

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

P139073134

<b>FACILITY:</b> RECLAIMED AGGREGATE INC DBA L & L AGGREGATES		<b>SRN / ID:</b> P1390
<b>LOCATION:</b> 6153 AURELIUS RD, LANSING		<b>DISTRICT:</b> Lansing
<b>CITY:</b> LANSING		<b>COUNTY:</b> INGHAM
<b>CONTACT:</b> Aaron Perrault , Owner		<b>ACTIVITY DATE:</b> 08/15/2024
<b>STAFF:</b> Michelle Luplow	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Onsite inspection to determine compliance with General PTI 88-23.		
<b>RESOLVED COMPLAINTS:</b>		

**Inspected by:** Michelle Luplow (author) and Jeremy Brown (AQD Asbestos)

**Personnel Present:** Ryan Flannery, Crusher operator

Jordan, Site Operator

**Off-site Personnel:** Aaron Perrault, Owner (rockbuilt.inc@gmail.com)

### **Purpose**

Conduct an unannounced, scheduled, on-site compliance inspection to determine compliance with L & L Aggregates (L & L) General Permit to Install (PTI) No. 88-23 for a non-metallic minerals crushing facility, which was issued 7/19/23. This will be the first time L & L has been inspected under the General PTI. Particular attention was given to ensuring that source piles for the crusher did not contain suspect ACM because L & L receives materials from many outside sources.

### **Facility Background/Regulatory Overview**

L & L processes (crushes and screens) asphalt, concrete, house demolition materials, cinder blocks, etc. L & L receives these various types of materials from outside sources, such as residential, municipal, and commercial entities.

L & L owns a diesel-fired engine that is used to power the crushing equipment.

The crushing equipment is subject NSPS Subpart OOO for non-metallic mineral crushers. NSPS Subpart OOO conditions are incorporated into the PTI. L & L is required to report to the AQD's annual emissions reporting system, SLEIS.

### **Inspection**

At approximately 9:40 a.m., Jeremy Brown and I arrived at the site and met with Ryan Flannery and Jordan to conduct the on-site inspection.

### **FGCRUSHING**

The equipment was operating during the inspection. I verified that all equipment listed in their General Permit to Install application was accounted for and labeled appropriately during the inspection

(Condition 1.11). See Table 1.

During the inspection, concrete mixed with soil was being processed.

### Visible Emission Limits

VE's are limited to the opacities specified in Table 1 for the NSPS-subject equipment. Wheel loaders, truck traffic, and material storage piles are limited to 5% opacity.

**Table 1. Permitted Equipment**

Equipment	Description	Status
Conveyors (7% Opacity Limit - NSPS):	<p>Grasan Stacking Conveyor (Device ID CP2306), Serial # 10030P2222</p> <p>Grasan Stacking Conveyor (Device ID CP2304), Serial # 5524P3498</p> <p>(Enclosed at top, used for return)</p> <p>Grasan Stacking Conveyor (Device ID CP2305), Serial # 10030P222</p> <p>Marco Conveyor (Device ID CP2308), Serial # 139744</p>	No opacity
Crusher (12% Opacity Limit - NSPS):	<p>Hazemag Impact Crusher (Device ID CP2301), Serial # HU-1652</p> <p>Hopper/Shaker – part of crusher (Device ID CP2301 – which was relabeled from CP2302, since it's part of the crusher)</p>	Opacity present likely in excess of 12% standard.
Screen (7% Opacity Limit - NSPS):	Deister Screen (Device ID CP2303), Serial # 1652P-3493	No Opacity
Rock Drill (5% Opacity - PTI)		

	One Rock Drill being used to break down concrete into smaller chunks prior to crushing.	At or below 5% opacity
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### Emission Limits & Equipment

There are emission limits associated with baghouse dust collectors; however, L & L does not employ baghouses for dust control; water spray is used instead.

