DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

P020937456

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FACILITY: HOFFMAN BROTHERS		SRN / ID: P0209
LOCATION: 8574 VERONA RD, BATTLE CREEK		DISTRICT: Kalamazoo
CITY: BATTLE CREEK		COUNTY: CALHOUN
CONTACT: Mike Mallos , Project Manager		ACTIVITY DATE: 10/31/2016
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Insp	ection	
RESOLVED COMPLAINTS:		

Background:

The AQD received notification from the facility's consultant in November 2010 that the facility had purchased a Metso impact crusher model Lokotrack LT1213 (manufacture date 2006) with a 415 horsepower (HP) engine (2.9 MMBtu/hour) and a Metso screening plant model ST 3.8 (manufacture date 2010) with a 141 HP engine (0.9 MMBtu/hour). The notification further stated that the process equipment was exempt from air use permitting requirements pursuant to Rule 290. The crushing equipment is subject to New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants under 40 CFR Part 60, Subpart OOO. Performance testing required under NSPS, Subpart OOO was completed on 11/23/10 and the average opacity readings for the crushing and screening plant were well below their respective limits. The facility is subject to Category II fees and reports annual emissions to the AQD through MAERS.

On October 31, 2016, MDEQ-AQD staff arrived at Hoffman Bros., Inc. (hereafter facility) at 1:10 pm to conduct an unannounced air quality inspection. Staff made contact with Mr. Mike Mallos, project manager, and stated the purpose of the visit and provided him with a business card. The facility has not previously been inspected by the AQD. The facility's website indicates that they are a site preparation contractor and engage in road, highway and airport construction projects along with other site work and construction of underground utilities.

Staff noted dust track out on to Verona Road adjacent to two access points in the facility's plant yard and asked Mr. Mallos if the facility had a fugitive dust control plan (FDCP) or procedures to minimize fugitive dust emissions. Mr. Mallos said that he wasn't aware if the facility had an FDCP, however they have four water trucks available to suppress dust as needed on unpaved roadways and sweepers to remove track out from Verona Road. A nearby associate stated that every spring Michigan Chloride, Inc. (MCI) brings their equipment down for testing and training purposes and apply chloride brine to their roadways. Staff asked if they have any records for the brine application and the associate said they do not because MCI does this work for free.

Staff went back to Mr. Mallos' office and requested the Rule 290 records for the crushing and screening plant for 2016. Per Mr. Mallos, the equipment hasn't been used yet in 2016 and is currently being set up adjacent to the asphalt concrete pile in the plant yard. Mr. Mallos further stated that the plant is generally idle until mid-to-late fall when staff is available to crush and stockpile concrete and asphalt. Staff asked for 2015 records and copies were provided and are attached to this activity report. Rule 290 records for EUCRUSHER and EUYARD use AP-42 emission factors developed by USEPA and reported monthly emission rates are well below the controlled particulate emission rate limit of 500 pounds/month. Attached records submitted with the 2015 MAERS report indicate that the facility is performing water spray inspections as required pursuant to 40 CFR 60.674(b).

Mr. Mallos then took staff out to the yard where the crusher and screening equipment was being set up. Staff asked about the water spray bars for the equipment and a nearby crew member showed staff where the main water hookup line was and the location of the four spray points on the crusher and general location of the spray point on the screener. A water truck is used to supply water to this equipment. Staff verified the manufacture date on the equipment specification plate for both the crusher and screen equipment along with the horsepower rating of the engines integrated with this equipment. Although the engines are integrated into the crusher and screener emission unit, they are treated similarly to engines under the General Permit to Install (GPTI) for Nonmetallic Mineral Crushing Facilities in that their emissions aren't counted towards the emission limits under the GPTI or under Rule 290. The engines are exempt from air use permitting requirements under Rule 285(g) because their maximum heat input capacity is less than 10,000,000 Btu/hour.

Staff thanked Mr. Mallos for their time and left the facility at 2:10 pm. At the time of the inspection and based on
a review of their Rule 290 and equipment inspection records, the facility appears to be in compliance with NSPS
Subpart OOO and applicable state air quality regulationsRIL

http://intranet.deg.state.mi.us/maces/WebPages/ViewActivityReport.aspx?ActivityID=246... 11/3/2016

RIL DATE 11/3/16 SUPERVISOR MAII 3/2016