

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

ACTIVITY REPORT: Scheduled Inspection

P047425497

FACILITY: Paxton Demolition Inc.	SRN / ID: P0474
LOCATION: 16929 Ida West Road, PETERSBURG	DISTRICT: Jackson
CITY: PETERSBURG	COUNTY: MONROE
CONTACT: Billy J. Paxton , Vice President	ACTIVITY DATE: 06/12/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Pending
SUBJECT: 2014 Targeted Inspection	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

SRN: P0474

COMPANY: Paxton Demolition, Inc.

COMPANY ADDRESS: 6225 Benore Road; Toledo, OH 43612

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Billy Paxton, Vice-President (Cell: 419-654-3411; Fax: 734-848-3753;

Email: billy@paxtondemolitioninc.com)

COMPANY PHONE NUMBER: 419-654-3411

On June 12, 2014, AQD staff, Erik Gurshaw, conducted an announced, targeted inspection of a portable non-metallic mineral processing plant owned and operated by Paxton Demolition at Stevens Disposal & Recycling located at 16929 Ida Road West in Petersburg, Michigan. The company's corporate office is located at 6225 Benore Road in Toledo, Ohio. The company was contracted by Stevens Disposal & Recycling to crush recycled concrete at the Petersburg location. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; NSPS Subpart OOO for Non-Metallic Mineral Processing Plants; and General Permit-to-Install (PTI) #150-13 for a non-metallic mineral crushing plant.

Upon arrival at the site, AQD staff introduced himself and stated the purpose of the visit to Mr. Billy Paxton, Vice-President. Mr. Paxton assisted AQD staff during the inspection. When operated, the plant runs from 8:00 AM until 6:00 PM, but it is operated very sporadically. A 3 man crew runs the crusher when it is being operated. The plant is currently producing 22AA road aggregate. Equipment at the location includes the following: 1 impact crusher; 1 double deck screen; 1 Komatsu PC300 excavator; and a water truck. Crushing was taking place at the time of the inspection.

As previously mentioned, the plant was processing recycled concrete at Stevens Disposal & Recycling located at 16926 Ida Road West in Petersburg. Concrete is broken up by an excavator and loaded into the impact crusher with the same excavator. After being crushed, the material is conveyed from the crusher to a storage pile. The size of the aggregate being produced is controlled by changing the curtain height within the crusher. The plant has a double deck screen which can be used to produce different sizes of aggregate, but the screen was not being used at the time of the inspection.

This crushing plant is not equipped with a baghouse. Special Condition 1.1 of its permit is, therefore, not applicable to its operations. Potential fugitive dust production is being controlled by applying water to the material at the inlet to the crusher, at the outlet to the crusher, and at the end of the discharge stacker. Water was being supplied from a portable water tank and a pond at the location. No visible emissions were observed at the outlet of the crusher, along the conveyor, or from the storage piles at the time of the inspection. Visible emissions of 20% to 40% opacities were observed to be emanating from the top of the crusher, however. AQD staff informed Mr. Paxton that dust is not being adequately controlled at the top of the crusher. In discussing the situation, Mr. Paxton agreed to install two new water spray bars at the top of the crusher to better control fugitive dust. AQD staff instructed Mr. Paxton to inform the AQD when the new spray bars have been installed so a second visible emission evaluation on the crusher could be made. Some dust was being produced from vehicle traffic at the time of the inspection, but the level of dust being produced was not deemed to be excessive by AQD

staff. The crusher is equipped with a belt scale which the company uses to compile daily production logs. The crusher did not operate in Michigan in 2013 and Mr. Paxton indicated that approximately 1,000 tons of material has been processed at Stevens Disposal & Recycling this construction season. Mr. Paxton said that the plant does not process any material containing asbestos. The plant is taking the following measures to control fugitive dust: the drop distance at each transfer point and storage pile is being minimize; water is applied to roadways and the plant yard when necessary; the time and date of water applications to the plant yard and roadways is being recorded on daily production logs; material spills are immediately cleaned up; and storage piles are watered when necessary. The plant's equipment was not required to be evaluated for visible emissions since the maximum rated capacity of the crusher and the screen is less than 150 tons per hour. Mr. Paxton indicated that he would like to have a visible emission evaluation conducted, however, even though the equipment is not subject to NSPS Subpart OOO. According to Mr. Paxton, no equipment has been replaced, modified, or added since the issuance of the crusher's PTI. Mr. Paxton maintains a copy of the plant's PTI in his car. PTI Number 150-13 was issued to the company for the crushing activity being done in Petersburg and the plant has yet to relocate within the State of Michigan since the issuance of its PTI. AQD staff explained what is required in a Relocation Notice to Mr. Paxton during the inspection. No residences or commercial establishments were within 500 feet of the plant. Therefore, the plant is maintaining the minimum setback distance required under Special Condition 1.13c of its PTI. The plant's equipment is not labeled. Mr. Paxton indicated that the crusher and screen will be labeled when the new spray bars are installed at the inlet to the crusher.

As a result of this inspection, it was determined that Paxton Demolition, Inc. is not adequately controlling fugitive dust at the inlet to its crusher. The company is planning to install two new spray bars to address the problem. Once the spray bars have been installed, AQD staff will make a follow-up visit to the site to further evaluate the crusher's operation. The company's compliance status will be marked as "Pending" in MACES until a follow up inspection takes place.

NAME Erik GushawDATE 6/16/14SUPERVISOR 