

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

P111473333

FACILITY: Dino-Mite Crushing & Recycling, LLC		SRN / ID: P1114
LOCATION: 12625 Greenfield Road, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Anthony Calo , Agent		ACTIVITY DATE: 08/28/2024
STAFF: Daniel McGeen	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection.		
RESOLVED COMPLAINTS:		

On August 28, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an unannounced inspection of Dino-Mite Crushing & Recycling, LLC, State Registration number (SRN) P1114, while it was visiting the Dan's Excavating job site at the former Buick City site in Flint.

Facility environmental contact:

- Anthony Calo, Agent; 313-363-2376; email unknown
- Chip Tokar, CPG, General Manager, Natural Resources Management, LLC (consulting firm); 419-841-3232, ext. 1303; ctokar@NRMsolution.com

EGLE, AQD contact:

Dan McGeen, Inspector; 517-648-7547, McGeenD@michigan.gov

Facility description:

This facility is a portable nonmetallic mineral processing plant, with a primary crusher (jaw crusher) and a secondary crusher (impactor), which was in Flint to process concrete from the rebuilding of I-475. .

Emission units:

Emission Unit* ID	Emission Unit Description	Permit to Install (PTI) No. And Federal Requirements	Compliance Status
EUPROCESS	A combination of process equipment (screens, crushers, feeders, conveyors, etc.) at 12625 Greenfield Road, Detroit, Michigan, used to reduce larger materials down to smaller sizes, classify and sort materials into various product types, material handling and transporting of	PTI 148-18A, 40 CFR Part 60, Subpart OOO	Noncompliance

	material to storage areas. Control methods include equipment enclosures or enclosed within a building, water sprays, drop chutes and/or pant legs for transfer points		
EUTRUCKTRAFFIC	Truck traffic for delivery of material products to customers; truck traffic from quarry pit to processing area and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road portions from the quarry pit to the process area.	PTI 148-18A, 40 CFR Part 60, Subpart 000	Compliance
EUSTORAGE	Open area stockpiles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles.	PTI 148-18A, 40 CFR Part 60, Subpart 000	Compliance

***An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.**

Flexible Groups:

Flexible Group** ID	Flexible Group Description	Compliance Status
FGCRUSHING	A nonmetallic mineral crushing facility located at 12625 Greenfield Road, Detroit, Michigan, consisting of crusher(s) and associated process equipment including grinding mills, drills, screening operations, bucket elevators, belt conveyors, loading and bagging operations, storage bins, enclosed truck or railcar loading stations and any other material handling equipment operated at the site. Each crusher and screen shall be equipped with a water	Noncompliance

	spray. A baghouse dust collector may alternatively be installed in lieu of water spray for any particular piece of equipment. Operation of the control equipment is required only when necessary to meet applicable emission limits.	
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****A *flexible group* is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.**

Regulatory overview:

This crusher is covered by a site-specific PTI 48-18A, which allows it to locate at 12625 Greenfield Road, Detroit, Michigan. However, this permit does not allow it to relocate at other sites. For that, the crusher must apply for a general PTI for a mineral crushing plant.

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 subject to 40 CFR Part 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants. This New Source Performance Standard (NSPS) was updated in 2008. Table 3 to Subpart OOO 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.

Michigan Air Pollution Control (MAPC) Rule 201 requires a permit to install prior to installation or construction of a process which emits or may emit a regulated air contaminant.

Fee status:

This facility is considered a Category D fee-subject source, because it is subject to a NSPS, specifically 40 CFR Part 60, Subpart OOO.

The facility submits an annual air emission report each year to MiEnviro, and to its predecessor, the Michigan Air Emission Reporting System.

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Location:

- Address: 1001 Leith Street, Flint, 48505, Genesee County.
- Description: This temporary site was the Dan's Excavating job site, where concrete from rebuilding of I-475 rebuilding was being crushed. It was located near the center of the RACER former Buick City site, SRN A1178. To the east of the crusher, beyond the RACER property line, were other industrial sites, the Flint River, and then residential areas. To the west, beyond the RACER property line, were residential neighborhoods. To the north and south were large expanses of the RACER site.

Recent testing:

The Michigan Air Compliance Enforcement System (MACES) does not mention a date for opacity testing being conducted pursuant to 40 CFR Part 60, Subpart OOO. Because this facility is headquartered within the Detroit District, staff there are more likely to be familiar with the history of this plant.

Safety attire required:

For being around any crusher, the AQD staff should wear safety glasses with side shields, hard hat, high visibility safety vest, and steel-toed boots, and should bring hearing protection, in case it is needed.

