



ROSEVILLE

— CRUSHED —

An Equal Opportunity Employer

September 20, 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 August 30, 2023
Roseville Crushed, LLC (SRN N6658)
Roseville, Michigan

This letter is in response to the EGLE-AQD Violation Notice dated August 30, 2023, 2023 (VN). The VN suggests that Roseville Crushed, LLC (RC) is in violation of its Fugitive Dust Plan because of track-out from the facility. The allegations cited in the VN are as follows:

Process Description	Rule/Permit Condition Violated	Comments
Site Roadways	PTI 143-11A – Appendix B: <i>Nuisance Minimization Plan Fugitive Dust</i> , Section I.(G)	The exit of the roadway must have rumble strips that are appropriately designed and maintained to minimize track out

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, we would like to note that RC has made several improvements in the last six months to minimize dust generated at the facility. These include:

- Installation of a 40 gpm water well
- New water cannon with 180o oscillation to control dust from the crusher
- Increased sweeping of the paved areas
- Additional staff committed to housekeeping, including a supervisor



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Complaints were received on both August 23 and 24, 2023, which were forwarded to RC for investigation. These complaints are puzzling as the area received record amounts of rain these two days which would make dust complaints unusual.

To better understand site conditions on August 24, 2023, the day EGLE indicated they were on site in the VN, we should evaluate weather conditions on August 23 and 24. Similar conditions existed as well during the follow-up visit made by EGLE-AQD on September 1, 2023.

EGLE-AQD received complaints on both days, which were forwarded to RC. The area was incredibly rainy on August 23 and 24 making it difficult to believe there was enough dust to blow off the roadway as described in the VN. The City of Roseville recorded 2.49 inches of rain in the 24 hours ending at 5 am on August 24 while the Detroit City Airport, which is just a few miles away, recorded 2.12 inches which is the highest ever recorded. [\[1\]](#) More information on the weather is included in Attachment 1. It was also quite windy during those storms, further complicating site conditions. It has been noted in other areas that rain on these days represented a 250-year flood event meaning there is only a 0.4% chance of such an event occurring in one year.

It should also be noted that the storm drain in the yard at RC spouted water during this rain event, further flooding the yard. This water eventually washed out onto Groesbeck Highway. At the time Robert Joseph visited the site, he witnessed this material that had overflowed off the site and into the street. As he noted in his communication to us, staff onsite worked hard to clean the material out of the street, however managing water during those few days was very difficult for everyone including RC. Groesbeck Highway is also a very busy street. The unusual amount of rain coupled with the inability of storm drains to evacuate the water led to conditions witnessed by Mr. Joseph when he visited the site on the afternoon of August 24.

While complaints on August 31 and September 1, 2023, were not referenced in the NV, RC would like to explain how weather impacted activities on those days as well. First, on both days (see Attachment 1) it was very windy, and the wind switched directions often. While the new water cannon oscillates in a 180° sweep of the yard, staff had difficulty managing the dust from the crusher and shut down early to avoid creating dust that could migrate offsite. Mr. Joseph noted in an email to Fishbeck that the facility was not in operation on September 1 when he visited the site. This is because they had shut down early. In addition, Mr. Joseph noted that the wind at the time was 10-15 mph from the ESE while the water cannon was positioned to the southwest. Earlier in the day, the wind seemed to shift, and staff had difficulty keeping up with the shift in wind direction. The cannon does oscillate over 180°, though when the wind is blowing toward the ESE the cannon should not be pointed towards the southwest, as Mr. Joseph stated in his e-mail. Staff will be reminded to check the wind direction before setting up the water cannon to make sure it is positioned properly.

Going Forward



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We will purchase an additional rumble strip mat to supplement the one that is in place now. From aerial photos, it appears the site previously had two rumble strips which worked much better than the one we now have in place, according to Mr. Joseph's emails. We are also committed to hiring a different third-party street cleaner to clean the paved area and the street near the exit, if necessary, as most of the mud carried into the street is from the paved area. Keeping the paved area cleaner should reduce track-out from the site. We are also working to reroute traffic at the site, though this is requiring more time than originally planned, as Fishbeck has had to get third-party approvals and assistance. It is our goal to reroute the traffic at the site before the spring. This will ensure that all trucks leaving the site exit over the rumble strips or that the wheels are cleaned in some other way before they enter Groesbeck Highway.

Additionally, we are planning to install a replacement crusher to reduce the size of aggregate stored at the site. If we use a primary crusher to reduce the size of the material, emissions from the existing crusher should be reduced as well as exhaust from a lower height. In Mr. Joseph's previous visit to the site, he mentioned that the excavator or front-end loader and associated activities was awfully high up on the pile. An additional crusher will eliminate this concern as well as lower emissions from crushing. We are working with EGLE-AQD to get this completed as soon as possible. We wanted to schedule an additional discussion on the need for a permit revision as we do not understand why it cannot be installed if it meets the exemption requirements.

Please note that many improvements have been made at the site and we will continue to work diligently to establish an effective fugitive dust program. We 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), because we would like to address them as soon as possible.

If you have any questions, please contact me at 586.405.7774 (Anthony.Rau@rauhornelec.com).

Sincerely,

Anthony Rau

Operations, Roseville Crushed, LLC

Attachments

By email and USPS

Attachments

Copy: Jenine Camilleri – EGLE-AQD, Lansing