

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

N670632164

FACILITY: HUBSCHER & SON, INC. - HP200		SRN / ID: N6706
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 inspections conducted 10/7 and 10/22/2015. Two compliance issues noted were resolved at time of 10/22/2015. Site staff have committed to maintaining proper records. Follow up inspections will be made the 2016 season.		
RESOLVED COMPLAINTS:		

On October 7th and 22nd , 2015, AQD District Staff arrived onsite to conduct a scheduled site inspection for rock crushing equipment associated with SRN N6706 (AKA the 200 plant)(General Permit No. 401-99) located at the Hubscher & Sons, Inc. Deerfield Gravel Pit. Other SRNs associated with the Deerfield Gravel Pit include N6702, N6703 and N6704. It should be noted that each SRN and associated permit reflects a separate crusher plant that operates with its own 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 weight scaled 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 is being conducted in the portion of the Deerfield Pit located south of Broomfield road, and west of Gilmore Road.

Site Superintendent Paul Elmore met with District Staff regarding equipment and site operations. Site Inspections were conducted with the intent of confirming operational status as well as compliance with the referenced permit. The 200 Plant was operating at the time of the inspection.

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

DEVICES

Equipment associated with the 200 plant (apx. 200-tons per hour capacity) operating at the time of inspection included:

- Feed Hopper with Belt Feeder (HP200D), with
 - o Screen feed conveyor (HP200E)
- Nordberg Cone Crusher (HP200A), with
 - o Discharge conveyor (HP200B)
- Diester 2 Deck Screen (HP200I), with
 - o Under Screen Conveyor (HP200J)
- Stacker Conveyors,
 - o HP200C
 - o HP200H,
 - o HP200K
- Recirculating Conveyors,
 - o HP200F,
 - o HP200L,
 - o HP200G
- Sand Screw (4804) and associated Conveyor (6206)

Also noted at the time of the inspection was a previously unidentified and unlabeled wash station that the superintendent indicated is sometimes added to the 200 plant operations. This device is not listed as part of the permit.

Devices had been labeled as required by permit, but at the time of the inspection, had faded to the point that they were hard to read if visible at all. Mr. Elmore indicated that the re-labeling would be completed

within the week. Re-labeling of the equipment was confirmed as part of the October 22, 2015, site inspection.

COMPLIANCE

As noted previously, the 200 Plant is permitted under General Permit No. 401-99. The referenced General Permit was updated on November 6, 2009. The facility is subject to NSPS Subpart OOO and reports emissions annually.

Production- The General Permit for the 200 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 unleaded into the hopper for processing.

During the October 7, 2015, site inspection, 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 total operating hours reported for the various plants on a daily basis. Mr. Elmore reported that the plant operators would record the number of hours on the totalizing hour meter for the plant when completing the daily safety check reports at the beginning of each operating day. Mr. Elmore reported 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 visible emissions were noted at the time of the inspection, which indicated compliance with visible emission limits for process equipment outlined in the permit.

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 15 devices identified above, NSPS testing was conducted on either November 4, 1999 or April 17, 2000, for the following devices:

Device	ID	Test Date
Nordberg Cone Crusher and Discharge Conveyor	HP200A & HP200B	11/4/1999
Hartman Fabco Conveyor	HP200E	4/17/2000
Hartman Fabco Recirculating Conveyor	HP200F	4/17/2000
Hartman Fabco Cross Conveyor	HP200G	4/17/2000
Hartman Fabco Radial Stacker	HP200H	4/17/2000
Deister 2 deck screen and under screen conveyor	HP200I & HP200J	4/17/2000
Nordberg Radial Stacker	HP200K	4/17/2000
Shop Built Recirculating Conveyor	HP200L	4/17/2000

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

DEVICE	ID	TEST DATE
Kolberg Stacker	HP200C	NA
FeedHopper with Belt Feeder	HP200D	NA

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

- Sand Screw (ID 4804) and associated conveyor (ID 6206)
- Previously unidentified wash station/unit.

SUMMARY

At the time of the October 7th and 22nd, 2015 site visits, the facility was determined to have had three compliance issues. The equipment labels had faded, the production recordkeeping was not being kept up, and there was an unpermitted wash station that needed to be added to the permit. Of the three, the equipment had been relabeled by the second visit. The site superintendent also during the second site visit committed to maintaining production records and an approvable method based on totalizing hour meter records for each plant was determined. General permit modification paperwork to resolve the unpermitted equipment will be submitted to the AQD Permit section to correct the unpermitted wash station.

District Staff will conduct a follow up site inspection(s) during the 2016 season to confirm that the facility has continued to implement recordkeeping activities. Should they be found not to, a violation notice will be issued for any plants found not to be in compliance.

NAME *Maura G. Blenc*

DATE *11/17/15*

SUPERVISOR *C. More*