DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N664054002

FACILITY: CON AGG INC #243-99		**SRN / ID:** N6640
LOCATION: PORTABLE CRUSHING PLANT #243-99, SAULT S MARIE		**DISTRICT:** Upper Peninsula
CITY: SAULT S MARIE		**COUNTY:** CHIPPEWA
CONTACT: Ed Payment , Foreman		**ACTIVITY DATE:** 06/17/2020
STAFF: Michael Conklin	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Self initiated inspection for FY 20.		
RESOLVED COMPLAINTS:		

Facility: Con Agg, Inc. (SRN: N6640)
Location: 4576 S. Mackinac Trail, Sault Ste. Marie, MI 49783
Contact: Ed Payment, Plant Supervisor, 906-630-2003
Terry James, 906-322-3572

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Con Agg, Inc. (Con Agg) is a sand and gravel company based out of Sault Ste. Marie, MI. The company is a division of Norris Contracting, a contracting company for asphalt paving, excavation, trucking and aggregate. Con Agg operates a portable nonmetallic crusher plant between their two gravel pits in Chippewa and Mackinac County. For 2020, to-date, the plant has been operating at the Simmons Pit in St. Ignace Township, Mackinac County.

Emissions

Stone quarrying and processing operations can cause point and fugitive emissions of PM, PM10, and PM2.5. Emissions from process operations should be considered fugitive unless the source of emissions is vented through an air pollution control device or contained and emitted through a force-air vent or stack. Fugitive sources of emissions are generated from machine movement and wind erosion. Emission sources can include hauling, crushing, screening, and transferring of material. The primary factors affecting PM emissions are wind and the moisture content of the material. Moisture on the surface of the material can cause fine particles to adhere resulting in a dust suppression effect.

Emissions Reporting

The facility is subject to the federal New Source Performance Standards (NSPS) Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants and reports its annual emissions to Michigan Air Emissions Reporting System (MAERS). In 2019, the facility reported crushing 147,664 tons of material and emitting 1,476 pounds of PM10.

Compliance History

The facility has not received any violation notices in the past five years. The facility was last inspected in 2016 and found to be in compliance with General Permit To Install (PTI) No. 243-99 and all other applicable air quality rules and federal regulations at that time.

Regulatory Analysis

Con Agg is currently subject to General PTI No. 243-99 for a portable non-metallic crushing plant. The facility is considered a true minor source because the potential-to-emit (PTE) of all regulated air pollutants is less than the major source thresholds. The facility is also considered an area source because the PTE of individual HAPs is less than 9 tpy and the PTE of aggregate HAP emissions is less than 25 tpy. The facility is subject to NSPS Subpart 000 by having a portable crushing plant with a crushing capacity of greater than 150 tons/hr and equipment that has been constructed after August 31, 1983.

Inspection

On June 17, 2020, I conducted a self-initiated inspection on Con Agg at the Simmons Pit in St. Ignace, MI. The gravel pit is located just north of Dixie Highway on E Simmons Rd. I arrived at the site at 12:30 PM and began to check for visible emissions. The weather conditions were 75 degrees Fahrenheit and clear. Upon arrival, the plant was not operating. On-site I met with Ed Payment, the plant supervisor. I explained to Mr. Payment that the purpose of the inspection was to ensure compliance with General PTI No. 243-99 and all other applicable air pollution control rules and federal regulations.

The inspection began by going through the process from the beginning, starting with the primary crusher. Process equipment was inspected for labels and water sprays where required. While inspecting the equipment, it was observed a water spray was only installed on the jaw crusher and not on the screen (SC 1.7). The table below lists the equipment that was observed on-site and labeled (SC I.11).

Equipment	Label Number	VE Tested
Jaw Crusher	3242	5/30/07
Conveyor	C4258	5/30/07
Screen	T6x20	5/30/07
Conveyor	C3070	5/30/07
Conveyor	C3667	5/30/07
Conveyor	S4865	5/30/07
Conveyor	C3042	5/30/07

Additional equipment on-site included a diesel engine for power generation, a 9,000-gallon water truck, and front-end loaders. All process equipment on-site matches equipment listed in the General Permit To Install Application Process Information document (EQP5756).

