

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

N521167675

FACILITY: Stoneco of Michigan		SRN / ID: N5211
LOCATION: 6301 BELLEVIEW, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Michael McIntosh , East Rail Manager		ACTIVITY DATE: 06/09/2023
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection of facility that was last inspected by the AQD in 2020.		
RESOLVED COMPLAINTS:		

On June 9, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced inspection of Stoneco of Michigan's Flint facility, which had last been inspected by AQD in 2020.

Facility Contacts:

Michael McIntosh, East Rail Manager, 810-577-1911, mmcintosh@mipmc.com

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; mcgeend@michigan.gov

Facility Description:

The Flint site of Stoneco of Michigan (formerly CYDI of Michigan) receives aggregate via railway and occasionally truck and distributes it via truck.

Emission units:

Emission Unit* ID	Emission Unit Description	Permit to Install (PTI) Number	Compliance Status
EURAILUNLOAD	A rail yard terminal which handles aggregate and formerly handled coal. Material is received by rail and truck, stored on site, and shipped out via truck. Rail car unloading takes place in a two sided building enclosure with an underground hopper. Material is conveyed to on-site storage piles. Water sprays are located at various transfer points. Water is provided by the City of Flint.	147-09	Compliance; not operating
		147-09	Compliance

EUTRUCK TRAFFIC	Truck traffic for delivery of material products; truck and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road portions associated with the process area.		
EUSTORAGE	Open area stock piles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles	147-09	Compliance

*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.

Regulatory overview:

This facility is considered to be a true minor source, rather than a major source of air emissions. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

It is also considered a minor, or *area source*, for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

It is regulated by Permit to Install No. 147-09, for unloading, handling, and loading aggregates.

This facility is not subject to any federal New Source Performance Standards (NSPS) or Maximum Achievable Control Technology (MACT) standards.

Fee status:

This facility is not considered fee-subject, because it is not a major source for either criteria pollutants or hazardous air pollutants, nor is it subject to any NSPS or MACT standards. It is not required to report emissions annually via the Michigan Air Emission Reporting System (MAERS).

Location:

The facility is at 6301 Belleview Drive, Flint, Genesee County. It is located between Dort Highway and I-475 with Carpenter Road to the north and E. Pierson Road to the south. A residential area is located immediately west of the facility yard and to the east is a primarily industrial area.

Most recent inspection:

- 7/21/2020; no violations

Most recent dust complaints:

- 2016: one complaint.
- 2008: one complaint.

Safety attire required:

D. McGeen wore steel toed boots, safety glasses with side shields, a hard hat, and a high visibility safety vest, with hearing protection available, if needed. Due to the COVID-19 pandemic, he wore a disposable paper mask when indoors, out of personal preference.

Arrival:

- Arrival time: 11:00 AM
- Weather conditions: Sunny, 66 degrees F, and hazy from distant wildfire smoke, with winds out of the NW at 8 miles per hour (mph), per weather app
- Fugitive dust observed upon arrival: None

As D. McGeen approached the site on Belleview, southbound, this paved public road appeared to have been swept. The paved road gave way to an unpaved entrance drive, which was dry, but at the posted speed limit of 10 mph, the state car did not appear to be stirring up fugitive dust.

D. McGeen noted a portable rotating soil screening process, or trommel, parked at the west end of the plant yard. Michigan Air Pollution Control Rule 285(2)(t) exempts the following from the need to obtain a permit to install:

(t) Equipment for the mining, loading, unloading, and screening of uncrushed sand, gravel, soil, and other inorganic soil-like materials.

Pre-inspection meeting:

Upon reaching the office area, D. McGeen was met by Dylan, operator. D. McGeen provided his credentials, per procedure, and completed the site-specific safety orientation required for site visitors.

The aggregate they sell is said to be used by Hot Mix Asphalt plants, ready mix concrete plants, general construction contractors, and road building and excavating contractors, both small and large. The company no longer receives or sells any coal at all, the AQD was informed. It is also the AQD's understanding that they receive either washed aggregate, which has had most of the fines removed, and so is less dusty, or they receive washed sand, which still has some moisture content to it.

Inspection:

No aggregate was being delivered by rail or truck, at the time of the inspection. Specific emission units are discussed below.

EURAILUNLOAD; PTI 147-09:

D. McGeen was told they get rail deliveries 3 times per week, averaging about 20 cars per train. about D. McGeen was shown the Hewitt car shaker, which physically shakes railcars to help unload the coal into an underground hopper, or receiving pit, below. The hopper has two feeders and leads to a 36 inch conveyor belt. The building provides enclosure to reduce emissions of fugitive dust, D. McGeen was told. The baghouse for the process is no longer used, it was explained, as it was for the handling of coal, which is no longer done at this site. The current PTI does not require use of the baghouse for handling aggregate.

It is the AQD's understanding from past inspections that from December through March, they stop receiving rail car deliveries. This is because railcars are open to the elements, and precipitation could freeze the aggregate into a solid mass, which the Hewitt unloader would not be able to shake free. During these months only, they receive aggregates by truck.

Unloaded aggregates are conveyed by the 36 inch conveyor to on-site storage piles. The conveyors are almost completely covered. Water sprays are located at various transfer points, throughout the site, with two serving the unloading conveyor system. D. McGeen was shown that the hoses for the dust suppression were in good condition, but was told that they are seldom used, because of the effectiveness of the covers on the conveyors.

The company has their own well onsite. The AQD was shown the inside of their water shed, where they installed a booster pump for the well, to add pressure to the water.

