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

N7 17945245			
FACILITY: NAGLE RECYCLING CO		SRN / ID: N7179	
LOCATION: 13301 LEVAN Rd, LIVONIA		DISTRICT: Detroit	
CITY: LIVONIA		COUNTY: WAYNE	
CONTACT: James P. Oliver , Vice President		ACTIVITY DATE: 07/18/2018	
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT	
SUBJECT: Target Inspection			
RESOLVED COMPLAINTS:			

DATE OF INSPECTION	:	07/18/2018
TIME OF INSPECTION	:	11:00 am
NAICS CODE	:	212319
INSPECTED BY	:	Jill Zimmerman
PERSONNEL PRESENT	:	James Oliver, Vice President
		John Blaszak, Operations Manager
FACILITY PHONE NUMBER	:	248- 553-0600 X225
FACILITY FAX NUMBER	:	248- 553-0669
EMAIL	:	jblaszak@naglepaving.com

FACILITY BACKGROUND

Nagle Recycling operates a portable concrete crusher. This equipment is currently located at 13301 Levan Road in Livonia Michigan. This crusher has been at this location for the majority of the time, and the facility has no plans to move this crusher. The crusher crushes asphalt between February and April to be used in the asphalt production at Nagle Paving. The rest of the time, the crusher crushes concrete.

The crusher is currently operating one shift per day, five days per week with additional work on Saturdays when needed.

COMPLAINT/COMPLIANCE HISTORY

Recently, multiple complaints have been received from a nearby facility regarding dust fall out on the vehicles in the parking lot west of the storage piles. Samples were taken from the vehicles and the crushed pile during the onsite inspection for comparison. Mr. Oliver stated that many years ago, there were dust complaints in the area that were the result of an additional nearby facility cutting limestone. The prevailing wind direction would put the complainants upwind of Nagle Recycling.

PROCESS EQUIPMENT AND CONTROLS

Nagle Recycling is currently operating one concrete crusher. Also located at this site are multiple piles of crushed concrete and asphalt.

Raw materials are loaded onto the conveyor to be crushed. Before being crushed, the material passes through a magnet to remove any metal. The processed material is separated by size. Larger pieces are collected to be crushed again. Multiple water nozzles are located on the crusher to wet the crushed materials and control the dust.

Nagle also has a water truck kept onsite to treat the lot as needed. The facility has also installed screens around the crusher to catch the dust. All trucks pass through rumble strips before leaving the facility to knock off any dirt on the truck tires before the truck enter the public roadways.

INSPECTION NARRATIVE

I arrived at the facility at 11:00 am and met with Jim Oliver, Vice President and John Blaszak, Operations Manager. The crusher was being operated by an employee named Brett. Mr. Oliver explained that a log book is kept onsite, recording each application of water or calcium chloride to the ground. A record for the amount crushed is kept on site, with this information used to report annual emissions in MAERS. The log books were reviewed during the onsite inspection. In 2017, 315,208 tons of material were crushed.

Rumble strips are located at the entrance of the facility to knock off dirt from the truck tired as the trucks leave the site. A weigh scale is located next to the office. Large piles of crushed material are located throughout the site. The conveyor was set up to minimize the drop distance. The crusher was operating during the onsite inspection. No visible emissions were observed from the crusher while it operates. Water nozzles were present throughout the crushing process to control the dust. An employee was also spraying water on the piles and the material to be crushed.

APPLICABLE RULES/PERMIT CONDITIONS

Based on a review of Permit Cards, Nagle Recycling is permitted under Wayne County Permits C-11694 and C-11695. The special conditions are:

17. Compliance – No opacity was observed coming from the crusher.

18. Compliance – No opacity was observed coming from the crusher.

19. NA – The crusher has not been moved. No visible emissions were observed from the crusher.

20. Compliance – The facility has produced 315,208 tons of crushed material during 2017, which is less than the annual permit limit of 360,000 tons.

21. Compliance – Water sprays are installed to control dust from the crushing process during the onsite inspection

22. Compliance – All conditions of the fugitive dust plan in Appendix A are being followed.

23. Compliance – No asbestos is being crushed at this location. The facility only crushes asphalt and concrete.

24. NA – The crusher has not been moved since Nagle Recycling began operating this crusher. There are no plans to move the crusher in the future.

Appendix A:

Compliance – All paved roads ways are swept and watered as needed. Records are kept after each treatment. Speed limit signs of 10 mph are located onsite.

Compliance – All paved parking areas are swept and watered as needed. Records are kept after each treatment. Speed limit signs of 10 mph are located onsite.

Compliance – The drop distances is kept to a minimum distance as was observed during the onsite inspection. Speed limit signs of 10 mph are posted onsite.

Compliance – All open areas are swept and watered as needed. Records are kept after each treatment. Speed limit signs of 10 mph are located onsite.

Compliance – Water sprays are located on the crusher and were operating during the onsite inspection.

Compliance – No spilled material was observed during the onsite inspection. Minimal track out was observed during the onsite inspection. Rumble strips are located at the entrance and exit of the facility to knock off excess dirt from the truck tires and control track out.

Dumping occurs at a minimum drop distance. Records are kept in a book located onsite. No

trucks were observed at the facility during the onsite inspection.

A review of the file for this facility has the crusher permitted by 70-00. In permit cards, this permit was initially issued to Nagle before being transferred to A & E Aggregates on March 14, 2000 and was void on April 29, 2008. The application for this permit lists the address for Nagle Paving and states that the prior air permits are C-11964 and C-11965. In permit cards, C-11964 and C-11965 are still listed as active for Nagle Paving. Nagle Paving also sites these permits as the active permits in the equipment description for MAERS. During the next onsite inspection, serial numbers will be verified to that the crusher is operating under the proper permit.

MAERS REPORT REVIEW

MAERS for the reporting year 2017 were submitted on January 25, 2018 and were reviewed on May 21, 2018. The emissions appear to have been reported accurately. This portable crusher was located in Wayne County for 100% of 2017.

FINAL COMPLIANCE DETERMINATION

Nagle Recycling appears to be operating in compliance with all state and federal regulations as well as all permit conditions. A determination regarding the fall out complaints will be made once the laboratory results are reviewed.

Nagle Recycling is located adjacent to Nagle Paving. These two facilities operate under different SIC codes. However, it appears that Nagle Recycling is operating as a support facility for Nagle Paving. During the next onsite inspection, production records will be used to determine whether more than 50% of the production from Nagle Recycling is used by Nagle Paving. This determination will be done based on Policy 11.

DATE 12/18/18 SUPERVISOR

NAME

http://intranet.deg.state.mi.us/maces/WebPages/ViewActivityReport.aspx?ActivityID=24... 12/18/2018