

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

N670432180

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: HUBSCHER & SON, INC. - PIONEER 50VE PORTABLE  |                               | SRN / ID: N6704           |
| LOCATION: P.O. BOX 411, MOUNT PLEASNT   |                               | DISTRICT: Saginaw Bay     |
| CITY: MOUNT PLEASNT   |                               | COUNTY: ISABELLA          |
| CONTACT: Paul Elmore , site superintendent  |                               | ACTIVITY DATE: 10/07/2015 |
| STAFF: Sharon LeBlanc   | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR       |
| SUBJECT: Scheduled site inspection on 10/7/2015 and 10/22/2015, facility has corrected or committed to correcting compliance issues identified during inspection. Supplemental inspections to confirm the compliance actions will be made in 2016 operating season. |                               |                           |
| RESOLVED COMPLAINTS:  |                               |                           |

On Wednesday, October 7<sup>th</sup> and 22<sup>nd</sup>, 2015, AQD District Staff arrived onsite to conduct a scheduled site inspection for rock crushing equipment associated with SRN N6704 AKA the Pioneer 50VE Plant, (General Permit No. 191-99) located at the Hubscher & Sons, Inc. Deerfield Gravel Pit. Other SRNs associated with the Deerfield Gravel Pit include N6702, N6703 and N6706. 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 Pioneer 50VE plant was not operating at the time of the inspection.

No complaints are of record since the August 3, 2011, site inspection.

#### DEVICES

The Pioneer 50VE Plant consists of a 200 ton per hour self-contained processing plant (#4002) equipped with jaw and roll crushers, a four deck inclined screen, top feed conveyor and under crusher conveyor. Other equipment associated with the Pioneer 50VE Plant (4002) at the time of inspection included:

- Feed Hopper with Belt Feeder (4002A), with
- Feed Conveyor (4002C)
- Discharge Conveyor (4002D) and
- Unpermitted Superior 36" Telestacker (replacing 4002F)

Other permitted equipment associated with the plant, but not present at the time of the inspection includes:

- Field Conveyors:
  - o Hartman Fabco 4002B1, and
  - o Hartman Fabco 4002B2
- Pioneer Product Conveyor (4002E)
- Stackers(s)
  - o Kolberg (4002F), and

- o Hartman Fabco sand stacker (4002H)
- Sand Conveyor (4002G)

Devices had been labeled as required by permit, but at the time of the 2011 inspection had faded to the point that they were unable to be read. Mr. Elmore indicated that the re-labeling would be completed within the week. The relabeling was confirmed during the October 22, 2015, site visit.

## **COMPLIANCE**

As noted previously, the Pioneer 50VE Plant is permitted under General Permit No. 191-99. The facility is subject in part to NSPS subpart OOO and reports emissions annually.

Production – The General Permit for the Pioneer 50VE 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. However, it was determined that recordkeeping practices had fallen to the wayside since the last visit. Mr. Elmore during the October 22, 2015 site visit, committed the facility to reporting production based on the operating period of the 200 plant and the maximum thruput. When the plant is started up, it starts a totalizing hour meter. The amount of time on the meter will be recorded as part of the 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 the 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 24, 1999, for the following devices:

- Feed Hopper wth Belt Conveyor (4002A),
- Hartman Fabco Field Conveyors (4002B1 & 4002B2), and
- Shop Built Sand Conveyor (4002G)

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

- Pioneer 50VE Unit (4002),
- Pioneer Feed Conveyor (4002C),
- Shop Built Discharge Conveyor (4002D), and
- Pioneer Product Conveyor (4002E)

The following devices are endpoint stackers and are not subject to NSPS testing:

- Sand Stacker (4002H)
- Kolberg Radial Stacker (4002F), and
- New Superior TeleStacker (unpermitted)

**SUMMARY**

At the time of the inspection, the Pioneer 50VE plant was not operating. With the exception of the unpermitted Superior Stacker, and faded equipment/device labeling, and failure to keep production records, no other compliance issues were noted. The site supervisor has corrected the equipment re-labeling, and has committed to implementing appropriate production record keeping activities. The facility will be submitting an update to their permit to add the new stacker to their existing permit.

NAME Sharon Lettance DATE 11/16/15 SUPERVISOR C. Hare