

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

N660558282

FACILITY: PAYNE & DOLAN INC PC5 CRUSHER		SRN / ID: N6605
LOCATION: PC5 PORTABLE CRUSHING PLANT #60-02, OZARK		DISTRICT: Marquette
CITY: OZARK		COUNTY: MACKINAC
CONTACT: JAMES MERTES , ENVIRONMENTAL MANAGER		ACTIVITY DATE: 05/27/2021
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Targeted inspection for FY 21.		
RESOLVED COMPLAINTS:		

Facility: Payne & Dolan Inc. PC5 (N6605)

Location: Richmond Aggregate Site at 4011 CR 460, Newberry, MI 49868

Contact: Zach Leitner, Environmental Coordinator, 262-468-1573

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Payne & Dolan, Inc. (P&D) is an asphalt producer and pavement contractor based out of Waukesha, WI. P&D is one of several companies that make up the Walbec Group, a collection of companies that provides construction and engineering services. The company owns and operates several portable and stationary asphalt plants, along with non-metallic crushing plants in Wisconsin and Michigan. P&D PC5 is a portable non-metallic crushing plant that operates under General Permit to Install (PTI) No. 60-02.

Process Description

The crushing plant produces smaller size aggregate from larger size rock. The final product can be used for a variety of applications from infrastructure projects to residential landscape purposes. The crushing plant consists of loaders, haul trucks, generators, crushers, screens, conveyors, and stockpiles. The plant is located within a quarry. The process begins with large size rocks being fed into the primary jaw crusher via loader, producing an initial size product. From the primary crusher, the product is conveyed into a screen plant that separates the crushed aggregate into various sized products. Smaller size material is filtered out and leaves on separate conveyors to stockpiles, while larger size material continues into the secondary crusher. The secondary crusher breaks the aggregate down into smaller sizes before it enters the screen plant again or continues

down the line to the tertiary screen and crusher. From the tertiary screen and crusher, the material is conveyed to stockpiles.

Emissions

Stone quarrying and processing operations can cause point and fugitive emissions of PM, PM10, and PM2.5. Emissions from process operations should be considered fugitive unless the source of emissions is vented through an air pollution control device or contained and emitted through a force-air vent or stack. Fugitive sources of emissions are generated from machine movement and wind erosion. Emission sources can include hauling, crushing, screening, and transferring of material. The primary factors affecting PM emissions are wind and the moisture content of the material. Moisture on the surface of the material can cause fine particles to adhere resulting in a dust suppression effect.

Emissions Reporting

The facility is subject to the federal New Source Performance Standards (NSPS) Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants and reports its annual emissions to Michigan Air Emissions Reporting System (MAERS). For 2020, the facility reported crushing 514,372 tons of material and emitting 2,571.86 pounds of PM10.

Compliance History

The facility has not received any violation notices in the past five years. The facility was last inspected in 2016 and found to be in compliance with PTI No. 60-02 and all other applicable Michigan Air Pollution Control Rules and federal regulations at the time.

Regulatory Analysis

P&D PC5 is currently subject to General PTI No. 60-02 for a portable nonmetallic crushing plant. The facility is considered a true minor source because the potential-to-emit (PTE) of all regulated air pollutants is less than the major source thresholds. The facility is also considered an area source because the PTE of individual HAPs is less than 9 tpy and the PTE of aggregate HAP emissions is less than 25 tpy. The facility is subject to NSPS Subpart OOO by having a portable crushing plant with a crushing capacity of greater than 150 tons/hr and equipment that has been constructed after August 31, 1983.

Inspection

An on-site inspection for P&D PC5 was performed at the Richmond Aggregate site in Newberry, MI, on 5/27/2021. The gravel pit is located south of M-28 off County Road 460. I arrived at the

site at 10:30 AM and began to check for visible emissions. The weather conditions were 60 degrees Fahrenheit and clear. Upon arrival, the plant was not operating. On-site I met with Zach Leitner, Environmental Coordinator. I explained to Mr. Leitner the purpose of the inspection was to ensure compliance with General PTI No. 60-02 and all other applicable Michigan Air Pollution Control Rules and federal regulations.

