

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

N665844936

FACILITY: ROSEVILLE CRUSHED CONCRETE		SRN / ID: N6658
LOCATION: 29765 Groesbeck, ROSEVILLE		DISTRICT: Southeast Michigan
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Leslie Perfili , President/Operations Manager		ACTIVITY DATE: 06/15/2018
STAFF: Robert Joseph	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection and Complaint Investigation		
RESOLVED COMPLAINTS: C-18-01685		

On Friday, June 15, 2018, I, Michigan Department Environmental Quality-Air Quality Division staff Robert Joseph, conducted an unannounced scheduled inspection of Roseville Crushed Concrete located at 29765 Groesbeck Hwy, Roseville, MI 48066. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Administrative Rules and conditions of the facility's permit to install (PTI) 143-11 and Consent Judgement No.15-676-CE. In addition, I was also to investigate a fugitive dust complaint that was alleged against the facility on June 11, 2018.

Opening Introduction

I arrived at the facility at approximately 10:30am and met with the office receptionist. I introduced myself and presented my identification and credentials and stated the purpose of my visit. The receptionist informed me that I should come back another day and to make an inspection appointment in-advance. I informed her that I am authorized per the State of Michigan regulations to make unannounced inspections of the facility. She informed me that I was free to walk around the plant on my own. I informed her that I will not perform the inspection without the presence of facility personnel. She indicated to me that she would inform Leslie Perfili, the facility owner, of my presence and that she would conduct the inspection with me.

Leslie introduced herself and asked me if I could return at a later date after making an appointment. I informed her that the MDEQ-AQD policy is to make unannounced inspections of the facility. She told me she was very busy and that making an appointment would be best to conduct an inspection. I informed her that I am authorized to make unannounced inspections of the facility. She asked me what I wanted to inspect, and I told her the entire facility.

She indicated that inspections are typically done via appointment. I informed her that I am authorized to make unannounced inspections of the facility. She indicated that I was free to conduct the inspection on my own within the plant. I informed her that I will not perform the inspection without the presence of facility personnel. She informed me that she was very busy and that she needed to get situated before performing the inspection. She told me to wait and then she would accompany me. I waited outside the office for nearly 30 minutes as I observed the plant's operations from distance. As I observed the plant's operations they slowly began to cease.

Leslie presented herself once again and asked me for my visible emissions certification, so she could make a copy of it. I asked her for a business card. She made a copy of my certificate and provided a copy of hers as well.

A speed limit sign is posted for incoming traffic and is located near the middle of the property site. I asked Leslie why there was a speed limit sign posted for incoming traffic and one not posted for exiting traffic in the same location. She indicated that she did not believe that it was necessary. I suggested to her that posting speed limit signs for both incoming and exiting traffic can better control fugitive dust from being generated by truck traffic, and that it could be subject to a permit violation. The PTI does not state that multiple signs are needed, however, multiple dust fallout complaints have been recently alleged against the facility.

During this inspection, I observed that Roseville Crushed Concrete did not have an appropriately designed wheel wash section, rumble strips, and wet area to minimize track out as outlined in PTI 143-11, Appendix B, I.G, and Consent Judgement 15-676-CE, Section IV. 4.1. The wet area is not appropriately designed as it is less than 10 ft wide and not wide enough to wet all 4 tires of truck traffic passing through it. The wet area is a depressed section of pavement over a manhole cover which appears to have been plugged to prevent water from entering it. A garden hose rests on a small pole emitting a very light mist of water as it tries to replenish the wet area before evaporating in the air. In addition, Mrs. Leslie Perfili insisted that rumble strips were to have been removed from the permit and the facility is not large enough to have them installed.

During an August 16, 2017, inspection, AQD staff member Kerry Kelly observed a small pool of water, less than the width of a truck, near the exit of the facility. She indicated the wet area did not appear large enough to wet all tires, and the design and maintenance of the wet area did not appear to be completely effective at minimizing track out. She discussed the wet area effectiveness with Ms. Snyder-Perfili. Ms. Snyder-Perfili stated at the time she is working on improving the wet area. A violation notice was not issued at time for the insufficient wet area/tire wash area.

