DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

M:	352	63	28	47

FACILITY: STATE CRUSHING	G, INCEAST	SRN / ID: M3526		
LOCATION: 25501 Sherwood	WARREN	DISTRICT: Southeast Michigan		
CITY: WARREN		COUNTY: MACOMB		
CONTACT: R.J. Orozco , Co-Owner		ACTIVITY DATE: 12/15/2015		
STAFF: Kerry Kelly	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR		
SUBJECT: Targeted inspectio	n	energy 8		
RESOLVED COMPLAINTS:		AND THE CONTRACTOR OF THE SECOND SECO		

On October 16, 2015 and December 15, 2015, AQD staff Kerry Kelly, Iranna Konanahalli, and Tyler Salamasick conducted a targeted inspection at State Crushing- East located at 25501 Sherwood Ave. in Warren, Michigan. The purpose of the inspections was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; and Permit-to-Install (PTI) #154-12 for a non-metallic mineral crushing plant.

Upon arrival at the site, AQD staff introduced themselves, presented their DEQ employee photo identification, explained the purpose of the inspection, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities" to Mr. R.J. Orozco, Co-owner. Mr. Orozco and Mr. Augustine Ochoa, Plant Operator, accompanied AQD staff during the inspections.

FACILITY DESCRIPTION

State Crushing-East produces building and road aggregate from concrete it receives from road construction projects. Permit to Install 154-12 was issued to Joe Davis Crushing, Inc. for 25501 Sherwood Ave. on November 7, 2012. The emission units addressed in PTI 154-12 are; EUPROCESS, EUTRUCKTRAFFIC, and EUSTORAGE. According to Mr. Orozco no equipment has been replaced or added since State Crushing purchased the plant from Joe Davis Crushing, Inc. in 2013.

INSPECTION EUPROCESS

EUPROCESS includes a combination of equipment (screens, crushers, feeder, conveyor, etc.) used to reduce larger materials down to smaller sizes, classify and sort materials into various product types, material handling, and transporting of material to storage areas. The EUPROCESS equipment observed and inspected at State Crushing - East is listed in the table below:

	Label Number ¹	Manufacturer	Serial Number	Model Number	Manufacture Date	Design Capacity
Primary Crusher	12	Pioneer	2854-PRVE-142 ²	2854 ²	1992 ²	185 - 428 tons/hr ²
Secondary Crusher	14	Eagle Crusher Company Inc.	11627	62D290	December 8, 1999	250 tons/hr
1 Deck Screen	15	Johnson Crushers International, Inc.	99H04G32	JCI 6202 32	2/2000 ³	
Conveyor 1	1	-u-p			1980 ³	
Conveyor 2	2			12.00	1980 ³	
Conveyor 3	3	Grasan	KR1200	1.4447	February 2000 ³	
Conveyor 4	4	Grasan	1530S3874	1530S	February 2000 ³	
Conveyor 5	5	Grasan	7030 P 3809	7030 P	February 2000 ³	
Conveyor 6	6		## # W		1980 ³	
Conveyor 7	7	Grasan	KR164 3808	KR164	February 2000 ³	
Conveyor 8	8			202	1980 ³	1
Conveyor 9	9	Grasan	55302P1532	ACCUSED TO ACCUSE	February 2000 ³	

Emission Limits

Potential fugitive dust from EUPROCESS is being controlled by the operator spraying areas in EUPROCESS with a garden hose.

Material Limits

The plant receives and processes road construction material which does not contain asbestos.

Mr. Orozco provided daily production records for April 1, 2015 through October 28, 2015. The highest reported daily production of material during the reported period was 1967 tons, which is below the 2,040 ton per day processing limit established in PTI 154-12. Based on the daily and monthly records provided for April 1, 2015 through October 28, 2015, and the 2014 MAERS report, it appears State Crushing - East is under the 343,000 tons per year production limit for EUPROCESS.

