

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

P067958512

FACILITY: CLIFF A MESSING EXC, INC.		SRN / ID: P0679
LOCATION: 8826 E. HURON LINE ROAD, RUTH		DISTRICT: Bay City
CITY: RUTH		COUNTY: HURON
CONTACT: Cliff Messing , President/Owner		ACTIVITY DATE: 06/15/2021
STAFF: Nathanael Gentle	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled on-site inspection.		
RESOLVED COMPLAINTS:		

On June 15, 2021, AQD staff conducted a scheduled onsite inspection at Cliff A Messing Exc. Inc, P0679. Staff arrived onsite at 10:15 AM and departed at 10:55 AM. 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 Environment Great Lakes and Energy, Air Quality Division (AQD) Administrative Rules; and to evaluate compliance with the facilities Permit to Install (PTI), PTI No. 11-16A. AQD staff were assisted onsite by Mr. Cliff Messing and Mr. Tim Messing. At the time of inspection, the facility was found to be in non-compliance.

Facility Description and History

Cliff A Messing Exc. owns and operates a non-metallic portable crushing unit located at 1773 Maine St, Minden City, MI 48456,. The unit remains at this location. Due to its location with proximity to residences and commercial buildings, the crusher operates under a site-specific permit to install, PTI No. 11-16A. The crusher is used to crush concrete resulting from excavation and demolition jobs. Concrete is transported from job sites and piled up at the location of the crusher. Once enough concrete accumulated at the crusher site, the concrete is loaded into the crushing unit where it is crushed down, producing 1.25" gravel which can then be utilized for excavation jobs.

The crusher was first permitted on March 7, 2016 with PTI No. 11-16. The facility was last inspected on March 9, 2018. At the time of inspection, the facility was found to be in non-compliance. During the 2018 inspection, it was revealed that a second crusher, Pioneer Jaw Crusher 10-36 unit, and an additional return conveyor 24-34, were installed without first obtaining a PTI. In addition, the facility had not completed the VE evaluations required by EUPROCESS S.C. V. 1. A Violation Notice was sent. The facility submitted a new PTI application and PTI 11-16A was issued on June 28, 2018. The new permit includes the additional equipment. No complaints are associated with the facility.

EUPROCESS

The crushing system is made up of the following equipment, as listed in Appendix A of PTI NO 11-16A. The equipment includes, feeder hopper, TelSmith 3042 jaw crusher, conveyor to screener, screener/conveyor (integral), return conveyor, stacking conveyor, scales conveyor, Pioneer jaw crusher, and return conveyor. Metal within the material is removed by magnets located on the crushers and screener. Concrete is first loaded and crushed by the TelSmith jaw crusher. The crushed material is then sent to the screener. Material that is small enough to pass through the

screener is sent across a series of conveyors, including transfer conveyor 24-30 with an installed belt scale, to the final pile of gravel. Material that is not small enough to pass through the screener is conveyed to the Pioneer jaw crusher to be further crushed. From the Pioneer jaw crusher, material is sent back to the screener. Material will continue this cycle until it is small enough to fit through the screener and be sent to the final pile of gravel. Onsite personnel report the system crushes material at rate of 50 tons/hour. No new equipment has been installed since the facility was last inspected. The system is powered by a diesel generator. The generator is 300 KW with a fuel rate of approximately 8-10 gal/hr. Based on these specifications, the generator appears to meet the requirements for exemption R. 285(g). ID numbers for the equipment, listed in Appendix A, were not readily visible on the equipment. Facility personnel said the labels likely wore off or were covered with paint. EUPROCESS S.C. IX. 1. requires that any equipment in EUPROCESS be labeled with the ID numbers in Appendix A in a conspicuous location on the equipment. Personnel said they would make sure the equipment was labeled with the appropriate ID numbers.

Asbestos material is not processed in the crushing system, in compliance with EUPROCESS S.C. II. 1. Any material from excavation jobs that is suspected of containing asbestos containing waste is not brought back to the pile of material to be crushed. In addition, material is tested for asbestos onsite at the demolition sites.

