

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N808749064

FACILITY: Lewiston Sand and Gravel		SRN / ID: N8087
LOCATION: 8291 Buttles Road, ATLANTA		DISTRICT: Gaylord
CITY: ATLANTA		COUNTY: MONTMORENCY
CONTACT: Ted May , Owner		ACTIVITY DATE: 06/06/2019
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: unannounced, self initiated site inspection of permitted non-metallic mineral crushing plant. Plant not operating at the time of the inspection. sgl		
RESOLVED COMPLAINTS:		

INTRODUCTION

On June 6, 2019, AQD District Staff conducted an unannounced, scheduled site inspection at 8291 Buttles Road, Atlanta, Montmorency County, Michigan. The referenced location is of record for two Lewiston Sand & Gravel Inc. portable, non-metallic mineral crushing plants (N8039 and N8087).

The intent of the site inspection was to determine if operation of the two portable plants is in compliance with General Permit for Non-Metallic Mineral Crushers No. 132-08 and 221-08. The last inspections of record were conducted September 24, 2013. This report summarizes inspection activities for N8087, N8039 is reported independently. Mr. Ted May met with AQD District Staff during the site inspection.

Weather at the time of the inspection was sunny with scattered clouds, temperatures in the mid 60's with occasional light wind gusts (< 5 mph).

FACILITY

The Buttles Road Pit is located in Vienna Township, Montmorency County, and is the present location of both permitted Lewiston Sand & Gravel Inc. portable, crushing plants. Adjacent properties include a limited number of residential properties, undeveloped acreage and other inactive pits.

During discussions with Mr. May, he indicated that activities onsite are centered on meeting material orders. Consistent with that practice only limited piles of screened materials were noted onsite. Production totals reported and used to determine annual emissions are generated from sales records.

Neither crushing plant was operating at the time of the inspection and were reported to be in need of repairs. The Gravel Plant 2000 (permit 221-08, N8087) was reported to only be operated as a wash plant until the crusher repairs could be made. The Gravel Plant 2000 is reported to have been operated only in the Buttles Road Pit.

In addition to the permitted plants, district staff noted topsoil screening equipment near the entrance. The referenced equipment would appear to be exempt from permitting under Rule 285(2)(t), which exempts from Rule 201 permitting "Equipment for the mining, loading, unloading and screening of uncrushed sand, gravel, soil, and other inorganic soil-like materials"

PERMITTED EQUIPMENT

Permitted equipment under 221-08 (Gravel Plant 2000) is reported to include the following:

Equipment ID	Equipment Description
FH#1	Hartman Fabco Feed Hopper
FC#2	Hartman Fabco Conveyor
Screen #3	Svedala 5X10 Screen
Svedala Cone #4	Svedala Cone Crusher
HF CC #5	Hartman Fabco Conveyor
Wash 6 X 20 # 6	Svedala 3D Screen

SC #7, 8, 9 and 10	Swift Stacking Conveyors
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PERMITTING

As previously indicated, two SRNs are associated with the Buttles Road address. For the purposes of the June 6, 2019, site inspection, AQD District Staff evaluated both permitted plants with regards to compliance with their respective permits which are summarized below:

SRN	Permit No.	Application Date	Issuance Date
N8087*	221-08	April 14, 2008	August 7, 2008

* File notes indicate that the equipment for the Gravel Plant 2000 was purchased from Rydahl Industries (N7306) and at the time of purchase was permitted under PTI 274-04. Permit application 221-08 reported that the unit was tested prior to purchase, but the engineer’s notes indicated that Rydahl was under enforcement to conduct testing at the time of sale. District Staff activity report for 11/5/2008 testing activities onsite indicated that the cone was enclosed and not subject to testing.

No permit modifications have been requested since permit issuance.

REGULATORY

The permitted plant is considered a true minor for particulate matter (PM).

Gravel Plant 2000 (N8087) at the time of permitting was reported to be subject to Federal Regulations under 40 CFR Part 60 Subpart OOO, Standards of Performance for New Stationary Sources (NSPS); Nonmetallic Mineral Processing Plants (effective date of August 31, 1983). The referenced subpart is applicable to most components of the permitted plant, with the exception the wash plant components and the wash plant conveyors and stackers which as wet material operations are exempt under 40 CFR 60.670(a)(2).

COMPLIANCE

Compliance status for the facility had been based on information provided during the June 6, 2019, site inspection,

EQUIPMENT/OPERATION LIMITS - Each crusher and screen is required to be equipped with a water spray or a bag house dust collector (SC 1.7) The required equipment is equipped with water spray as required by permit. Waters are obtained from a small pond located onsite and are recycled by the plant..