The hopper of the crusher was equipped with water spray during the inspection. J. Brown and I had the sun within the Method-9 140 degree angle to our backs and it appeared the hopper below the crusher had exceedances of greater than 12% opacity. Ryan Flannery stopped the crusher operations after we informed him of the excessive fugitive dust, and he hooked up an additional water spray at the hopper. The addition of the water spray appeared to reduce fugitive emissions; however, there was another location on the crusher which also appeared to be generating dust in excess of the standard, but due to the location of the equipment, we were unable to get a good view of the equipment while still maintaining the sun to our back to determine where the opacity was coming from. I plan to revisit the site again in the afternoon when the sun is at a better angle to determine where the dust is coming from and whether it truly is in excess of the standard.

R. Flannery said he planned to install water spray on the crusher return conveyor, as he believes this will further minimize dust from the process. He provided a photo of the installed spray bar on Wednesday, August 21, and said that they did not operate the equipment on Monday or Tuesday, and installed the spray bar on Tuesday, August 20, around 3:00 p.m. I will assess whether this is sufficient water spray at a future site visit.

R. Flannery said that crushing concrete is especially dusty, and so he tries to ensure the concrete is mixed with soil to minimize dust from concrete crushing. During this site visit, it appears that even with soil mixed in, the crushing of concrete can cause dust in excess of the NSPS opacity standard. Future site visit are necessary observe the opacity with afternoon sun.

### Material Usage Limits, Testing & Reporting

FGCRUSHING has a limit of 2,000,000 tons of non-metallic mineral processed per calendar year per site. This limit does not include materials processed at sites with site-specific permits. L & L does not have any site-specific permits at this time. L & L is required to keep daily and annual records of the amount of material processed in tons for each site. L & L provided the daily and calendar year records for November 2023 – August 15, 2024, as requested. Records indicate that a total of 6,071 tons was crushed from startup through December 2023, and 37,294 tons crushed between January and August 15, 2024.

L & L is required to ensure that no asbestos tailings or asbestos-containing waste materials are crushed. Jeremy Brown and I surveyed the various source piles across the site. Based on Jeremy Brown's professional judgment as an asbestos inspector, all piles appeared to be acceptable, except for a pile that specifically originated from the McLaren demolition. This pile was intentionally kept separate from the other piles because it consisted of transformers, scrap metals, and other debris in addition to concrete materials. L & L staff remove all materials except for concrete to prior to crushing from this pile. Jeremy Brown found suspect ACM material in this McLaren pile and took 2 samples of

these materials for analysis. Attached are the lab analysis results. Both samples came back negative for ACM materials.

J. Brown and I had a post-inspection follow-up call to ensure owner, Aaron Perrault, understood the company's responsibility for managing materials coming into the site and ensuring that the materials coming in are ACM-free if they plan on crushing it, noting that in the event L & L has a pile on-site that contains ACM, they are responsible for the cost of landfilling the pile or removing all ACM materials prior to crushing. Aaron Perrault expressed that he understood these requirements. J. Brown recommended that L & L receive proof from the hauler that the materials were tested and documented as ACM-free.

L & L conducted the NSPS Subpart OOO opacity testing on November 13, 2023. Test results indicate compliance with all NSPS opacity limits.

#### **Process/Operational Limits**

**FGCRUSHING** shall not operate unless the Fugitive Dust Control Program specified in Appendix A is implemented

The following is an evaluation of compliance with Appendix A:

#### ***Plant***

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 appear to maintain a minimum free-fall height that ensures minimum to no opacity and therefore L & L is meeting this requirement.

#### ***Truck Traffic***

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.

#### ***Site Roadways and the Plant Yard***

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. During the inspection, loader and truck traffic on the unpaved roads and plant yard were causing fugitive dust in excess of the 5% opacity limit. I informed R. Flannery of this issue and they immediately responded by using their on-site water truck to water down these areas. The water appeared to be sufficient to ensure compliance with the limit.

#### **Compliance Statement**

L & L appears to be in compliance with General PTI 88-23 at this time. Follow-up site visits are necessary to confirm.



**Image 1(Return Spraybar)** : Spray bar added to crusher return. Photo credit: L & L Aggregates



**Image 2(Suspect Source Pile)** : Pile of concrete mixed with other materials (transformers, scrap metal, etc). This pile is where J. Brown found suspect ACM.