Daily records of material processed in the 2021 operating season were provided. The crusher had been operated twice between the beginning of 2021 and the time of inspection. On April 14, 2021, the crusher was operated for 4 hours, processing approximately 200 tons of material. The crusher was operated on May 1, 2021 for 6 hours, processing approximately 300 tons of material. For both days of operation, the amount of material processed was well below the permitted limit of 1600 tons/day, EUPROCESS S.C. II. 2.

Records for amount of material processed in 2020 were provided. In 2020, the facility processed 3435 tons of material. The majority of material was processed during the time periods December 2019- February 2020 and September to November 2020. Facility personnel said they prefer to operate the equipment during wet periods when the material piles are wet. They do this to further minimize dust.

EUPROCESS S.C. IV. 2. requires a belt scale be installed and maintained on the transfer conveyor 24-30 portion of EUPROCESS. A belt scale was confirmed to be installed during the onsite portion of the inspection. Personnel said the scale was giving them issues recently, but they are confident they can get it working properly before the crusher is operated again. Personnel said they are also able to calculate the amount of material processed based on the amount of time the crusher is operated. Knowing the crushing system processes 50 tons/ hour, personnel can calculate the amount of material processed based on the number of hours the equipment was operated. In addition, personnel are aware of how much material is hauled to the site because it comes from their excavation job sites. By knowing this, they can maintain a visual estimate of how much material is processed.

Water spray control devices are installed and maintained on the Telsmith jaw crusher, the Screener/conveyor (integral), and the pioneer jaw crusher, compliant with EUPROCESS S.C. IV. 1. Water supply is available onsite. The crusher was not operating at the time of inspection. Personnel said water spray is turned on to control dust while the crusher is being operated. The

water sprays are frequently inspected and cleaned or replaced as needed to ensure the controls are operating properly, EUPROCESS S.C. III. 4.

Pursuant to EUPROCESS S.C. V. 1., the permittee shall evaluate visible emissions from EUPROCESS, at the owner's expense, in accordance with federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO. At the time of inspection, evaluation of visible emissions had not been completed. A Violation Notice was previously sent on March 14, 2018, for the evaluation of visible emissions not being completed. Personnel were made aware during the onsite inspection that the evaluation needs to be completed and that a violation notice would be sent. In addition, personnel were made aware there was potential for a fine as this is the second violation notice for this violation. They explained completing the evaluation was difficult due to the amount of material and run time needed to complete the evaluation, in addition to the costs to hire a company. Further information on EGLE AQD regulation of non-metallic mineral crushers, evaluation of visible emissions, AQD's list of air quality consultants, and information on Michigan smoke school to get Method 9 certified, were provided in an email following the onsite inspection.

EUTRUCKTRAFFIC

Visible emissions associated with onsite truck traffic shall not exceed 5 percent opacity, EUTRUCKTRAFFIC S.C. I. 1. Dust is to be controlled through implementation of the Nuisance Minimization Plan Fugitive Dust in Appendix B, EUTRUCKTRAFFIC S.C. III. 1. Personnel said applications of water are applied to the site roadways on an as needed basis to control fugitive dust. Cliff A Messing Exc. hires an external company to conduct the applications.

EUSTORAGE

Visible emissions from onsite storage piles shall not exceed 5%, EUSTORAGE S.C. I. 1. Dust is to be controlled through implementation of the Nuisance Minimization Plan Fugitive Dust in Appendix B, EUSTORAGE S.C. III. 1. Facility personnel said disturbance of piles is minimized when conditions are dry to prevent fugitive emissions. As previously discussed, material is preferentially processed during periods of the year in which the material is wet. While onsite, no visible emissions were observed to be coming off any of the material storage piles.

Summary

Cliff A Messing Exc. owns and operates a nonmetallic mineral crushing facility. Due to its proximity to residences and commercial establishments, the facility operates under a site specific PTI, PTI NO. 11-16A. An onsite inspection was conducted to evaluate facility compliance. The facility was found to be in non-compliance as result of not completing the evaluation of visible emissions.



NAME

DATE 6/18/2021


SUPERVISOR _____