Leslie indicated to me that she spoke with Jeremy Hoeh, AQD Permit Engineer, in 2012 and that the rumble strips were to be removed from the permit. I indicated to her there is no documentation of that in-reference to the facility's permit. She indicated there was not enough room on the property for them to be installed. She also indicated that previous MDEQ-AQD employees were satisfied with the washout section pertaining to the Fugitive Dust Plan. I informed her that these measures were to be constructed and completed by June 30, 2012 per the permit, or other appropriately designed alternative method approved by the department would be required.

She then abruptly indicated that Chris would accompany me on the tour of the facility instead of her, however, she indicated that Chris and the entire staff had now gone on their lunch break and that he was not available. I asked her who was responsible for the facility's recordkeeping and she indicated that she was. I asked her if we could look over the facility's records while Chris was taking his lunch break and then resume the tour once he was available.

She accompanied me back into the office facility and told me that only photocopies of records were available and that most inspections only require a few months of records. I informed her that I wanted to begin by reviewing last month's (May 2018) daily and monthly calculations of the amount of material processed using the maximum rated capacity of the crusher, and the daily and monthly hours of the equipment operation, per the PTI, Emission Unit ID EUPROCEES, Monitoring/Recordkeeping, Special Condition VI.2 and Consent Judgement 15-676-CE, Section IV. 4.1

As I viewed the records, I began to observe multiple sheets of incomplete records for the month of May. As I questioned these records, she began to raise her voice as I questioned the facility's records. The hours of equipment operation were documented, but the amount of material processed daily was not calculated. She indicated she could complete it now. I informed her that these records are to be calculated on a daily basis per EUPROCESS, Monitoring/Recording, Section VI.2, of the facility's PTI 143-11.

She immediately closed the records book and stated, "you're being anal, I was not in a good mood and I told you today is not a good day, I've repeatedly asked you to come back another day and to make an appointment and you wouldn't listen, you have to leave now." Leslie then immediately opened the office door as she stood adjacent to it and told me to leave. I informed her as I left that the facility will be receiving a violation notice from the AQD Division for incomplete records. I left the facility after 12pm.

Conclusion

During this inspection, it was noted that Roseville Crushed Concrete presented incomplete material process records. Natural Resources and Environmental Protection Act 451 of 1994, Section 324.55526 (1)(a) and (b) state the MDEQ-AQD must;

(a) Have access to and copy, at reasonable times, any records that are required to be maintained pursuant to this part, rules promulgated under this part, the clean air act, a permit issued under this part, or any determination or order issued under this part.

b) Inspect at reasonable times any facility, equipment, including monitoring and air pollution control equipment, practices, or operations regulated or required under this part, rules promulgated under this part, the clean air act, a permit issued under this part, or any determination or order issued under this part.

During this inspection, it was noted that Ms. Leslie Perfli actively prohibited the Air Quality Division from completing an inspection as authorized per The Natural Resources and Environmental Protection Act 451, 324.5526, which states in part "The department may, upon the presentation of credentials and other documents as may be required by law, and upon 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 this part, rules promulgated under this part, the clean air act, a permit issued under this part, or any determination or order issued under this part.

Roseville Crushed Concrete is not in-compliance with the Federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of PTI 143-11. The facility currently has Consent Judgement No. 15-676-CE issued by the division on January 6, 2016. After discussing the violations with the AQD District Supervisor, it has been determined the MDEQ-AQD will issue a violation notice due to non-compliance. A return visit will be made this year.

Complaint Investigation

I then visited Graphics East, Inc. which had filed a complaint against Roseville Crushed Concrete. Graphics East, Inc. is located west of the facility. They are located on Sturgeon St. which currently is under construction. I informed the complainant at Graphic East that I was unable to complete the inspection at Roseville Crushed Concrete as I was told to leave.

The complainant had indicated in their complaint that fallout had occurred on the vehicles in the parking lot emanating from Roseville Crushed Concrete. However, given the current ongoing construction on Sturgeon St.-combined with Roseville Crushed Concrete ceasing operations upon my arrival, the fugitive dust fallout could not be verified. I informed the complainant at Graphics East to notify me should the fugitive dust fallout continue to occur from Roseville Crushed Concrete.

NAME Robert JosephDATE 06/24/18SUPERVISOR SK