**Image 3(Fugitive Dust)** : truck traffic dust present in the distance.



**Image 4(Rock Drill)** : Rock drill used to break large pieces of concrete into small pieces of concrete.



**Image 5(Fugitive Dust)** : Fugitive dust backlit by sun. Future inspection necessary in the afternoon to allow for a proper viewing angle with respect to the sun. Water truck being used to control fugitive dust from plant yard.

NAME M. J. Rudy

DATE 9/20/24

SUPERVISOR RB

DAILY CRUSHING LOG - 2024		TOTAL TONS
DATE	TONS	37,294.00
01/03/24	349.00	
01/05/24	150.00	
01/29/24	125.00	
02/01/24	100.00	
02/05/24	150.00	
02/06/24	200.00	
02/09/24	225.00	
02/12/24	375.00	
02/14/24	380.00	
02/20/24	325.00	
02/23/24	385.00	
02/26/24	350.00	
02/27/24	380.00	
02/28/24	350.00	
02/29/24	400.00	
03/01/24	425.00	
03/04/24	425.00	
03/05/24	400.00	
03/07/24	425.00	
03/12/24	400.00	
03/13/24	425.00	
03/14/24	390.00	
03/18/24	395.00	
03/20/24	425.00	
03/22/24	390.00	
03/25/24	400.00	
03/26/24	390.00	
03/28/24	400.00	
04/01/24	425.00	
04/02/24	400.00	
04/03/24	380.00	
04/04/24	355.00	
04/09/24	375.00	
04/10/24	380.00	
04/12/24	375.00	
04/15/24	380.00	
04/16/24	375.00	
04/17/24	360.00	
04/23/24	390.00	
04/24/24	400.00	
04/25/24	350.00	
04/26/24	380.00	
04/29/24	400.00	



05/01/24	400.00	
05/07/24	425.00	
05/08/24	380.00	
05/09/24	400.00	
05/13/24	375.00	
05/14/24	390.00	
05/15/24	350.00	
05/16/24	400.00	
05/20/24	380.00	
05/21/24	500.00	
05/22/24	475.00	
05/23/24	365.00	
05/29/24	400.00	
05/30/24	375.00	
05/31/24	380.00	
06/03/24	390.00	
06/04/24	400.00	
06/05/24	380.00	
06/06/24	400.00	
06/07/24	360.00	
06/10/24	325.00	
06/11/24	380.00	
06/12/24	425.00	
06/14/24	375.00	
06/17/24	390.00	
06/18/24	380.00	
06/19/24	425.00	
06/20/24	350.00	
06/25/24	400.00	
06/26/24	375.00	
06/27/24	390.00	
06/28/24	375.00	
07/01/24	380.00	
07/02/24	400.00	
07/08/24	400.00	
07/09/24	375.00	
07/10/24	300.00	
07/11/24	350.00	
07/12/24	380.00	
07/16/24	400.00	
07/17/24	425.00	
07/18/24	450.00	
07/19/24	360.00	
07/22/24	350.00	
07/23/24	380.00	

07/24/24	380.00	
07/29/24	400.00	
07/30/24	375.00	
07/31/24	350.00	
08/02/24	380.00	
08/05/24	400.00	
08/06/24	375.00	
08/08/24	380.00	
08/09/24	400.00	
08/12/24	380.00	
08/13/24	350.00	
08/15/24	400.00	

DAILY CRUSHING LOG - 2023		TOTAL TONS
DATE	TONS	6,071.00
11/01/23	294.00	
11/02/23	548.00	
11/03/23	424.00	
11/06/23	50.00	
11/07/23	207.00	
11/08/23	95.00	
11/09/23	453.00	
11/10/23	540.00	
11/13/23	420.00	
11/14/23	132.00	
11/15/23	101.00	
11/16/23	105.00	
11/17/23	81.00	
11/20/23	62.00	
11/22/23	144.00	
11/28/23	238.00	
11/29/23	63.00	
11/30/23	99.00	
12/01/23	63.00	
12/04/23	83.00	
12/05/23	89.00	
12/06/23	87.00	
12/07/23	141.00	
12/08/23	36.00	
12/11/23	70.00	
12/12/23	290.00	
12/13/23	231.00	
12/14/23	40.00	
12/19/23	311.00	
12/22/23	248.00	
12/28/23	144.00	
12/29/23	182.00	



