

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B177455421

FACILITY: CLANCY EXCAVATING CO		SRN / ID: B1774
LOCATION: 29950 LITTLE MACK, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Robert Clancy , Owner		ACTIVITY DATE: 08/31/2020
STAFF: Robert Joseph	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of Nonmetallic Mineral Processing Facility		
RESOLVED COMPLAINTS:		

On August 31, 2020, I, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff Robert Joseph, conducted a scheduled inspection of Clancy Excavating Co. located at 29950 Little Mack Avenue, Roseville, MI 48066. The purpose of the inspection was to determine the facility's 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, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and conditions of the facility's permit to install (PTI) 589-87A.

Opening Introduction

I arrived at the facility at approximately 1 p.m. and met with the facility receptionist, Cindy Laurence, and facility owner, Robert Clancy. I introduced myself and presented my identification and credential and stated the purpose of my visit. I asked Mr. Robert Clancy, the owner, to provide me some general information about the facility. He indicated the facility operates Monday through Friday, 8 a.m. to 4:30 p.m. He stated four employees and three operators are employed by the facility. The facility was issued PTI 589-87 on February 10, 1988. This PTI required the installation and operation of a wheel wash system. A revised PTI, No. 589-87A, was issued on September 23, 2015 which required rumble strips to be installed in-lieu of the wheel wash system.

Facility Tour

PTI No. 589-87A required the installation of rumble strip as proposed by the facility, however, the rumble strips installed in late 2018/early 2019 at both the north exit and in the middle of the yard (which requires vehicles to pass over before exiting on the south exit) lack the proper dimensions for satisfactory truck traffic sediment removal. These rumble strips were determined to be unsatisfactory in 2019 by the EGLE-AQD in the presence of the Assistant Attorney General, Charlie Cavanagh, who now is assisting the EGLE-AQD by initiating action with the facility through written documents in an effort towards achieving compliance. The facility has a fleet of ten vehicles and sells their product by the ton. The facility operates one concrete crusher, two conveyors, and two water trucks.

Environmental Compliance per PTI 589-87A: The facility's permit contains conditions for one emission unit, EUPLANT.

EUPLANT

I. EMISSION LIMITS

There did not appear to be any emissions greater than 10% opacity on-site.

II. MATERIAL LIMITS

Mr. Clancy indicated that the facility does not process any asbestos related material.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility's nuisance minimization plan appears to be implemented and maintained with the exception of the facility's rumble strips installation. The facility's roadways appeared to be swept and there were no signs of fugitive dust leaving the site into the surrounding community. Mr. Clancy indicated the facility maintains calcium chloride onsite and a water truck for application. Both were observed but not in operation.

IV. DESIGN/EQUIPMENT PARAMETERS

The facility appears to have the appropriate water sprays for EUPLANT but not satisfactory rumble strips constructed at each truck exit.

V. TESTING/SAMPLING

U.S. EPA Method 9 opacity readings were performed on July 23, 2015. Test results indicate readings to be below the 10% opacity permit limit.

Appendix A-Nuisance Minimization Plan

I. Site Roadways/Plant Yard

The facility provided records of yard sweepings and dust suppression applications with the use of calcium chloride. There was no visible fugitive dust while on-site, however, sweeping records will be discussed with the facility to ensure sweeping is occurring at a minimum of twice per week.

II. Truck Traffic

There did not appear to be any issues with truck traffic loading or fugitive dust, however, the rumble strips installed are unsatisfactory given their dimensions.

III. Storage Piles and Crusher Operations

There did not appear to be any concerns with the storage piles or the drop height distance. The facility provided records of watering/dust suppression applications. This too will be discussed with the facility to ensure proper interpretation of the records is being maintained. There were no concerns observed during the inspection.

IV. Record Keeping

The facility provided records for applications of dust suppressants, roadway sweepings and plant yard sweepings. In addition, the facility provided a log recording the amount of material processed through the crushing plant. Records indicate the largest and smallest production days thus far in 2020 have an output of 765 tons and 265 tons, respectively. This has occurred on multiple days.

Conclusion

It appears the facility has maintained the required record keeping, however, due to the current unsatisfactory rumble strips that are installed, Clancy Excavating is not in-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, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and conditions of the Administrative Rules and conditions of the facility's PTI 589-87A.

NAME Robert Joseph

DATE 09/25/20

SUPERVISOR Sebastian Kallumkal