

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

N597435572

FACILITY: Fisher Construction Aggregates		SRN / ID: N5974
LOCATION: 900 S. Bradley Street, MOUNT PLEASNT		DISTRICT: Saginaw Bay
CITY: MOUNT PLEASNT		COUNTY: ISABELLA
CONTACT:		ACTIVITY DATE: 07/12/2016
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled site inspection for plant permitted under 169-15.		
RESOLVED COMPLAINTS:		

July 12, 2016, AQD District Staff conducted a scheduled site inspection for the Fisher Construction Aggregates portable crusher N5974, located at the "Stone Pit". No relocation notice had been received for the equipment since June 7, 2010. The inspection was conducted to determine if the referenced crusher plant was being operated in compliance with General Permit to Install (PTI) 169-15, issued on October 5, 2015. The referenced General PTI replaced PTI 286-96 which had been issued for the crusher plant.

The facility was operating upon arrival, however the crusher was not in operation at the time of the inspection. Jamie Brown the facility operator was onsite at the time of inspection, and provided information regarding plant operation and records.

FACILITY DESCRIPTION

N5974 is associated with a portable permit for a Hewitt Robbins jaw/roll crusher and associated conveyors/stackers. The permitted equipment is presently located in Hatton Township, Clare County, Michigan and consists of an active sand and gravel operations located on approximately 74 acres. The present location of the crusher was noted to be farther west than noted during the June 18, 2010 site inspection. The roadways were noted to be unpaved, but were in reasonable condition, and had been watered earlier in the day.

The water source for the site is a water truck purchased for the task. At the time of the inspection, the water truck was reported to be at the nearby mannsiding pit for repairs.

The property is bounded on all sides by various sized parcels of private property, with the smallest being a 6-acre residential property located on the eastern property boundary and bounded on 3 sides by Fisher property. A number of residences are located within the general vicinity, and Schunks Rock Farm, a permitted sand and gravel pit is lted immediately east of the facility across cornwell Road.

COMPLIANCE HISTORY

No records of complaints for the facility are of record in District Files. No Violation Notices (VNs) have been issued to the facility since the last inspection on June 18, 2010.

COMPLIANCE EVALUATION

The facility was operating, and trucks were hauling out product, but the portable crusher was not operating upon arrival. No fugitive dust from the roadways or stockpiles was visible.

Process Equipment -

At the time of the inspection consisted of :

- One Hewitt Robbins Jaw/Roll Crusher, max rated capacity of 400 ton/yr (No. 4505)
- One feed hopper (No. 4526)
- Two pre-crusher conveyors (Nos. 4544 and 8560)
- Two post crusher conveyors (No.s 4540 and 4513)

- One radial stacker (No. 4541)

The above referenced process equipment was consistent with the equipment permitted under 169-15. All equipment was appropriately labeled as specified in the application [Special Condition 1.1 (SC1.1)]. It should be noted that SC 1.11 requires the equipment labeling be completed within 45 days of initial startup. This portion of the SC would not be applicable as the equipment was labeled at the time of the June 18, 2010, inspection and prior to re-permitting the equipment under 169-15.

The facility does not have a baghouse, therefore SC1.1 is not applicable. Wet suppression is reported to be provided to materials at the crusher, and was confirmed as part of the inspection (SC1.7). However, as the water truck was not present, and the plant was not operating, confirmation of sufficient wet suppression and visible emissions (VE) limits (SC 1.2 and associated table) could not be made by the inspector.

SC1.8 required verification of VE rates for all 40 CFR Part 60 Subparts A and OOO (NSPS) subject crushers, screens, all transfer points on conveyors and all other misc. equipment. At the time of permitting verification testing for conveyor numbers 8560 and 4513 had been tested on November 12, 2010. The Hopper and Crusher were reported to be grandfathered with a 1969 construction date. The radial stacker (No. 4541) was permitted as an end point and is not subject to testing.

A review of records indicates that conveyor no. 4540 and 4544 had not been tested at the time of the permit application (September 15, 2015), but would be tested. The permit condition allows for 180 days for completion of testing, and as the permit was issued September 28, 2015, which reflected the end of the crusher season, testing should be completed within the 2016 season and prior to the initiation of the 2017 crushing season. The company has been requested to check their records to confirm that the conveyors had not been tested. Discussions with the plant superintendent the week of July 18, 2016, indicated that the conveyors in question were tested in 2015, and that copies had been submitted by the district. Supplemental copies have been requested by District Staff.

Material Limits -

The permittee is limited to not processing more than 2 million tons of any non-metallic mineral per site per year. As the plant has remained at the site since the last inspection, and annual MAERS reporting is well below the permit condition (SC1.3). Materials crushed at the facility are limited to native stone and sand, and do not include asbestos tailings or asbestos containing materials (SC1.5).

Record Keeping and Monitoring -

By permit, the company is required to keep daily and annual records of the amounts of material processed for each site at which the facility operates at (SC1.9). Production records are presently maintained onsite in a three ring binder for the season, and totals are provided to the office, for monthly and annual totals. Production totals were reported to be obtained from a weight scale located on the first conveyor. A copy of the General PTI is maintained onsite by the operator (SC1.13(d)).

Reporting -

The facility reports annual production totals in the Michigan Air Emissions Reporting System (MAERS). Reports have been received in a timely manner since the last site inspection in June 2010.

Under the referenced permit, the facility is required to notify the AQD within initial startup (SC1.10). This condition is part of the general permit template, and would not be applicable in this instance since the facility was operating at this site under PTI 286-96, and was operating at the time of permitting.

Fugitive Emissions -

SC 1.6 requires that a continuous fugitive dust control for all facility roadways, yard, storage piles and material handling operations as specified in Appendix A be implemented in order to operate the plant.

The referenced dust control plant includes use of water on stockpiles, roadways and the yard, as well cleanup of spillage on roads and sweeping of paved areas to minimize fugitive dust. Other practices outlined include minimizing drop distances at each transfer point, and loading practices of on-site vehicles to control dust. AQD Staff noted that there were no paved areas onsite, and that no dust from storage piles or roadways were present, indicating general compliance with the referenced condition.

SUMMARY

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The only compliance issues noted at the time of the inspection was no water source onsite to provide wet suppression should the plant be operated, and two conveyors without documentation of VE Testing. With respect to the water source, it was reported to be in for repairs, and would be returning to the stone pit. The plant was not operating at the time of the inspection, so no official violation was identified at the time of the inspection.

With regards to the two conveyors, verification of VE testing will be provided by the company within the next week, or the equipment will be scheduled to be tested later this fall. The company has staff that would be able to recertify in the fall and test prior to end of the season. Should the equipment not be tested prior to startup in 2017, a violation notice will be issued. sgl

NAME Sharon Cobble

DATE 7/20/16

SUPERVISOR C. Kere