The inspection began by going through the process from the beginning, starting with the primary crusher. Process equipment was inspected for labels and water sprays where required. The table below lists the equipment that was observed on-site and labeled. Visible emission test records were provided via email following the inspection for each piece of crushing equipment on-site.

Equipment	Label Number	VE Tested
Jaw crusher	145064	08/04/1999
Screen plant	145068	08/03/1999
Conveyor	145071	06/13/2005
Conveyor	145074	08/04/1999
Conveyor	145076	08/04/1999
Cone crusher	145065	08/04/1999
Conveyor	345040	06/13/2005
Screen plant	145285	08/08/2006
Conveyor	145073	08/04/1999
Conveyor	145072	06/13/2005
Conveyor	145304	05/21/2008
Cone crusher	145284	08/08/2006

Conveyor	345039	06/13/2005
Conveyor	145303	10/03/2007
Conveyor	145190	06/21/2005
Conveyor	145189	08/12/2020
Conveyor	345055	12/08/1995
Conveyor	145308	04/29/2009

Additional equipment on-site included a diesel engine for power generation, a water truck, and front-end loaders. All process equipment on-site matches equipment listed in the General Permit to Install Application Process Information document (EQP5756).

After reviewing process equipment for labels and water sprays, the plant resumed operation. Water sprays were equipped on both cone crushers and the secondary screen. However, water sprays were not equipped on the primary jaw crusher and screen. I explained to Mr. Leitner and the plant supervisor that all crushers and screens must be equipped with water sprays. The material being crushed is well saturated enough that water sprays were not need on the primary crusher and screen and no opacity exceedances were observed. After explaining that the permit requires each crusher and screen to be equipped with water sprays, the plant supervisor proceeded to install water sprays on the primary jaw crusher and screen plant.

The sun was oriented towards my back as I was observing process equipment for visible emissions. Over the period of 15 minutes of operation, visible emissions from the crushers, screens, conveyors, and transfer points were all less than 10% opacity. The drop heights from conveyors to transfer points were kept low to minimize dust. No visible emissions were observed from the storage piles. Visible emissions from the front-end loaders were less than 5% opacity. The roadway entering the pit was well saturated along with the plant yard where front-end loaders were operating. A water truck was observed spraying the roadways. The facility appears to be following its fugitive dust control plan.

Records of material crushed and Method 9 visible emission test documents were submitted via email. Method 9 visible emission tests were performed on all process equipment that was

operating. This includes all the conveyors, screens, and crushers. All equipment passed the tests for their respected opacity limits.

The company maintains a daily environmental tracking report for air compliance. The daily reports note hours of operation, aggregate production, equipment used, and if water was used for dust control on process equipment and roadways. Example records were provided for 4/20/2021 and 5/26/2021. Both reports provide the amount of material processed and the amount of water used on process equipment and roadways. In addition to daily records of material processed, the company also maintains monthly and 12-month rolling records of material produced. Through May 2021, the facility has crushed a total of 525,079 tons in the last 12 months.