Arrival:

The AQD was represented by Dan McGeen, inspector.

- Arrival time at Buick City site: 9:19 AM.
- Weather conditions: Overcast, humid, and 76 degrees F, with winds out of the west at 5 mile per hours
- Dust observed: None. The north-south concrete roadway through the Buick City site was being watered and swept by Dan's Excavating's wet sweeper, despite rains from the previous day.
- Arrival time at Dan's Excavating job site: 9:24 AM.

The crusher was not operating when the AQD first arrived. D. McGeen contacted Maik, the plant operator. He said that they were awaiting a replacement part for the belt feeder, which should arrive around 12:00 PM. D. McGeen left the site for other field work, but returned at 2:39 PM, to find the crusher running.

Inspection:

While reviewing the PTI 48-18A at the site, the AQD's D. McGeen noted that it appeared to be site-specific, only allowing relocation to 12625 Greenfield Road, Detroit. He noted that the SRN on the Dini-Mite Crushing & Recycling permit was P0538, and was concerned that there might be confusion with crushers and SRNs. Talking with plant staff did not clarify if this permit was associated with this Dino-Mite Crushing plant, whose SRN was P1114. Please refer to the post-inspection follow up section of this activity report.

The crushing plant was operating. Opacity from the primary crusher, jaw crusher CR-1, varied from 0 to 5%. Opacity from the secondary crusher, impactor IM-1 was 5-10%.

Using a laser rangefinder from the AQD Lansing District Office, D. McGeen measured the setback from the secondary crusher to the nearest place of public gathering, a church, as 1,229.2 feet, and the setback to the nearest residence as 864 feet. This is much greater than the minimum 500-foot setback required by the AQD general permit for crushers, but Dino-Mite Crushing plant did not appear to have a general permit.

Site-specific PTI 48-18A compliance check with special conditions (SC):

Site-Specific PTI 48-18A SC	Requirement	Comments	Complies?
FGCRUSHING, SC I.1	Visible emissions from FGCRUSHING shall not exceed the limits in the following table:	Please see below. See below	
FGCRUSHING, SC I.1.2a	Any equipment enclosed within a building: No visible emissions.	NA	NA
FGCRUSHING, SC I.1.2b	All crushers: 12% opacity.	This limit was met, as primary crusher was 0-5%, and secondary crusher was 5-10%.	Yes
FGCRUSHING, SC I.1.2c	Screens: 7% opacity.	NA, as the AQD did not see a screen.	NA
FGCRUSHING, SC I.1.2d	Rock drills: 5% opacity.	NA, as there were no rock drills.	NA
FGCRUSHING, SC I.1.2e	Conveyors/Transfer points: 10% opacity.	This limit was met, with 0% opacity.	
FGCRUSHING, SC I.1.2f	Wash screens and all subsequent equipment downstream up to the next crusher or storage bin: No visible emissions.	NA	NA
FGCRUSHING, SC I.1.2g	All equipment controlled by a baghouse dust collector: 7% opacity.	NA	NA
FGCRUSHING, SC I.1.2h	Wheel loaders and truck traffic: 5% opacity.	This limit was met.	Yes

FGCRUSHING, Material storage piles: 5% opacity. SC I.1.2i	This limit was met.	Yes
FGCRUSHING, Any other process equipment which is part of the nonmetallic mineral crushing facility or related processes: 10% opacity. SC I.1.2j	This limit was met.	Yes
FGCRUSHING, The permittee shall not process more than 600,000 tons of any non-metallic mineral through FGCRUSHING per 12-month rolling time period as determined at the end of each calendar month. SC II.1	Unknown.	Unknown
FGCRUSHING, 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. SC II.2	The facility met this requirement. No suspect materials were observed. The AQD was informed that there was only concrete from I-475 getting processed, not from building demolitions.	Yes
FGCRUSHING, The permittee shall not operate FGCRUSHING unless the program for continuous fugitive emissions control for all facility roadways, the facility yard, all storage piles, and all material handling operations specified in Appendix B has been implemented and is maintained. SC III.1	The facility met this requirement.	Yes
FGCRUSHING, The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and OOO, as they apply to FGCRUSHING. SC III.2	The AQD's MACES database does not contain a reference to this crusher having undergone opacity testing. The Detroit District staff may be more familiar with the history of this crusher.	Unknown