After reviewing process equipment for labels and water sprays, Mr. Payment started the plant back up to resume operation. The plant is currently setup to crush limestone into sizes ranging from 3/8" minus to 8". The water spray for the jaw crusher was on and receiving water from the water truck. The sun was oriented towards my back as I was observing process equipment for visible emissions. Over the period of 15 minutes of operation, visible emissions from the jaw crusher, screen, conveyors, and transfer points were all less than 5% opacity. The drop heights from conveyors to transfer points were kept low to minimize dust. No visible emissions were observed from the storage piles. Visible emissions from the front-end loaders were less than 5% opacity. The plant roadways appeared well saturated. Con Agg applies calcium chloride on plant roadways as dust suppressant.

Records of material crushed and Method 9 visible emission test documents were submitted via email. Method 9 visible emission tests were performed on all process equipment that were operating. This includes all the conveyors, screen, and jaw crusher. The tests were performed on 05/30/07 by a TriMedia environmental consultant. All equipment passed their tests for their respected opacity limits (SC 1.8).

The company tracks the amount of material crushed daily (SC 1.9). Each loader that removes finish product from the stockpiles has a scale in the bucket that records the weight of each scoop. The computer then sums the daily amount. For 2019, records indicate a total of 59,193 tons of material was processed. This is different than the 2019 MAERS reported throughput. It appears the company copied the 2018 throughput into the 2019 report. The company was notified that this needs to be addressed going forward in MAERS reporting. For 2020, to-date, the plant has crushed 8,269 tons of material.

After the inspection, I discussed recordkeeping and relocation notices with Mr. Terry James, Norris Contracting, and Mr. Payment. No records were supplied for the use of dust suppressants on roadways and storage piles. Mr. James stated he would create a log so that Mr. Payment could record when dust suppressants are used to control fugitive dust.

Special Condition 1.13, the new relocation notice rule, was discussed. I provided Mr. James an informational sheet about what is required to be submitted for a relocation notice. The forms EQP5757, EQP5727, EQP5729,

and EQP5756 are all required to be submitted with each relocation notice, along with a site plan of the new geographical site with all residential or commercial establishments within 1,000 feet of the proposed facility site identified. Mr. James reviewed the document and stated the required information would be submitted going forward.

As noted above, a water spray was not installed on the screen being used. SC 1.7 requires each crusher and screen to be equipped with a water spray and should be operated as necessary to comply with the emission limits. Mr. James stated in a follow up email that supplies were being ordered to install a water spray on the screen. Mr. Paymont stated that they have never needed a water spray on the screen in the past, but since its required in the permit they will install one in case it becomes necessary to use it. Since visible emissions from the screen were below 5% opacity and the company is willing to comply with their permit by installing a water spray on the screen, a violation notice will not be issued at this time.

Records that were reviewed to determine compliance can be found here: \\Gwn084m1oapf502 \deq\GWN\SHARED\Air Quality Division\CONKLIN\Inspections\N6640.

Compliance
Based on this inspection, it appears that Con Agg, Inc. is in compliance with General PTI No. 243-99 and all applicable air pollution control rules and federal regulations.

