

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

N665239785

FACILITY: Stoneco Inc., South Kent Gravel		SRN / ID: N6652
LOCATION: 7555 Whiteford Road, OTTAWA LAKE		DISTRICT: Jackson
CITY: OTTAWA LAKE		COUNTY: MONROE
CONTACT: Susanne Hanf,		ACTIVITY DATE: 04/28/2017
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection for GPTI. 56-00		
RESOLVED COMPLAINTS:		

On April 28, 2017, I conducted an inspection of Stoneco Portable 76 Plant which is a portable crushing plant operating per the requirements of General Permit to Install (GPTI) No. 56-00 (N6652). A relocation notice was received March 9, 2017 to relocate the portable crushing plant from 3700 Patterson Road in Middleville to the Pit located at 3477 Hall Road in St Johns.

Facility Name and Location:

Stoneco Portable 76 Plant (South Kent Portable Plant)
Stoneco, Bauer Pit
3477 Hall Road, St Johns, Michigan

Relocation Notification Received: 3-9-2017**Commencement of Operations: 3-14-17 to May 2017****Amount to be processed: 70,000 tons****Facility Contacts:****Susanne Hanf, Environmental Engineer, 734-777-3647, shanf@stoneco.net****Mike Yeager, Environmental Technician, 734-770-1311****On-site supervisor: Ron Belden****Last AQD Inspection Date: None****Facility Description:**

The portable crushing plant on GPTI No. 56-00 (N6652) is located in an existing pit that is being mined for gravel and sand (e.g. aggregates). The process is a nonmetallic mineral processing plant consisting of crushers, screens, and conveyors. Power is provided by a diesel fuel-fired engine that is mounted on semi-truck trailer.

The area surrounding the Bauer Pit is rural with some residential housing mixed in.

Portable crushing plants are minor sources of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program. Equipment that is part of a portable crushing plant could be subject to the New Source Performance Standard (NSPS) in 40 CFR 60, Subpart 000 — Standards of Performance for Nonmetallic Mineral Processing Plants.

§60.670 Applicability and designation of affected facility.

(a)(1) Except as provided in paragraphs (a)(2), (b), (c), and (d) of this section, the provisions of this subpart are applicable to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Also, crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart.

(2) The provisions of this subpart do not apply to the following operations: All facilities located in underground mines; plants without crushers or grinding mills above ground; and wet material processing operations (as defined in §60.671).

(b) An affected facility that is subject to the provisions of subparts F or I of this part or that follows in the plant process any facility subject to the provisions of subparts F or I of this part is not subject to the provisions of this subpart.

(c) Facilities at the following plants are not subject to the provisions of this subpart:

(1) Fixed sand and gravel plants and crushed stone plants with capacities, as defined in §60.671, of 23 megagrams per hour (25 tons per hour) or less;

(2) Portable sand and gravel plants and crushed stone plants with capacities, as defined in §60.671, of 136 megagrams per hour (150 tons per hour) or less; and

(3) Common clay plants and pumice plants with capacities, as defined in §60.671, of 9 megagrams per hour (10 tons per hour) or less.

(d)(1) When an existing facility is replaced by a piece of equipment of equal or smaller size, as defined in §60.671, having the same function as the existing facility, and there is no increase in the amount of emissions, the new facility is exempt from the provisions of §§60.672, 60.674, and 60.675 except as provided for in paragraph (d)(3) of this section.

(2) An owner or operator complying with paragraph (d)(1) of this section shall submit the information required in §60.676(a).

(3) An owner or operator replacing all existing facilities in a production line with new facilities does not qualify for the exemption described in paragraph (d)(1) of this section and must comply with the provisions of §§60.672, 60.674 and 60.675.

(e) An affected facility under paragraph (a) of this section that commences construction, modification, or reconstruction after August 31, 1983, is subject to the requirements of this part.

(f) Table 1 of this subpart specifies the provisions of subpart A of this part 60 that do not apply to owners and operators of affected facilities subject to this subpart or that apply with certain exceptions.

Table 1 to Subpart 000 of Part 60—Exceptions to Applicability of Subpart A to Subpart 000

Subpart A reference	Applies to subpart 000	Explanation
60.4, Address	Yes	Except in §60.4(a) and (b) submittals need not be submitted to both the EPA Region and delegated State authority (§60.676(k)).
60.7, Notification and recordkeeping	Yes	Except in (a)(1) notification of the date construction or reconstruction commenced (§60.676(h)).
	Also, except in (a)(6) performance tests involving only Method 9 (40 CFR part 60, appendix A-4) require a 7-day advance notification instead of 30 days (§60.675(g)).	
60.8, Performance tests	Yes	Except in (d) performance tests involving only Method 9 (40 CFR part

		60, appendix A-4) require a 7-day advance notification instead of 30 days (§60.675(g)).
60.11, Compliance with standards and maintenance requirements	Yes	Except in (b) under certain conditions (§§60.675(c)), Method 9 (40 CFR part 60, appendix A-4) observation is reduced from 3 hours to 30 minutes for fugitive emissions.
60.18, General control device	No	Flares will not be used to comply with the emission limits.

