# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Self Initiated Inspection

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<b>FACILITY: NEWBERRY REDI</b>	MIX NEWBERRY	SRN / ID: A2981	
LOCATION: E VICTORY, NEV	VBERRY	DISTRICT: Upper Peninsula	
CITY: NEWBERRY		COUNTY: LUCE	
CONTACT: Robert Crawford,		ACTIVITY DATE: 06/14/2019	
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR	
SUBJECT: Inspection to deter	mine compliance with PTI No. 363-75.		
RESOLVED COMPLAINTS:			

Facility: Newberry Redi-Mix

Location: P.O. Box 404, East Victory Way, Newberry, MI 49868

Contact: Robert Crawford, Operator, 906-293-5178

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, The Michigan 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** 

Newberry Redi-Mix, located in Newberry, MI, provides transit mixed cement and masonry product services. The company operates a concrete batch plant providing ready-mixed concrete (RMC) for customers. The batch plant combines cement powder, water, and aggregates of sand and crushed stone to produce RMC. The RMC is then delivered by transit mixers in a plastic state to the desired site. The table below summarizes the emission units at this source.

Emission Unit ID	Description
EUCEMENTSILO	A cement silo with a fabric filter collector.

#### **Emissions**

The primary pollutants of concern with concrete batch plants are point and fugitive emissions of particulate matter. The point source of emissions is the transfer of cement powder to silos and is frequently controlled with a fabric filter collector. Fugitive sources of emissions include the transfer of sand and aggregate, vehicle traffic, and wind erosion from sand and aggregate storage piles. Fugitive emissions can be controlled with water sprays, hoods, enclosures, and telescoping chutes.

Emissions Reporting

The facility is neither a major source for regulated air pollutants nor subject to any federal New Source Performance Standards (NSPS), and thus is not required to report its annual emissions to Michigan Air Emissions Reporting System (MAERS).

**Compliance History** 

This facility was last inspected in 2010 and found to be in compliance with all state air quality rules and federal regulations.

Regulatory Analysis

Newberry Redi-Mix is currently subject to Permit To Install (PTI) No. 363-75 for a cement storage silo with a fabric filter collector. The facility is considered a true minor source for all regulated air pollutants because the facility's potential-to-emit is less than 100 tpy for each regulated air pollutant. The facility is also considered an area source for hazardous air pollutants (HAP) because the potential to emit of any single HAP is less than 10 tpy and aggregate HAP emissions are less than 25 tpy. The facility does not contain any equipment or processes that are subject to federal New Source Performance Standards (NSPS) or National Emissions Standards for Hazardous Air Pollutants (NESHAP).

## Inspection

On June 14, 2019, I (Michael Conklin) conducted an unannounced inspection at Newberry Redi-Mix in Newberry, MI. I arrived at the facility and met with plant operator, Robert Crawford. I explained to Mr. Crawford that the purpose of the inspection was to ensure compliance with Michigan's Air Pollution Control Rules.

We began the inspection by discussing the batch concrete operations. The RMC process begins with cement powder pneumatically transferred through the elevated baghouse, from trucks, into the silo. Sand and aggregate are belt conveyed into the weigh hopper and the cement powder is gravity fed to combine in proper amounts. Water is added in the hopper to finish making the RMC. The RMC is fed into a mixing truck and mixed on the way to the site where the concrete is to be poured. Mr. Crawford stated that about 38 tons of cement powder goes through the process per load. For 2018, about 1,130 tons of cement powder was processed through the silo to make RMC. Next, we proceeded to inspect the silo and baghouse attached.

## **EUCEMENTSILO**

The airstream from the pneumatic transfer of cement powder is conveyed through a bin vent. The fabric filter collector acts as a material collection device and air pollution control device by collecting material from the airstream and having clean air exit the filters. This collector features a shaking mechanism for cleaning the filters that is operated manually by the controller. Mr. Crawford demonstrated that the shaker mechanism operates (SC 12). At the time of the inspection, the cement silo was not being loaded and thus no visible emissions were observed (SC 11). Mr. Crawford stated that the filter bags are inspected annually and replaced if any visible emissions are observed.

#### <u>Compliance</u>

Based on this inspection, it appears that Newberry Redi-Mix is in compliance with all state air quality rules and federal regulations.



Image 1(Cement Silo): Cement silo with fabric filter collector

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