

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

B438359780

FACILITY: Kasson Sand and Gravel		SRN / ID: B4383
LOCATION: 10282 South Pierce Rd., MAPLE CITY		DISTRICT: Cadillac
CITY: MAPLE CITY		COUNTY: LEELANAU
CONTACT:		ACTIVITY DATE: 09/10/2021
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection PTI 346-99.		
RESOLVED COMPLAINTS:		

I conducted an inspection to determine compliance with Kasson Sand and Gravel's Permit to Install # 346-99, the Air Pollution Control Rules and NSPS Subpart OOO. I met with Mr. Brad Shearer who accompanied me on the inspection of the gravel pits and equipment. At the time of the inspection the weather was about 70 degrees, and mostly sunny with light winds.

Kasson Sand and Gravel was purchased by Rieth-Riley Construction Company, Inc. in 2016 but continues to operate as Kasson Sand and Gravel. The plant consists of 800 acres primarily broken up into two large working pits separated by Pierce Rd. The west pit has largely been mined out but some material recovery is still taking place according to Mr. Shearer. The main plant is located just outside the west pit near the center of the property, as are the plant offices. Most of the mining comes from the east pit and material is transferred by truck to the main plant.

AQD records indicate that four different crushing operations have been permitted to Kasson Sand and Gravel. The permitted crushing operations are the main plant, El Jay plant, Telesmith plant, and Cedar Rapids crusher. The El Jay plant has been largely disassembled though portions of it (screens and conveyors) had been used in the main plant in the past.

At the time of the inspection Kasson Sand and Gravel were just completing modifications to the main plant. The main plant has been reconfigured to include the addition of the Cedar Rapids plant as well as one new crusher and two new screens that replaced one old crusher and four old screens. Several new Superior conveyors and stacking conveyors have also been added to the main plant which has been down for renovations since the end of August and has not begun operation yet. It does not appear, with the exception of maybe an old conveyor, that any of the El Jay equipment remains in use.

PTI 346-99 Special Condition V.2. requires that the permittee shall update the general permit listing all new or additional equipment added to the process a minimum of 10 days before the equipment is installed. The AQD has not received this notification. I mentioned this to Mr. Shearer and agreed to update the permit as soon as possible. The new equipment must also be tested for compliance with NSPS Subpart OOO within 60 days of achieving maximum production rate and no later than 180 days after initial startup. Mr. Shearer was aware of this requirement.

In addition to the main plant there is a second, smaller crushing operation (Telesmith plant) consisting of a loading bin, crusher, conveyer, and a new Superior stacking conveyor located in the east pit. This plant was operating at the time of the inspection and we observed the plant for several minutes. Mr. Shearer stated that the crusher is equipped with water sprays, though they did not appear to be

operating at the time of the inspection. However, the material being processed appeared to be fairly damp and there was light opacity from the crusher less than the 15% opacity limit in PTI 346-99. No visible emissions were present from any of the other equipment.

In the past, all of the old equipment at this source has been tested in accordance with NSPS Subpart OOO. Rieth-Riley has switched to a new equipment numbering system this year and the equipment has yet to be updated but this is planned.

Roads and yard areas were in fairly good shape with only minor dust being raised by equipment operations. Kasson Sand and Gravel has a water truck on site used to treat the roads as necessary. Additionally the roads have been treated with salt brine on an "as needed" basis. Records of dust suppressant application are maintained and were reviewed. I did not observe any visible emissions from the storage piles.

Material throughput based on the weight and number of truckloads of each aggregate product is logged daily. The daily records are summarized to generate the annual production data. The 2020 MAERS submittal indicates the throughput of the main plant was 320,421 tons and 171,399 tons for the Telesmith plant. The MAERS submittal indicates the El Jay plant did not operate in 2020. PTI 346-99 limits total plant production to 2,000,000 tons per year.

At the time of the inspection the facility appeared to be in compliance with the Permit to Install, the APC Rules, and Subpart OOO with the exception that some new equipment has been added to the main plant without prior notification/modification of the permit.

NAME _____

DATE _____

SUPERVISOR _____