Process/Operational Restrictions

PTI 154-12 requires State Crushing not operate any portion of EUPROCESS unless each process meets the specific opacity limit and the fugitive dust control plan has been implemented. State Crushing - East is also subject to 40 CFR 60 Subpart OOO. AQD staff did not observe any visible emissions from the screen, conveyors, stackers, or transfer points while the crusher was operating at the time of the inspection on October 16, 2015. AQD staff requested sweeping and water application records required by SC III. 2. Mr. Orozco provided sweeping records for September 17, 2015 through October 16, 2015. Watering records were not provided as of November 13, 2015. This is appears to be a violation of SC III. 2. AQD issued a violation notice for SC III. 2. on September 10, 2015. A second violation notice for SC III. 2. was issued on November 13, 2015.

Design/Equipment Parameters

AQD staff observed water spray equipment (garden hose) located on the crusher as required by SC IV.1.

Testing/Sampling

PTI 154-12 SC V.1., 40 CFR §60.672 (b), and 40 CFR §60.676 (f) require an initial visible emission test be conducted and written record of the test be submitted within 60 days after achieving maximum production, but no later than 180 days after commencement of trial operation. On October 21, 2015, Ms. Kelly asked Mr. Orozco for documentation that an initial performance test was conducted. As of January 4, 2015, AQD staff did not receive documentation verifying an initial performance test was conducted. A violation notice will be issued for failure to comply with PTI 154-12 SC V.1. and 40 CFR 60 Subpart OOO.

Monitoring/Recordkeeping

Monthly and 12-month rolling records of the amount of processed material are required in SC VI. 2. Mr. Orozco provided daily production records for April 1, 2015 through October 28, 2015.

Other Requirements

The plant's crusher, screen, conveyors, and stackers were labeled as required by SC IX.1.

EUTRUCKTRAFFIC

EUTRUCKTRAFFIC includes truck traffic for delivery of material products to customers; truck traffic from unloading area to processing area and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road

¹Equipment is required to be labeled per PTI 154-12 EUPROCESS SC IX

²Serial number was obtained from PTI 154-12 permit application. A Pioneer crusher was observed by AQD staff during the inspection. The model number, manufacture date, and design capacity was provided by a representative Kolberg-Pioneer Inc. based on the serial number provided in the permit application.

³Manufacture date was obtained from PTI 154-12 application

portions.

Emission Limits

AQD staff did not observe any visible emissions from EUTRUCKTRAFFIC during the inspections.

Process/Operational Restrictions

The plant yard and roadways were wet at the time of the inspections. According to Mr. Orozco, sodium chloride has been applied to limit fugitive dust production from the plant yard and roadways. In an effort to remove track-out, Sherwood Ave. and the paved portion of the yard is swept every other day by Sweepmaster, Inc. AQD staff did not observe track out along Sherwood Ave. during the inspections. AQD staff did observe a Sweepmaster, Inc sweeper sweeping Sherwood Ave. north and south of the State Crushing - East throughout the inspection on October 16, 2015. The company provided records of the dates Sweepmaster was at State Crushing - East for September 17, 2015 through October 16, 2015. According to Mr. Orozco, spills are cleaned up immediately with the front loader.

AQD staff observed the he drop distance at each transfer point which appeared to be at the minimum the equipment can achieve.

EUSTORAGE

Emission Limits

AQD staff observed the open stock piles during the inspections. No visible emissions were detected from the stock piles.

CONCLUSION

It appears State Crushing - East is not in compliance with PTI 154-12, SC III. 2. (Appendix B, I. A) for not supplying water applications records. It appears State Crushing - East is also not in compliance with PTI 154-12, SC V.1., 40 CFR §60.672 (b), and 40 CFR §60.676 (f) for not conducting an initial performance test. A second violation notice was issued to State Crushing - East on November 13, 2015 for failure to comply with SC III. 2. (Appendix B, I. A). A violation notice will be issued to State Crushing - East for failure to comply with SC V.1., 40 CFR §60.672 (b), and 40 CFR §60.676 (f).

On November 18, 2015, AQD received water application records for September 8, 2015 through November 18, 2015 for State Crushing - East.

NAME Kenny Kelly DATE 1/6/16