

P0951
portable
manila

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

P095148815

| | | |
|---|-----------------------------------|---------------------------|
| FACILITY: SC Environmental Services | | SRN / ID: P0951 |
| LOCATION: 701 East South Street, LANSING | | DISTRICT: Lansing |
| CITY: LANSING | | COUNTY: INGHAM |
| CONTACT: John Sears, Member | | ACTIVITY DATE: 05/10/2019 |
| STAFF: Daniel McGeen | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Unannounced, scheduled inspection. | | |
| RESOLVED COMPLAINTS: | | |

On 5/10/2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of SC Environmental Services, LLC's recently permitted portable crushing plant.

Environmental contact:

John Sears, Member; 517-896-1896; john@scenvironmental.com

Dan Heathman, Director of Operations; 517-775-7790; dan@scenvironmental.com

Facility description:

This facility is a portable, non-metallic mineral crushing plant which was permitted by AQD in 2019.

Emission units:

Non-metallic mineral processing plant, General PTI No. 38-19, 40 CFR Part 60, Subpart 000

Equipment list:

| Process equipment | Make and Model | Serial No. | Device ID |
|-------------------|----------------|------------|-----------|
| Impact Crusher | McCloskey 144R | 86135 | Impact1 |
| Jaw Crusher | McCloskey J50 | 85228 | Jaw1 |
| Wheeled stacker | McCloskey ST80 | 86903 | ST801 |
| Wheeled stacker | McCloskey ST80 | 88257 | ST802 |
| Tracked Screen | McCloskey R155 | 86590 | TScreen1 |

Regulatory overview:

This facility is considered a minor source of criteria pollutants, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A major source of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants, and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or area source for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

This facility is believed to be subject to 40 CFR Part 60, Subpart 000 - *Standards of Performance for Nonmetallic Mineral Processing Plants*. This New Source Performance Standard (NSPS) was updated in 2008. Table 3 to Subpart 000 sets a 12% opacity limit for affected facilities (as defined in Section 60.670 and 60.671 that commenced construction, modification, or reconstruction on or after 4/22/2008. Because the impact crusher TC was reported to be manufactured in 2016, it is subject to the NSPS 12% opacity limit for fugitive emissions. It should be noted that this limit is stricter than the 15% opacity limit

for crushers in the General PTI No. 38-19, so there are two different opacity limits, both of which this crusher must meet.

Fee status:

This facility is not considered a Category I fee-subject source, because it is not a major source for criteria air pollutants. It is considered a Category II fee-subject source, because it is subject to a New Source Performance Standard. The facility reports emissions each year through the Michigan Air Emission Reporting System (MAERS).

Location:

This location for the portable plant is at 5252 North Dort Highway, in Flint, Genesee County, north of the intersection of Carpenter Road with Dort. The property is owned by RJ Industries, and is on the east side of Dort, across from RJ Torching, and the CSX railyard. This area has been heavily industrialized for decades. To the north and south, on either side of Dort Highway, are mostly industrial but also some commercial businesses. The nearest residences are about 1,600 feet to the southwest and 1,800 feet to the west, as measured by me in Google Maps. To the south, the nearest residences are about 2,500 feet away.

Initially, review of the crusher relocation notice appeared to indicate the plant was complying with setback limits in the general PTI No. 38-19. However, following the inspection, a subsequent review showed that the location was within 500 feet of nearby businesses. A Violation Notice (VN) was subsequently prepared and sent to the company, on 6/4/2019.

History:

In August 2018, SC Environmental had been operating their portable crusher in Holly, Oakland County. They were inspected by AQD staff from the Southeast Michigan District Office, and were sent a violation for not having a permit to install for the crusher. The company's permit application was received on 1/24/2019, and General PTI No. 38-19 was issued on 2/26/2019.

In January 2019, AQD asbestos inspector Craig Dechy, from AQD's Technical Programs Unit was contacted by a complainant who alleged that asbestos containing materials (ACM) were being processed through the crusher at 52552 North Dort Highway. The complainant subsequently contacted the AQD Lansing District Office (LDO), on 1/10/2019, to allege that there was fugitive dust being emitted by the crusher. The complainant reported that the ACM was from residential demolitions within the City of Flint.

C. Dechy promptly contacted the company, who suspended operations, until the ACM complaint could be investigated. C. Dechy made more than one site visit, but no evidence of ACM was found until 4/16/2019. C. Dechy was at the North Dort site, and saw a black, asphaltic coating on four concrete blocks, which were in a pile of concrete demolition material that had not yet been processed by the crusher. The four blocks were on the far side of the pile from where an excavator was taking material to feed into the crusher. C. Dechy directed the attention of the operator(s) to these four blocks, which were removed from the pile and not crushed. C. Dechy sampled the coatings, and one of the samples came back positive for asbestos. Please see attached results.

My understanding, from speaking with C. Dechy, is that SC Environmental placed an employee who was certified in asbestos recognition to spot and remove ACM containing material from the raw material storage piles.

