

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

B611467708

FACILITY: AGGREGATE RESOURCES		SRN / ID: B6114
LOCATION: 14500 EAST MICHIGAN AVENUE, GALESBURG		DISTRICT: Kalamazoo
CITY: GALESBURG		COUNTY: KALAMAZOO
CONTACT: Henry Balkema ,		ACTIVITY DATE: 05/09/2023
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

Staff, Monica Brothers, arrived on-site at 1:00 pm and met with Mike Bell, Foreman. I introduced myself to Mike and briefly explained the inspection process. We began the inspection with some preliminary questions and by reviewing some records. Aggregate Resources is a stationary nonmetallic mineral crushing facility that mines, crushes, and sorts mineral material. They have about six employees who work a one 12-hour shift, Monday-Friday. They operate the crushing and sorting processes from March to November every year and conduct only maintenance activities during the winter months. They do not have any boilers or emergency generators at the facility, but they do have one parts washer that is serviced by Safety Kleen.

Records:

This facility is currently operating under PTI #81-77A. Some of their equipment is likely subject to 40 CFR, Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants, such as their crushers, but some of the equipment may be considered grandfathered under this federal regulation, depending on manufacture dates. Mike was able to show me that they are keeping track of their throughput. Their permit limits them to operating at a maximum of 700 tons/hour. Mike said that they typically do not operate above 500-550 tons/hour, with an absolute maximum capacity of 650 tons/hour. Their permit also limits them to less than 1,000,000 tons/year of material processed. Records showed that they processed 616,750 tons in 2021, 601,422 tons in 2022 and 119,000 tons so far in 2023. Mike also showed me that they are keeping track of their fugitive dust control activities and are watering the roadways much more than the required twice per month. I observed a watering truck upon arrival at the facility that day, and this seemed to keep the roadway dust at an acceptable level. I asked Mike if they had any records of their monthly moisture tests for the material that goes into the crushers. He said that he did not have any such records. After the inspection, I contacted Henry Balkema to see if he had these records in a different location, but he said that he could not find them. He said that he would have these tests performed going forward. A Violation Notice will be sent for lack of moisture tests.

I also asked for verification of visible emissions testing on the equipment listed in their permit or equivalent equipment if the original equipment has since been replaced. Mike did not have any records to show compliance with this permit condition, but after the inspection, Henry sent me a visible emissions test results document for the El-Russ 3042 Crusher. This is the only piece of equipment that had proof of visible emissions testing. A Violation Notice will be sent for the lack of visible emissions testing on the other equipment.

After the inspection, Henry also sent me a current listing of on-site equipment. However, some of the columns of information, such as manufactured date, tested, NSPS subject, were not filled in

or were incomplete. Some of the equipment had IDs but others did not. Henry mentioned that they recently began the process of taking stock of their equipment and have been gathering this information but have not yet completed this project. Without this information, it is not clear which equipment is subject to the NSPS and/or testing requirements. The facility needs to obtain this information and make sure that the required tests are conducted on each piece of equipment. The facility also needs to make sure each piece of equipment has an ID and is appropriately labeled.

Tour:

After our discussion about records, Mike took me on a tour of the plant. They no longer have the TelSmith 2540 jaw crusher and have replaced it with a Pioneer 2854 jaw crusher. They currently have a total of three crushers on-site, the Pioneer 2854, El-Russ 3042, and Allis H-4000. In the past, this facility has swapped crushers under Rule 285(2)(c), and it seems like this exemption would again apply to this new Pioneer 2854 crusher. I did not see any visible emissions during my inspection of the crushing, screening, and conveying equipment, and the crushed material seemed well-watered. They have many water sprayers for the equipment and the drop distances seem to be acceptable. Mike showed me that some of the equipment does have a welded label, but they were not very legible and may not correspond to the current IDs in their recordkeeping. I suggest that the facility install new large and legible labels to each piece of equipment. I observed that the posted speed limits at the plant were 20 mph. Appendix A in their permit requires the speed limits to be 10 mph or less. A Violation Notice will be sent for this. I also viewed the parts washer. The lid was closed, and the rules were posted. They use Safety-Kleen Premium Solvent (Virgin and Recycled) in the unit, which is Distillates (petroleum), hydrotreated light, CAS # 64742-47-8 and 100% VOC. This unit is not heated or agitated and is maintained by Safety-Kleen.

The facility was not in compliance at the time of inspection. A Violation Notice will be sent for lack of monthly moisture testing, lack of visible emissions testing, and the speed limits over 10 mph.

NAME 

DATE 6/15/23

SUPERVISOR RIL 6/15/23