



3600 Rennie School Road  
Traverse City, MI 49685  
Phone (231) 943-3443 • Fax (231) 943-8975  
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September 16, 2022

EGLE  
AQD, Cadillac District  
120 West Chapin Street  
Cadillac, MI 49601

RECEIVED  
AQD  
SEP 19 2022  
MACES FILE  MAERS

To EGLE, Air Quality Division, in response to violation notice for SRN: P1068, please see the following:

On June 1, 2022 and EGLE AQD inspector conducted an inspection of Elmer's Crane and Dozer's portable crushing plant P1068 / PTI number 120-19 while it was operating at the Benzie County Road Commission Pit on CR669 in Maple City, Leelanau County, MI.

Violations found included the crusher and some associated equipment not having been tested for visible emissions, and conveyors in use that were not listed on the EQP5756 forms for this PTI.

This portable plant (known to Elmer's as the Lippmann #931) was first permitted by EGLE in April 2021. It was first used sporadically at Elmer's M-72 Pit in Maple City, MI until the end of the 2021 crushing season, and then started up again in April 2022 and shortly after moved to the Benzie County Road Commission pit where it was inspected on June 1, 2022 with a different conveyor arrangement than was listed on the PTI as it operated at the M-72 Pit.

On September 15<sup>th</sup>, 2022, a permit modification form EQP5756 was mailed to EGLE AQD to add the conveyors that are currently operating with the plant but not listed on the permit (see enclosed permit modification forms). Also, a NSPS test notification was mailed to EGLE AQD with testing scheduled for Friday September 30<sup>th</sup> 2022 (see enclosed test notification letter).

In summary, the plant was out of compliance with its permit due to a number of factors including multiple moves, the addition of conveyors in response to facility

location and the array of aggregate products being produced, as well as short operating windows with many down days due to employee availability, breakdowns and maintenance. In the future, any time the plant is relocated I will ensure that any change in conveyors, no matter how short a time they may be used with the plant, are included on a EQP5756 to have added to the PTI and that any equipment that has not been NSPS tested is scheduled as soon as possible.

Sincerely,



Tom Wolf  
Compliance Manager  
Team Elmer's  
231-590-9269

cc: Jenine Camilleri



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
CADILLAC DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

September 13, 2022

VIA EMAIL AND U.S. MAIL

Tom Wolf, Compliance Manager  
Elmer's Crane and Dozer Incorporated  
3638 Rennie School Road  
Traverse City, Michigan 49685

SRN: P1068, Grand Traverse County

Dear Tom Wolf:

**VIOLATION NOTICE**

On June 1, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Elmer's Crane and Dozer located at the Benzie County Road Commission CR669 Pit, just south of 10212 County Road 669 in Maple City, Leelanau County, Michigan. The purpose of this inspection was to determine Elmer's Crane and Dozer compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 120-19.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCrushing - A non-metallic mineral processing plant consisting of a crusher, feeder, and associated conveyors.	R 336.2001, 40 CFR Part 60 Subparts A & OOO/ Special Condition 1.8	The crusher, feeder, and associated equipment at the plant have not been tested for visible emissions.
FGCrushing - New or additional equipment added to the existing non-metallic mineral processing plant	R 336.1201a(1) / Special Condition 1.12	There were three conveyors numbers 999, 1126, and 1159 that were not covered on the EQP5756 forms for this PTI and the permit section and District Supervisor were not notified prior to installing the equipment. <i>not currently with plant, see drawing</i>

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 4, 2022 (which coincides with 21 calendar

Tom Wolf  
Elmer's Crane and Dozer Incorporated  
Page 2  
September 13, 2022

days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601, and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Elmer's Crane and Dozer, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Elmer's Crane and Dozer, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Caryn Owens  
Senior Environmental Engineer  
Air Quality Division  
231-878-6688

cc: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Shane Nixon, EGLE



Michigan Department Of Environment, Great Lakes, and Energy  
Air Quality Division

FOR EGLE USE ONLY
PERMIT NUMBER

**GENERAL PERMIT TO INSTALL APPLICATION**

**PROCESS INFORMATION - NONMETALLIC MINERAL CRUSHING (PAGE 1 OF 2)**

Authorized under 1994 PA 451, as amended. Completion of form is required. Applicant may be subject to civil and /or criminal penalties for providing false information.

**Instructions:** Use this form to request authority to install and operate a nonmetallic mineral crushing facility, under the terms and conditions of a general permit to install pursuant to Rule 201a. If two or more primary crushers operate in parallel, each constitutes a separate facility. Complete a separate copy of this form for each facility. Prepare and submit this form with the General Information form (EQP5727). **For a Modification:** Complete Items 1 - 9. Identify all existing and new or additional process equipment. Certify and submit pages 1 and 2 of this form to the Permit Section and the appropriate district office. See map for district office locations.