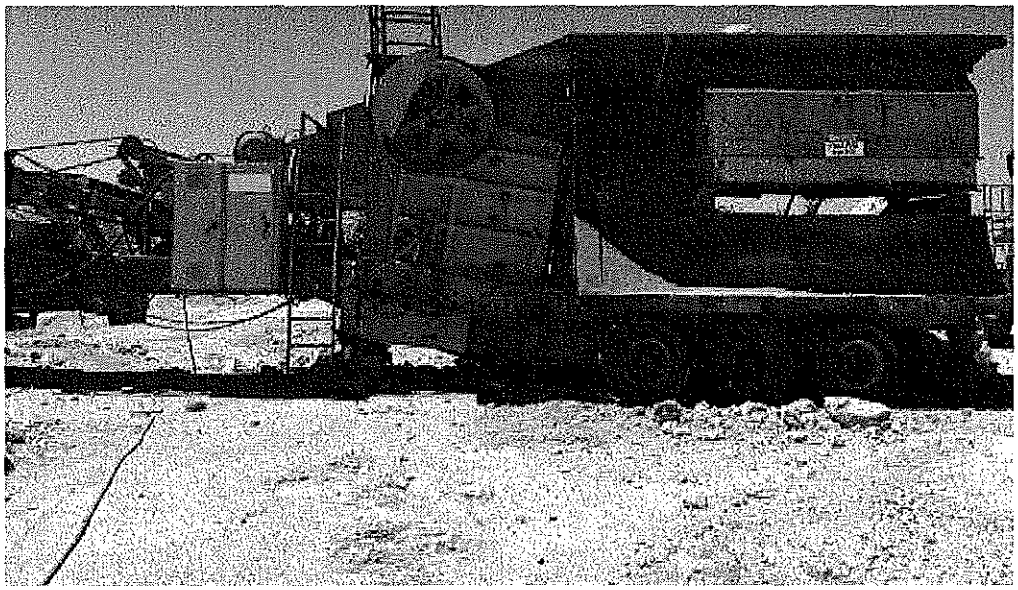


Image 2(Jaw Crusher) : Cedar Rapids primary jaw crusher.

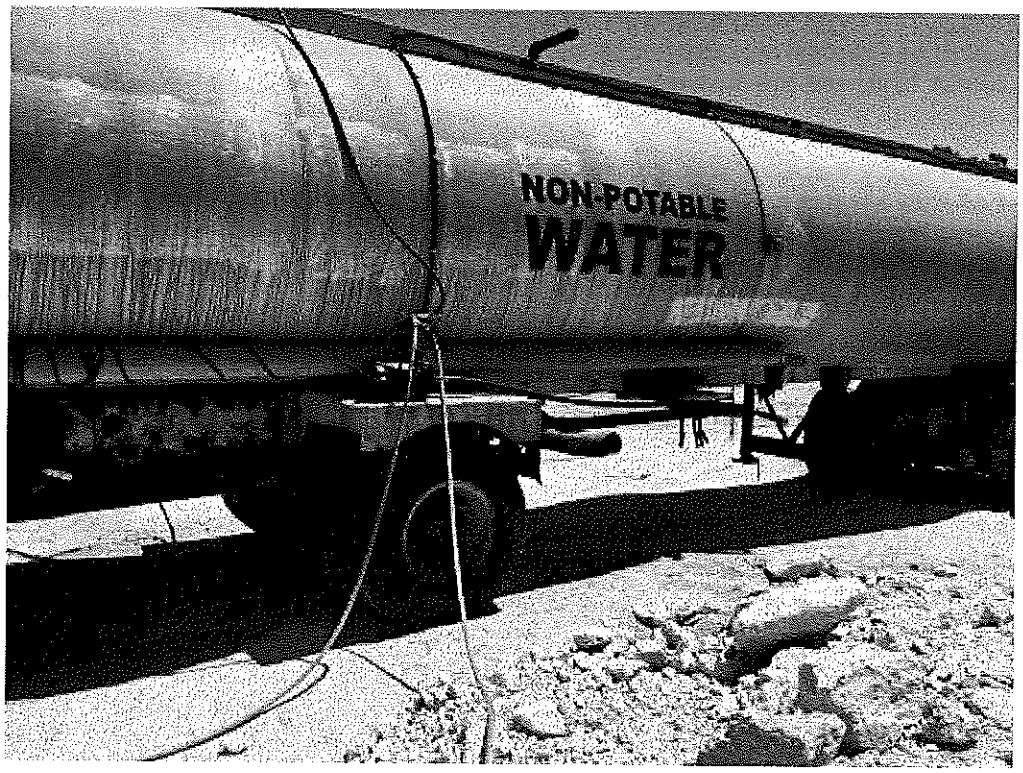


Image 3(Water) : 9,000 gallon water truck on-site.