FGCRUSHING, SC IV.1	The permittee shall not operate any portion of FGCRUSHING unless the water sprays for each crusher and each screen are installed, maintained and operated in a satisfactory manner.	The facility met this requirement.	Yes
FGCRUSHING, SC IV.2	The permittee shall install and maintain a belt scale(s) on the transfer conveyor (s) portion of FGCRUSHING which continuously shows the daily throughput rate for the conveyor(s).	The facility met this requirement with what they called a current day meter.	Yes
FGCRUSHING, SC V.	NA	NA	NA
FGCRUSHING, SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	NA, as the permit does not require calculations.	NA
FGCRUSHING, SC VI.2	The permittee shall keep daily and monthly records of the amount of material processed through FGCRUSHING. Furthermore, the permittee shall calculate on a monthly basis, the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of material processed on file and make them available to the Department upon request.	The facility met this requirement, as described by NRM's C. Tokar.	Yes
FGCRUSHING, SC VI.3	The permittee shall not operate FGCRUSHING unless the nuisance minimization plan for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B has been implemented and is maintained.	The facility met this requirement. A wet sweeper was addressing site roadways, while the crushers appeared to be	Yes

		equipped with water sprays.	
FGCRUSHING, SC VI.4	The permittee shall keep records of all watering/dust suppressant applications for the site roadways, plant yard and stockpiles as required by Appendix B. The permittee shall keep all records on file and make them available to the Department upon request.	This requirement was met. NRM's C. Tokar said lafrates does the recordkeeping on dust control, and does watering on site with trucks.	Yes
FGCRUSHING, SC VII.1	Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FGCRUSHING.	The AQD's MACES database does not contain a reference to this having been done. Detroit District staff may be more familiar with the history of this crusher.	Unknown
FGCRUSHING, SC VII.2	The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7.	The AQD's MACES database does not contain a reference to this having been done. Detroit District staff may be more familiar with the history of this crusher.	Unknown
FGCRUSHING, SC VII.3	The permittee shall submit notification to the AQD District Supervisor at least 10 days prior to relocating FGCRUSHING to this site.	The facility met this requirement. The relocation notice was received on 4/30/2024.	Yes
FGCRUSHING, SC VIII.	NA	NA	NA

FGCRUSHING, SC IX.1	In the event that EUPROCESS is removed from this location, the permittee may return, install and operate this equipment at this location pursuant to this Permit to Install, provided that all of the following conditions are met:	NA, as the plant was not at 12265 Greenfield Road, Detroit, but at a different site without a general permit allowing such a relocation. This was a violation of MAPC Rule 201.	NA
FGCRUSHING, SC IX.1.a	There are no outstanding and unresolved compliance issues, resulting from written notification by the AQD, involving either EUPROCESS or this location.	NA, as the plant was not at the Greenfield Road, Detroit site.	NA
FGCRUSHING, SC IX.1.b	The permittee provides written notification to the AQD District Supervisor, at least one week prior to the return of EUPROCESS, that the equipment is scheduled to return to this location. Notwithstanding the provisions of this condition, the AQD may void this permit during the time that EUPROCESS is removed from this location if it has reason to believe that, if returned, EUPROCESS is not likely to operate in compliance with all applicable rules and permit conditions. If this action is taken, the AQD shall notify the permittee, in writing, of the reasons, therefore. The voiding of this permit shall be without prejudice to the permittee's right to file a new Permit to Install application.	NA, as the plant was not at the Greenfield Road, Detroit site.	NA

APPENDIX B

Fugitive Dust Control Plan

Fug. Dust Control Plan SC	Requirement	Comments	Complies?
SC I. Plant	The drop distance at each transfer point throughout the plant shall be reduced to the minimum the equipment can achieve	The conveyor drop height seemed high, but D. McGeen was informed the piles could reach that height in a day of operation.	Yes
SC II. Truck Traffic	On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within six inches of the top of any sideboard, side panel or tailgate, otherwise, the truck shall be tarped.	The facility met this requirement.	Yes
SC III. Site Roadways and the Plant Yard	Please see below.	Please see below.	See below
SC III.a	The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet an opacity limit of five percent.	The facility met this requirement, using water.	Yes
SC III.b	All paved roadways and the plant yards shall be swept as needed between applications of dust suppressants.	The facility met this requirement, with a wet sweeper.	Yes
SC III.c	Any material spillage on roads shall be cleaned up immediately	NA, as spillage was not observed.	NA
SC III.d			Yes

