

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

P095064542

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| FACILITY: Verrette Materials, Inc | SRN / ID: P0950 |
| LOCATION: 24 Mile Road, DAGGETT | DISTRICT: Marquette |
| CITY: DAGGETT | COUNTY: MENOMINEE |
| CONTACT: Chad Kary , Manager, Safety & Environmental | ACTIVITY DATE: 08/29/2022 |
| STAFF: Lauren Luce | COMPLIANCE STATUS: Non Compliance |
| SUBJECT: Unannounced Inspection | SOURCE CLASS: MINOR |
| RESOLVED COMPLAINTS: | |

Facility: Verrette Materials

Location: 24 Mile Rd., Daggett, MI

Contact: Chad Kary, Safety & Environmental Manager, 920-855-2146

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Verrette Materials is based out of North Gillett, WI. The company provides concrete and masonry services throughout the Upper Peninsula and Wisconsin. For aggregate, Verrette Materials operates a portable nonmetallic crusher plant in Daggett, MI.

Process Description

A crushing plant produces smaller size aggregate from larger size rock. The final product can be used for a variety of applications from infrastructure projects to residential landscape purposes. A crushing plant can consist of loaders, haul trucks, generators, crushers, screens, conveyors, and stockpiles. The plant is normally located within a quarry, crushing stone that was generated from blasting. The process begins with large size rocks being fed into the primary crusher via loader, producing an initial size product. From the primary crusher, the product can be conveyed into a screen plant that separates the crushed aggregate into various sized products. Smaller size material is filtered out and leaves on separate conveyors to stockpiles, while larger size material continues into the secondary crusher. A secondary crusher will break the aggregate down into smaller sizes before it enters the screen plant again or continues down the line to a tertiary screen and crusher. A crushing plant may have several crushers, screens, and conveyors depending on how many sizes of aggregate are to be produced.

Emissions

Stone crushing and processing operations can cause point and fugitive emissions of PM, PM10, and PM2.5. Emissions from process operations should be considered fugitive unless the source of emissions is vented through a force-air vent or stack. Fugitive sources of emissions are generated

from machine movement and wind erosion. Emission sources can include hauling, crushing, screening, and transferring of material. The primary factors affecting PM emissions are wind and moisture content of the material. Spray bars on crushers and screens, along with the use of dust suppressants on roadways reduces fugitive dust emissions from activity by 60% to 85%. Moisture on the surface of the material can cause fine particles to adhere resulting in a dust suppression effect.

Emissions Reporting

The facility is subject to the federal New Source Performance Standards (NSPS) Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants and is required to report its annual emissions to Michigan Air Emissions Reporting System (MAERS). The following table lists the source total emissions for the reporting year 2021.

| Pollutant | Emissions (PPY) |
|--------------|-----------------|
| PM 10 FLTRBL | 137.2 |

Compliance History

The facility has not received any violation notices in the past five years. The facility was last inspected in June 2019 and was found to be in compliance with all applicable air quality rules and regulations at that time.

Regulatory Analysis

Verrette Materials is subject to General Permit to Install (PTI) No. 141-18 for a portable non-metallic crushing plant. The facility is considered a true minor source because the potential-to-emit (PTE) of all regulated air pollutants is less than the major source thresholds. The facility is also considered an area source because the PTE of individual HAPs is less than 9 tpy and the PTE of aggregate HAP emissions is less than 25 tpy. The facility is subject to NSPS Subpart OOO by having a portable crushing plant with a crushing capacity of greater than 150 tons/hr and equipment that has been constructed after August 31, 1983.

Inspection

On August 29, 2022, AQD Staff (Lauren Luce) conducted an unannounced inspection on Verrette Materials on 24 Mile Rd. in Daggett, MI. The pit is located west of Daggett in a rural area. The crusher was not operating and there were no staff on site.

The inspection began by checking process equipment for labels. Equipment on site included three conveyors, primary crusher, water pump, loaders, and a trailer. Labels were not clearly visible except for on one conveyor (Label #5). Records on production and visible emissions were requested via email following the on-site inspection from Chad Kary, Safety & Environmental Manager.

No crushing has been done on the site in 2022. In 2021, the total throughput amount was 13,230 tons. The company was unable to provide any visible emission testing records. It was explained that the equipment must be visible emission tested within 60 days after achieving maximum production rate, but not later than 180 days after initial startup. Chad Kary stated there was a change in company personnel in 2021 and this must have been missed in the transition. Additional information on Nonmetallic Mineral Crushing and NSPS OOO requirements was provided.

Compliance

Based on this inspection, it appears Verrette Materials is not in compliance with PTI No. 141-18 and other applicable state air pollution control rules and federal regulations. It was conveyed to the company that a violation notice will be issued for not conducting visible emissions testing on NSPS Subpart OOO subject equipment and for not labeling all equipment associated with FGCRUSHING.



Image 1: Site and stockpiles



Image 2: Primary crusher

NAME *Sam Sam*

DATE 9-14-22

SUPERVISOR *Michael Kaplan*