

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

N670232161

FACILITY: HUBSCHER & SON, INC. - ASPHALT PRODUCTS SYSTEM		SRN / ID: N6702
LOCATION: P.O. BOX 411, MOUNT PLEASNT		DISTRICT: Saginaw Bay
CITY: MOUNT PLEASNT		COUNTY: ISABELLA
CONTACT: Paul Elmore , Supervisor		ACTIVITY DATE: 10/07/2015
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: October 7 and 22, 2015 site inspections. Two issues of non-compliance have been resolved prior to completion of written report. Facility to be visited again during 2016 season.		
RESOLVED COMPLAINTS:		

On Wednesday, October 7, 2015, and October 22, 2015, AQD District Staff arrived onsite to conduct a scheduled site inspection for rock crushing equipment associated with SRN N6702 AKA the 300 plant, (General Permit No. 163-99, most recent update in April 2002) located at the Hubscher & Sons, Inc. Deerfield Gravel Pit. Other SRNs associated with the Deerfield Gravel Pit includes N6703, N6704 and 6706. It should be noted that each SRN and associated permit reflects a separate crusher plant that operates within the permit, and is responsible for specific grades of product.

The referenced pit extends from South Littlefield Road and Tomah Road south of West Broomfield Road. (map in file). With the exception of the weigh scale located at the South Littlefield entrance of the Deerfield Pit, the Deerfield pit north of Broomfield Road is presently inactive. Active sand and gravel mining was being conducted in the portion of the Deerfield Pit south of Broomfield road, and west of Gilmore Road.

Site Superintendent Paul Elmore met with District Staff regarding equipment and site operations. Site inspection was conducted with the intent of confirming operational status as well as compliance with the referenced permit. The 300 plant was not operating at the time of the inspection.

No complaints are of record since the August 3, 2011, site inspection to the Deerfield Gravel Pit.

#### **DEVICES**

The 300-plant is used to produce a variety of crushed and screened product. The plant consists of two parts, one to the north of the tunnel feeder (6414) and the other to the south. Each part of the 300-plant has a crusher and screen(s) pairing with associated conveyors and stackers. The southern component can be operated independent of the northern component of the plant, or they can be operated together. Equipment associated with the 300-plant (apx. 200 tons per hour capacity) at the time of inspection included:

##### **Southern Components of 300 Plant:**

- Feed Hopper with Belt Feeder (4815A),
- Hewitt Robins Jaw Crusher (4814D) and Deister Horizontal 3 Deck Screen (4814A), with associated conveyors
  - o Noreast channel frame conveyor (4814B)
  - o Noreast channel frame conveyor (4814C)
  - o Hartman Fabco conveyor (4814E)

(note the above combo appears to be one unit, but is a post manufacture fabrication)

- Deister 2-Deck Screen (4822)
- Field Conveyors,

- o Nordberg (4818)
- o Hartman Fabco (4806),
- o Hartman Fabco (6415F)
- o Nordberg (6402A)
- Stackers,
  - o Hartman Fabco Radial Stacker (6421C)
  - o McClosky Sand Stacker (4902)

**Northern Components of 300 Plant:**

- Tunnel Hartman Fabco Belt Feeder (6414)
- Nordberg feed conveyor (4808)
- Deister 3 Deck Screen (6415A) with associated screen conveyor
  - o Nordberg (6415B) (under screen)
- Nordberg 300 Cone Crusher (6407)
- Transfer Conveyors
  - o Hartman Fabco (6415C)
  - o Hartman Fabco (6415D)
  - o Shop Built (4003B)
  - o Hartman Fabco (6416) (note listed as stacker)
- Stackers
  - o Nordberg (4819)

**Permitted Devices for 300 Plant not in use at the time of inspection:**

- Sand Screw (4804)
- Under Screen Conveyor (6415E)
- Atlas Stacker (6206)
- Nordberg Stacker (4805A)
- Shop Built Conveyors (4815E and 4815F), and
- Conveyor 6421A,

Devices had at the time of the September 17, 2009, site inspection been labeled as required by permit, but at the time of the October 7, 2015, inspection had faded to an unreadable state. Mr. Elmore indicated that the re-labeling would be completed within the week. Re-labeling was confirmed on October 22, 2015.

**COMPLIANCE**

As noted previously, the 300 Plant is permitted under General Permit No. 163-99. The referenced General Permit was most recently updated on April 9, 2002. The facility is subject to NSPS subpart OOO and reports emissions annually.

**Production –** The General Permit for the 300 Plant limits production to less than 2 million tons of non-metallic mineral product per year per site. Annual production reported under the Michigan Annual Emissions Reporting System (MAERS) is well below the annual limit.

The facility reports that they do not crush any asbestos tailings or asbestos containing materials onsite, in compliance with the permit.

**Recordkeeping and Monitoring-** Under the present permit the facility is required to keep daily records of production for the plant. At the time of the previous site inspection, Mr. Elmore reported that plant operators recorded number of bucket loads of materials unloaded into the hopper for processing.

During the October 7, 2015, site visit, it was determined that recordkeeping practices had fallen to the wayside. Mr. Elmore during the October 22, 2015 site visit, committed the facility to reporting production based on the operating period of the plant from the plants hour meter. The hour meter is totalizing meter, which will be reported daily on the daily safety check reports completed by the operator at the beginning of each operating day. Mr. Elmore has indicated that he will be creating a spreadsheet to more easily monitor and record data.

**Emissions -** Per the General Permit, the facility is required to equip each crusher and screen with a water spray to control emissions/dust. The presence of these dust controls was confirmed as part of the October 7, 2015, inspection.

No fugitive dust was noted on roadways at the time of the inspection. Roads were wet, and the facility maintains records of dust control applications to the roadways.

**NSPS Testing –** Of the devices identified above, NSPS testing was conducted on September 23, 1999, for all devices with the following exceptions.

The following equipment is not subject to testing due to a manufacture date prior to 1983:

- o Hewitt Robbins Jaw Crusher (4814D), and
- o Hartman Fabco under crusher conveyor (4814E)

The following equipment is wet operation equipment and is not subject to NSPS testing requirements:

- o Sand Screw (4804)

The following equipment are stackers and are exempt from permitting, as they are endpoint components:

- o Nordberg Radial Stacker (6402B),
- o Atlas Stacker (6206) (may also exempt due to 1965 manufacture date),
- o Nordberg Stacker (4805A),
- o Nordberg Stacker (4819), and
- o McClosky Sand Stacker (4902)

The facility also identifies the Tunnel Belt Feeder (6414) as an exempt device. No manufacture date was provided, and review of Subpart OOO did not identify “feeders” as affected equipment which would exempt them from NSPS testing under the subpart. No rationale for the determination was provided in the permit application. However, the referenced feeder is completely horizontal, with no notable drop-point to evaluate.

## SUMMARY

At the time of the October 7<sup>th</sup> and 22<sup>nd</sup>, 2015 site visits, the 300 plant was not operating. The facility was determined to have two compliance issues. Based on discussions with the Pit Supervisor and subsequent activities by facility staff, all the plant equipment has been relabeled for easy identification, and a commitment to implement appropriate production recordkeeping activities has been given.

District Staff will be following up with the facility regarding record keeping practices for the 2016 season. Should the facility not show proper recordkeeping practices a VN will be issued at that time.

NAME Maureen GleBlanc

DATE 11/16/2015 SUPERVISOR C. Bare