

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

B177458662

FACILITY: CLANCY EXCAVATING CO		SRN / ID: B1774
LOCATION: 29950 LITTLE MACK, ROSEVILLE		DISTRICT: Warren
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Robert Clancy , Owner		ACTIVITY DATE: 06/04/2021
STAFF: Robert Joseph	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of non-metallic mineral processing plant		
RESOLVED COMPLAINTS:		

On June 4, 2021, 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

The facility has been at its current location since approximately 1965 and primarily is a producer of MDOT 21AA aggregate material (used as either road shoulder gravel or base course for pavement) and 1 x 3-inch crushed concrete (used in environmental control measures like sedimentation traps or access road for track-out control, or base course for pavement).

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, at the request of the facility to install rumble strips in-lieu of the wheel wash system. The facility installed the rumble strips in October 2018 at both the north and south exits (located just prior to entering on the weigh station), however, they lack the proper dimensions for satisfactory truck traffic sediment removal. These rumble strips were determined to be unsatisfactory in May 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 a Consent Judgment in an effort towards achieving compliance. The facility is also subject to the regulations of the New Source Performance Standards (NSPS) Subpart OOO for Nonmetallic Mineral Processing Plants.

Facility Tour

I arrived at the facility at approximately 1 p.m. and met with the facility receptionist, Cindy Laurence. I introduced myself and presented my identification and credentials and stated the purpose of my visit. She contacted Doug Clancy, Facility Manager, and I indicated to him that I was here to conduct a State of Michigan air compliance inspection. Doug stated that he was very busy and that an appointment should be made prior to inspecting the site. I informed him that per the Natural Resources and Environmental Protection Act 451 of 1994, the regulation permits unannounced inspections during normal business operating hours. Doug indicated there was nothing to see, however, he agreed to allow me to inspect the facility.

The facility generally operates Monday through Friday, 7 a.m. to 4:30 p.m. He stated the facility maintains six employees (three of which operators). The facility has a fleet of ten vehicles and sells their product by the ton. The facility operates one primary jaw concrete crusher (Pioneer Model 2854, manufactured 1985), one secondary cone crusher (El-Jay Model 1313 manufactured 1986),

one three-deck screener (only two are currently used), two conveyors (Kohlberg Series Model 31-30125, manufactured 1990), and two other conveyors currently not in use (Barber-Greene Portables, manufactured 1978 and 1983). The facility also has one water truck and one wet sweep vehicle.

The facility is currently constructing a new storage facility in the northeast section of their site. Due to the ongoing construction, the facility has closed truck exit to the north exit and has grinded away the rumble strips for that exit. The facility is currently only utilizing the south exit.

PTI 589-87A

EUPLANT

I. EMISSION LIMITS

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

II. MATERIAL LIMITS

Doug indicated that the facility does not process any asbestos related material nor was any material observed on-site.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility's nuisance minimization plan is being implemented 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 at the time of inspection. Doug indicated the facility maintains calcium chloride onsite and a water truck for application. Both were observed but not in operation at the time.

IV. DESIGN/EQUIPMENT PARAMETERS

The facility appears to have the appropriate water sprays for EUPLANT but not satisfactory rumble strips constructed at the south 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 and sweeping records indicate wet sweepings occurred twice daily, once in the morning and afternoon.

II. Truck Traffic

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

III. Storage Piles and Crusher Operations

There did not appear to be any concerns at the time of inspection regarding the storage piles or the conveyor drop height distance. The facility provided records of watering/dust suppression applications. Their records indicate that water with calcium chloride was applied twice daily, once in the morning and in the early afternoon.

IV. Recordkeeping

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 daily through the crushing plant.

The facility does not have a production limit in the permit; however, the facility has been using 90 tons/hours to calculate their daily throughput which is used for their MAERS submittal. The facility is not required, nor do they utilize a scale to measure the quantity crushed of 21AA and 1 x 3 aggregates. The facility indicated they determined this tonnage amount based on an average estimated throughout, however, I indicated the throughput varies depending on the aggregate material being crushed and the crusher setting utilized.

The facility's crusher has various maximum crushing settings for production (185, 213, 267, 321, 375 and 428 tons/hours). I advised them to begin using the average quantity of 360 tons/hour beginning July 1, 2021, for their MAERS submittal which is a satisfactory quantity for their daily crushing operations.

Conclusion

It appears the facility has maintained the required recordkeeping, however, due to the current unsatisfactory dimensions of the 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 facility's PTI 589-87A.

NAME Robert Joseph

DATE 07-16-21

SUPERVISOR Joyce