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

N572069844

FACILITY: CHENEY LIMESTONE CO	SRN / ID: N5720							
LOCATION: 9400 SAND RD, BELLE	DISTRICT: Lansing							
CITY: BELLEVUE	COUNTY: EATON							
CONTACT: Larry Mathewson , Plant	ACTIVITY DATE: 11/14/2023							
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR						
SUBJECT: Onsite inspection to deter	SUBJECT: Onsite inspection to determine compliance with General PTI # 43-18.							
RESOLVED COMPLAINTS:								

Inspected by: Michelle Luplow

Personnel Present: Larry Mathewson, Plant Superintendent (<u>larry@cheneylimestone.com</u>)

Other Personnel: Sky Cheney, President (sky@cheneylimestone.com)

Purpose

Conduct an unannounced, onsite compliance inspection to determine compliance with Cheney Limestone's General Permit to Install (PTI) No. 43-18 for a non-metallic mineral crushing facility, which was issued March 13, 2018. This permit was issued to replace PTI 533-95 to allow for Cheney Limestone to operate under updated crushing permit requirements.

Facility Background/Regulatory Overview

Cheney Limestone (Cheney) mines and processes (crushes and screens) limestone from its own quarries, located across the street from their office at 9400 Sand Road. L. Mathewson explained that the crushed limestone is used for various applications including agricultural applications (soil acid neutralization); and roads, parking lots, and driveways (for the Eaton County Road Commission); and landfills. L. Mathewson said they have been located at this site since 1999.

Cheney Limestone generally operates based on daylight hours. Their operating season starts approximately April 1 and ends near the end of November. Operating hours are generally from 7:00/7:30 a.m. – 3:30 p.m., but sometimes as late as 5:30 p.m., 5 days a week, with 5-hour Saturday shifts in the spring and late fall if the demand for lime increases.

Cheney Limestone is subject NSPS Subpart OOO for non-metallic mineral crushers. NSPS Subpart OOO conditions are incorporated in the PTI. Cheney Limestone is required to report to MAERS. Although the General PTI allows for Cheney Limestone to relocate, L. Mathewson said that this is a stationary plant.

Limestone is a hygroscopic mineral that, when too wet, can cause undesirable characteristics. The crushed limestone Cheney produces is akin to a very fine sand, that when wet, will inhibit the crushing equipment from working properly, because of its thick, mud-like consistency. Cheney Limestone uses water at the primary crusher and conveyor in moderation, but the majority of the dust control is done by enclosing the equipment to prevent fugitive emissions.

Inspection

At approximately 12:38 p.m. on November 14, 2023, I arrived onsite. I noted that the unpaved yard and haul roads appeared to be dry, with some trackout onto Sand Road. Upon my arrival, L. Mathewson met me outside and informed me that they had a water line break that morning due to freezing overnight temperatures, but the equipment was fixed. He then proceeded to use Cheney's onsite water truck to water down the unpaved plant yard and roads. He said they aim to use the water truck once per hour to maintain these areas. The water truck is filled by pumping water out of the pit's pond.

While onsite, after water had been applied to the roads, I observed various pieces of heavy loader equipment driving throughout the site on these areas and the fugitive dust from this traffic was minimal (<5%).

I verified with L. Mathewson that the permitted equipment presented in Table 1 is present at the site. All equipment was being operated during the inspection. All ID numbers were also verified.

Table 1. Permitted Equipment

Equipment	Description	Opacity Limit (%)	Status
Feeder Hopper	Receives uncrushed lime	10	Compliance
Hazemag Primary Impactor; Model APPH 1315Q, 350 HP	Device ID: 1315, Serial # HU1567	15	Compliance
Cage Mill Secondary Crusher Stedman Model G54H4-47, 250 HP	Device ID: 54, Serial # D3187 Secondary Crusher; used to crush lime down to "Ag Lime" size (powder/fine particulate)	15	Compliance
5 x 12 Double deck Screen (First Screen Tower) Diester BHM 2512	Device ID: S1 Serial # 699612 Used to sort crushed lime into 2 different sizes	10	Non-compliance
8 x 12 Double deck screen (Final Screen Tower)	Device ID: S2	10	Compliance

Diester BHM 2820	Serial # 699611		
	Used to sort crushed lime into 2 different sizes		
Vibratory Feeder Diester VFB5016	Device ID: F1 Serial # 64367	10	Compliance
Diester VI DS010	Serial # 04307		
Conveyor	Device ID: C1	10	Compliance
Nordberg Model 250	Serial # 366009		
Conveyor	Device ID: C2	10	Compliance
Nordberg Model 240	Serial # 366010		
Conveyor	Device ID: C3	10	Compliance
Nordberg Model 240	Serial # 366011		
Conveyor	Device ID: C4	10	Compliance
Nordberg Model 153	Serial # 366012		
Conveyor	Device ID: C5	10	Compliance
DL Dinning Model 5427027	Serial # 102417-07-CL		
Conveyor	Device ID: C6	10	Compliance
Nordberg Model 240	Serial # 366013		

Conveyor	Device ID: C8	10	Compliance
Nordberg Model 240	Serial # 366014		
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Conveyor	Device ID: C10	10	Compliance
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Nordberg Model 240	Serial # 366016		
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Nordberg Model 240	Serial # 366018		
Conveyor	Device ID: C13	10	Compliance
Nordberg Model 153	Serial # 366019		
Conveyor	Device ID: C14	10	Compliance
Nordberg Model 153	Serial # 366020		
Conveyor	Device ID: C15	10	Compliance
Nordberg Model 153	Serial # 366021		

FGCRUSHING

EUPROCESS consists of a crushers and associated process equipment (including drills, screening operations, belt conveyors, loading operations, and any other material handling equipment operated at the site).