1. FACILITY CODE STATE REGISTRATION NUMBER (SRN) <b>P 1 0 6 8</b>		2. MINE/QUARRY NAME <b>LIPPMANN #931</b>	
SECTION <b>33</b>	TOWNSHIP <b>T27N</b>	RANGE <b>R11W</b>	3. AMOUNT PROCESSED AT THIS SITE (tons per year) <b>100K</b>
4. DESCRIPTION (Brief description of this facility or proposed modification. Attach a detailed site map showing all site characteristics including the location of any residential and/or commercial establishments and places of public assembly located within 1,000 feet of the proposed site) <b>CRUSHER USED IN THE PRODUCTION OF CONSTRUCTION SAND AND GRAVEL</b>			
5. DOES THIS FACILITY HAVE ANY OUTSTANDING UNRESOLVED AIR VIOLATIONS?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
6. ARE THE CRUSHER(S) LOCATED A MINIMUM OF 500 FEET FROM ALL RESIDENTIAL OR COMMERCIAL ESTABLISHMENTS OR PLACES OF PUBLIC ASSEMBLY?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
7. WAS THIS FACILITY PREVIOUSLY PERMITTED PURSUANT TO RULE 201? IF YES, PERMIT NO.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
8. APPLICATION IS FOR <input type="checkbox"/> NEW GENERAL PERMIT <input checked="" type="checkbox"/> MODIFICATION TO EXISTING GENERAL PERMIT - PERMIT NO. <b>120-19</b>			
9. FOR A MODIFICATION: IS THE FACILITY CURRENTLY IN COMPLIANCE WITH ALL CONDITIONS OF THE EXISTING GENERAL PERMIT, INCLUDING BUT NOT LIMITED TO THE TESTING OF ALL NSPS SUBJECT EQUIPMENT?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

**Instructions for completing the following items:** Each piece of equipment must have a unique identification number (ID). The ID may be any combination of up to 10 letters, numbers or keyboard characters with no spaces between characters. Provide an ID and complete all items for each piece of process equipment at the facility. If equipment is shop built, the manufactured date may be estimated. This data is mandatory. Use as many copies of page 2 as needed to list all process equipment. Use Additional Information form EQP5729 if needed to describe why a device is not subject to NSPS.

DEVICE DESCRIPTION (crusher-type, screen, conveyor, drill, etc.) <b>36" X 60' CONVEYOR</b>		DEVICE ID (Assign an identification number for this device) <b>1124</b>	
MAKE AND MODEL <b>GOODFELLOW</b>		SERIAL NUMBER <b>36100SC05408</b>	MANUFACTURED DATE (year) <b>2005</b>
MAXIMUM RATED CAPACITY (tons per hour) <b>750</b>	CONTROL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO CONTROL TYPE		
IS DEVICE SUBJECT TO NSPS? <input checked="" type="checkbox"/> YES, HAS DEVICE BEEN TESTED? <input checked="" type="checkbox"/> YES, DATE TEST PASSED <b>9/29/2016</b> <input type="checkbox"/> NO, DATE TEST SCHEDULED <input type="checkbox"/> NO, REASON NOT SUBJECT			

DEVICE DESCRIPTION (crusher-type, screen, conveyor, drill, etc.) <b>36" X 80' CONVEYOR</b>		DEVICE ID (Assign an identification number for this device) <b>1189</b>	
MAKE AND MODEL <b>SUPERIOR</b>		SERIAL NUMBER <b>1072633</b>	MANUFACTURED DATE (year) <b>2020</b>
MAXIMUM RATED CAPACITY (tons per hour) <b>750</b>	CONTROL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO CONTROL TYPE		
IS DEVICE SUBJECT TO NSPS? <input checked="" type="checkbox"/> YES, HAS DEVICE BEEN TESTED? <input type="checkbox"/> YES, DATE TEST PASSED <input checked="" type="checkbox"/> NO, DATE TEST SCHEDULED <b>9/30/2022</b> <input type="checkbox"/> NO, REASON NOT SUBJECT			

**This page must be certified by an authorized employee**

**Applicant Certification:** I certify, under penalty of law, that this permit application and any attachments were prepared by me, or under my direction or supervision in accordance with a system to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. In addition, the equipment described in this application meets the necessary criteria for applicability for a General Permit to Install. Furthermore, I certify that I can and will comply with all conditions outlined in the General Permit to Install. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.