Compliance checklist for Special Conditions (SC) for PTI 147-09, EURAILUNLOAD:

PTI 147-09 SC	Requirement	Comments	Complies?
EURAILUNLOAD, SC I.1	Visible emissions from the drop point and transfer point portions of EURAILUNLOAD shall not exceed 10 percent opacity.	EURAILUNLOAD was not running, at the time of the inspection.	Yes
EURAILUNLOAD, SC II.1	The permittee shall not process any asbestos containing materials in EURAILUNLOAD pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M.	The company indicated that they do not handle any asbestos containing materials (ACM). There was no evidence like demolition debris to suggest the presence of ACM.	Yes
EURAILUNLOAD, SC III.1	The permittee shall not operate EUPROCESS unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained.	The company appeared to be implementing and maintaining the program for fugitive emissions control.	Yes
EURAILUNLOAD, SC IV.	NA	NA	NA
EURAILUNLOAD, SC V.	NA	NA	NA

EURAILUNLOAD, SC VI.	NA	NA	NA
EURAILUNLOAD, SC VII.	NA	NA	NA
EURAILUNLOAD, SC VIII.	NA	NA	NA
EURAILUNLOAD, SC IX.	NA	NA	NA

EUTRUCKTRAFFIC; PTI 147-09:

D. McGeen was told they use about 2000 gallons of water per day, for controlling dust from the plant yard and roadways, as well as periodic calcium chloride applications. He was told they typically apply water a minimum of twice per day, and 5 times per day, on their busiest day. The most recent calcium chloride application was said to be 1 and 1/2 weeks ago, and still appeared effective, overall.

Dylan explained ordinarily he would be applying water to the unpaved roadways and yard, but he was unable today, because he was the only person onsite. Everyone else had been called to the Stoneco Lansing site to help with aggregate unloading, he indicated. The most recent application of calcium chloride was still effective, overall. I was advised to reach out to the East Rail Manager Michael McIntosh, if copies of fugitive dust control records were needed; please see section of their report on post-inspection follow up.

Compliance checklist for PTI 147-09, EUTRUCKTRAFFIC:

PTI 147-09 SC	Requirement	Comments	Complies?
EUTRUCKTRAFFIC, SC I.1	Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUTRUCKTRAFFIC, shall not exceed 5 percent opacity.	They appeared to be meeting the 5% opacity limit.	Yes
EUTRUCKTRAFFIC, SC II.	NA	NA	NA
EUTRUCK TRAFFIC, SC III.1	The permittee shall not operate EUTRUCKTRAFFIC unless the program for	They appeared to be implementing	Yes

	continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained.	and maintaining this.	
EUTRUCK TRAFFIC, SC IV.	NA	NA	NA
EUTRUCK TRAFFIC, SC V.	NA	NA	NA
EUTRUCK TRAFFIC, SC VI.	NA	NA	NA
EUTRUCK TRAFFIC, SC VII.	NA	NA	NA
EUTRUCK TRAFFIC, SC VIII.	NA	NA	NA
EUTRUCK TRAFFIC, SC IX.	NA	NA	NA

EUSTORAGE; PTI 147-09:

Despite the recent dry weather, the storage piles, including sand piles, did not appear to be fugitive emission sources, under current wind conditions. However, when some aggregates were loaded into a customer's truck by the front end loader, the dumping into the truck caused brief high opacity, due to the dryness of the aggregate materials. It would not be expected to exceed 5% over a 6-minute average, however, due to the brief nature of the dust.

Compliance checklist for PTI 147-09, EUSTORAGE:

PTI 147-09 SC	Requirement	Comments	Complies?
EUSTORAGE, SC I.1		There were no visible emissions	Yes

	Visible emissions from each of the material storage piles maintained under EUSTORAGE shall not exceed 5 percent opacity.	from material storage piles.	
EUSTORAGE, SC II.	NA	NA	NA
EUSTORAGE, SC III.1	The permittee shall not operate EUSTORAGE unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained.	They appeared to be implementing and maintaining this.	Yes
EUSTORAGE, SC IV.	NA	NA	NA
EUSTORAGE, SC V.	NA	NA	NA
EUSTORAGE, SC VI.	NA	NA	NA
EUSTORAGE, SC VII.	NA	NA	NA
EUSTORAGE, SC VIII.	NA	NA	NA
EUSTORAGE, SC IX.	NA	NA	NA

Departure:

D. McGeen noted that on the way out of the site at 11:42 AM, northbound at the posted speed limit of 10 mph, there was fugitive dust behind the state car. Fugitive dust had not been noticeable while entering the site in the southbound lane, this morning. The fugitive dust was also noticeable in the northbound lane of the paved public road, Belleview Drive, whereas it had not been while driving southbound, earlier. The AQD determined to contact the company, for follow up.

Post-inspection follow-up:

On 6/15, D. McGeen called East Rail Manager Michael McIntosh to inform him of fugitive dust which was noticed, during departure from the site, in the northbound lane of the plant driveway and the northbound lane of Belleview Drive. M. McIntosh indicated that they have done more sweeping and watering at the site since the AQD left on 6/9 and are updating their dust control records to reflect these activities.

He indicated that they have Curbcoco, who is based in Flint, come out to sweep Belleview Drive with a vacuum truck on the day after a rain. He added that because it was raining on this day, they were going to have Curbcoco sweep tomorrow, 6/16. The vacuum truck has a water supply, he added, and they also have their own onsite water wagon, which holds 1,000 gallons. By keeping things wet, the sweeping is said to be less likely to generate fugitive dust.

PTI 147-09, APPENDIX A, Condition I.A requires, in part, that a record of all watering/dust suppressant applications shall be kept on file and made available to the AQD upon request. On 6/15/2023, D. McGeen emailed M. McIntosh, to request copies of fugitive dust control records for 2023, year to date. The records will be reviewed upon receipt.

Conclusion:

No instances of noncompliance were observed.

NAME DATE 6/29/2023SUPERVISOR RB