

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

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| FACILITY: CLANCY EXCAVATING CO | | SRN / ID: B1774 |
| LOCATION: 29950 LITTLE MACK, ROSEVILLE | | DISTRICT: Warren |
| CITY: ROSEVILLE | | COUNTY: MACOMB |
| CONTACT: Doug Clancy , Manager | | ACTIVITY DATE: 05/25/2022 |
| STAFF: Robert Joseph | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MINOR |
| SUBJECT: Scheduled on-site inspection and complaint investigation of Non-metallic Mineral Processing Plant. | | |
| RESOLVED COMPLAINTS: C-22-00853, C-22-00854 | | |

On May 25, 2022, I, Robert Joseph, of the Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD), and staff member Joe Jaskowski, 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, conditions of the facility's permit to install (589-87A), Consent Judgement (2021-154-CE), and to investigate two fugitive dust complaints (May 19, 2022, and May 20, 2022) alleged against the facility

Opening Introduction

The facility has been at its current location since approximately 1965 and primarily is a producer aggregate material such as 21AA (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, vehicle access roads for track-out control, and as a base course for pavement). The facility provides material primarily for MDOT construction projects and must be certified to do so. In addition, the facility provides aggregate material to county, local, and commercial construction projects. The facility is subject to the federal regulations of the New Source Performance Standards (NSPS) Subpart OOO for Nonmetallic Mineral Processing Plants.

Background Introduction

The facility was issued the permit to install (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 before the weigh station), however, they both lacked the proper dimensions for satisfactory truck traffic sedimentation control.

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 assisted the EGLE-AQD with the development of a Consent Judgment (CJ) in an effort to bring the

facility into compliance. The AQD had issued five violation notices (VN) to the facility since the 2015 permit issuance.

The CJ details the facility's requirement to install rumble strips at both the south exit (only exit currently used) and the north entrance once operational. The rumble strips must also meet the specified dimensions (10' x 50' x 2") and be maintained daily as required and recorded via recordkeeping. In addition, the CJ outlines stipulated penalties should the facility violate any of its conditions. It was signed into law on July 30, 2021.

Finally, in late November 2021, the facility installed rumble strips on the south exit to meet the required dimensions as outlined in the consent judgement. The facility currently is not utilizing the north exit as it has been closed due to the construction of a storage facility.

Facility Tour

We arrived at the facility at approximately 10 a.m. and met with the facility receptionist, Cindy Laurence. We introduced ourselves and presented our identification and credentials and stated the purpose of our visit. She contacted Doug Clancy, Facility Manager, and I indicated to him that we were there to conduct an inspection of the facility with regards to its air-use permit to install. Upon arrival, the aggregate crusher was under repairs due to a hydraulic leak. Doug provided us a brief tour of the facility's operations while the repairs were being made.

Doug stated that 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 broom sweep vehicle.

Doug detailed the operations of the facility until the aggregate crusher was repaired. Upon completion of it, he returned to operate the equipment as Joe and I observed the facility's operations. The wind was 10-15 mph from the ESE and there did appear to be visible fugitive dust leaving the site. The grounds had been applied with dust suppression to control this. Fugitive dust was slightly visible generating off of the storage piles but it did not exceed 5% opacity, nor did it appear to be leaving the site.

The facility completed the construction of a new storage building in the northwest section of the site. The facility previously closed the north exit while construction of the storage building was occurring as this required the north exit rumble strips to be grinded away. The facility is currently only utilizing the south exit for truck traffic hauling the materials. Joe and I continued to observe the facility's operations before conducting a records review

of the facility's permit. Upon completion of the inspection and records review we thanked the facility for their time and left shortly before 12 p.m.

PTI 589-87A

EUPLANT

I. EMISSION LIMITS

There were no visible 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 as specified in Appendix A. The facility's roadways were 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 and rumble strips were installed meeting the CJ's dimensional requirement for the south exit. The facility is not currently using the north exit, however, they are required to install rumble strips there as well and have agreed to do so when the exit begins use.

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. Other than visible emissions (under 5%) visible from the storage piles, fugitive dust was not observed to leaving the site. Records indicate power broom sweepings occurred as needed within the yard, and rumble strip cleaning occurred in the morning and late afternoon.

II. Truck Traffic

There did not appear to be any issues with truck traffic loading or fugitive dust generated by them given the installation of the rumble strips at the south exit. Truck traffic was also driving along an access road which leads to the top of the storage pile.

III. Storage Piles and Crusher Operations

I expressed concern to Doug at the time of inspection regarding the storage piles heights. He indicated that the facility was attempting to meet aggregate demand but stated the facility would water the piles. I further indicated to him that the pile heights may lead to nuisance fugitive dust complaints unless the heights are reduced. There did not appear to be a concern with the conveyor drop height distance. The facility provided records of watering/dust suppression applications. Their records indicate that water with calcium chloride occurs most days at least twice daily, once in the morning and again 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 detailing the amount of material processed daily through the aggregate crusher. Records indicate the aggregate crusher operated for 119.5 hrs in April 2022 for a throughout of 43,020 tons.

The facility does not have a production limit in the permit; however, the facility has been using 360 tons/hours to calculate their daily throughput (the aggregate crusher has various maximum crushing settings for production at 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.

Conclusion

Given the completion of the on-site inspection, the facility is 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, conditions of the facility's PTI 589-87A and Consent Judgement (2021-154-CE). In addition, the two fugitive dust complaints will be considered resolved. Additional complaint investigations will be conducted should additional complaints be received.

NAME Robert Joseph

DATE 06-30-22

SUPERVISOR Joyce