

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

N393154696

FACILITY: IRON CITY ENTERPRISES INC.		SRN / ID: N3931
LOCATION: N2404 HIGHWAY US-41, MENOMINEE		DISTRICT: Upper Peninsula
CITY: MENOMINEE		COUNTY: MENOMINEE
CONTACT: THOMAS NEMETZ, PRESIDENT		ACTIVITY DATE: 08/12/2020
STAFF: Michael Conklin	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-initiated inspection to determine if crushing plant was in compliance with state air pollution control rules and federal regulations. Source was suspected of operating without a permit.		
RESOLVED COMPLAINTS:		

Facility: Iron City Enterprises

Location: Iron City Enterprises Wildwood Pit, Ingalls, MI

Contact: Tom Nemetz, President, 715-923-5987

#### 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

Iron City Enterprises (ICE) is a construction company based out of Menominee, MI. The company provides services in the septic tank, concrete, and aggregate industries. For aggregate, ICE operates a portable nonmetallic crusher plant throughout the Upper Peninsula.

#### 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

This portable crushing plant is currently not permitted with the AQD and has not been reporting its annual emissions to MAERS.

#### Compliance History

There is no history of inspections performed at this facility and no violation notices have been issued.

#### Regulatory Analysis

ICE is subject to Permit to Install (PTI) No. 503-93 for a bulk cement silo and fabric filter collector. The

company also operates a portable non-metallic crushing plant that has not been permitted by the AQD.

### Inspection

An unannounced inspection was performed on 08/12/2020 to determine ICE's non-metallic crushing plant compliance with state air pollution control rules and federal regulations. I arrived at the Wildwood Pit at 11:00 AM CT, with weather conditions clear and 90 degrees Fahrenheit. The Wildwood Pit is located southeast of Ingalls on Wildwood Rd No 17, about a mile east of US-41. I met with Tom Nemetz, President of ICE. I informed Mr. Nemetz that the purpose of the inspection was to determine compliance with state air pollution control rules and federal regulations.

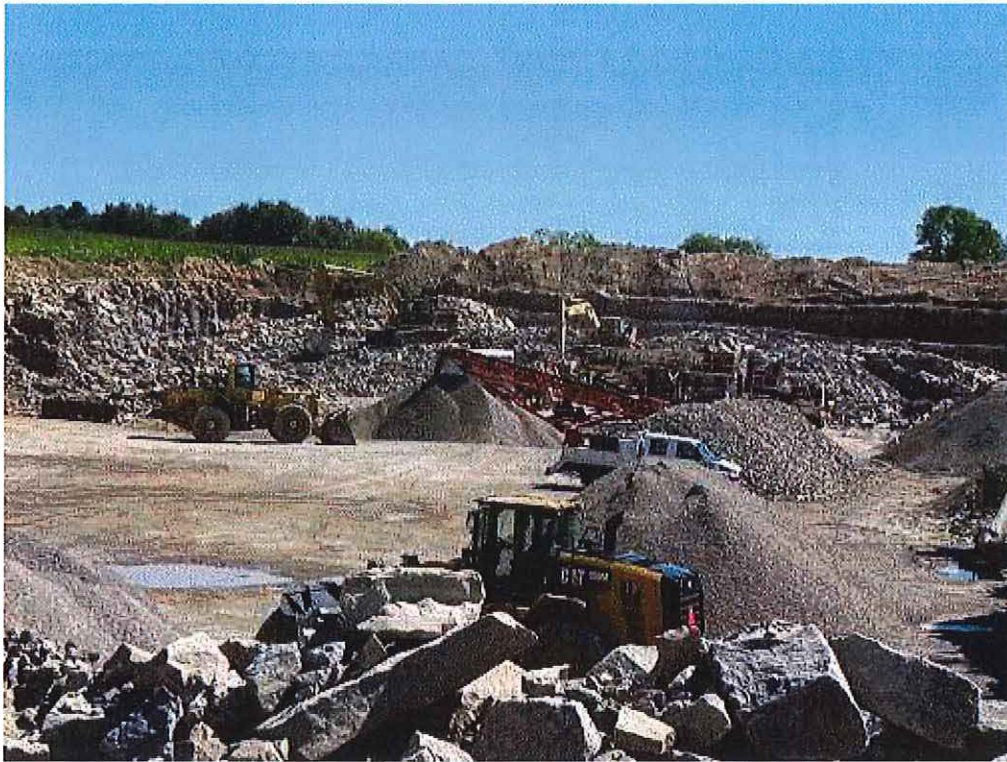
Mr. Nemetz stated ICE has been crushing for over ten years and did not know that they were required to have an air permit with EGLE. I informed Mr. Nemetz that a Permit to Install (PTI) is required for all crushing facilities in Michigan, whether the equipment is leased from a second party on a temporary basis or owned outright. Rule 201 of the Michigan Air Pollution Control Rules requires a person to obtain an approved Permit to Install for any potential source of air pollution unless the source is considered exempt from the permitting process. A crushing operation in Michigan is required to first apply for and receive a PTI before commencing crushing activities at a job site. I informed Mr. Nemetz that ICE is in violation of Rule 201 and will need to submit a PTI application. The plant is also not in compliance with NSPS Subpart OOO by not having conducted initial performance tests and following recordkeeping and reporting requirements.