Visible Emission Limits & Equipment, Design/Equipment Parameters & Testing/Sampling

There are visible emission limits for each piece of equipment in FGCRUSHING, based on a 6-minute average, per the listing in Table 1. These visible emission limits are associated with affected facilities that commenced construction, modification or reconstruction after August 31, 1983 but before April 22, 2008, as applicable to Cheney Limestone affected facilities.

All affected facilities appeared to meet the visible emission limits except for the 5 x 12 Double-deck screen, Device ID S1, which was exceeding the 10% opacity limit the entire time I was onsite. A Method 9 check was conducted by ensuring that the sun was to my back while observing the emissions. Attached are photos of the process and fugitive dust. L. Mathews said onsite that he believed the reason why there was opacity is because the tarp covering the unit was torn. I requested that L. Mathewson provide me with a description of what was done to correct the issue by the end of the week (November 17) and take photos of the process while in operation to demonstrate to my satisfaction that the opacity issues have been addressed.

L. Mathewson informed me that the screen enclosure was fixed on November 15, 2023. S. Cheney provided further follow-up on November 17, describing the corrective actions and sending photos of the corrective actions. He stated that they added extra flashings to reduce air movement through the screen as well as replacing the warn tarps. This description, in conjunction with the photos, demonstrate that Cheney Limestone has sufficiently addressed the opacity issues emitting from the S1 screen. See attached photos.

The NSPS Subpart OOO requires that all affected facilities be tested to comply with the established opacity limits. All affected facilities were tested for the NSPS in 1997.

Material Usage Limits & Monitoring/Recordkeeping

FGCRUSHING has a limit of 2,000,000 tons of non-metallic mineral processed per calendar year at this site. Cheney Limestone is required to keep daily and monthly records of the amount of material processed in tons. I requested these records from January 2021 – October 2023. S. Cheney provided these records, see Table 1 & attached. Records indicate compliance with the 2,000,000-ton annual material limit.

Table 1. Materials Processed through crusher January 2021 – October 2023

Year Crushed	Tons Crushed
2021	148,318

2022	167,086
2023	145, 649

Process/Operational Limits

FGCRUSHING shall not operate unless the Fugitive Dust Control Program specified in Appendix A is implemented.

The following is an evaluation of compliance with Appendix A:

Plant, Site Roadways and the Plant Yard

The dust on the site roadways and plant yard are required to be controlled by applications of water, calcium chloride, or other approved fugitive dust control compounds. This shall be done as needed to ensure the 5% opacity limit is met for truck traffic. During the inspection I noted the 5% opacity limit for truck traffic was being met and water appeared to be a sufficient fugitive dust suppressant for this site.

The drop distance at each transfer point throughout the plant should be reduced to the minimum the equipment can achieve. During the inspection I observed that all transfer points appeared to be maintained at a minimum free-fall height to minimize emissions. Additionally, dropchutes are installed on several stockpiling conveyors, which also minimizes emissions.

Storage Piles

Stockpiles shall be watered on an as needed basis to meet the opacity limit of 5%. I observed no opacity from the stock piles.

Truck Traffic

Onsite vehicles being loaded should have the loads be no higher than 6" below the top of any sideboard, side panel, or tailgate, otherwise the truck shall be tarped. I did not observe any loading of materials during the inspection.

I reminded L. Mathews that Cheney Limestone is required to track all dust suppressant applications for the site roadways and plant yard and the storage piles. I did not request fugitive dust records at this time, as fugitive dust from these areas appeared to be kept to a minimum.

Compliance Statement

Cheney Limestone appears to be in compliance with PTI 43-18 at this time.



Image 1(Fugitive Dust 1): 5 x 12 Screen (S1) and fugitive dust in excess of 10% standard.



Image 2(Fugitive Dust 2): 5 x 12 Screen (S1) and fugitive dust in excess of 10% standard.



Image 3(Fugitive Dust 3): 5 x 12 Screen (S1) and fugitive dust in excess of 10% standard.



Image 4(S1 Screen): Photo credit: Cheney Limestone. Screen fixed to address opacity issues.



<u>Image 5(S1 Flashing)</u>: Flashing added to further enclose screen and minimize air intrusion

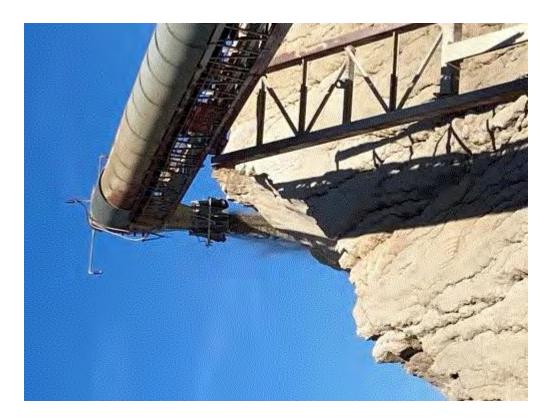


Image 6(Drop Chute) : Drop Chute on stacking conveyor to minimize fugitive dust emissions.

NAME Michelle Luplow

DATE 11/29/23 SUPERVISOR PB

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July	16933	14827	13253
August	20787	20219	24762
September	12646	26827	20551
October	15379	23674	18966
November	9865	16385	
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