Equipment listed on GPTI 56-00 is subject to the requirements of 40 CFR 60, Subpart OOO as indicated on the GPTI Application form. The affected facility is capable of processing greater than 150 tons per hour, and each piece of equipment is subject if it was constructed after August 31, 1983.

Michigan Air Emissions Reporting System (MAERS):

The facility reports to MAERS as a Category III fee subject. There were 7077.15 lbs of PM10 emissions reported for 2016 due to crushing operations. The portable plant processed 707,715 tons of sand and gravel in 2016.

Inspection:

Arrived: 2:00 PM
 Departed: 3:20 PM
 Weather: 63°F, SSW 11 MPH, UV Index 6 High

When I arrived, I did see dust coming from behind a big pile of sand/aggregate, so they were operating. I observed a truck pulling up to the scale. A front-end loader came around to the scale house and topped off the truck. No dust was observed during the operation. I detected no odors around the facility. There was a lot of standing water around the pit due to a lot of rain this spring and truck traffic across the pit roads were not kicking up dust.

I called the contact on the relocation notice, Mr. Mike Yeager. Mike contacted the on-site supervisor, Mr. Ron Belden who came around and met me. While we drove back to the crusher, Ron explained that the gravel roads around the pit had recently had an application of dust suppressant. The neighbors had called and complained about dust. Despite the recent rain, there were still areas that were dry and when operating the potential for dust to be kicked up exists.

The crushing plant was operating during the entire inspection. A blend sand and 20 AA gravel was being produced. A watering system was installed or capable of being installed on the conveyors and crushing equipment as required by Special Condition (SC) 1.7. They were not operating with water spray as the material was wet enough that no dust was being kicked up by conveying the material and dropping it onto piles. Drop distances were minimized as required by the Fugitive Dust Control Plan in Appendix A. Some dust was coming from the TelSmith Cone Crusher 43.0054 (7610). SC 1.2b limits opacity from all crushers to less than 15%. No opacity readings were taken. The operator probably should have added some water to Crusher 43.0054.

A survey of the equipment on-site was taken. The list with the number posted on the equipment is as follows:

Jaw crusher – 41.0030
Four (4) – 30 ft conveyors
- #1 – 47.0240
- #2 – 47.0237
- #3 – 47.0238 (not in use, ripped belt)
- #4 – 47.0239
80 ft conveyor #2 – 47.0244
Main feed – 47.0243
#1 Superior 125 ft – 47.0250
#2 Superior 125 ft – 47.0251
Gray feeder (not on the relocation notice list) – 35.0626
60 ft conveyor #2 – 47.0242
JCI screen (Fisher made body) – 43.0053
McCloskey return conveyor – 47.0247
McCloskey feed conveyor – 47.0246
Telsmith Cone Crusher - 43.0054 (7610)
60 ft conveyor #1 – 47.0241
Superior Telestacker (new) – 47.0213
Diesel engine – CAT 3512

Ron had a complete list of equipment for the plant. A picture of the list is attached. The numbers on the equipment did not generally match the numbers on the relocation notice. Stoneco is in the process of updating the equipment list. When I got back to the office, I verified that the modification to the GPTI had been submitted and it does include the new Superior Telestacker 47.0213. A copy of the modification application with the numbers that match the equipment on-site is attached. The only piece of equipment that appears to be missing is the Gray feeder – 35.0626. They are in the process of modifying the permit in order to comply with SCs 1.11 and 1.12.

Ron stated that a copy of the permit was posted per the requirements of SC 1.13d. The crushers were located greater than 500 feet from the nearest residence per SC 1.13c. The closest residence was located a little over 700 feet away to the north.

Ron showed me the daily production records (in compliance with SC 1.9). A picture of the record for 4-21-17 is attached. To date, the plant has processed 40,008 tons of 22A gravel, 35,282 tons of 23A gravel, and 83,307 tons of blend sand. This is well below the limit of 2,000,000 ton per year per site allowed in SC 1.3.

A relocation notice to move the plant from 3477 Hall Road in St Johns (Clinton County) to 3700 Patterson Road in Middleville (Barry County) was received May 15, 2017. This is in compliance with SC 1.13b.

Summary:

I discussed with Susanne Hanf the status of the equipment updates and NSPS testing. She is scheduling the testing for the new stacker and for any equipment that she has not been able to find the records of the testing. She thinks everything was tested. The location of the testing is still pending. From what Ron was saying while I was on-site, they are running behind schedule due to all the rain. I told Susanne to submit the test plan to the Technical Programs Unit in Lansing, and list all the possible locations and dates for the test in order to meet the noticing requirements in SC 1.8. She will contact the specific district office when the testing location is final.

In general, the process was in compliance with all applicable air quality rules and regulations, and Stoneco is in the process of modifying PTI 56-00 and adding any missing equipment.



Image 1(Conveying) : Drop point



Image 2(Shaker) : Drop point



Image 3(Cone crusher) : Discharge



Image 4(Crusher operation) : Crusher operation

NAME Julie L. Egan DATE 5/15/17 SUPERVISOR B.M.