Compliance

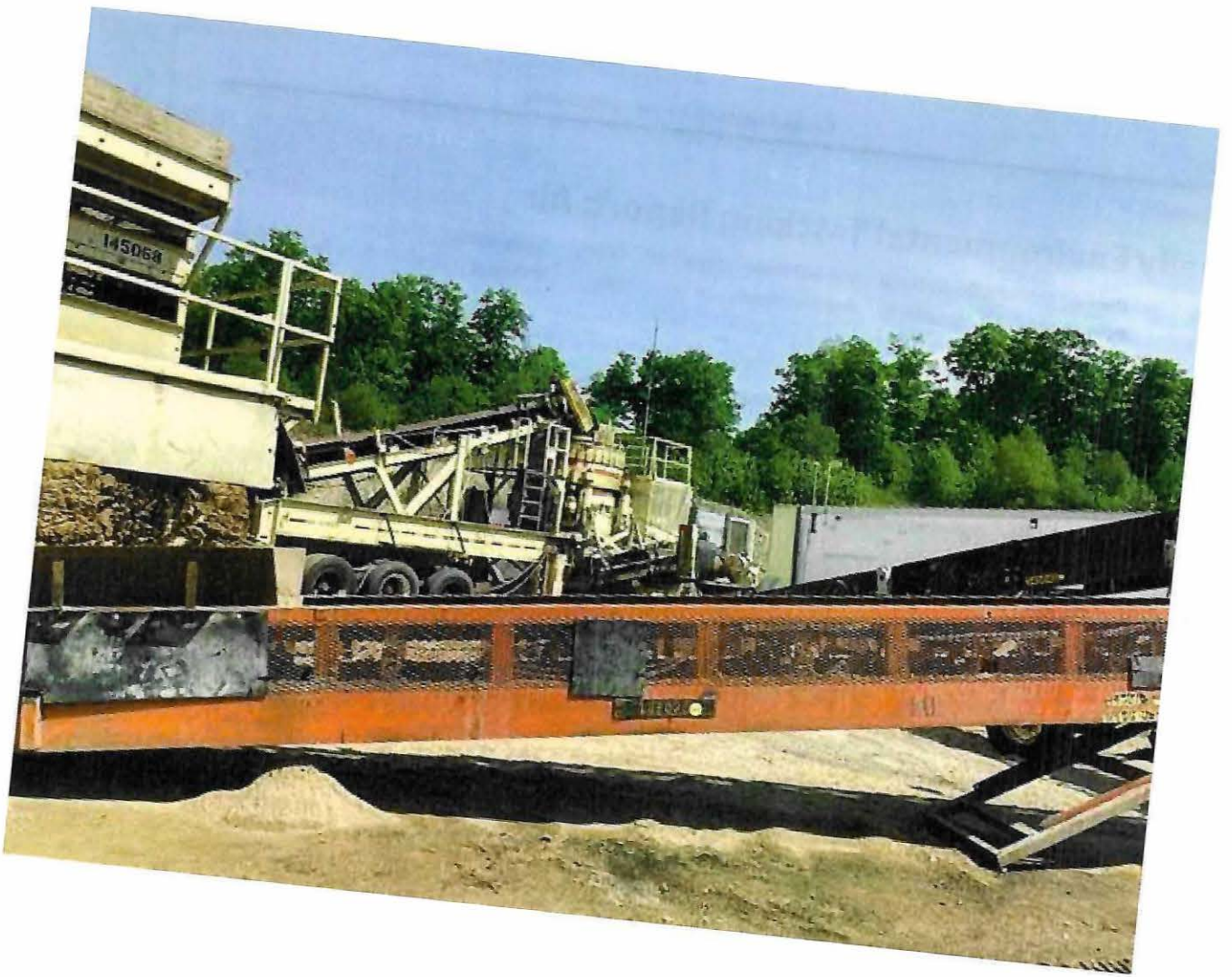
Based on this inspection, it appears P&D PC5 is in compliance with General PTI No. 60-02 and all other applicable Michigan Air Pollution Control Rules and federal regulations.











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Daily Environmental Tracking Report: Air

Date	Crusher	Pit/Quarry Name	Trained Person	State	MI	County	Ozone Status
4/20/2021	PC-5 Portable	I.R. Home Pit Bit	Aran Malmquist			Iron	Attainment

Hours of Operation: (in Military Time)

Start Time	Stop Time	First Downtime Start	First Downtime Stop	Second Downtime Start	Second Downtime Stop
600	1500	1500	1800	0	0

Aggregate Production:

Tons of Material Produced	Gallons of Fuel Used - Attainment	Gallons of Fuel Used - NonAttainment
4540	320	0

Equipment Used:

Primary	Secondary	Tertiary	Screens	Conveyors
1	1	1	2	13

Dust Control - Crushing Equipment and Conveyors:

Spray bars operational?	If No, describe action taken	Gallons of water applied	Rain or snow in the last 24 hours?	V.E.R on site?	VE under limits?
Yes		1500	Yes	Yes	Yes

Dust Control - Roadways:

Water truck on site?	Gallons of water applied	Rain or snow in the last 24 hours? (Y/N)	V.E.R on site? (name)	VE under limits?	Speed control?	Other dust control measures
Yes	1000	Yes	Aran Malmquist	Yes	No	0

Emissions Control - Crusher and Genset Engines:

Routine inspection	Engine maintenance
yes	no

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NAME Michael Malmquist

DATE 6/8/21

SUPERVISOR EL