	A record of all applications of dust suppressants and roadway and the plant yard sweepings shall be kept on file for the most recent five-year period and be made available to the AQD upon request.	This requirement was met. NRM's C. Tokar said lafrates does the recordkeeping on dust control, and does watering on site with trucks.	
SC IV. Storage Piles	Please see below.	Please see below.	See below
SC IV.a	Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.	The facility met this requirement.	Yes
SC IV.b	Stockpiles shall be watered on an as needed basis in order to meet an opacity limit of five percent. Equipment to apply water or dust suppressant shall be available at the site, or on call for use at the site, within a given operating day.	NA, as no watering of piles was needed.	NA
SC IV.c	A record of all watering shall be kept on file for the most recent five-year period and be made available to the AQD upon request.	It is unknown how far back records of dust control are kept. Ask Chip Tokar, NRM.	Unknown
SC V. AQD/EGLE Inspection	Please see below.	Please see below.	See below
SC V.	The provisions and procedures of this plan are subject to adjustment by written notification from the AQD, if following an inspection, the AQD finds the fugitive dust requirements and/or the permitted opacity limits are not being met.	NA, as the AQD did not see a need for adjustment.	NA

(End of compliance check.)**Departure:**

The AQD left the site at 3:34 PM. D. McGeen indicated to plant employees that he would call Anthony Calo to follow up on his questions about the permit and SRN.

Post-inspection follow up:

Upon returning to the Lansing District Office, it was noticed that Anthony (Tony) Calo is the agent/compliance contact for Dino-Mite Crushing & Recycling, LLC, SRN P1114, but also the President of Kraken Concrete Crushing & Recycling, LLC, SRN P0358, so there may be some overlap between the two companies.

A timeline was constructed to help in determining if there was any mix up of crusher permits or SRN's, below:

- 4/30/2024: The LDO received and reviewed a relocation notice for Dino-Mite Crushing, with PTI 48-18A being referenced. On the AQD active permit webpage the SRN on the webpage for Dino-Mite is P1114, whereas the PTI 48-18A itself has SRN P0358 on the cover page and header. This is a site-specific permit, for 12625 Greenfield Road, Detroit.
- 6/12/2024: D. McGeen tried to inspect Dino-Mite Crushing, P1114, at Flint's former Buick City site, State Registration Number A1178, but it had not arrived at the site yet.
- 6/20/2024: D. McGeen tried to inspect Dino-Mite Crushing at the former Buick City site, but the plant was still being assembled.
- 6/28/2024: The AQD inspector, Terseer Hemben, inspected Dino-Mite Crushing, P1114, under site-specific PTI 48-18A, at 12625 Greenfield Road, Detroit, but noted it was the Kraken Crushed Concrete & Recycling, LLC plant, under SRN P0358 and general PTI 13-16 which had relocated to the Detroit site.
- 8/28/2024: While inspecting the now-operating Dino-Mite crusher at the former Buick City site, D. McGeen noted that PTI 48-18A was site-specific and the SRN in the header was P0358 and was concerned there might have been some confusion. Permit Cards showed that PTI 48-18A is for P1114, not P0358, but PTI 48-18A only allows for relocation to 12625 Greenfield Road, Detroit.
- 8/30/2024: D. McGeen called the company and an employee of Anthony Calo, Agent, said that the crusher D. McGeen observed in Flint was indeed Dino-Mite Crushing & Recycling, P1114, whereas the crusher T. Hemben inspected in Detroit was Kraken Crushed Concrete & Recycling, P0358. Because the P1114 plant only has a site-specific PTI for the Detroit site, they are need to get a general PTI. He was willing to pursue getting a general PTI and said to call their consultant, Alyssa at NRM, 937-542-9857, as she handles all their environmental paperwork. D. McGeen asked if a written log is kept of daily production and total production at sites, and he advised contacting Lisa Ebere at 248-468-9200 to discuss.
- 9/30/2024: D. McGeen left a voicemail (VM) for Alyssa Beall at NRM to request a call back to discuss the site-specific PTI. When he called Lisa Ebere's number, he was referred to Chip Tokar, CPG, General Manager of NRM. He left a VM for C. Tokar who called back. Recordkeeping and the need for a general PTI were discussed.

Conclusion:

A violation of MAPC Rule 201 was identified. The Dino-Mite crusher, P1114, has only a site-specific PTI 48-18A, to go to a site in Detroit. Without a general PTI, it is not authorized to go to other sites, such as the one in Flint. A VN will be sent, and the company will need to apply for a general PTI.

NAME *Daniel J. Gen*

DATE 9/30/2024

SUPERVISOR *RB*