DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

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| P014360024 | · | |
| FACILITY: Rocky-Top Sand & Gravel LLC | | SRN / ID: P0143 |
| LOCATION: 91 141st Ave, WAYLAND | | DISTRICT: Kalamazoo |
| CITY: WAYLAND | | COUNTY: ALLEGAN |
| CONTACT: William Fennema, | | ACTIVITY DATE: 08/17/2021 |
| STAFF: Cody Yazzie | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Unannounced Inspec | ction | |
| RESOLVED COMPLAINTS: | | and the second control of the second control |

On August 17, 2021 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 91 141st Ave, Wayland Michigan at 1:30 PM to conduct an unannounced air quality inspection of Rocky Top Sand and Gravel (hereafter Rocky Top). Staff made initial contact William Fennema, Rocky Top, Plant Operator, and stated the purpose of the visit.

This is a sand and gravel production facility. The facility produces grades of product that is primarily used in the asphalt industry.

Rocky Top was last inspected by the AQD on July 21, 2011 and appeared to be in Compliance at that time with General PTI No. 165-10. Staff asked, and Mr. Fennema stated that the facility does not have any emergency generators, boilers, or cold cleaners.

Mr. Fennema gave staff a tour of the facility. Required personal protective equipment are a high visibility vest, hard hat, steel toe boots, and safety glasses. Staff observations and review of records provided during and following the inspection are summarized below:

FGCRUSHING:

Special Condition 1.3 limits the facility to not processing more than 2,000,000 tons per year per site of any non-metallic minerals through FGCRUSHING. During the facility staff was provided with records for January 2020 through September 2021. The facility processed 99,194 tons in 2020 and 101,683 tons so far in 2021. The facility reports that it is below the 2,000,000 tons per year limit.

During a previous inspection it was noted that the following equipment was apart of the crushing operation. It was noted that Mr. Fennema stated the same equipment still existed during the 2021 inspection. Staff took Visible emission readings but did not follow the method 9 procedures for taking a measurement every 15 seconds and recording. These readings reflect the highest reading observed for a 2–3-minute period observing the unit. Based on these observations the facility appeared to be meeting the opacity limits specified in the Special Condition Table 1.2 of PTI No. 164-10.

- #10 Feeder and bar screen No VE's observed
- #107 Conveyor No VE's observed
- #106 Conveyor No VE's observed
- #9 Crusher 5 10% Opacity Observed
- #105 Conveyor 5% Opacity Observed
- #201 Crusher Screen No VE's observed
- #104 Conveyor No VE's observed
- #103 Conveyor No VE's observed
- # 3 Sand Screw No VE's observed

- #102 Conveyor No VE's observed
- #4 Screens No VE's observed
- #101 Conveyor No VE's observed
- #109 Conveyor No VE's observed
- #8 Log Washer No VE's observed
- #12 Sand Screw No VE's observed
- #112 Conveyor No VE's observed
- · #113 Conveyor No VE's observed
- #114 Conveyor No VE's observed
- · #111 Conveyor No VE's observed
- · #11 Screens No VE's observed

During the inspection Staff was told that the facility had replaced Crusher# #9. In addition, the facility had recently added a new Jaw crusher. It was indicated that by Mr. Fennema that the replacement #9 crusher was added in the beginning of 2020. The Jaw was added during the winter of 2019. Special condition 1.12 requires that the permittee shall not replace or modify FGCRUSHING, or any portion of FGCRUSHING unless the facility updates and submits a new process information form (EQP5756) to the permit section and District Supervisor, identifying all existing and new or addition equipment added to the process a minimum of 10 days before the equipment is replaced or modified. The facility would also be responsible for the NSPS OOO testing requirements if subject. The facility appears to be in violation of Special Condition 1.12.

During the inspection Staff noted that fugitive and overall dust at the facility appeared to be adequate. It was noted that the facility appeared to be follow the Fugitive Dust Control Plan outlined in Appendix A. Staff was shown a log in which the facility records if/when roads are watered. Staff was also told that the facility will occasionally use calcium chloride instead of water when needed.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in non-compliance with General PTI No. 165-10 Special Condition 1.12. Staff stated to Mr. Fennema that a violation notice and report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 2:30 PM.-CJY