

B3534
MAWILA

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B353436261

FACILITY: EDW. C. LEVY CO. PLANT 2 PORTABLE CRUSHER		SRN / ID: B3534
LOCATION: 9400 EAGLE, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT: Alicia Ramsdell, Environmental Engineer		ACTIVITY DATE: 08/18/2016
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <i>Minor</i>
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : August 18, 2016
 TIME OF INSPECTION : 10:30 am
 NAICS CODE : 327992
 EPA POLLUTANT CLASS : PM
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Alicia Ramsdell
 FACILITY PHONE NUMBER : 248-675-0093
 FACILITY EMAIL ADDRESS : aramsdell@edwclevy.net

FACILITY BACKGROUND

The Edward C. Levy Company operates this portable concrete crusher. This crusher has been located in Sanilac County since at least January 2015. There currently is no plan to move this portable crusher.

REQUIRED PPE

Steel toed shoes and a hardhat should be worn anytime that a portable crusher is being inspected. A safety vest should also be worn.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility.

PROCESS EQUIPMENT AND CONTROLS

The facility is permitted to operate a portable concrete crusher with appropriately included water controlling sprays. Recently the facility added an additional jaw crushing stage to the process. Dust is controlled throughout the entire system using water. Fugitive dust is controlled throughout the yard by both water and applications of calcium chloride.

INSPECTION NARRATIVE

During my review of the 2015 MAERS, this facility was reported to have been in Sanilac County for all of 2015. On Friday July 1, 2016 at 11:30 am I sent an email to Mr. Benjamin Kroeger, Environmental Engineer and Mr. Thomas Green, Director of Environmental Services to determine where the crusher was currently located. On Tuesday July 5, 2016 at 8:20 am I received an email response from Mr. Kroeger. Mr. Kroeger stated that the crusher was still located in Sanilac County.

On August 18, 2016 I met with Ms. Alicia Ramsdell, Environmental Engineer with Edw. C. Levy Co. and Pat, who is an operator with the portable crusher. Recently, the portable crusher permit was modified to add an additional jaw crusher to the beginning of the process. As part of the modified permit, the facility is planning to perform visible emission (VE) readings on the entire plant on August 30, 2016.

When I arrived at the facility I observed some track out onto the roadway. The facility is located in a rural area, with no nearby neighbors. A water sprinkler was watering the yard near the scale. The yard is unpaved. The scale building and the office trailer are set back from the road. The crusher is located near the rear of the property in a large pit. Other activities occurring at this location are earth moving vehicles such as front loaders and diggers. No other production occurs at this location.

After discussing the process, we drove to the crusher. When we exited the vehicle, there was a sulfur odor. Most likely this odor comes from naturally produced sulfur in the watering ponds as this water is used to control dust on this site. Minimal VE's were seen from the plant as a whole, with the most VE coming from the secondary crusher. The ground surrounding the crusher as very wet as a result of recent rainfall that had occurred in the area. The crusher was operating during the inspection.

The facility maintains records on the monthly amount of material crushed, and a 12-month rolling average on the amount of material crushed. The facility does not crush any slag at this location.

APPLICABLE RULES/PERMIT CONDITIONS

This crusher was operating under the permit to install (PTI) 206-03C, which was approved on August 15, 2016. Here is an evaluation of the permit conditions:

EU-PROCESS – A combination of process equipment used to reduce larger materials down to smaller sizes, classify and sort materials into various product types, material handling and transporting of material storage areas. Control methods include equipment enclosures and water sprays.

- i. **Emission Limits – Compliance.** During the onsite inspection, a minimal drop distance was maintained for the final product. There were no VE observed at this point of the process.
- ii. **Material Limits**
 1. **Compliance.** Only rocks and materials coming directly from the earth are being crushed. No asbestos is being crushed at this location.
 2. **NA.** The facility does not crush slag at this location.
 3. **Compliance.** During 2015, this plant crushed 74,930 tons of materials. The plant did not begin crushing until March 2016 according to the records collected during the onsite inspection. Between March 2016 and my August 2016 onsite inspection, the plant had crushed 31,150 tons of materials. For the past 20 months, the facility has crushed a total of 106,080 tons of material. The facility is limited to 2,000,000 tons of material processed during a 12-month rolling time period.
- iii. **Process / Operational Restrictions**
 1. **Compliance** – The facility is following the fugitive dust plan. During the onsite inspection, the roadway near the office trailer was being treated with water. A copy of the records for the application of calcium chloride is attached to this report. Calcium chloride was last applied on July 5, 2016. There was minimal trackout observed from the entrance of the site onto the main road.
 2. **Compliance** – The facility appears to be complying with all the conditions of subpart A and OOO. The facility is choosing to preformed VE readings on the entire plant as part of this newly issued permit, which exceeds the requirement as only the newly added equipment is required to be subjected to the VE testing.