ICE's crushing operation is a portable plant that crushes at various sites throughout the Upper Peninsula. Mr. Nemetz stated the plant processes on average around 150,000 tons per year. At the time of the inspection, the plant was setup to produce 1.25" limestone. The plant consisted of a primary jaw crusher, single deck screen, secondary cone crusher, and four (4) conveyors. The maximum rated capacity and year of manufacture of the crushing equipment is unknown and will be provided with the submittal of a PTI application. Water sprays were observed at the top of the primary crusher. However, the water sprays were not providing sufficient prevention of fugitive dust before the material entered the primary crusher, as visible dust emissions appeared to be over 20% opacity from the primary crusher. No other water sprays were observed on crushing equipment. The roadways around the plant and exiting the quarry appeared to be watered. At the time of the inspection, no loaders were operating, and an excavator was loading material into the primary crusher. I informed Mr. Nemetz that the drop distance from the excavator into the primary crusher should be kept low and not overloaded, to prevent spills and unnecessary fugitive dust emissions.

At the end of the inspection, Mr. Nemetz understood that the facility was out of compliance and agreed to submit a PTI application. Before leaving, I provided Mr. Nemetz with the *Michigan Environmental Compliance Guide for Nonmetallic Mineral Crushing Facilities*, a copy of the General PTI conditions for non-metallic crushing plants, and district office contact information. A follow-up email will be sent to ICE providing links to the PTI application forms.

### Compliance

Based on this inspection, it appears that Iron City Enterprises is not in compliance with all applicable air pollution control rules and federal regulations. A letter of violation will be issued for noncompliance with Rule 201 by not having a PTI for the crushing equipment. Since a violation notice is being issued, the facility will not be eligible for the General PTI and will need to submit a PTI application.



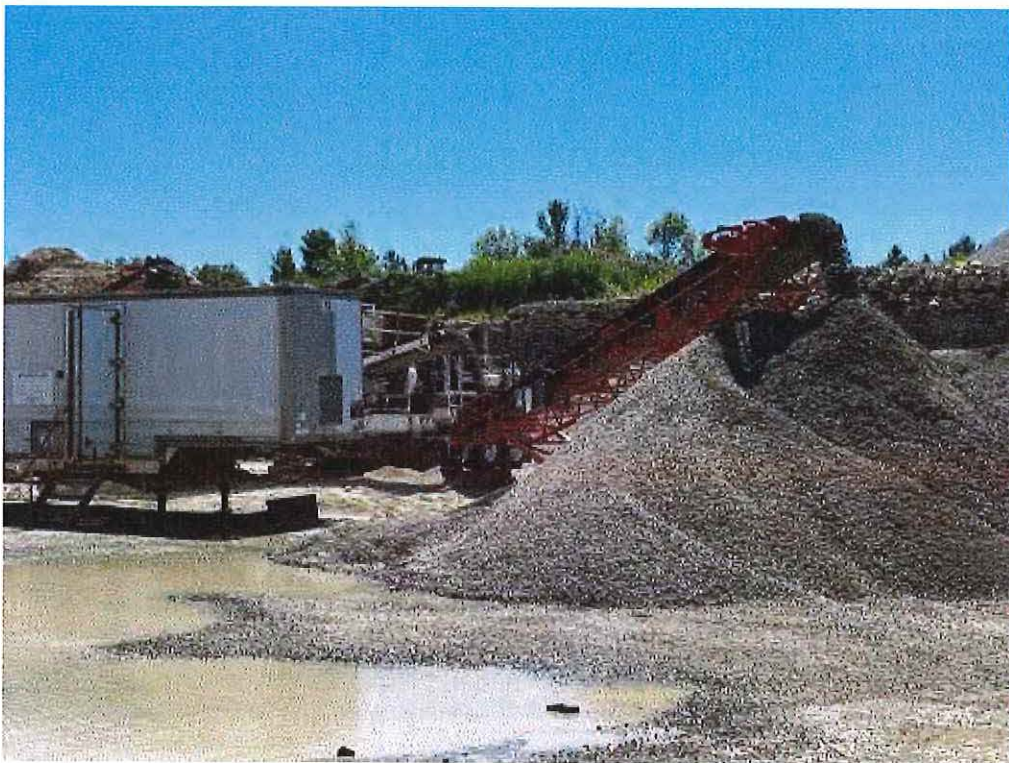
**Image 1(Crushing Plant)** : Iron City Enterprises crushing plant at the Wildwood Pit.



**Image 2(Primary)** : Primary jaw crusher.



**Image 3(Transfer Point)** : Conveyor transfer point.



**Image 4(Stockpiles)** : Stockpiling of 1.25" limestone.

NAME Michael Miller

DATE 08/21/2020 SUPERVISOR EDL