



ROSEVILLE

— CRUSHED —

An Equal Opportunity Employer

June 21, 2023
Project No. 231039

Robert Joseph
Warren District Office
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, MI 48092

Response to the Violation Notice Dated June 1, 2023
Roseville Crushed Concrete, LLC (SRN N6658)
Roseville, Michigan

This letter is in response to the EGLE-AQD Violation Notice dated June 1, 2023 (VN). We appreciate you taking the time to meet with us on June 15, 2023 and have incorporated your suggestions into this letter and our record keeping system. The VN suggests that Roseville Crushed Concrete (RCC) is in violation of several air quality regulations. The allegations cited in the VN are as follows.

Process Description	Rule/Permit Condition Violated	Comments
EUPROCESS	336.1901 PTI 143-11A – General Condition 6. PTI 143-11A – Appendix B: <i>Nuisance Minimization Plan Fugitive Dust</i> , Sections II, III, and V	<i>The drop distance at each transfer point to the storage piles and the loading of the concrete crusher is causing unreasonable interference with the comfortable enjoyment of life and property due to the fugitive dust plumes being generated</i>
Plant, Storage Piles, and Management of Loader Operations	PTI 143-11A – Appendix B: <i>Nuisance Minimization Plan Fugitive Dust</i> , Sections II, III, and V.	<i>Operations were not performed to minimize the drop distance when stockpiling non-metallic minerals and when loading the concrete crusher to control potential dust problems. An excavator is being utilized rather than a front-end loader to fill the concrete crusher.</i>
Site Roadways	TI 143-11A – Appendix B: <i>Nuisance Minimization Plan Fugitive Dust</i> , Section I.	The exit of the roadway must have rumble strips that are appropriately designed and maintained to minimize track out



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As requested, this letter provides information regarding the referenced citations, including: the date the alleged violations occurred; an explanation of the causes and duration of the alleged violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations; the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

First, it should be noted that the Rau's purchased the RCC facility earlier this year (2023). Since then we have made many improvements to facility operations designed to reduce fugitive dust and minimize overall environmental impacts. A well was installed which delivers 40 gallons per minute (gpm) of water; since its installation we have been using copious amounts of water around the yard to reduce fugitive dust. We are also rerouting traffic in an effort to eliminate track-out onto Groesbeck Highway. We have engaged an environmental consultant, Fishbeck, to provide additional visible emissions (VE) observation and to outline additional measures that can be taken to reduce fugitive dust. We have five employees trained in USEPA Method 9 VE Evaluation; at least two of those employees are onsite when the facility is operating. We have also contracted a company to apply a brine solution to the yard, which should also help to prevent the formation of fugitive dust. While we have been working hard to clean the yard and implement fugitive dust measures, it will take us time to implement all the changes we have identified. We appreciate EGLE's patience and that you have noted the improvement of the site. We are also committed to investigating complaints and addressing them as they apply to the operations at our site.

With this additional background information, we can address the individual allegations included in the VN. For your convenience, we have ***bolded and italicized*** the EGLE VN comments and provided our response directly following each.

1. The drop distance at each transfer point to the storage piles and the loading of the concrete crusher is causing unreasonable interference with the comfortable enjoyment of life and property due to the fugitive dust plumes being generated.

Since receiving the VN, RCC staff have explained to equipment operators that the stacker and associated equipment must be operated to reduce drop heights. Operators were asked to ensure that the stacker was moved as close to the pile as possible. Water is applied at all transfer points at a minimum of 0.5 gpm. A second water sprayer was added on the two stacker conveyors to reduce the potential for fugitive emissions from dropping material onto the piles. An additional water cannon was installed in the southwest quadrant of the property to keep the material on the pile wet and to wet material prior to it being dumped into the crusher. This water cannon is operated at all times while the facility is operating, even when the crusher is not operating.

2. Operations were not performed to minimize the drop distance when stockpiling non-metallic minerals and when loading the concrete crusher to control potential dust problems. An excavator is being utilized rather than a front-end loader to fill the concrete crusher.



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As indicated under Response 1, RCC has increased the number of water sprays and provided additional instruction to operators about minimizing drop height. With the additional water sprays and change in operating the equipment, we feel we have properly addressed this concern.

3. The exit of the roadway must have rumble strips that are appropriately designed and maintained to minimize track out.

RCC has been in contact with a street sweeping company to help clear out track out and help clean up the adjacent paved areas at the site. We are proposing to reroute traffic in order to ensure that the scale and surrounding areas remain clean and to ensure that trucks always drive over some type of rumble strip or gravel pad to prevent track-out. In the meantime, RCC is moving its rumble strip mats back to clean wheels before the wheels drive onto the paved areas. We have increased the frequency of sweeping this area so it is clean and no track-out will occur.

In addition, RCC installed a gravel pad that is located prior to the truck scale and paved roadway exit. This will prevent the track out of mud onto the paved area and then onto the road. We are committed to having a permanent and effective resolution before the end of July. As we indicated earlier, we will make a concerted effort to keep the paved area swept and washed down to prevent track out onto Groesbeck Highway.

We are working diligently to establish an effective fugitive dust program and appreciate EGLE's patience while we finish the remaining action items. In addition, we appreciate the information on complaints you forwarded (even when you were on vacation). We do not believe the incident reported earlier this week is associated with our operations as the City of Roseville inspected the area and identified activities at 29801 Groesbeck as the source of the complaints as we indicated in our e-mail dated June 20, 2023.

If you have any questions, please contact me at 586.405.7774 (ARau@rauhornerlectric.com) (ARau@rosevillecrushed.com)

Sincerely,



Anthony Rau

Operations Manager, Roseville Crushed, LLC

Attachments

By email and USPS

Attachments

Copy: Jenine Camilleri – EGLE-AQD, Lansing