3. During the onsite inspection, the plant appeared to be operating within the opacity limits. On August 15, 2016, this permit was approved to include the jaw crushing unit at the beginning of the process. This new unit required the facility to preformed visible emission testing within 30 days of the permitting being approved. The facility had decided that the VE testing would be performed on the entire plant by the end of August 2016.
- iv. Design / Equipment Parameters
 1. Compliance – Water sprays are used at different portions of the crushing process. These water sprays appear to have been operating properly during the onsite inspection.
 2. NA – No slag is crushed at this location.
- v. Testing / Sampling
 1. Undetermined – This permit was issued on August 15, 2016. The facility has until September 14, 2016 to perform the VE testing. During the onsite inspection, the facility stated that they planned to perform the VE testing by the end of August 2016.
- vi. Monitoring / Recordkeeping
 1. Compliance – Material processing records and calcium chloride records were maintained and were completed up to the date of the onsite inspection.
 2. Compliance – Monthly processing records were collected during the onsite inspection. On August 30, 2016 I requested daily records for the amount of materials processed for the month of July. These records are attached to this report.
- VII. Reporting
 1. Compliance – This permit was issued on August 15, 2016. No new construction has occurred on this plant since the most recent permit was issued.
- VIII. Stack / Vent Restrictions – NA
- ix. Other Requirements
 1. Compliance – During the onsite inspection, labels were seen on the operating equipment.
 2. NA – The facility has not relocated this equipment in more than a year. The facility has no plans to relocate this equipment.

EU-TRUCK: Truck traffic for the delivery of material products to customers; truck traffic from quarry pit to processing area and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road portions from the quarry pit to the process area.

- I. Emission Limits
 1. NA – During the onsite, minimal VE was observed from the truck traffic moving throughout the site. The site is unpaved. The roadways were wet due to the recent rainfall that had recently occurred.
- II. Material Limits – NA
- III. Process / Operational Restrictions
 1. Compliance – It appeared that the fugitive dust plan was being following during the onsite inspection. The roadways were wet during the onsite inspection. Water was being applied to the roadway near the office trailer during the onsite inspection.
- IV. Design / Equipment Parameters – NA
- V. Testing / Sampling – NA
- VI. Monitoring / Recordkeeping – NA

- VII. Reporting – NA
- VIII. Stack / Vent Restrictions – NA
- IX. Other Requirements – NA

EU-STORAGE: Open area stock piles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles.

- I. Emission Limits
 - 1. Compliance – VE from the storage piles was minimal. The piles appears wet, which was controlling the dust.
- II. Material Limits – NA
- III. Process / Operational Restrictions
 - 1. Compliance – The storage piles appeared wet, which was controlling the dust. The roadways were wet, which controlled the dust.
- IV. Design / Equipment Parameters – NA
- V. Testing/ Sampling – NA
- VI. Monitoring / Recordkeeping – NA
- VII. Reporting – NA
- VIII. Stack / Vent Restrictions – NA
- IX. Other Requirements -- NA

Fugitive Dust Plan

- I. Site Roadways / Plant Yard
 - A. Compliance – During the onsite inspection, the dust appeared to be well controlled. The roadways were wet, and water was being applied to the roadway near the entrance of the facility. A record of calcium chloride applications is attached to this report.
 - B. NA – The roadway did not appear to need sweeping.
 - C. NA -- No spillage was observed on the roadway
- II. Plant – Compliance. The drop distance is minimalized manually. The drop arm is controlled by hydraulics. During the onsite inspection, it appeared that the facility was maintaining a minimal drop distance.
- III. Storage Piles
 - A. Compliance – The facility was maintaining minimal drop distances between the crusher and the storage piles.
 - B. Compliance – The storage piles appeared wet during the onsite inspection, which was controlling the dust.
- IV. Truck Traffic – NA. I did not observe the loading or unloading of any trucks during the onsite inspection.
- V. AQD / MDNRE Inspection – NA. At this time, it appears that this fugitive dust plan is effectively controlling the dust at this site.

MAERS REPORT REVIEW

I reviewed the MAERS on March 15, 2016. The report was received on March 4, 2016. The diesel fuel was initially reported as 11240 e3 gal, which was an extremely high amount. I contacted the facility and they agreed that this value was too high. The diesel fuel amount was corrected to 11.240 e3 gal. All of the emissions were recalculated using the lower fuel volume. The emissions appear to have been reported accurately.

FINAL COMPLIANCE DETERMINATION

This portable crusher appears to be operating in compliance with all state and federal

regulations as well as all permit conditions. The current relocation notification states that the EDW. C. levy planned to keep this portable crusher at this location until December 31, 2016. However, the facility has no plans to relocate this facility at the end of the year.

NAME Jill Zimmerman

DATE 9/1/16

SUPERVISOR JK