# BULK SAMPLE ANALYTICAL REPORT

Project # 240298

NVLAP Accreditation #101510-0

Client Name: \_\_\_\_\_ State of MI - EGLE/AQD  
Project Name: \_\_\_\_\_ L&L Crusher  
Summary: \_\_\_\_\_ 1 Submitted Bulk Sample, 1 Sample Layer Analyzed.

Date Sampled: \_\_\_\_\_ 8/15/2024  
Date Submitted: \_\_\_\_\_ 8/15/2024  
Date Analyzed: \_\_\_\_\_ 8/15/2024

Client P.O. #: \_\_\_\_\_ N/A  
C.O.C. #: \_\_\_\_\_ N/A  
Report Date: \_\_\_\_\_ 8/15/2024

ERG Sample No.	Client I.D. No.	Description / Location	Asbestos Type	Non-Asbestos Containing Portion	Analyst
1	1	Black asphaltic material, Tar Coating. (Homogeneous)	NAD	Cellulose fibers 1% Synthetic fibers 1% Non-fibrous material 98%	KS





**Comments**

Bulk samples were analyzed using the USEPA Test Method EPA/600/R-93/116: Method for Determination of Asbestos in Bulk Building Materials and EPA-40 CFR Appendix E to Subpart 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples. The constituent percent reported represents an estimate of the area percent of the component. The test report relates only to items tested. This report is not intended to be used as a product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced, except in full, without the written approval of the laboratory. Individual sample layers are homogeneous, unless otherwise noted.

If no asbestos was detected in a sample the acronym NAD (no asbestos detected) will appear in the Asbestos Type column of the report.

Fine fibers like those in floor tile may not be discernible by this method.

Factors related to measurement uncertainty have been identified and are available up request.

Test items were received in acceptable condition unless otherwise noted. Revision 5.0 dated 08/27/19.

Approved Signatory: 

Date: 8/15/2024



# Environmental Resources Group

3125 Sovereign Drive • Suite B • Lansing, MI 48911  
Phone: 517-999-6020 • Fax 248-924-3108

PAGE 1 of 1

Client Name: <u>State of MI EGLE/AQD</u>				MATRIX (SEE RIGHT CORNER FOR CODE)	# OF CONTAINERS	<u>Asbestos</u>	PARAMETERS										Matrix Code			
Contact Person: <u>Jeremy Brown</u>							HOLD SAMPLE	S	Soil	GW	Ground Water									
Project Name/ Number:								A	Air	SW	Surface Water									
Project Location: <u>L&amp;L Crusher</u>								O	Oil	W	Wastewater									
Email Distribution List:								B	Bulks	X	Other: Specify									
browning9@michigan.gov																				
Phone No.: <u>517 599 7825</u>																				
Purchase Order No.:																				
Date	Time	Sample #	Client Sample Descriptor														Remarks:			
8/15	11:00	1	Tar coating		1															
Comments:				Samples received in acceptable condition <input checked="" type="checkbox"/>																
Sampled/Relinquished By: <u>[Signature]</u>				Date/ Time: <u>8/15/24 @ 12:00</u>				Received By: <u>[Signature]</u> 8/15/24												
Relinquished By:				Date/ Time:				Received By:												
Relinquished By:				Date/ Time:				Received By Laboratory: <u>[Signature]</u>												
<u>X</u> Turnaround Time ALL RESULTS WILL BE SENT BY THE END OF THE BUSINESS DAY														LAB USE ONLY						
Same day _____ 1 bus. day _____ 2 bus. days _____ 3 bus. days _____ 4 bus. days														ERG project number: <u>240298/0006</u>						
5-7 bus. days (standard) _____ Other (specify time/date requirement): _____														Temperature upon receipt at Lab (if applicable): _____						
Please see back for terms and conditions																				