suggest that MI ReAgg is also processing the asbestos-containing materials in EUPROCESS, and therefore in violation of this requirement.

C. Dechy obtained 3 samples from the source pile that appeared suspect. Attached are the COC and sample results. All 3 samples came back negative for asbestos. MI ReAgg took 3 samples from the same materials that C. Dechy took, in addition to a 4th sample which C. Dechy identified as suspect and recommended that MI ReAgg test. MI ReAgg had their samples analyzed and the 4th sample (the sample that the AQD did not sample) came back positive for asbestos. I was informed of this 4th sample being positive on July 19, 2023, per a phone call w/ C. Dechy.

I had a call with M. Suty to discuss this issue. In response to these findings, MI ReAgg immediately isolated the source pile where the positive sample had been found. They used caution tape to ensure it remained isolated from the rest of the material. This pile, he said will not be touched for processing. Instead, the materials in the isolated pile will be disposed of in a dumpster lined properly for asbestos-containing materials and waste-manifested and disposed of as such. He explained that as a result of this finding, they will develop a standard operating procedure. While this SOP is being developed, he said that they will train the front-end loader operator and the 2 crusher operators on what to look for. If they find suspect materials, they will stop work, take samples, and leave the area within which they found the suspect materials untouched until they can confirm whether the materials are asbestos-containing or not.

On July 26, 2023, M. Suty provided a rough draft of the SOP and on August 17, 2023, M. Suty sent me a finalized copy of their SOP, attached. The SOP appears to address asbestos-containing materials found in the source pile. Future inspections may be conducted to confirm the SOP is sufficient for addressing these issues.

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 B:

Site Roadways and the Plant Yard (EUTRUCK TRAFFIC)

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 for truck traffic. The Grand River site consists of both unpaved roadways and an unpaved plant yard. During the inspection I noted truck traffic throughout the yard was causing fugitive dust in excess of this 5% standard.

M. Busterna said they use calcium chloride to treat the unpaved plant yard and roadways; however, he stated they have not applied chloride due to recent rain events, which would wash the calcium chloride treatment away. On July 18, 2023, I requested steps that MI ReAgg plans to take to address the fugitive dust in excess of the 5% standards from truck traffic throughout the plant yard. On June 19, 2023, he provided documentation demonstrating that calcium chloride had been applied to the plant yard that day by Chloride Solutions.

This addresses the fugitive dust from truck traffic for now; however, future inspections may occur to confirm that MI ReAgg is continuing to appropriately controlling dust from truck traffic.

Plant & Storage Piles (EUSTORAGE)

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 at a minimum free-fall height to minimize emissions, but a future inspection, when the equipment is operating, will confirm this.

Stockpiles shall be watered on an as needed basis to meet the opacity limit of 5%. I observed no opacity from the stock piles. The stock piles appeared to be well-saturated with water.

TruckTraffic

On-site 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

MI ReAgg, Inc. appears to be in compliance with PTI 74-23 at this time.



Image 1(Suspect ACM) : Photo of suspect asbestos containing material identified on site by Craig Dechy, AQD, TPU

NAME Michelle Luplow

DATE 9/28/23

SUPERVISOR RB

MICHIGAN ReAgg, Inc.

PRODUCERS OF RECYCLED AGGREGATE

#600-5 AAI Shop

<u>Date</u>	<u>Weight (Tons)</u>	<u>Downtime</u>
14-Jun	35	
15-Jun	521	
16-Jun	470	
19-Jun	538	
20-Jun	274	
21-Jun		No Work
22-Jun	0	Maintenance/Repairs
23-Jun	0	Maintenance/Repairs
26-Jun	0	Maintenance/Repairs
27-Jun	0	Maintenance/Repairs
28-Jun	0	Maintenance/Repairs
29-Jun	0	Maintenance/Repairs
30-Jun	0	Maintenance/Repairs
3-Jul	0	Holiday
4-Jul	0	Holiday
5-Jul	203	
6-Jul	113	
7-Jul	0	Maintenance/Repairs
10-Jul	271	
11-Jul	165	
12-Jul	241	
13-Jul	177	
14-Jul	0	Maintenance/Repairs
17-Jul	53	
18-Jul	0	Brandon Vacation
19-Jul		
20-Jul		
21-Jul		
24-Jul		
25-Jul		
26-Jul		
27-Jul		
28-Jul		
31-Jul		
1-Aug		
2-Aug		
3-Aug		
4-Aug		

Total

3,061 Tons

Certificate of Laboratory Analysis

Test Method, Polarized Light Microscopy (PLM)



Project #: 2420 - Industrial - Lansing

Report To:

Mr. Craig W. Dechy
EGLE/LANSING
525 W. Allegan
Lansing, MI 48909

ARI Report # 23-105417
Date Collected: 07/12/23
Date Received: 07/13/23
Date Analyzed: 07/13/23
Date Reported: 07/14/23

Sample Information	Asbestos Type/Percent	Non-Asbestos Material
Lab ID #: 105417 - 01 Cust. #: 2420-01 Material: Tar Paper Location: Supply Pile Appearance: black, fibrous, homogenous Layer: 1 of 1	Asbestos Present: NO No Asbestos Observed	Cellulose - 60% Other - 40%
Lab ID #: 105417 - 02 Cust. #: 2420-02 Material: Roofing Tar/Felt Location: Supply Pile Appearance: black, fibrous, nonhomogenous Layer: 1 of 1	Asbestos Present: NO No Asbestos Observed	Cellulose - 50% Other - 50%
Lab ID #: 105417 - 03 Cust. #: 2420-03 Material: Concrete Location: Supply Pile Appearance: grey, nonfibrous, homogenous Layer: 1 of 2	Asbestos Present: NO No Asbestos Observed	Other - 100%

For Layered Samples, each component will be analyzed and reported separately.

