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

N521154279

FACILITY: Stoneco of Michigan		**SRN / ID:** N5211
LOCATION: 6301 BELLEVIEW, FLINT		**DISTRICT:** Lansing
CITY: FLINT		**COUNTY:** GENESEE
CONTACT: Michael McIntosh , General Manager		**ACTIVITY DATE:** 07/21/2020
STAFF: Daniel McGeen	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On 7/21/2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of Stoneco of Michigan - Flint, which had last been inspected by AQD in 2017.

Facility Contacts:

- Michael McIntosh, General Manager, 810-577-1911, mmcintosh@mipmc.com
- Sue Hanf, Environmental Manager, 734-854-2265, shanf@mipmc.com

Facility Description:

Stoneco of Michigan (formerly known as CYDI of Michigan) receives aggregate via railway and occasionally truck, and distributes it via semi-truck.

Emission units*:

EURAILUNLOAD: A rail yard terminal which handles aggregate and formerly handled coal. Material is received by rail and truck, stored on site, and shipped out via truck. Rail car unloading takes place in a two sided building enclosure with an underground hopper. Material is conveyed to on-site storage piles. Water sprays are located at various transfer points. Water is provided by the City of Flint.

EUTRUCK TRAFFIC: Truck traffic for delivery of material products; truck and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road portions associated with the process area.

EUSTORAGE: Open area stock piles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles

***An emission unit is any part of a stationary source which emits or has the potential to emit an air contaminant.**

Regulatory overview:

This facility is considered to be a true minor source, rather than a major source of air emissions. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

It is also considered a minor, or *area source*, for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

It is regulated by Permit to Install No. 147-09, for unloading, handling, and loading aggregates.

This facility is not subject to any federal New Source Performance Standards (NSPS) or Maximum Achievable Control Technology (MACT) standards.

Fee status:

This facility is not considered fee-subject, because it is not a major source for either criteria pollutants or hazardous air pollutants, nor is it subject to any NSPS or MACT standards. It is not required to report emissions annually via the Michigan Air Emission Reporting System (MAERS).

Location:

The facility is located between Dort Highway and I-475 with Carpenter Road to the north and E. Pierson Road to the south. A residential area is located 225 feet or less to the west of the facility yard and to the east is a primarily industrial area.

Recent events:

On 6/8/2020, I had been driving on Belleview Avenue, which appeared to have been recently swept. I saw a semi truck approaching around a bend, stirring up a moderate amount of fugitive dust. On 6/9/2020, I emailed the facility's environmental contact, Ms. Sue Hanf, Environmental Manager, to advise her of the dust. I asked that they take measures to reduce the dust on the paved road, to ensure no negative impacts offsite.

On 6/9, Ms. Hanf replied by email, stating that they believe the dust was caused by the semi driver driving on the unpaved shoulder of the road, as the road itself had recently been swept. She indicated that they would remind the truck drivers to stay on the pavement and they would install signage, as well. She indicated they are already doing periodic sweepings and daily waterings on the roadway. The next sweeping will be done on 6/11 or 6/12, she added.

Most recent dust complaints:

- 2016: one complaint.
- 2008: one complaint.

Safety attire required:

I wore steel toed boots, safety glasses with side shields, a hard hat, and a high visibility safety vest.

Due to the COVID-19 pandemic, I wore a disposable paper mask, per EGLE guidance. As an added precaution against the spread of COVID-19, I wore a clear plastic face shield which was attached to my hard hat.

Arrival:

During the current COVID-19 pandemic, EGLE guidance to inspectors, as of July 2020, on conducting inspections was as follows:

- pre-arrange inspections with facilities, to facilitate a plan to conduct the inspection while adhering to facility guidelines for safety.
- always wear a mask, when doing field work.

Therefore, the time and date for this inspection had been pre-arranged with the facility. Ms. Sue Hanf, Environmental Manager, was unable to attend, and informed me in advance that I would be met by Mr. Michael McIntosh, General Manager, at the site.

I arrived at 10:00 AM. Weather conditions were approximately 70 degrees F, overcast, and humid from heavy rains two days ago. Winds were 5-10 miles per hour out of the northeast.

I saw no fugitive dust on Belleview Avenue, which is paved. Upon reaching the site entrance road off of Belleview, I saw no fugitive dust. The unpaved and paved portions of the roadway appeared to have just been watered, by the site's water wagon.

Pre-inspection meeting:

Upon reaching the office area, I was met by Mr. McIntosh, and by Mr. Mike Yeager, Environmental Tech, who works for Ms. Hanf.

I inquired as to how business has been, during the COVID-19 pandemic. I was informed that because they are an essential industry, they have been able to continue operating, but not all the contractors who are their customers are considered essential. It was explined that this led to a late start to the season, and a slow first quarter for 2020.

