

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

N604560099

FACILITY: AGGREGATE INDUSTRIES - PULLMAN (SWEET) PLANT		SRN / ID: N6045
LOCATION: 6211 Ann Arbor Road, DUNDEE		DISTRICT: Kalamazoo
CITY: DUNDEE		COUNTY: MONROE
CONTACT: Caroline Depp , Environmental and Land Manager		ACTIVITY DATE: 08/25/2021
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Inspection		
RESOLVED COMPLAINTS:		

On August 25, 2021 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 4540 108<sup>th</sup> Ave, Pullman Michigan at 1:45 PM to conduct an unannounced air quality inspection of Aggregate Industries (SRN N6045) (hereafter AI). Staff made initial contact with Brady Iehl, AI, Plant Manager, and stated the purpose of the visit. Mr. Iehl indicated that he could accommodate a site visit/tour, but records were handled by Caroline Depp who is the new environmental contact for the facility.

This is a sand and gravel production facility. The facility produces grades of product that is primarily used in the asphalt industry.

Mr. Iehl gave staff a tour of the facility. Required personal protective equipment are steel toe boots, safety glasses, a hard hat, and a high visibility vest. Staff observations and review of records provided during and following the inspection are summarized below:

**FGCRUSHING:**

AI currently has two different crushing operations located at the facility. The Wash Plant is a non-portable crushing operation that is operated under General PTI No. 472-96 for Aggregate Industries with SRN N6045. The Dry Plant is a portable crushing operation that is operated under General PTI No. 35-01 for Aggregate Industries facility with SRN N6197.

Special Condition 1.3 limits the facility to not processing more than 2,000,000 tons of any non-metallic minerals through FGCRUSHING per year per site. Staff was provided with records for January 2020 through July 2021. The facility only operated the Wash Plant during 2020 in which 74,987 tons were processed in 2020. During 2021 the portable dry plant was moved to the facility location. Records supplied to Staff showed that the facility has processed 78,510 tons through the Dry Plant operation and 45,943 tons through the Wash Plant operation. This totals to 124,453 tons for both operations during 2021. The facility reports that it is below the 2,000,000 tons per year per site limit.

General PTI No. 472-96 (Wash Plant Equipment) is assigned to the facility SNR N6045 had the following equipment identified in the 2006 permit modification application. The application included the equipment description and identification numbers seen below. During the inspection it was noted that the facility was currently in the process of updating their identification numbers on all the existing equipment.

834 Feeder

740 Feed Conveyor

470A Kicker

570 Deck Vibrating Screen

606 Cone Crusher

835 Return Conveyor

606C Discharge Conveyor

836 Conveyor

577 Deck Vibrator

532 Cage Mill

604 Material Washer

739 Conveyor

565 3 Deck Vibrating Screen

837 Conveyor

537 Sand Screen

839 Conveyor

840 Conveyor

793 Conveyor

723 Sand Stacker

606B Cone Discharge Conveyor

- 737 Conveyor
- 838 Conveyor
- 877 Conveyor - Sand Extension
- 876 Feed Conveyor
- 875 Surge Bin
- 874 Conveyor - Bin Stacker
- 872 Conveyor
- 873 Conveyor
- 871 Kicker Conveyor

The facility had acquired 3 new equipment for this process. The newly added process equipment is shown below. As apart of FGCRUSHING Special Condition 1.12 the facility should not replace or modify FGCRUSHING, or any portion of FGCRUSHING, unless the permittee update the general permit by submitting a new Process Information Form (EQP5756) to the Permit Section and District Supervisor, identifying all existing and new or addition equipment added to the process a minimum of 10 days before the equipment was replaced or modified. During the inspection Staff were informed that the equipment had been at the facility since the beginning of the year. As stated previously the General PTI requires a notification 10 days prior to the new equipment becoming operational. At the time of the inspection the facility had not submitted a timely notification regarding the newly added equipment. During the records/inspection review the facility submitted PTI modification identifying all new equipment that is located at the Pullman facility under the General PTI No. 472-96. On September 27, 2021 the Kalamazoo District Office received the electronic notification of the PTI modification required by Special Condition 1.12. It was Staff's understanding that while the notification was not received in a timely manner that during the inspection the facility was in the process of updating the equipment identification numbers and submittal of PTI modification. With this knowledge the Kalamazoo AQD District Office has decided to use discretion and not issue a violation notice this time for the timely submittal of the PTI modification notice as required by Special Condition 1.12. AQD does note that if future notifications are not submitted in a timely fashion a violation notice will be issued to the facility.

