

INSPECTION NARRATIVE

I arrived at the facility at 11:00 am and met with Jim Oliver, Vice President and John Blaszak, Operations Manager. The crusher was being operated by an employee named Brett. Mr. Oliver explained that a log book is kept onsite, recording each application of water or calcium chloride to the ground. A record for the amount crushed is kept on site, with this information used to report annual emissions in MAERS. The log books were reviewed during the onsite inspection. In 2017, 315,208 tons of material were crushed.

Rumble strips are located at the entrance of the facility to knock off dirt from the truck tires as the trucks leave the site. A weigh scale is located next to the office. Large piles of crushed material are located throughout the site. The conveyor was set up to minimize the drop distance. The crusher was operating during the onsite inspection. No visible emissions were observed from the crusher while it operates. Water nozzles were present throughout the crushing process to control the dust. An employee was also spraying water on the piles and the material to be crushed.

APPLICABLE RULES/PERMIT CONDITIONS

Based on a review of Permit Cards, Nagle Recycling is permitted under Wayne County Permits C-11694 and C-11695. The special conditions are:

17. Compliance – No opacity was observed coming from the crusher.
18. Compliance – No opacity was observed coming from the crusher.
19. NA – The crusher has not been moved. No visible emissions were observed from the crusher.
20. Compliance – The facility has produced 315,208 tons of crushed material during 2017, which is less than the annual permit limit of 360,000 tons.
21. Compliance – Water sprays are installed to control dust from the crushing process during the onsite inspection
22. Compliance – All conditions of the fugitive dust plan in Appendix A are being followed.
23. Compliance – No asbestos is being crushed at this location. The facility only crushes asphalt and concrete.
24. NA – The crusher has not been moved since Nagle Recycling began operating this crusher. There are no plans to move the crusher in the future.

Appendix A:

Compliance – All paved roads ways are swept and watered as needed. Records are kept after each treatment. Speed limit signs of 10 mph are located onsite.

Compliance – All paved parking areas are swept and watered as needed. Records are kept after each treatment. Speed limit signs of 10 mph are located onsite.

Compliance – The drop distances is kept to a minimum distance as was observed during the onsite inspection. Speed limit signs of 10 mph are posted onsite.

Compliance – All open areas are swept and watered as needed. Records are kept after each treatment. Speed limit signs of 10 mph are located onsite.

Compliance – Water sprays are located on the crusher and were operating during the onsite inspection.

Compliance – No spilled material was observed during the onsite inspection.

Minimal track out was observed during the onsite inspection. Rumble strips are located at the entrance and exit of the facility to knock off excess dirt from the truck tires and control track out.

Dumping occurs at a minimum drop distance. Records are kept in a book located onsite. No

trucks were observed at the facility during the onsite inspection.

A review of the file for this facility has the crusher permitted by 70-00. In permit cards, this permit was initially issued to Nagle before being transferred to A & E Aggregates on March 14, 2000 and was void on April 29, 2008. The application for this permit lists the address for Nagle Paving and states that the prior air permits are C-11964 and C-11965. In permit cards, C-11964 and C-11965 are still listed as active for Nagle Paving. Nagle Paving also sites these permits as the active permits in the equipment description for MAERS. During the next onsite inspection, serial numbers will be verified to that the crusher is operating under the proper permit.

MAERS REPORT REVIEW

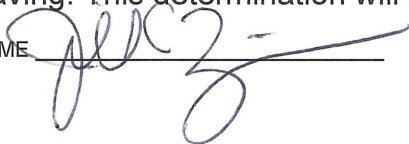
MAERS for the reporting year 2017 were submitted on January 25, 2018 and were reviewed on May 21, 2018. The emissions appear to have been reported accurately. This portable crusher was located in Wayne County for 100% of 2017.

FINAL COMPLIANCE DETERMINATION

Nagle Recycling appears to be operating in compliance with all state and federal regulations as well as all permit conditions. A determination regarding the fall out complaints will be made once the laboratory results are reviewed.

Nagle Recycling is located adjacent to Nagle Paving. These two facilities operate under different SIC codes. However, it appears that Nagle Recycling is operating as a support facility for Nagle Paving. During the next onsite inspection, production records will be used to determine whether more than 50% of the production from Nagle Recycling is used by Nagle Paving. This determination will be done based on Policy 11.

NAME



DATE

12/18/18

SUPERVISOR

JK