

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

P099849788

FACILITY: Mi Gravel dba TCA Management LLC		SRN / ID: P0998
LOCATION: 10222 Sheridan Road, MILLINGTON		DISTRICT: Saginaw Bay
CITY: MILLINGTON		COUNTY: TUSCOLA
CONTACT: Robert Gilling, President		ACTIVITY DATE: 08/05/2019
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <i>Misc</i>
SUBJECT: Unannounced inspection to determine compliance with PTI No. 33-19.		
RESOLVED COMPLAINTS:		

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On Monday (8/5/19) I (Matt Karl) conducted a compliance inspection at Mi Gravel dba TCA Management LLC located at 10222 Sheridan Road, Millington, Michigan. 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 (EGLE-AQD) Administrative Rules; Permit-to-Install (PTI) No. 33-19. Mr. Robert Gilling, president, assisted me during my inspection and provided me with requested records.

Background:

PTI No. 33-19 is a general permit for non-metallic mineral crushing facility. This facility operates as a gravel processing plant that makes road gravel. Mr. Robert Worth, Member of the Millington Township Planning Commission contacted Chris Hare, AQD Bay City District Supervisor on Tuesday (7/16/19) to inquire if there would be any air quality concerns if the facility stockpiled concrete and asphalt at the gravel pit located at 10222 Sheridan Road, Millington, MI and then crushing those materials throughout the year. Chris responded via email that an air quality permit was required to crush that material, and that there were specific requirements in the permit that Mi Gravel dba TCA Management LLC has to comply with. Chris also noted the main air quality concern with non-metallic mineral crushing facilities generally is dust generated by the process equipment if water spray controls are not operated properly or dust from truck traffic on dirt roads if fugitive dust plans are not followed correctly.

On Friday (8/2/19) I received a complaint from a Millington resident that was concerned about the Millington Township Planning Commission allowing Mi Gravel dba TCA Management LLC to stockpile and periodically crush concrete and asphalt at the gravel pit located at 10222 Sheridan Road, Millington, MI. The complainant thought that the facility might be installing an asphalt plant in the gravel pit as well.

On Monday (8/5/19) I contacted via phone call Mr. Terry Burns, Vice Chairperson of the Millington Township Planning Commission to inquire about the plans for the gravel pit located at 10222 Sheridan Road, Millington, MI. Terry confirmed that the discussions were to allow Mi ravel dba TCA Management LLC to stockpile and periodically crush concrete and asphalt in the gravel pit and that there were no plans to install an asphalt plant. He confirmed that they had held a public hearing in July 2019 and there were some local residents that were concerned. He noted that the next Planning Commission meeting was scheduled for Monday (8/12/19).

From the Non-Metallic Mineral Crushing Plants Background Information (Revised August 14, 2003) the general permit is applicable to facilities which crush and process rock, stone, concrete, recycled asphalt, sand, gravel or soil for the construction and transportation industry.

PTI No. 33-19 covers the following equipment located at 10222 Sheridan Road, Millington, Michigan:

Device Description	Device ID	Make and Model	Serial Number	Manufactured Date (Year)	Maximum Rated Capacity (tons/hr)	Control Type	Subject to NSPS OOO?
Feeder, Screen	Finlay 23 Plant	Finlay 390	FG451286	1995	<150	Water Sprays	No
Screen	Dister 23 Plant	Dister Screen	BTFM3P-2516	2006	<150	Water Sprays	No
Impact	Inertia 23 Plant	Inertia 40	17141162	2018	<150	Water Sprays	No
Conveyor	150-23 Plant Conveyor	Shop Built	-	-	<150	None	No
Jaw	Pioneer 23	Pioneer 10-	C585	1943	<150	Water	No

Plant	36				Sprays
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Site Inspection:

I arrived on site at approximately 3:00 pm. I met with Bob Gilling. We proceeded to inspect the 23-plant equipment. Bob stated that the 23-plant equipment was currently having the screen leading to the Jaw crusher repaired and that the 23-plant was currently not operating. Bob informed me that the Jaw crusher manufactured in 1943 and has a capacity of approximately 12-15 tons/hr. He also pointed out the hose running to the water sprayer control. Bob pointed out the Impact crusher, manufactured in 2018, which has a capacity of approximately 60 tons/hr. He again pointed out the hose running to the water sprayer control. Bob showed me the water tank that provides the water spray controls and stated that the tank is filled as needed from an on-site well.

The 23-plant equipment is currently powered by two (2) diesel generators. Bob stated that DTE is currently in the process of installing poles to bring in power lines to provide grid power to the gravel pit. He is expecting the project to be completed in the next few months.

Bob stated that the 23-plant equipment is projected to process 35,000 tons of material in 2019. This is well below the 2,000,000 tons per year material limit (Special Condition (SC) 1.4).

Bob showed me photos on his phone of trucks applying calcium chloride to the gravel pit roads on July 8, 2019 to provide fugitive dust control.

We returned to the gravel pit office and discussed PTI No. 33-19. I pointed out and emphasized SC 1.5 which states "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."

Bob informed me that they had verified visible emissions for the 23-plant equipment by conducting opacity testing to show compliance with 40 CFR Part 60, Subpart OOO – NSPS for non-metallic mineral crushing facilities, even though the throughput capacity and age (for the jaw crusher) indicates that they were not subject to that requirement. Bob stated that the only time they observe visible emissions are upon start-up or shut down and that these visible emissions last less than 6 minutes before the water spray controls adequately wet the material being processed. I requested a copy of the opacity observations and visible emissions report for the 23-plant equipment. Bob stated that he would email me a copy.

Summary:

At the time of my inspection Mi Gravel dba TCA Management LLC appeared to be in compliance with PTI No. 33-19.

NAME Matthew R. Kord

DATE 8/7/19

SUPERVISOR C. Howe