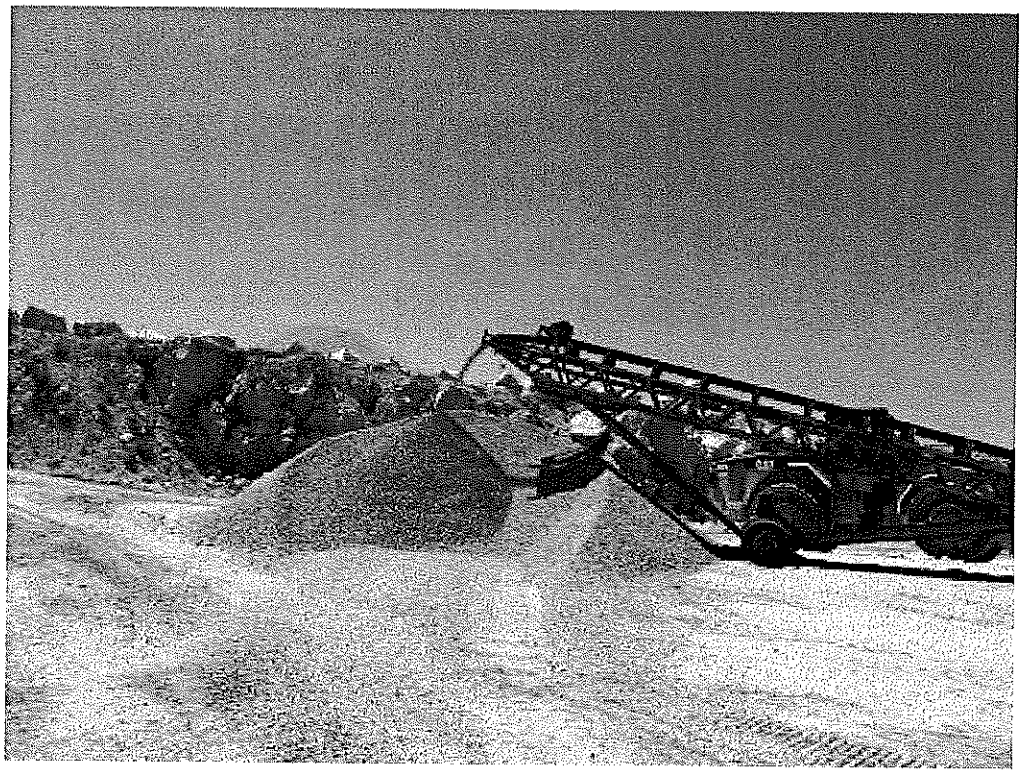


Image 4(Transfer Point) : Transfer point from conveyor to stockpile.

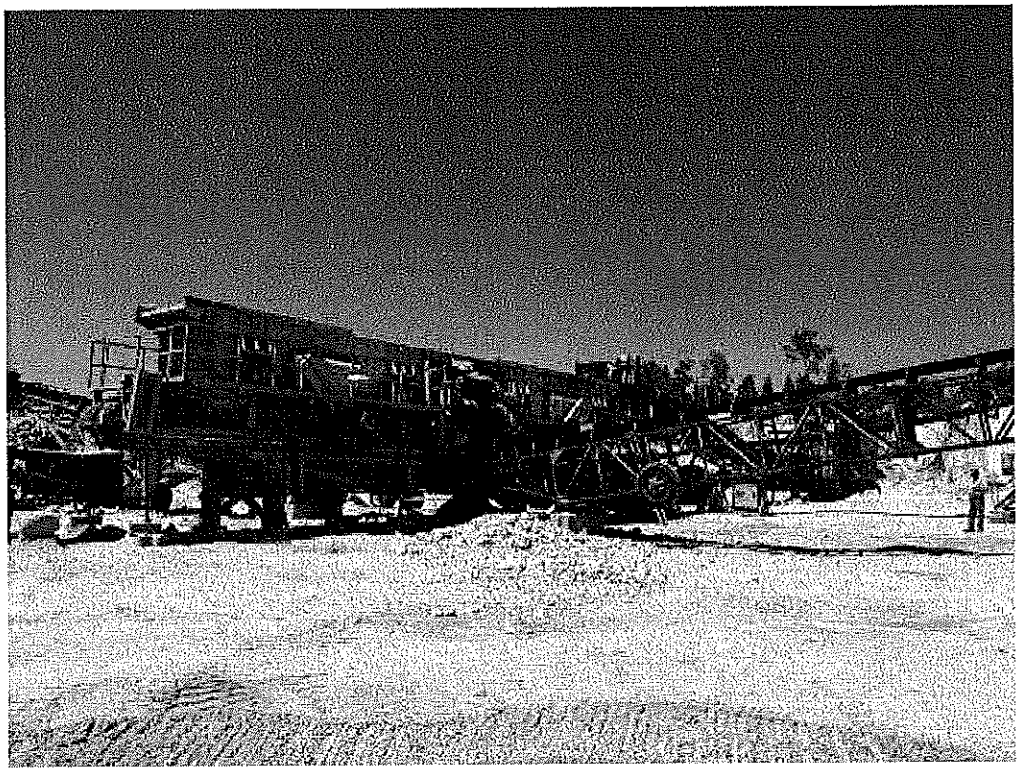
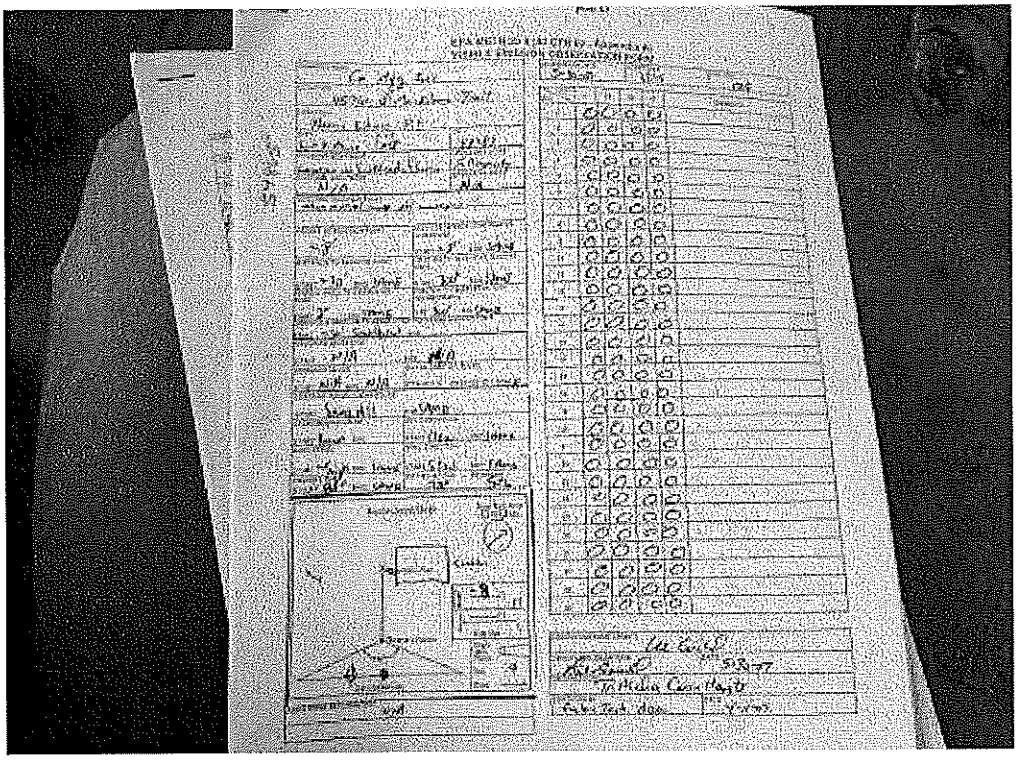
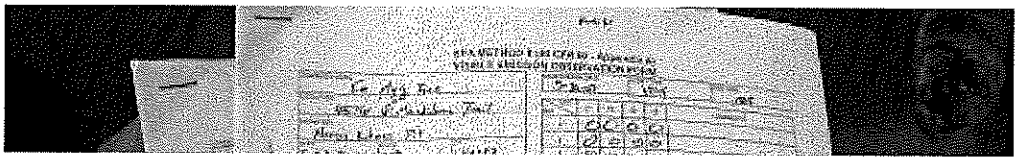


Image 5(Crusher Plant) : Can Agg, Inc. portable crushing plant at Simmons Pit.





NAME Michael Conklin by EJ DATE 7/9/20 SUPERVISOR EJ