

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: ~~Stack Test Observation~~

N693240704

FACILITY: DCF Recycling Inc.		SRN / ID: N6932
LOCATION: Kensington Road, GREEN OAK TWP		DISTRICT: Lansing
CITY: GREEN OAK TWP		COUNTY: LIVINGSTON
CONTACT: Dave Fons , Vice President		ACTIVITY DATE: 07/12/2017
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection and Stack Test Observation		
RESOLVED COMPLAINTS:		

Inspection Report

N6932- DCF Recycling

7266 Kensington Drive (N side of Ajax Drive)

Brighton, MI 48116

Office: 101 Appian Way Suite 105, PO Box 1357, Brighton, MI 48116

Inspection Date:

7/12/17

Facility Contacts:

Joe Peters, Site Manager

Dave Fons, Site Manager, 810-522-6474, dfons@gbmrecycledconcrete.comCraig (Butch) Fons, Site Manager, 810-522-6474, csfons@gbmrecycledconcrete.com**Testing Contacts:**Jacob Abair, VE Reader, Fishbeck, Thompson, Carr & Huber (FTC&H), jjabair@ftch.com**MDEQ AQD Personnel:**Nathan Hude – 517-284-6779, huden@michigan.gov**Facility Description:**

This site is in the Kensington Industrial park area and has a non-metallic mineral crusher which was permitted under PTI 1-01 and now PTI 2-17.

The site is located of Kensington Road on Ajax Drive. It is the second property on the north side of the road.

Applicable Regulations:

PTI 2-17

40CFR60 Subpart 000

Permit Discussion:

The facility in the past has solely operated under PTI 1-01. During a review of the area for other inspections, I noted that the setback distances were under the 500 feet requirement. Due to the permit being issues despite the setback and the lack of complaints, I encouraged the company to obtain a site specific permit. The company applied and received PTI 2-17 for the specific site located at 7272 Kensington Drive. PTI 1-01 was retained as it is for the "portable crusher" associated with this site.

Testing was conducted on the original equipment on October 5, 2006 with acceptable results. Since that time and with the review of the equipment listed in 1-01 it was found that 2 conveyers, identified as SCO112 and FEO122, were not included in the 2005 test. Thus testing on 7/12/17 was completed for compliance with the permit and 40CFR60 OOOO.

Previous Inspections:

4/27/09, Ken Damrel, no concerns noted

8/24/12, Brad Myott, no concerns noted

Previous Violations:

none

Recent Complaints (within 2 years):

none

Number of Violations Found During this Inspection:

none

Inspection Key Concerns:

none

MAERS Reporting

2016 throughput 67,819 tons material

2015 throughput 48,487 tons material

2014 throughput 73,862 tons material

2013 throughput 64,816 tons material

2012 throughput 89,234 tons material

MAERS Emission Unit List

EUCrusher

Site Visit Summary

This inspection was completed concurrent with a scheduled stack test. The testing began at approx. 9:30am. They were processing concrete that contained re-rod, thus the test had to be stopped every so often to empty the magnets as needed. I did not remain for the entire test, but rather confirmed the operation of the control devices (residual moisture from previous equipment spray bars) and opacity limits. The operation was running at about 100-125 tons/hr. At the rate of 125 tons/hr, it would take approx. 3,200 hrs to crush the limited total of 400,000 tons. The site has 3 individuals working in the yard and one individual working in the scale house. The crusher operation varies but normally operates 6.5-8hrs per day for anywhere from 2-5 days per week. At 5 days per week, 8 hrs per day, it would take more time than a year allows to crush the limit of 400,000 tons (using 5- 12 hour days, it would take 53 weeks). During the week of the 4th of July, they only ran it two days and Joe stated they run it based on demand. The crusher does not operate in winter months.

With the test being completed the day of testing (7/12/17), the test report would be due 60 days thereafter per state of Michigan Part 10 rules; this equates to September 10, 2017. Upon returning to the office that day, I wrote an email to Craig, Dave, and the FTC&H contact stating that the written report must include: copies of all field data sheets, a summary of data sheets and results in percentage for each test unit identified by Emission Unit ID, identify the operating rate during the test; I also included the LDO office address. The email was acknowledged that day.

The rest of this report identifies the results of each special condition for PTI 2-17 which closely mimics PTI 1-01.

EU-PROCESS

I.1. Visible emissions from the drop point and transfer point portions of EUPROCESS shall not exceed 10 percent opacity. (R 336.1301, 40 CFR 52.21 (c) & (d), 40 CFR 60.670)

RESULTS: Compliance- observed drop points during the visit and test met this limit.

II.1. The permittee shall not process any asbestos tailing or asbestos containing waste materials in EUPROCESS pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. (40 CFR Part 61 Subpart M)

RESULTS: Compliance- no asbestos containing material was identified in the piles to be crushed. Joe stated that they sometimes receive pipe wrapped in asbestos from older bridge demolitions but the asbestos is easily identified and removed when found.

