

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N665855435

FACILITY: ROSEVILLE CRUSHED CONCRETE		SRN / ID: N6658
LOCATION: 29765 Groesbeck, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Lesli Perfili , President/Operations Manager		ACTIVITY DATE: 09/21/2020
STAFF: Robert Joseph	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of Nonmetallic Mineral Processing Facility		
RESOLVED COMPLAINTS:		

On September 21, 2020, I, Michigan Department Environment, Great Lakes, and Energy-Air Quality Division staff Robert Joseph, observed a concrete crusher opacity test and conducted a scheduled inspection of Roseville Crushed Concrete Company (SRN: N6658) located at 29765 Groesbeck Highway, Roseville, Michigan 48066. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, conditions of the facility's Permit to install (PTI) 143-11A, and the facility's Consent Judgement 15-676-CE.

Opening Introduction

The facility is a nonmetallic mineral processing facility and supplies aggregate material to construction contractors around the state of Michigan. The facility has a number of trucking companies who are contracted out to transport the material to their destination. The facility currently has a consent judgement (15-676-CE) on file with the EGLE-AQD due to the facility's noncompliance with its previous PTI, 143-11.

The facility contacted the AQD at the end of May 2019, and indicated they intend to replace the facility's 75-ton/hr maximum capacity crusher with the current 300-ton/hr maximum capacity crusher. I informed the facility that a new permit would be required, and I directed the facility to the EGLE-AQD permit application web page. The facility submitted the permit to the EGLE-AQD Permits Division in June. Permit, 143-11A, was issued to the facility on August 23, 2019.

In addition, the facility has an unresolved violation dating back to last year due to not having a vehicle track-out control device (rumble strips). Consent Judgement (15-676-CE) allows the EGLE-AQD to impose penalties upon the facility when violations occur regarding the facility's permit conditions.

Facility Tour

I arrived on-site at approximately 1 p.m. and met with the facility's owner, Ms. Lesli Perfili. I also met with Jeff, testing staff member from Montrose Air Quality Services, LLC. Jeff and I observed opacity testing per U.S. EPA Method 9 procedures for the facility's new concrete crusher. Upon completion of the opacity test, I met with Ms. Perfili regarding the facility's compliance inspection. The facility generally operates from 7 a.m-4 p.m. Monday-Saturday during the construction season, and there are approximately 10 employees employed by the facility.

Environmental Compliance per PTI 143-11A: The facility's permit contains conditions for three emission units: EUPROCESS, EUTRUCKTRAFFIC, EUSTORAGE.

EUPROCESS

The facility's permit references the following infrastructure in Appendix A:

Equipment Description	ID Number	Opacity Limit (Percent)	Control Device
Crusher	Eagle Crusher – E1	10	Water Spray
Crusher	Diamond Crusher #2	10	Water Spray
Screen	Simplicity Screen #02 – S02	10	Water Spray

Conveyor	Conveyor #001	10	Water Spray
Conveyor	Conveyor #008	10	Water Spray
Conveyor	Conveyor #003	10	Water Spray
Conveyor	Conveyor #005	10	Water Spray

I. EMISSION LIMITS

There were not any visible emissions from the drop point and transfer point portions.

II. MATERIAL LIMITS

The facility does not process any asbestos or asbestos containing waste within their operations. According to the facility's records, there is no evidence the facility produces more than 3,000 tons of material per day, nor 150,000 tons of material through EUPROCESS per 12-month rolling time period as determined at the end of each calendar month.

III. PROCESS/OPERATIONAL RESTRICTIONS

The opacity requirements appear to be met for each portion of EUPROCESS. It appears the facility has implemented the fugitive dust control plan for all plant roadways, plant yard, and material storage piles as stated in Appendix B, however, the facility's rumble strips may require modification. The facility was informed of this. The EGLE-AQD will investigate this further and consult the U.S. EPA for further guidance if needed. The opacity test today meets the facility's requirements as specified in 40 CFR 60 Subpart OOO for the equipment listed in PTI 143-11A. The facility indicates they have not experienced any malfunction which has created unsafe operating procedures.

IV. DESIGN/EQUIPMENT PARAMETERS

Water sprays appear to be installed and maintained for all listed infrastructure of EUPROCESS.

V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility is now compliant with the testing requirements for EUPROCESS per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO. The EGLE-AQD has not required additional testing.

