

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

N815529983

FACILITY: BOND CRUSHED CONCRETE		SRN / ID: N8155
LOCATION: 3740 PATTERSON RD, BAY CITY		DISTRICT: Saginaw Bay
CITY: BAY CITY		COUNTY: BAY
CONTACT: Allan Bond , Owner		ACTIVITY DATE: 06/25/2015
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Dual purpose - follow up on reported asbestos presence and conduct inspection since last one was in 2009.		
RESOLVED COMPLAINTS:		

On Tuesday June 24, 2015, the DEQ was informed of piles of suspect material dropped off at Bond Crushed Concrete. The material reportedly smelled like ammonia. There was also mention of a pipe which appeared to be made of asbestos. Ben Witkopp and Sharon LeBlanc of the MDEQ-AQD Saginaw Bay District Office visited the site for an inspection and further investigation of the pipe in question.

The facility is owned by AI Bond. It is basically a crushing operation subject to New Source performance Standard OOO. It is covered by air use permit 338-08. The crusher was not in operation at the time of the visit. The site has already undergone the testing required by the NSPS. The on site facility contact was Deborah. There was no processing occurring at the time of the visit. The crusher / screener / conveyor set up was checked. The equipment was identified by number and she was in the process of upgrading the readability and making sure the IDs were visible from all sides. A home made conveyor had been added to the set up and was noted as being ID 12. It was added in 2012. The additional conveyor was not permitted at the time of installation thereby resulting in a Rule 201 violation. Sharon made a sketch of the set up and it is attached.

We asked to see the pipe / asbestos. Deborah took us over to a metal bin. She said she diverted it from the pile of material to be crushed. The pipe had only a few small flakes off the end. This was the only damage after being unearthed, dumped, hauled, and dumped again. Sharon determined the company should bag it, tape it shut, and ID the contents. She said it should then be taken to a licensed landfill for proper disposal.

The material that reportedly smelled like ammonia had been covered with plastic tarps. The material piles were located on the south side of the pile of uncrushed concrete. It was SW of the crusher and extended westward well past the compost pile located near the south property boundary. It was dropped off by Wirt and was said to be the remains from a loading dock at their fertilizer operation. Mike Jury of the MDEQ Remediation and Redevelopment Division and Loren Curtis of the MDEQ Waste Management and Radiological Division already investigated the material and samples were taken. The general consensus was that if the sample results came back okay then the material may be accepted by an area landfill.

Records of material processed per month were allowed to be kept on a calendar by a previous inspector. In this manner, the tonnage processed during a 12 month rolling time period could be determined. However, no such records were available. The lack of records is a violation of special condition VI 1. The facility limit is 25,000 tons.

The facility is required to have and implement a fugitive dust control plan. This requirement is found in special condition III 1. AI Bond signed the plan on March 4, 2013. Part of the plan concerns recordkeeping for items such as the date / time of the application of calcium chloride as well as any reapplication. The same is true for subsequent water applications. Unfortunately, no such records were available thereby resulting in a violation.

Also, the main entrance from Patterson Rd back to the crusher area is designated as being paved but there was little evidence of any pavement. When this was brought to Deborah's attention she said the area has crushed asphalt under it. Though that may be true, it is completely covered by dust. This shows the fugitive dust control plan has not been implemented for quite some time resulting in a violation for lack of implementation of the fugitive dust control plan required by the permit.

We discussed the need for modification of the existing permit with AI and Deborah and informed them a violation notice would be sent.

