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

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FACILITY: STONECO INC	SRN / ID: B4923			
LOCATION: 6837 SCOFIELD RD, M/	DISTRICT: Jackson			
CITY: MAYBEE	COUNTY: MONROE			
CONTACT: Joshus Markgraff, Michig	ACTIVITY DATE: 08/05/2019			
STAFF: Diane Kavanaugh Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT		
SUBJECT: On 8/5 Conducted complete FCE SM Opt Out facility inspection. On 8/1 attempted inspection. Both dates, accompanied by Stephanie Weems, AQD. New plant manager was on vacation and plant on 2-day shutdown for maintenance. Determined best to return on Monday 5th. We did meet briefly with Larry, Operator and asked some questions and observed wheel wash near offices and left site. Returned on 8/5 Conducted complete scheduled inspection.				
RESOLVED COMPLAINTS:				

AQD EGLE staff present: Stephanie Weems and Diane Kavanaugh Vetort

FACILITY LOCATION: Stoneco, Maybee Quarry, Monroe County, 6837 Scofield Rd., Maybee, 48159

Contact Plant Manager: Joshua Markgraff (734) 587-7125 and (734) 777-1775

<u>Today's Contact</u>: Mike Yeager, Environmental and Mining Technician, Stoneco of Michigan, A CRH Company, 7555 Whiteford Road Ottawa Lake, 49267. (734) 770-1311, <u>Michael.yeager@mipmc.com</u> Works with Sue Hanf, EE (734) 854-2265 and (734) 777-3647.

Safety Note: PPE required hard hat, vest and boots. It is also required to watch a Safety Video and complete and sign a Hazard Training & Recognition Checklist; valid for one year. Both Stephanie and I did this.

On August 5, 2019 the AQD conducted an inspection of a non-metallic mineral crushing plant owned and operated by Stoneco of Michigan, now part of a larger company referred to as CRH. Oldcastle purchased Stoneco & Cadillac Asphalt. The crushing operation is located at the Maybee Quarry (6837 Scofield Road) where the company mines limestone to be processed in its crushers for sale primarily for road and other construction related activity. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD) administrative rules; federal NSPS Subpart OOO for Non-Metallic Mineral Processing Plants; and Permit-to-Install (PTI) #133-98G for a non-metallic mineral crushing operation, last revision added a Pep Screen (10/17/18).

AQD learned that Stoneco is close to having mined out the west side quarry. They have recently expanded to property they own across Scofield Road to the north. At this time operations are just beginning and does not involve new equipment. We observed that Scofield is closed at the corner of Doty. There is a farm house and field on the north side of Scofield. Apparently mining will occur behind this farm.

The following EU are part of the PTI 133-98G:

EUPROCESS covers the crushers, feeders, conveyors and screens of the overall limestone processing plant.

II. Material Limits, Condition 2. The permittee shall not process more than 20,000 tons of material per day, nor 5,000,000 tons of material per 12 month rolling time period. COMPLIANT

Stoneco records received on 8/12 report production in 12 month rolling tons for months ending January 2018 through July 2019 never exceeded the permit limit of 5 million tons. Average 12 month rolling is around 600,000 tons. Highest *tons per month* occurred in September 2018 at 107,273 tons which if operated for 4 wks at 5 days/wk or 20 days, would equate to 5,364 tons per day < 20,000 tons limit. Daily records were provided and were checked against totals.

III. Process/Operational Restrictions, Condition 1. requires meet Opacity standard listed in Appendix A; and Condition 2. requires maintain the FDP in Appendix B; Condition 3. requires compliance with the NSPS Subparts A and OOO. NOT OPERATING

IV. Design/Equipment Parameters, Condition 2. The permittee shall install and maintain a belt scale on the transfer conveyor (Barber Greene Belt Conveyor 3). COMPLIANT

AQD observed this conveyor but was unable to clearly identify the belt scale. Stoneco follow-up stated the system is now automated and there are multiple scales. Stoneco proposed to submit a permit revision to update this information.

VI. Monitoring/Recordkeeping, Conditions 1 and 2 require records of material processed. COMPLIANT records are kept see above.

EUTRUCKTRAFFIC covers all truck traffic for transport from processing to storage and to customers.

I. Emission Limits, Condition 1. requires visible emissions of not more than 5% from all wheel loaders and truck traffic. COMPLIANT some truck traffic; no visible emissions were observed.

IV. Design/Equipment Parameters, Condition 1. requires wheel wash system be installed, maintained and operated properly. COMPLIANT observed & drove through.

VI. Monitoring/Recordkeeping, Condition 1. requires monthly and 12 month rolling time period records of the amount of equivalent 50-ton transport trucks entering and leaving the facility. COMPLIANT

Stoneco records received 8/12 report January to July 2019 tons shipped and 50-ton equivalent trucks. The highest three months were May: 51,572 tons shipped or 1,031 50 -ton equiv., June: 89,474 tons shipped or 1,789 50-ton equiv., and July: 82,758 tons shipped or 1,655 50-ton equiv. trucks respectively.

EUSTORAGEPILES covers all on site materials stock piled by various sizes and product types.

I. Emission limits, Condition 1. visible emissions from each material storage pile shall not exceed 5% opacity. COMPLIANT no visible emissions were observed.