I asked what kinds of industries make up their customer base, and was told that their aggregate is used by Hot Mix Asphalt plants, ready mix concrete plants, general construction contractors, and road building and excavating contractors, both small and large.

Inspection:

I asked if they still receive coal, and was told that they receive no coal at all, now. They receive either washed aggregate, I was told, which has had most of the fines removed, and so is not very dusty, or they receive washed sand, which still has some moisture content to it.

EURAILUNLOAD:

The railcar unloading process was not operating at this time. The PTI No. 147-09 Special Condition (SC) EURAILUNLOAD I. EMISSION LIMITS 1 sets a limit of 10% opacity. There was no opacity from the process at this time.

The permit SC EURAILUNLOAD II. MATERIAL LIMITS 1 prohibits the processing of any asbestos containing materials in EURAILUNLOAD, pursuant to 40 CFR Part 61, Subpart M, *National Emission Standad for Asbestos*. It is my understanding that they do not process any materials which contain asbestos.

I was told they get rail deliveries about once per week, typically 2500 tons. Rail car unloading takes place in a two-sided building enclosure, with an underground hopper. The baghouse is no longer used, I was informed, as it was intended to control dust from coal. If they need to, however, they can use a hose to provide a water spray inside the unloading building, I was told.

I was shown the Hewlett car shaker, which physically shakes railcars, to help unload the coal into a receiving pit below. Please see attached photo No. 001. The hopper below has two feeders, and leads to a 36 inch conveyor belt.

During the week of Thanksgiving each year, they stop receiving rail car deliveries until spring. This is because railcars are open to the elements, and precipitation could freeze the aggregate into a solid mass , which the Hulett unloader would not be able to shake free.

Unloaded aggregates are conveyed by the 36 inch conveyor to on-site storage piles. The conveyor and subsequent conveyor are covered, in a number of places. Water sprays are located at various transfer points, which I was shown, throughout the site, with two serving the unloading conveyor system. The hoses for the dust suppression all looked to be in good condition. Please see photo No. 002 for a representative example, at a transfer point leading away from the railcar unloading building.

They have wtare provided by the City of Flint. I was shown the inside of their water shed, where they installed a booster pump, to add pressure to the water. .

Based on the above availability of water sprays for dust supression, and the dampness of roadways and storage piles I witnesssed, the company appears to be meeting the intent of SC EURAILUNLOAD III. PROCESS/OPERATIONAL RESTRICTIONS 1. This condition requires that the process not be operated unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained.

EUTRUCKTRAFFIC:

I was told that deliveries of aggregate by truck are not common during the warmmonths, and mostly take place from November through January. I saw no fugitive dust from truck traffic or from front end loader traffic. There was a high moisture content in the unpaved roadways from recent rains, and from the facility's water wagon.

SC EUTRUCKTRAFFIC I. EMISSION LIMITS 1 limits visible emissions from all wheel loaders and all truck traffic operated in conjunction with truck traffic to not exceed 5% opacity. Opacity today from vehicles was 0%, complying with this limit.

SC EUTRUCKTRAFFIC III. PROCESS/OPERATIONAL RESTRICTIONS 1 prohibits operation of EUTRUCKTRAFFIC unless the fugitie dust program specified in Appendix A has been implemented and is maintained. Based on the water wagon applying water to onsite roadways this morning, the fugitive dust control program appeared to be implemented and maintained.

I was informed that they watered and swept almost every day here, this summer. However, on some days their team is at their Lansing site, it was pointed out, so dust control would not be done, when they are absent. In addition to using water for control of dust from roadways and yard areas, they have applied 6,000-9,000 gallons of calcium chloride this year, I was informed.

EUSTORAGE:

There was no fugitive dust from the various storage piles. Some of the piles had damp spots visible on their west sides, either from water applied on the conveyor stacker belts for dust suppression, or from recent rains. SC EUSTORAGE I. EMISSION LIMITS 1 restricts opacity from the storage piles to 5%, and the present 0% opacity was in compliance with this requirement.

SC EUSTORAGE III. PROCESS/OPERATIONAL RESTRICTIONS prohibits the facility from operating EUSTORAGE unless the fugitive dust control program specified in Appendix A of the PTI has been implemented and is maintained. Based on the lack of opacity from the storage piles, and damp spots atop storage piles from possible recent application of water, it appeared that they were implementing and maintaining the fugitive dust control program.

Conclusion:

No instances of noncompliance were observed. I left the site at this time.

Image 1(001) : Hulett railcar shaker.

Image 2(002) : Hose to supply water to transfer point.

NAME _____ DATE 11/18/2020 SUPERVISOR B. M.