VI. MONITORING/RECORDKEEPING

The facility appears to be maintaining monthly calculations of the amount of material processed through EUPROCESS by tracking the daily hours of EUPROCESS by using the maximum rated capacity of the crusher (300 tons/hr), as well as on a monthly basis for the yearly throughput rate based upon the most recent 12-month rolling time period. Records indicate 150 tons to 2750 tons produced daily with monthly totals varying between 1,000 tons to 23,000 tons. The facility's current 12-month rolling total thus far in 2020 is 37,236 tons.

In addition, the facility provided daily inspection records of the process equipment and the associated control devices prior to process start-up for each calendar operating day, and visible emission limit readings from EUPROCESS at a minimum of once per calendar operating day during maximum routine operating conditions. There did not appear to be any issues with the equipment or visible emission exceedances. Also, the facility did not indicate any maintenance activities or repairs were conducted this year.

The facility has chosen to label all equipment using a permanent marker and indicated that affixed labels kept becoming loose and falling off.

EUTRUCKTRAFFIC

I. EMISSION LIMITS

There did not appear to be any visible emissions from all wheel loaders or truck traffic.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility has implemented and maintained the fugitive dust control plan for all plant roadways, plant yard, and material storage piles, however, the facility's rumble strips may require modification as stated in Appendix B. The facility was informed of this. The EGLE-AQD will investigate this further and consult the U.S. EPA for further guidance if needed. The sedimentation trackout control device has not yet been installed. The remaining plant requirements relating to drop height, dust suppressant applications, and trucks covering their loads appears to be occurring.

V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility met the testing requirements for EUTRUCKTRAFFIC in 2012 per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO.

VI. MONITORING/RECORDKEEPING

The facility provided records for visible emission readings conducted once per calendar day for EUTRUCKTRAFFIC.

EUSTORAGE

I. EMISSION LIMITS

There did not appear to be any visible emissions from the material storage piles.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility appears to be implementing and maintaining the fugitive dust control plan for all material storage piles. In addition, the plant requirements relating to drop height, dust suppressant applications, and trucks covering their loads appears to be occurring.

V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility met the testing requirements for EUSTORAGE in 2012 per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO.

VI. MONITORING/RECORDKEEPING

The facility provided records for visible emission readings conducted once per calendar day for EUSTORAGE.

APPENDIX B - Nuisance Minimization Plan for Fugitive Dust

I. Site Roadways / Plant Yard

The facility maintains two calcium chloride tanks on site for dust suppression for the facility's roadways. In addition, the facility uses a truck to apply water to all truck traffic surfaces. Records indicate the facility applies this daily. The facility was encouraged to use another method such as a water truck to apply water rather than using a semi-truck. There was little fugitive dust on onsite but none appeared to be leaving the site. The facility maintains a sign posted on-site indicating the speed limit to be under 4 miles per hour. All input roadways appear to be paved with asphalt and crushed concrete surrounds the process equipment and material storage piles.

The facility exit contains a rubberized rumble strip, approximately 16 feet long by 8 wide, however this may require additional sets to meet the dimensions necessary to properly control sedimentation trackout.

II. Plant

The drop distance at each transfer point appears to be reduced to the minimum the equipment can achieve.

III. Storage Piles

The stockpiles did not appear to be generating fugitive dust.

IV. Truck Traffic

The facility maintains a posted sign informing all out-going trucks to cover their loads with tarps prior to leaving the site. There did not appear to be any issues with on-site vehicles.

V. Management of Front-End Loader Operations

While on-site, it appears the facility front-end loader equipment was attempting to minimize drop height to avoid spillage.

VI. Process Equipment

There did not appear to be any excessive fugitive emissions or malfunctions from any transfer system, storage bin, mixer or hopper, and the water spray systems appear to be maintained.

Conclusion

It appears that Roseville Crushed Concrete Company has maintained the required permit recordkeeping. The facility has implemented the procedures outlined in Appendix B except for the unsatisfactory dimensions of the rumble strips on-site it. It will be recommended that the facility obtain an additional rumble strip pad to meet a minimum requirement of three tire revolutions. The facility currently is not in full compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; and the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, conditions of the facility's PTI 143-11A, and Consent Judgement 15-676-CE.

NAME Robert Joseph

DATE 09/29/2020

SUPERVISOR Sebastianykallemkal