II.2. The permittee shall not process more than 400,000 tons of material through EUPROCESS per 12-month rolling time period as determined at the end of each calendar month. (40 CFR 52.21 (c) & (d))

RESULTS: Compliance- A review of MAERS found this requirement to be within limits.

III.1. The permittee shall not operate any portion of EUPROCESS unless each portion of EUPROCESS meets the specific opacity limit listed in Appendix A of this permit. (R 336.1301, 40 CFR 52.21 (c) & (d), 40 CFR 60.670)

RESULTS: Compliance- During the visit and test it appeared all equipment met the limits as identified in the appendix.

III.2. The permittee shall not operate EUPROCESS unless the nuisance minimization plan for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B has been implemented and is maintained. (R 336.1371)

RESULTS: Compliance- the plan appears to be implemented and maintained; sweeping was completed the morning of the test.

III.3. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and OOO, as they apply to EUPROCESS. (40 CFR Part 60 Subparts A & OOO)

RESULTS: Compliance- Shop-Built Transfer Conveyor SC0112 and Graysan 20245 Transfer Conveyor FE0122 were tested during this event to conform to the requirements of 40CFR60 OOOO. All other equipment was tested in 2005.

IV.1. The permittee shall not operate any portion of EUPROCESS unless the equipment's specified control device is installed, maintained and operated in a satisfactory manner as listed in Appendix A. (R 336.1910, 40 CFR 52.21 (c) & (d))

RESULTS: Compliance- During the visit and test it appeared all equipment was installed, maintained and operated in a satisfactory manner as identified in the appendix.

V. NA

VI.1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (40 CFR 52.21 (c) & (d))

RESULTS: Compliance- records were not checked on this visit, but were on the previous site visit conducted in November of 2016.

VI.2. The permittee shall keep monthly records of the amount of material processed through EUPROCESS. Further the permittee shall calculate on a monthly basis, the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of material processed on file and make them available to the Department upon request. (40 CFR 52.21 (c) & (d))

RESULTS: Compliance- records were not checked on this visit, but were on the previous site visit conducted in November of 2016.

VII. NA

VIII. NA

IX.1. Within 90 days of issuance of this permit, the permittee shall label all equipment using the company ID Numbers in Appendix A, according to a method acceptable to the AQD District Supervisor. Labels shall be in a conspicuous location on the equipment. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. (R 336.1201)

RESULTS: Compliance- all ID Numbers were on the equipment as required during the inspection

EU-TRUCKTRAFFIC

I.1. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUTRUCKTRAFFIC, shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). (R 336.1301, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))

RESULTS: Compliance- During the visit and test it appeared all equipment met the limits as identified in this condition.

II.1. NA

III.1. The permittee shall not operate EUTRUCKTRAFFIC unless the nuisance minimization plan for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B has been implemented and is maintained. (R 336.1371, R 336.1372, Act 451 324.5524)

RESULTS: Compliance- the plan appears to be implemented and maintained; sweeping was completed the morning of the test.

- IV. NA
- V. NA
- VI. NA
- VII. NA
- VIII. NA
- IX. NA

EU-STORAGE

I.1. Visible emissions from each of the material storage piles maintained under EUSTORAGE, shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). (R 336.1301, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))

RESULTS: Compliance- During the visit and test it appeared all equipment met the limits as identified in this condition.

II. NA

III.1. The permittee shall not operate EUSTORAGE unless the nuisance minimization plan for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B has been implemented and is maintained. (R 336.1371, R 336.1372, Act 451 324.5524)

RESULTS: Compliance- the plan appears to be implemented and maintained; sweeping was completed the morning of the test.

- IV. NA
- V. NA
- VI. NA
- VII. NA
- VIII. NA
- IX. NA

Appendix A- all ID Numbers

Equipment Description, ID Number, Opacity Limit (Percent), Control Device

Lippman J3062 Primary Crusher, FE0137, 15, Water Spray

Lippman 4860 Transfer Conveyor, FE0137A, 10, Water Spray

Lippman 4248LS Secondary Crusher, FE0136, 15, Water Spray

Shop-Built Transfer Conveyor, SC0112, 7, Residual Moisture

Graysan 20245 Transfer Conveyor, FE0122, 7, Residual Moisture

Graysan 6530 Transfer Conveyor, FE0131, 10, Water Spray

Graysan 7530 Stacking Conveyor, FE0119, 10, Residual Moisture

Graysan 6536 Stacking Conveyor, FE0121, 10, Residual Moisture

RESULT: Compliance- all ID Numbers were on the equipment as required and all opacity limits appeared to be met during the inspection

Based on my observations during the inspection and the portion of the VE test I witnessed, it appears that GBM Recycled Concrete is compliant with PTI 2-17 as well as the applicable state and federal rules.



Image 1(Site Layout) : Site Layout

NAME *[Signature]*

DATE 7/14/17

SUPERVISOR _____

