

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

P026930242

FACILITY: Bierlein Companies, Inc.		SRN / ID: P0269
LOCATION: 2000 Bay City Road, MIDLAND		DISTRICT: Saginaw Bay
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT:		ACTIVITY DATE: 07/16/2015
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, self-initiated inspection of portable crusher which temporarily relocated to a demolition site in Flint, from its headquarters in the Saginaw Bay District.		
RESOLVED COMPLAINTS:		

On 7/16/2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced inspection of the Bierlein Companies crusher identified by SRN P0269, while it was located at the former McLaren Hospital site in Flint.

Environmental contact:

Mindy Schultz, CSP, Vice President, Environmental Health and Safety; 989-496-0066;
mschultz@bierlein.com

Facility description:

This is a portable crusher, headquartered in the Saginaw Bay District, which temporarily relocated to Flint, in order to process concrete and bricks from the demolition of a hospital in Flint Township.

Emission units:

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Permit to Install No.	Compliance Status
EUPROCESS	A combination of process equipment (screens, Crushers, feeders, conveyors, etc.) used to reduce larger materials down to smaller sizes, classify and sort materials into various product types, material handling and transporting of material to storage areas. Control methods include equipment enclosures, and water sprays.	85-15A	Compliance
EUTRUCKTRAFFIC	Truck traffic for delivery of material products to customers, truck traffic from debris piles to processing area and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road portions to the process area.	85-15A	Compliance
EUSTORAGE	Open area stock piles of various sizes and product types. Water spray of material products are used when necessary for material storage piles.	85-15A	Compliance

Regulatory overview:

This portable concrete crushing facility normally operates under a general PTI. However, for temporarily crushing at the former McLaren Hospital in Flint Township, the crusher would not be able to comply with the 500 foot setback requirement for residences, businesses, and places of public assembly in the general crusher PTI. Therefore, it was necessary to have the company apply for and receive a site-specific PTI, No. 85-15. Weather-related delays, from numerous days of strong winds in June, were

reported to have delayed plant startup until early July. This meant that the crusher would not be able to complete all the work at the site before the permit expiration date of 7/15/2015. Therefore, the company applied for and received a permit revision, No. 85-15A, to extend the allowed dates of operation until a new deadline date, of 9/30/2015.

This crusher is subject to 40 CFR Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral processing Facilities. It has already undergone and passed the opacity testing required by Subpart OOO.

This facility is considered a true minor source for particulate matter, because it does not have the potential to emit (PTE) to emit 100 tons per year (TPY) or more of particulate matter smaller than 10 microns (PM-10) or particulate matter smaller than 2.5 microns (PM2.5). It does not have the PTE to be a major source for CO, NOx, SO2, VOC, or lead. It is not considered to be a major source for Hazardous Air Pollutants (HAPs), because it does not have the PTE 10 TPY or more of a single HAP, nor does it have the PTE to emit 25 TPY or more of total HAPs.

Fee status:

This crusher is considered a Category II fee-subject facility, because it is subject to 40 CFR Part 60, Subpart OOO, the Standards of Performance for Nonmetallic Mineral Processing Facilities. It annually reports emissions via the Michigan Air Emissions Reporting System (MAERS).

Recent history:

Bierlein Companies, Inc. did the actual demolition work on the former hospital building, in addition to crushing the concrete debris which remained after the demolition. As discussed earlier in this report, weather-related delays resulted in the plant not being able to start operating until early July. This meant that the plant would be unable to finish work at the site prior to the expiration date of 7/15/2015 in PTI No. 85-15. The company subsequently applied for and received a revised permit, No. 85-15A. This provided a termination date of on or before 9/30/2015.

Location:

the site of the former McLaren Hospital in Flint Township is within 500 feet of other medical buildings, which are currently staffed and used by patients. There are also nearby businesses, and a busy intersection. Because the crusher would be located within 500 feet of businesses, residences, or places of public assembly, it was necessary for the company to obtain a site-specific PTI.

Arrival:

I arrived at 11:16 AM. Weather conditions were sunny and 73 degrees F, with moderate humidity, and winds out of the east. I met with Mr. Kevin Overly, and an operator, Jeremy. I provided my identification/credentials, and provided a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, per AQD procedures.

Inspection:

The crusher and associated equipment were running, at this time. The individual components of the crusher were labeled, as required by the PTI, numbers T-1 through T-15. The throat of the crusher has a water spray for dust control, which is manually operated, I was informed. The raw material storage pile, "the hill" was slightly damp, from having a Dust Boss spray water onto it this morning. I could see that the material being fed into the crusher by an excavator was damp.

It was explained to me that the impactor is a metal drum with blow bars. These pick up material, and blow it against the inside of the drum, crushing it. I was informed that a water hose was supplying water into the impactor. I was also told that water is running to the crusher whenever it operates. Following

the impactor, a magnet on top of a conveyor removes steel. A screening process is used to sort material by size, returning oversize material to the impactor.

There were no visible emissions detected coming from the crusher, screening system, or conveyors. The only fugitive dust I saw onsite today was from heavy vehicles; when I was looking towards the sun, and the dust was backlit. With the sun at my back, which is necessary for proper visible emissions reading, I could not see any dust. The crusher runs about 800 tons per day, I was informed, and as of today, Thursday, 7/16, it had run 2,500 tons this week, so far.

I was informed that they would like to obtain a site-specific PTI to allow a portable jaw crusher to be brought to this site. They intended to submit a permit application to the AQD Permit Section.

Conclusion:

I did not observe any instances of noncompliance with PTI No. 85-15A, nor with 40 CFR Part 60, Subpart 000. Company staff appeared to be taking appropriate measures to control fugitive dust at this site. I left the site at 11:50 AM. When the crusher completed operations on 9/8/2015, AQD was notified by e-mail, within 2 business days.

Note: the company subsequently applied for, and received, a site-specific PTI, No. 141-15, to allow their jaw crusher, SRN P0197 to relocate to this site. The permit termination date is on or before 9/30/2015.

NAME  DATE 9/25/2015 SUPERVISOR 