III. Process/Operational Restrictions, Condition 1. permittee shall not store more than 900,000 tons of aggregate products. COMPLIANT

Stoneco records received 8/12 identify all materials stored as of 7/15/19 in cubic yards and the conversion factor per material type and the resulting measured tons. The total of all materials reported is 205,174.08 tons < 900,000 tons limit

EQUIPMENT LIST Appendix A: includes 4 crushers and numerous associated equipment and their associated required emissions control and opacity limit. PARTIAL COMPLIANCE

We observed all major equipment had labels (numbering), many were identified clearly however some were worn and some had numbers that were not easily identified. AQD requested Stoneco conduct an audit of all their equipment, against the associated numbers /names as identified in the Appendix A list. Any corrections will need to be made and/or the list updated. (See more below).

FUGITIVE DUST PLAN Appendix B: includes the plant wide FD control requirements.

Stoneco appears to be in general compliance with the FDP with the exception that the Sweeper truck should be verified to operate with water, a vacuum system or on wetted material. There was some excess dust observed during its operation on 8/1. It was not observed on-site during the 8/5 inspection.

It is also noted here that the next scheduled inspection must occur during full operation to evaluate overall compliance with the FDP and NSPS.

COMPLIANCE INSPECTION SUMMARY

AQD initially attempted the inspection on 8/1 however the new plant manager was on vacation and the plant was on a two day maintenance shut down. We were able to see that the plant was not operational upon our arrival. It was decided that we would return on Monday 8/5.

On 8/1 we did observe the Sweeper truck on the driveways and perimeter roads around the site. It appeared to be very dry and there was some dust generated. Stoneco was advised that the sweeper should be wet or the water truck should have been used prior based on the FDP. In my experience a dry sweeper on trackout material merely generates fugitive dust itself.

Upon our arrival on 8/5 it was apparent that the plant was again not operating today but we did observe some load out activity at the storage piles. At the office we provided identification and stated the purpose of the visit. We learned they were down due to continued maintenance on one crusher. Also, their water truck, which underwent maintenance last week during 2-day shut down 8/1 and 8/2, has low pressure and a new pump has been ordered. Stoneco also uses the aforementioned Sweeper truck, contracted (wet and dry).

At the office we were informed that Joshua was away from the site at a meeting today. We met with Mike Yeager, who works for Stoneco under Sue Hanf. He agreed to accompany us during the inspection and to provide or obtain all needed recordkeeping and monitoring information. We rode with Mike in his truck around the entire site stopping at various locations. Load out of materials was occurring today. We also observed the preparation of blasting on the upper shelf in the current work area of the quarry. I observed a truck with a drill rig and at least one person working there. We observed a large rock Hammer breaking up boulders at the bottom of the existing quarry near the current working face.

No significant dust was observed while driving through the quarry areas. Maintenance was observed to be working on both sides of Doty Road at the primary crusher prior to the conveyor to the pile that feeds into the tunnel that then crosses over Doty Road to the processing side.

We drove through the EUPROCESS plant and observed the main crushers. We observed maintenance work was being conducted on both sides of Doty Road (runs North and South). One area they were welding, west side at the primary crusher. The second work area was on the east side. This involved a stacked (multiple level) section of the processing plant. Some excess visible emissions were observed in this area as material fell to the ground from higher levels. Fugitive dust emissions did not travel off site and mostly settled in the immediate area.

Walking around the equipment we observed the number labeling. It appeared there are some issues related to labels being clearly visible and with the numbers matching to the Equipment list in Appendix A. I requested that Stoneco audit their existing equipment against the permit list and update it as necessary. It was also requested that the labeling be reapplied where needed. Mike agreed to do this and to follow up with additional information to me along with the requested recordkeeping. This was submitted on 8/12, and is pending submittal of a permit revision application at this time.

We continued to drive around the existing stock piled materials, EUSTORAGEPILES and around through the wheel wash, located near the office and before a Tarp station. We then returned to the office. No fugitive dust was observed from the storage piles or yard. Again it is noted that the plant was not operating today. The wheel wash is required by PTI 133-98G EUTRUCKTRAFFIC Condition IV. 1. and it was installed and operating properly.

OVERALL RECORDKEEPING

Each EU has required recordkeeping, some have associated limits (see EU list above with records review details). I requested all records for the prior 12 month rolling time period ending July 2019, or for the period since the previously submitted MAERS calendar year (so Jan to July 2019). All requested records were received from Stoneco by email on August 12, 2019.

Stoneco informed AQD that a permit revision application would be submitted to address and update the equipment list in Appendix A. Also, Stoneco said the belt scale is installed and maintained on the transfer conveyor and continuously shows the daily throughput rate for the conveyor. However the permit requirement is outdated since the plant has been automated and the daily throughput is continuously monitored on the plant operator screen at various locations including the conveyor output to the primary crusher and conveyor feed to the secondary plant. Stoneco will request updates to reflect the automated system installed on the plant. Stoneco is to submit the application to Lansing by the end of August.

FUGITIVE DUST PLAN

I obtained some records during the closing conference with Mike on 8/5. This included the watering and sweeping record. Those records included some information related to the hydrogen sulfide treatment system and water discharge from the quarry (west side). Stoneco has ponds for hydrogen peroxide treatment and aeration before discharging the pumped water to the ditch along Doty Road. Very little H2S odor was observed near some standing water on the quarry floor. No odor was noted in the predischarge pond. AQD has not historically received many complaints for this facility.

FDP records were again provided with the 8/12 submittal. Overall Stoneco appears to operating in compliance with the permit FDP Appendix B.

DKV advises that the next scheduled inspection be conducted in June or early July when the plant will more likely be operational.

NAME Mille Contraction DATE \$130/19 SUPERVISOR