A handwritten signature in black ink, appearing to read "Robert T. Letarte Jr.".

Robert T. Letarte Jr., Laboratory Director

Test Method EPA 40 CFR - Part 763 and/or EPA 600/R-93/116 was used to analyze the above samples. Matrix interference and/or resolution limits may yield false/negative results in certain circumstances. Suspect floor tiles containing <1% should be tested with SEM or TEM. This certificate of analysis relates only to the samples as submitted and to insure the integrity of the results, may only be reproduced in full. This certificate must not be used by the customer to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government. APEX Research Inc. is not responsible for the accuracy of the results for layered samples or samples comprising multiple materials. Liability limited to cost of analysis.



NVLAP Lab Code 102118-0

APEX Research Inc., 7717 Kensington Ct., Brighton, MI 48116
(734) 449-9990, Fax (734) 449-9991

Certificate of Laboratory Analysis

Test Method, Polarized Light Microscopy (PLM)



Project #: 2420 - Industrial - Lansing

Report To:

Mr. Craig W. Dechy
EGLE/LANSING
525 W. Allegan
Lansing, MI 48909

ARI Report # 23-105417

Date Collected: 07/12/23

Date Received: 07/13/23

Date Analyzed: 07/13/23

Date Reported: 07/14/23

Sample Information**Asbestos Type/Percent****Non-Asbestos Material**

Lab ID #: 105417 - 03a

Cust. #: 2420-03

Material: Coating/Tar

Location: Supply Pile

Appearance: black, nonfibrous, homogenous

Layer: 2 of 2

Asbestos Present: **NO**

No Asbestos Observed

Other - 100%

Lab ID #:

Cust. #:

Material:

Location:

Appearance:

Layer: of

Asbestos Present:

Lab ID #:

Cust. #:

Material:

Location:

Appearance:

Layer: of

Asbestos Present:

For Layered Samples, each component will be analyzed and reported separately.

A handwritten signature in black ink, appearing to read "Robert T. Letarte Jr.".

Robert T. Letarte Jr., Laboratory Director

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— Ice & Dust Control —

672 N. M-52 • Webberville, MI 48892 • 517-521-2124

FREIGHT BILL NO: 51525

18:53 07/18/23
Cash Customer
TRUCK ID: 10C
DRIVER: Hitchcock
BOL: 51525
GALLONS: 4028

TICKET NUMBER: 2282
LOCATION: North Par

B/L NO.	TRIP NO.	DATE
SHIPPER / LOCATION C/S WEBBerville MI		TOWNSHIP Asbestos Abatement 2420 N Grawley Lansing MI

DATE	GALLONS	NAME OF ROAD	MILES	# OF PASSES	DIRECTION START / FINISH / NOTES
		Spray Drive AND. Parky Area			
		AND OVERALL DRIVE			
TOTAL	4028				

Tractor No. 10C Trailer No.'s 310	TRUCK OWNER Solutions	P/U DRIVER:	
		DEL. DRIVER:	
		SPRAY DRIVER:	

WHITE - ORIGINAL

YELLOW - COPY

PINK - COPY

GOLDENROD - COPY



APEX Research, Inc.

7717 Kensington Ct., Brighton, MI 48116 Phone: (734) 449 - 9990, Fax (734) 449 - 9991 www.ApexMI.com

Apex #

105417

Company: State of Michigan-EGLE-AQD

Customer Name: Craig Dechy

Address: 525 W. Allegan St

City, St., Zip: Lansing, Michigan 48909

Phone: 517-749-2891 Fax:

Date of Survey: 7.12.2023

Project Name: _____

Project #: 2420-INDUSTRIAL-LANSING

Contact Person: Craig Dechy

Email: dechyc@michigan.gov, luplowm1@michigan

Turn Around Time: (circle one) **Daily Sample Reception Cutoff: 3 pm, Lead Same Day Cutoff: 10:30 am

Circle analyses required, indicate type and quantity

Same Day

~~24 Hour~~

48 Hour

3-5 Day

Other:

TTP yes / no

If RUSH, please specify above.

(Test Till Positive)

***Terms & Conditions on other side

Asbestos: Bulk X Air Other Point Count

Lead / Cad / Chrome: Paint Air Wipe **ASTM E1792?** circle YES or NO

Mold: Bulk Air Tape Other

Smoke/Soot/Char:	Bulk	Wipe	Tape	Other
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Relinquished By: [Signature]

Date: 7.13.2023

Received By: AD JUL 13 2023

Time/Date: 8:42
APEX RESEARCH

Relinquished By: _____

Date: _____

Received By: _____

Time/Date: