

portable



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7555 Whiteford Road
Ottawa Lake, Michigan 49267

STONECO

December 10, 2013

Ms. Dorothy Bohn
MDEQ, Kalamazoo District Office
7953 Adobe Rd
Kalamazoo, MI 49009-5025

Re: Violation Notice, SRN: N6652
Stoneco, Portable 76 Plant

Dear Ms. Bohn:

This letter is response to your Violation Notice dated December 3, 2013. The following addresses the items listed in your letter.

1. Relocation Notice for Stoneco Portable 76 Plant: On November 18 Stoneco faxed the relocation notice to your office. We made several attempts throughout the day and believed that the notice went through sometime in the afternoon. However on November 21, 2013, we were informed by the Lansing Office that your office was experiencing phone issues and therefore we faxed the notice again on November 21.
2. Enclosed is a site plan showing the location of the plant in relation to the property boundary and neighboring houses. The nearest residential house is approximately 500 ft or more from the location of the crusher. The plant sits below grade. To our knowledge, there are no commercial establishments or places of public assembly within 1000 ft.
3. General Permit Condition 1.13b. Your letter states that a relocation notice is required 20 days in advance. However, the general permit for this facility requires a 10 day advance notice. See the attached conditions page 5. For sites that are preapproved, a 2 day notice is required prior to relocation. See attached guidance document taken from the DEQ website for portable Crushing facilities. Stoneco was under the impression that this was a pre-approved site as we have been to this site several times over the past years. After reviewing the procedures, we understand that a notice may be required at the beginning of every year. Therefore we will be submitting a relocation notice at the beginning of each year for every site we anticipate locating to. In addition, we will include a site plan and a site map for each site.

Please let us know if this response satisfies the items of concern in your notice. If you have any questions, I can be reached at 734-777-3647.

Sincerely,

Susanne Hanf
Environmental Engineer

RECEIVED
DEC 12 2013
AQD-KALAMAZOO



Google earth

feet
meters



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Permit Dates

1.11 The permittee shall label all equipment associated FGCRUSHING within 45 days of initial start up according to the company IDs specified in the application (Form EQP5756). Labels shall be in a conspicuous location on the equipment. **[R336.1201, 40 CFR 60.670]**

Miscellaneous/Allowed Modification

1.12 The permittee shall not replace or modify FGCRUSHING, or any portion of FGCRUSHING, including control equipment, unless all of the following conditions are met: **[R336.1201a(1), 40 CFR Part 60 Subparts A and OOO, R336.2001]**

- a) The permittee shall update the general permit by submitting a new Process Information Form (EQP5756) to the Permit Section and District Supervisor, identifying all existing and new or additional equipment added to the process a minimum of 10 days before the equipment is replaced or modified.
- b) The permittee shall continue to meet all general permit to install applicability criteria after the replacement or modification is complete.
- c) The permittee shall keep records of the date and description of the replacement or modification.
- d) The permittee shall notify the Air Quality Division, within 15 days after startup of any new or additional equipment, of the actual date of initial startup.
- e) All new or additional equipment that is subject to the federal NSPS Subpart OOO, which has not been previously tested, shall comply with the testing requirements of the NSPS.

1.13 The permittee shall not relocate FGCRUSHING to any new geographical site in Michigan unless all the following criteria are met: **[Act 451 324.5505(5), R336.1201, R336.1205, R336.1901]**

- a) The facility shall have no outstanding unresolved violations of any of the Michigan Department of Environmental Quality Air Pollution Control rules, orders, or permits; or Federal air quality regulations.
- b) A notice of intent to relocate (Relocation Notice Form EQP5757); a copy of the original general permit forms (EQP5727, EQP5729 and EQP5756); any Process Information forms for previous modifications; and a proposed site plan identifying the proposed new geographical site and the probable duration at the new site shall be provided to the appropriate district office and the Permit Section not less than 10 days prior to the scheduled relocation. All residential or commercial establishments and places of public assembly within 1,000 feet of the proposed facility site shall be clearly identified on the proposed site plan.
- c) The crusher(s) shall be located a minimum of 500 feet from any residential or commercial establishment or place of public assembly.
- d) A copy of this general permit and conditions shall be clearly posted in the operator's office or workstation.



RELOCATING YOUR CRUSHING FACILITY

Once you have been issued a General Permit to Install for your first location of operation there may be need to move to a new location to continue operations at a new job site. A relocation is simply picking up the crushing facility and moving it to a new job site. In order to continue to operate the crusher, a *Relocation Notice Form (EQP5757)* must be filled out and filed with the AQD.

To relocate your equipment, your company must first be in compliance with all of the applicable requirements of the General Permit to Install (i.e., no outstanding or unresolved violations). Additionally, the General Permit to Install requires you to keep records of how much material is crushed at any one site in order not to exceed the 2 million tons per-year per-site condition in the General Permit.

Filling out and submitting a *Relocation Notice Form (EQP5757)* is important because no two job sites are the same. There may be different products crushed, the crusher may be located in a different jurisdiction, and the crushing facility may impact the surrounding people or the environment differently. It is also important to remember that the General Permit to Install's conditions for operation continue to be applicable at your new job site. If you are changing the type of equipment to be used in your next crushing facility, you will need to modify your General Permit to Install by submitting a new *Process Information Form (EQP5756)* to identify existing and new equipment. This is especially important when utilizing rented or leased equipment. By filling out and filing the *Relocation Notice Form* and the *Process Information Form*, you are letting the AQD know your crushing facility will be moving to a different location and whether there will be any significant change in your process since your last job.

The Relocation Notice Form (EQP 5757)

	Michigan Department of Environmental Quality - Air Quality Division	FOR DEQ USE ONLY
	GENERAL PERMIT TO INSTALL APPLICATION RELOCATION NOTICE	PERMIT NUMBER

Submitting the Relocation Notice Form

Whether you rent or own the crushing equipment, a *Relocation Notice Form* must be filed at least 10 days prior to the scheduled relocation to your next job site. As an alternative, you can send a fax to the AQD district office at least 2 days prior to the relocation if you previously submitted a completed Relocation Notice well in advance of the relocation such as at the beginning of the year, a month in advance, etc. Figure 1-4 provides a list of information which should be included in the notification sent to the AQD district office for the new job site location. For help in filling out the *Relocation Notice Form*, see Appendix B of this guide.