SIGNATURE OF AUTHORIZED EMPLOYEE <b>TAM WOLF</b>	DATE <b>9/15/2022</b>
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Michigan Department Of Environment, Great Lakes, and Energy - Air Quality Division  
**EGLE GENERAL PERMIT TO INSTALL APPLICATION NONMETALLIC MINERAL CRUSHING- (PAGE 2 OF 2)**

FOR EGLE USE ONLY
PERMIT NUMBER

Authorized under 1994 PA 451, as amended. Completion of form is required. Applicant may be subject to civil and /or criminal penalties for providing false information.

**Instructions:** Page 1 of this form must be completed and certified by an authorized employee. Provide an ID and complete all items for each piece of process equipment at the facility. If the equipment is shop built, the manufactured date may be estimated. This data is mandatory. Use as many copies of this page as needed to list all process equipment. Use Additional Information form EQP5729 if needed to describe why a device is not subject to NSPS.

**For a Modification:** Provide the information for all existing and new or additional process equipment. Submit pages 1 and 2 to the Permit Section and the appropriate district office. See map for district office locations.

ADD

DEVICE DESCRIPTION ( <i>crusher-type, screen, conveyor, drill, etc.</i> )		DEVICE ID ( <i>Assign an identification number for this device</i> )	
36" X 150' CONVEYOR		1130	
MAKE AND MODEL		SERIAL NUMBER	MANUFACTURED DATE (year)
KOHLBERG		410146	2010
MAXIMUM RATED CAPACITY ( <i>tons per hour</i> )	CONTROL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
750	CONTROL TYPE		
IS DEVICE SUBJECT TO NSPS?			
<input checked="" type="checkbox"/> YES, HAS DEVICE BEEN TESTED? <input checked="" type="checkbox"/> YES, DATE TEST PASSED 11/5/2014 <input type="checkbox"/> NO, DATE TEST SCHEDULED			
<input type="checkbox"/> NO, REASON NOT SUBJECT			

DEVICE DESCRIPTION ( <i>crusher-type, screen, conveyor, drill, etc.</i> )		DEVICE ID ( <i>Assign an identification number for this device</i> )	
MAKE AND MODEL		SERIAL NUMBER	MANUFACTURED DATE (year)
MAXIMUM RATED CAPACITY ( <i>tons per hour</i> )		CONTROL? <input type="checkbox"/> YES <input type="checkbox"/> NO	
		CONTROL TYPE	
IS DEVICE SUBJECT TO NSPS?			
<input type="checkbox"/> YES, HAS DEVICE BEEN TESTED? <input type="checkbox"/> YES, DATE TEST PASSED <input type="checkbox"/> NO, DATE TEST SCHEDULED			
<input type="checkbox"/> NO, REASON NOT SUBJECT			

DEVICE DESCRIPTION ( <i>crusher-type, screen, conveyor, drill, etc.</i> )		DEVICE ID ( <i>Assign an identification number for this device</i> )	
MAKE AND MODEL		SERIAL NUMBER	MANUFACTURED DATE (year)
MAXIMUM RATED CAPACITY ( <i>tons per hour</i> )		CONTROL? <input type="checkbox"/> YES <input type="checkbox"/> NO	
		CONTROL TYPE	
IS DEVICE SUBJECT TO NSPS?			
<input type="checkbox"/> YES, HAS DEVICE BEEN TESTED? <input type="checkbox"/> YES, DATE TEST PASSED <input type="checkbox"/> NO, DATE TEST SCHEDULED			
<input type="checkbox"/> NO, REASON NOT SUBJECT			

DEVICE DESCRIPTION ( <i>crusher-type, screen, conveyor, drill, etc.</i> )		DEVICE ID ( <i>Assign an identification number for this device</i> )	
MAKE AND MODEL		SERIAL NUMBER	MANUFACTURED DATE (year)
MAXIMUM RATED CAPACITY ( <i>tons per hour</i> )		CONTROL? <input type="checkbox"/> YES <input type="checkbox"/> NO	
		CONTROL TYPE	
IS DEVICE SUBJECT TO NSPS?			
<input type="checkbox"/> YES, HAS DEVICE BEEN TESTED? <input type="checkbox"/> YES, DATE TEST PASSED <input type="checkbox"/> NO, DATE TEST SCHEDULED			
<input type="checkbox"/> NO, REASON NOT SUBJECT			

DEVICE DESCRIPTION ( <i>crusher-type, screen, conveyor, drill, etc.</i> )		DEVICE ID ( <i>Assign an identification number for this device</i> )	
MAKE AND MODEL		SERIAL NUMBER	MANUFACTURED DATE (year)
MAXIMUM RATED CAPACITY ( <i>tons per hour</i> )		CONTROL? <input type="checkbox"/> YES <input type="checkbox"/> NO	
		CONTROL TYPE	
IS DEVICE SUBJECT TO NSPS?			
<input type="checkbox"/> YES, HAS DEVICE BEEN TESTED? <input type="checkbox"/> YES, DATE TEST PASSED <input type="checkbox"/> NO, DATE TEST SCHEDULED			
<input type="checkbox"/> NO, REASON NOT SUBJECT			



