

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N574836235

FACILITY: ELMER'S CRANE AND DOZER, INC.		SRN / ID: N5748
LOCATION: 3600 RENNIE SCHOOL ROAD, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT:		ACTIVITY DATE: 08/04/2016
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Thursday, August 4, 2016, Caryn Owens of the Department of Environmental Quality (DEQ)-Air Quality Division (AQD) conducted a scheduled field inspection and records review of Team Elmer's – Lippmann I Crusher and associated equipment (SRN: N5748). At the time of the inspection the crusher and associated equipment was located at the Nickerson Pit, located on Norton Road in Traverse City, Grand Traverse County, Michigan. More specifically, the site was located on the south side of Norton Road, approximately ¼ mile east of County Road 633. The field inspection and records review were to determine compliance with Permit to Install (PTI) 109-02. Team Elmer's – Lippmann I Crusher and associated equipment currently operate under a General permit and is considered a minor source for particulate matter (PM) criteria air pollutants. Majority of the equipment, including the crusher are subject to New Source Performance Standards (NSPS) of Performance for Nonmetallic Mineral Processing Plants under 40 CFR, Part 60, Subpart OOO.

Evaluation Summary

The activities covered during this scheduled field inspection and records review appears to be in compliance with PTI 109-02. Team Elmer's will be updating PTI 109-02 to include conveyor No. 1144. Specific permit conditions that were reviewed are discussed below.

Source Description

The Lippmann I crusher and associated equipment are considered a portable source and moves from pit to pit on a "as needed" basis throughout the construction season, typically April through November. The operations at the Nickerson Pit were used to crush stone to produce gravel for construction projects. The associated equipment to the crushers contained conveyors and a scale. There was also a screening plant east of the crusher area. The facility operates Monday through Friday. The crushers operate between 8 to 12 hours per day.

On-site Inspection:

During the field inspection it was really dry conditions, sunny with calm winds between 5 to 10 miles per hour, and approximately 80 degrees Fahrenheit. I stayed to the north of the construction activity, and only the screening plant was operating during the inspection. DEQ met with Mr. Bill Plutt, one of Elmer's crew members at this site. Mr. Plutt informed me that the onsite contact (Tad Elliott) had left for an appointment and would return later in the day, and the crusher operations were shut down until he returned. I inspected the equipment associated with the crushers, which were labeled accordingly. I observed the following equipment connected to the crusher at the time of the inspection:

- 911: Jaw Crusher, NSPS tested July 16, 1996
- 912: Twin Roller Crusher, NSPS tested July 16, 1996
- 910: Feeder, No test, not subject to NSPS
- 1000: Conveyor Stacker, NSPS tested September 5, 1996
- 986: Conveyor, NSPS tested November 6, 1996
- 1144: Conveyor,
- 999: Conveyor Scale, NSPS tested September 5, 1996

The conveyor numbered 1144 was not listed in the PTI, and therefore no test date was noted.

I observed numbers identifying equipment at the screening plant, however; a loader was operating around the screening plant during the inspection, which was loading material into the screener, and therefore I stayed back from this area. I could not read the numbers on the screening equipment. There appeared to be some fugitive dust around the loaders, and minimal fugitive emissions when loading the earth material in the screener, but the fugitive emissions quickly dissipated and did not travel off site. I observed no fugitive emissions from the drop point of the stacker conveyor to the sand pile. The screener equipment did not appear to be associated with the equipment covered in PTI 109-02.

During the inspection, I asked Mr. Plutt for the daily records from this pit, and Mr. Plutt informed me that Mr. Elliot

had all the records in his truck, which was not present at the time. I had Team Elmer's send me the records for the day of the inspection, which showed they processed 3,131 tons of material on August 4th. Mr. Karl Domres, Aggregate Operations Manager of Team Elmer's, arrived on site as I was about to leave, so I discussed my observations with Mr. Domres prior to leaving the site. An inspection brochure was not given to Mr. Domres at the time of the inspection, but one will be emailed to him with this inspection report.

Review of PTI 109-02:

I. Design Parameters:

A.-C.: The equipment at the site consisted of two crushers, a screener, and six conveyors. Majority of the equipment was not operating during the inspection, except for two conveyors and a screener. The screen plant appeared to have water sprays installed because no fugitive emissions were observed from the drop point of the stacker conveyor following the screener. At the time of the inspection, the site was within the fugitive emission limits of the PTI.

II. Material Processing/Emission Limits:

A.: The material limit processed per year per site is 2,000,000 tons processed. According to Jack Morris, Compliance Engineer of Team Elmer's, stated that the season run time for the year 2015 was from April 13, 2015 through December 16, 2015, and the seasonal start-up for the year 2016 began April 29, 2016.

According to the records reviewed from July 2015 through July 2016, the Nickerson Pit processed 127,007 tons of material, which was the pit that processed the most material out of six different locations.

III. Compliance Evaluation:

A.: Daily and annual records of the amount of material processed are kept. DEQ reviewed records from July 2015 through July 2016.

B.: The visible emissions tests were completed in 1996.

IV. Operational Parameters:

1. Based on DEQ's database, Team Elmer's notified the DEQ within 15 days after the initial start-up of the crushing site.
2. During the field inspection I observed the numbers on the associated equipment at the facility.
3. According to the permitted information, the jaw crusher is uncontrolled and the roller crusher is equipped with water sprays. These crushers were not operating during the inspection, however, the screener appeared to be equipped with water sprays while operating.
4. Team Elmer's has and follows a fugitive dust plan for the site, and according to Mr. Plutt a water truck was recently at the site, earlier in the day, to spray the haul roads.
5. Based on the records reviewed, only road gravel, recycled asphalt, and crushed concrete road gravel are crushed using this equipment.
6. The crushers and associated equipment did not operate at a facility with a site specific air use PTI.

V. Allowed Modifications:

1. This PTI allows for new process equipment and/or control equipment without applying for a new General PTI if all the applicable current PTI conditions are met after the replacement or modification.
- 2-4. New or additional equipment added to the process shall be submitted to the permit section and District Supervisor within 10 days before installing the additional equipment. There was conveyor No. 1144 and the screening equipment that were not covered on the EQP5756 forms for this PTI. I discussed this with Mr. Domres, and the screening plant is just separating the sand from the rock, and no crushing is involved. Team Elmer's is claiming the screening plant falls under exemption R 336.1285(t). Additionally, Mr. Domres stated that this was the first time this conveyor No. 1144 was used with this crusher and associated equipment. Team Elmer's needed a longer conveyor for this current project, and therefore conveyor 1144 was brought in. Mr. Domres said that the conveyor will be added to the permit in case it is needed for a future project with this crushing equipment.

5.
 - a. The facility has no outstanding, unresolved violations with the DEQ.
 - b. Relocation notices have been submitted to the DEQ along with a geographical map with the portable equipment identified as well as residential and commercial establishments identified and distances between the two noted. DEQ has discussed this with Team Elmer's and they try to give DEQ the minimum 10 days' notice prior to relocation.
 - c. The crusher is located further than 500 feet from residential and commercial establishments.
 - d. During the field inspection, a copy of the permit was reported to be in Mr. Elliot's truck, and the equipment would not be operating until Mr. Elliot returned.

NAME Camp Owens

DATE 8/4/16

SUPERVISOR 