SC 1.11 requires all equipment to be labeled within 45 days of initial startup. At the time of the June 6, 2019, site inspection the labeling which had been previously documented as completed has faded. Mr. May indicated that the equipment will be refreshed in the near future.

SC 1.5 does not allow the permittee to crush any asbestos tailings or asbestos containing waste materials. The Gravel Plant 2000 is reported to only crush, screen and wash materials from the pit itself, which do not include asbestos minerals, only glacial tills.

SC 1.6 restricts the permittee from operating the plant unless the program for continuous fugitive emission control in Appendix A of General Permit. Mr. May indicated that the roadways and stockpiles are watered as needed. No dust was noted on roadways by District Staff. The plant has only operated as a wash plant to date in 2018. No dust complaints are of record for the plant, which would indicate that fugitive dust is an issue for the plant.

MATERIAL LIMITS - Processing limits for the Gravel Plant 2000 is no more than 2 million tons per year per site (SC 1.3 and 1.4). A review of annual emissions reports for the facility indicated compliance with permit limits. Annual production/processing rates for Gravel Plant 2000 are summarized below:

Calendar Year	Total Material Processed (tons)	Permit Limit (SC 1.3) (tons)

2018	25,054.6	2 million/year
2017	31,450.3	2 million/year
2016	30,874.6	2 million/year
2015	31,547.4	2 million/year
2014	31,810.4	2 million/year

EMISSION LIMITS -Emissions associated with the permitted equipment consists of both baghouse dust collector exhaust as well as visible emission limits. The Gravel Plant 2000 is equipped with spray bars, rather than a baghouse dust collector, therefore Special Condition 1.1, (SC1.1) is not applicable.

Visible Emission (VE) limits are defined for all components associated with the portable crusher plant with the exception of wash screens and all subsequent equipment downstream up to the next crusher or storage bin (SC 1.2 a-j). Compliance with VEs could not be verified as the equipment was nonoperational at the time of the inspection.

TESTING ACTIVITIES – Testing activities required by permit for the crusher include method 9 VE testing per NSPS OOO (SC 1.8). All new or additional equipment subject to the NSPS not previously tested is required to be tested per the NSPS. VE Testing pieces of equipment were conducted on November 5, 2008 by Gosling and Czubak Engineering Sciences, Inc. The report was received by the District Office on November 10, 2008 and is of record in MACES.

MONITORING/RECORDKEEPING – By permit the Facility is required to keep daily and annual processing records for a minimum of 5 years (SC 1.9). Records are reported to be kept at the sales office in Lewiston.

REPORTING - Notifications required by permit are limited to notification of testing (SC 1.8), of initial startup (SC 1.10) and relocations. The Gravel Plant 2000 is reported to not have been relocated from it's present pit. Notification of testing was received by District Staff in 2008, as were initial startup activities.

OTHER REQUIREMENTS- General Permit 221-08 allows for replacement, installation and/or removal of equipment from the crusher plant without application for a new permit (SC 1.12). Permit updating is conducted thru the submittal of a new form EQP5756, listing all new and existing equipment associated with the plant. (SC 1.12). As previously indicated no modifications are of record for the plant.

Relocation of equipment from one location to another is limited to permitted equipment with no outstanding unresolved violations (SC 1.13.a) and requires submittal of a relocation notice (SC 1.13.b). Crusher locations are to be a minimum of 500 feet from any residential or commercial establishment as well as places of public assembly. (SC 1.13.c). The Gravel Plant 2000 is reported to not have been relocated since permitting.

SUMMARY –

On June 6, 2019, AQD District Staff conducted an unannounced, scheduled site inspection at 8291 Buttles Road, Atlanta, Montmorency County, Michigan. The referenced location is of record for two Lewiston Sand & Gravel Inc. portable, non-metallic mineral crushing plants (N8039 and N8087). Neither crushing plant was operating at the time of the inspection, and confirmation of VEs. Could not be made at the time of the visit.

The intent of the site inspection was to determine if operation of the two portable plants is in compliance with General Permit for Non-Metallic Mineral Crushers No. 132-08 and 221-08. The last inspections of record were conducted September 24, 2013. This report summarizes inspection activities for N8087, N8039 is reported independently. Mr. Ted May met with AQD District Staff during the site inspection.

Based on information obtained for the non-operating plant, it appears that the facility is operating in general compliance with it's permit.

MACES- Activity Report

NAME Spencer LeBlanc

DATE 6/10/19

SUPERVISOR SN