The AQD LDO had called the company on 1/11/2019 to advise them of fugitive dust complaint, and to request corrective action. The LDO was not able to make it to the site, prior to the company's departure. The LDO planned to inspect the facility upon its return to 5252 North Dort Highway. On 3/21/2019, SC Environmental sent AQD a relocation notice, to return to the North Dort site on 4/12/2019. Their predicted stay was to be through 5/1/2019.

Safety apparel required:

Hard hat, safety glasses with side shields, hearing protection, steel-toed boots, and high visibility safety vest.

Arrival:

On 5/10/2019, at 11:29 AM, weather conditions were overcast, damp from recent rains, and 48 degrees F, with winds out of the west northwest at 10-15 miles per hour. These were not good conditions for checking for fugitive dust, but I was aware the plant would soon be departing from this site.

I saw no fugitive dust as I approached the RJ Industries site. Upon arrival, employees directed me to the southeast portion of the site, where the SC Environmental crusher was operating.

Inspection:

I met with an operator, John (not the same person as John Sears). I was introduced to Ben Canfield, the foreman, and to Nate, who was in charge of removing ACM from the raw material feed to the crusher. I was informed that Nate had been working with ACM for 10 years.

I was shown a trailer into which several concrete blocks and half a dozen concrete fragments with asphaltic coating had been segregated. Please see attached photo. The trailer had been flagged with safety taping indicating the presence of asbestos. It was my understanding that when the trailer was full, it would be taken offsite for proper disposal. This would be the second trailer of ACM material removed from the site, I was told.

General PTI No. 38-19, Special Condition (SC) No. 1.5 states:

1.5 The permittee shall not crush any asbestos tailings or asbestos containing waste materials, as defined by the National Emission Standard for Hazardous Air Pollutants regulations, in FGCRUSHING. (40 CFR 61.141)

I did not observe crushing of any concrete with black asphaltic coating today. It is AQD's current position, however, that when ACM is identified in a pile of material awaiting crushing, that a violation is identified. This position is considered to be the most protective of public health and the environment. I relayed this information Mr. John Sears, Member, by phone later today, discussed later in this report.

The plant was running, and was crushing concrete. I saw no fugitive dust from the crushers, screens, or conveyors. The raw material was damp from recent rains. The plant capacity is 200 TPH, I was told, but when conditions are this wet, they are slowed down to 110 TPH, because of the wet clay in with the concrete.

I was shown the primary crusher, which is their jaw crusher, with magnet to remove rebar. I was told it reduces material to 6-8". There were no visible emissions. The secondary crusher is their impactor crusher, which is said to reduce material to either 1 by 3", or 1 and 1/2" minus. It had no visible emissions. There were no fugitive dust emissions from the onsite roadways, which were visibly damp.

I did not check during the inspection for the presence of labels/identification on the crushers and other process equipment. On 6/4/2019, I called Mr. Dan Heathman, Operations Director, and left a voice mail, inquiring about the required labeling/identification. When he called me back that afternoon, Mr. Heathman assured me that all the equipment was properly labeled, in accordance with the General PTI No. 38-19.

ACM violation discussion:

Pursuant to AQD policy, a VN was prepared for ACM material identified in the 4/16/2019 sampling by AQD TPU's Craig Dechy. I called Mr. Sears on the day of the inspection to discuss the pending VN. Mr. Sears felt that because they have asbestos-trained staff, the ACM material on 4 concrete blocks, which

C. Dechy had observed in his 4/16 inspection, would have been pulled from the pile, and would never have been crushed.

Setback violation discussion:

Subsequent to the 5/10/2019 inspection, I reviewed the relocation notice of 3/21/2019 a second time, and observed that the crusher appeared to be about 305 feet from a business to the south, and about 350 feet from a business to the northwest. This is within the 500 foot setback criteria specified in General PTI No. 38-19. Special condition No. 1.13c states:

c) The crusher(s) shall be located a minimum of 500 feet from any residential or commercial establishment or place of public assembly.

On 6/4/2019, I advised Mr. Dan Heathman, Operations Director, that a Violation Notice (VN) was being sent for the crusher being within 500 feet of a business to the south, and to the northwest, in addition to the ACM violation identified by AQD. I advised that they would need to apply for a site-specific PTI in order to return here, to the North Dort site. The VN was sent on 6/4.

Violation Notice response:

The 6/24/2019 response from Mr. Sears indicated that although they did not believe that any ACM had actually been processed in the crusher at the time of C. Dechy's complaint investigation, they subsequently have a certified/trained employee who handles ACM recognition and handling, as I observed myself during the inspection. They identified some of the other nearby businesses as facilities which have brought crushers onsite before, and indicated the business to the south is believed to be vacant. However, he stated that they would apply for a site-specific permit to install for this location, before returning here. AQD will contact the company to discuss. The general permit conditions do not give AQD the flexibility to distinguish between a closed and an operational business, so applying for a site-specific PTI is the best way to ensure compliance, in the future.

Conclusion:

A VN was sent on 6/4/2019, in part for the four concrete blocks with a coating containing ACM which C. Dechy had observed and sampled on 4/16/2019. Also cited in the VN was a violation for today's date, for being within 500 feet of the nearest business establishment. T

Note: the company's response to the VN is discussed above.

NAME  DATE 9/30/19 SUPERVISOR 