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September 15, 2022

Shane Dixon  
MDNRE - Cadillac  
120 W. Chapin St.  
Cadillac, MI 49601

**RE: Test Notification and Protocol for EPA - NSPS OOO, Permit #120-19, SRN #P1068**

**Dear Mr. Dixon:**

As part of NSPS requirements coinciding with the recently submitted Air Use Permit to Install we will be performing a visual emissions test according to the following protocol:

1. Testing for components: conveyor #1189 and crushers # 931/932.
  - a. Contacts: Tom Wolf at PO Box 6150 Traverse City, MI 49696  
Phone: (231) 590-9269
  - b. Non-metallic mineral crushing facility
  - c. 10,000 tons max of raw material (based on 10-hr day)
  - d. Some speed variance if crusher stops and starts
  - e. Process is regulated by raw bank material (prior to the crusher/wash plant and wet material (after processing through the crusher/wash plant)
  - f. Rate Capacity: 500 TPH
  - g. Permit #120-19
2. Control Device(s): water suppression (spray bars on screens only)
3. Measured pollutant is visual emissions
5. US EPA Test Method 9 requires reading taken every 15 seconds, averaging 24 readings over a 6 minute period. During the observation for dust generation of the various components of a crushing facility, a certified US EPA Test Method 9 reader can reduce the observation time from 3 hours to 1 hour (ten, 6 minute averages) in the following situations:
  - a. If no individual opacity readings are > 15% crushers, 10% for screens and conveyors, and
  - b. There are no more than three recorded opacity readings of said percents in a 1 hour period.
6. One piece of equipment will be tested at a time, with the exception of up to two conveyors.
9. Operation will be an average of 500 tons per hour.
15. Testing will be performed at Carmeuse St. Johns on **Friday September 30<sup>th</sup> at 11 AM** by Tom Wolf, certified on 3/31/2022.

Testing will be performed at "worst case" conditions. Test results will be submitted within 45 days of completion. If you have any questions or comments, please feel free to contact me.

Sincerely,

Tom Wolf  
Compliance Manager, Elmer's Crane & Dozer, Inc.

TEAM



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Home Office

P.O. Box 6150 Traverse City, MI 49696-6150

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9/14/2022  
St. Johns Job

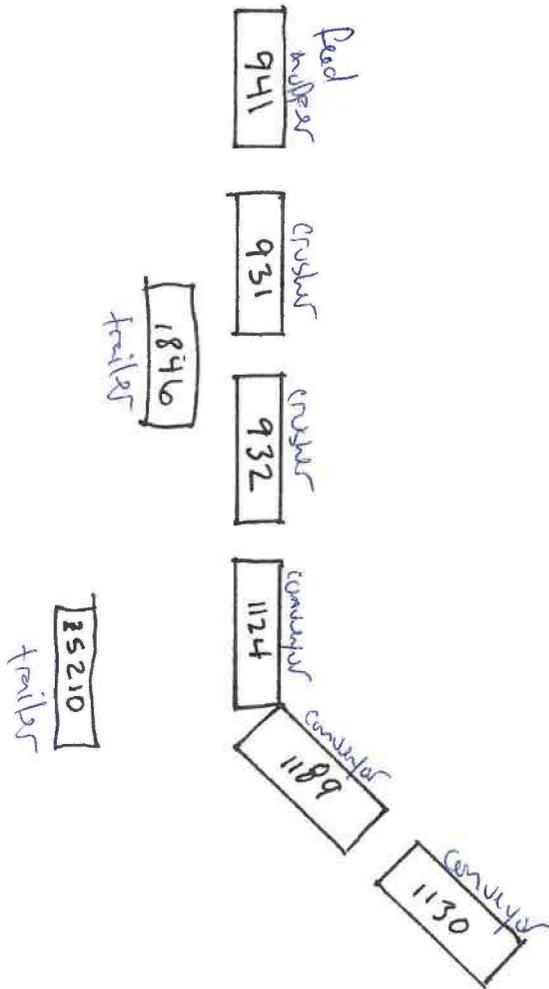
Equipment

2808

2881

4334

3389



Alanson  
231-944-0617

Boyne City  
231-373-3084

Harrison  
989-539-6460

Ludington  
231-845-7351

Midland  
989-832-3443

Omer  
989-653-2265

Petoskey  
231-758-3415

Alpena  
989-356-1649

Ellsworth  
231-588-2345

Hillman  
989-742-4531

Manistee  
231-723-2538

Mt. Pleasant  
989-772-6325

Oscoda  
989-739-9118

White Cloud  
231-689-1785