- Stacker 10150860
- Feeder 10150859

- Stacker 10150861

General PTI No. 35-10 (Dry Plant Equipment) is assigned to the facility SNR N6197. This Portable plant was relocated from the Kalamazoo Sweet Pit to the Pullman location in the winter of 2020 for this season. The facility is required to by Special Condition 1.13 to provide a notice of intent to relocate (Relocation Notice Form EQP5757); a copy of the original general permit forms (EQP5727, EQP5729, and EQP5756); any process information forms for previous modifications; and a proposed site plan identifying the proposed new geographical site and probable duration at the new site shall be provided to the appropriate district office and the Permit Section not less than 10 Days prior to the scheduled relocation. Staff looked through relocation notices for the Kzoo Sweet Plant SRN 6197 and the last relocation/start-up notice appears to be sent on March 26, 2016 for the A/C#2 portable crushing and screening plant covered under General PTI No. 35-01. The facility appears to be in violation of Special Condition 1.13 as the notification for relocation was not made for the recent move of Kzoo Sweet Plant to the Pullman Sweet Plant for the equipment covered under General PTI No. 35-01. On September 27, 2021 the Kalamazoo District Office received the electronic notification of the PTI modification required by Special Condition 1.12. In addition to the General PTI modification notice the facility also did submit a relocation notice. It was Staff's understanding that while the notification was not received in a timely manner that during the inspection the facility was in the process of updating the equipment identification numbers and submittal of PTI modification. With this knowledge the Kalamazoo AQD District Office has decided to use discretion and not issue a violation notice this time for the timely submittal of the PTI modification and relocation notice as required by Special Condition 1.12 and 1.13. AQD does note that if future notifications are not submitted in a timely fashion a violation notice will be issued to the facility.

During the facility Visible emissions were checked during the inspection. Staff did not make certified Method 9 readings for the FGCRUSHING operations. Staff is certified in conducting Method 9 readings and judging opacity; however, Staff's observations were only for a few minutes and not the required 30 to make a Method 9 determination. The only part of both the Dry and Wet Plants that Staff noticed any Visible emissions were the crushers. Staff did note that Visible emissions appeared to average around 10% during the few minutes observed. The crushers are allowed up to 15% opacity which would mean the facility appeared to be meeting this opacity limit.

During the inspection Staff noted that fugitive and overall dust at the facility appeared to be adequate. It was noted that the facility appeared to be follow the Fugitive Dust Control Plan outlined in Appendix A. Staff was shown a log in which the facility records if/when roads are watered. Staff was also told that the facility will occasionally use calcium chloride instead of water when needed.

Staff was shown electronic records that the facility in which the facility utilizes to record dust conditions, Visible Emission Reading, and if water was applied as a form of dust control. Staff was informed that the facility takes these records daily.

In a correspondence with Caroline Depp it was reported that the facility was in the process of updating their PTI for equipment renaming for all the Aggregate Industries facilities. The facility would also include the relocation information of the Kzoo Sweet Plant to the Pullman location. These notifications are required to be done 10 days before the addition and relocation of

equipment. While the facility appears to have plans to submit the notices to AQD the facility has not yet submitted them and did not meet the required 10 days prior to addition or relocation.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appeared to have submitted enough documentation and notifications for the issues outline with Special Conditions 1.12 and 1.13 of General PTI No.'s 472-96 and 35-01 to be considered resolved. Staff did note that future notifications that are not submitted in a timely fashion as required by the PTI's would result in violation notices being issued. Staff stated to Mr. Iehl that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 3:00 PM.-CJY

NAME Cosby Young

DATE 9/27/21

SUPERVISOR RIL 9/28/21