

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

N736145301

FACILITY: LES MILLER & SONS AGGREGATES, INC.		SRN / ID: N7361
LOCATION: 7250 N. Forest Hill Rd., SAINT JOHNS		DISTRICT: Lansing
CITY: SAINT JOHNS		COUNTY: CLINTON
CONTACT: Jim Miller, Co-owner		ACTIVITY DATE: 06/28/2018
STAFF: Julie Brunner	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of Les Miller & Sons Aggregates, Inc, portable non-metallic mineral crushing plant located at 7250 N. Forest Hill Road, St Johns		
RESOLVED COMPLAINTS:		

On June 28, 2018, I conducted a scheduled inspection of Les Miller & Sons Aggregates, Inc, portable non-metallic mineral crushing plant located at 7250 N. Forest Hill Road, St Johns, Michigan 48879. This crushing plant was last inspected on May 30, 2013.

**Relocation Notification Received: March 18, 2013**

Dates the plant is to be located at this site: 12-2012 to 12-20-2019

Amount to be processed: 1,000 tons per year (tpy)

Arrived: 1:05 pm

Departed: 2:25 pm

Weather: 83°F, WSW 9 MPH

No visible emissions (VEs) were observed from any of the facility operations upon arrival. No odors were identified surrounding the facility.

**Facility Contact:**

James Miller, President, 989-593-2055, lesmiller@casair.net

Dick Miller, Operations Manager, 989-593-2055, lesmiller@casair.net

**Facility Description:**

Les Miller & Sons Aggregates, Inc. owns and operates a portable non-metallic mineral crushing plant on General Permit to Install (PTI) No. 125-04 (N7361). It is located in an area that is being mined for sand and gravel, including 2NS stone for concrete, 6A stone, various sizes of landscaping stone, mason sand, and pea stone. The plant is powered by electricity provided by the local utility via a power line.

The surrounding area is rural with some residential mixed in.

Portable crushing plants are minor sources of any regulated air contaminants including hazardous air pollutants (HAPs) and not subject to the Title V Renewable Operating Permit (ROP) program. Equipment that is part of a portable crushing plant could be subject to the New Source Performance Standard (NSPS) in 40 CFR 60, Subpart OOO — Standards of Performance for Nonmetallic Mineral Processing Plants.

**§60.670 Applicability and designation of affected facility.**

(a)(1) Except as provided in paragraphs (a)(2), (b), (c), and (d) of this section, the provisions of this subpart are applicable to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Also, crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart.

The equipment permitted on GPTI 125-04 is not subject to the requirements of 40 CFR 60, Subpart OOO as indicated on the GPTI Application form. The affected facility is not capable of processing greater than 150 tons per hour, and each piece of equipment was constructed before August 31, 1983.

Amount processed so far this year: 500 tpy

**Staff #: 3 Shifts/Day: 1 (6:00 am to 5 or 6 pm) Days of Operation/Week: 5 (Monday to Friday normally with an occasional Saturday)**

**The crushing operation runs from April to November 15th.**

**Additional Exempt Equipment:**

**Wash Plant - Installed and operating pursuant to Rule 285(2)(t), equipment for the mining, loading, unloading, and screening of uncrushed sand, gravel, soil, and other inorganic soil-like materials. It was operating during the inspection.**

**Dry screener plant – Operating exempt pursuant to Rule 285(2)(t). The plant consists of a power screen – Commander 408 (dry feed), 80” stacker, 2 – 40” stacker, and a 40’ to 50’ green stacker/conveyer.**

**Portable generator that powers the dry screener plant - 400 hp, 250 kW diesel fuel-fired Kohler Genset with Detroit Diesel engine (exempt per Rule 285(2)(g) because less than 10 MMBtu/hr.**

**Any portable diesel fuel-fired generators are considered non-stationary and non-road. The designation of the diesel engine as a non-stationary engine establishes that they are not subject to 40 CFR 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The designation of the diesel engine as a non-road engine establishes that it is not subject to 40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.**

**Michigan Air Emissions Reporting System (MAERS):**

**The facility is not required to report to MAERS.**

**Inspection:**

**I met on-site Mr. Dick Miller (Operations Manager). The purpose of my visit and the status of the facility operations were discussed. The jaw crusher was not operational. It had been down for two (2) weeks. It actually runs about once a year. Larger stones from the wash plant are stock piled and then crushed to 1” road gravel. Material is dumped into the feeder of the jaw crusher using a front end loader. A garden hose is used to dump water into crusher while operating.**

**Equipment On-Site and Company IDs:**

**Device ID and Description; Make and model; serial #; Max. rated capacity; Notes / Subpart OOO tested**

**10 x 36 – Jaw Crusher; Pioneer; CC1934; 25 ton/hr or less; Mf. Date 1952 / Not subject  
 24 x 401 – Discharge conveyor; Shop built; -----; 25 ton/hr; Mf. Date unknown / Not subject  
 24 x 17 – Discharge conveyor; Shop built; -----; 25 ton/hr; Mf. Date unknown / Not subject  
 24 x 18 – Discharge conveyor; Shop built; -----; 25 ton/hr; Mf. Date unknown / Not subject  
 4 x 10 – Screen deck; Hewitt-Robins; VD-11757; 25 ton/hr; Mf. Date 1974 / Not subject / Spray bars  
 3CY – Feed bin & feeder on top; Shop built; -----; 25 ton/hr; Mf. Date unknown / Not subject**

**There was also a small Hewitt-Robins roll crusher located on-site that was not operating at the time of the inspection. It is used to make 1.0” to 2.5” gravel and is not operated that often. A water wagon is used with it. When operated, the following equipment from the dry screener plant is used with it:**

**Power screen – Commander 408 (dry feed)**

**80” stacker**

**2 – 40” stacker**

**40’ to 50’ green stacker/conveyer**

**The crusher is not permitted, and a permit will need to be obtained.**

**Visible Emission (VE) Limits --**

**Special Condition (SC) 1.2 contains visible emission limits for crushers, screens, conveyors, material storage piles, and truck traffic.**

**The process was not operational during the inspection, so VEs could not be evaluated.**

**There were no VEs from the piles of crushed materials. There was some VEs from truck traffic, so Dick was going to put some water down after the inspection. There had been rain during the week, but things were beginning to get a little dry with the sun coming back out.**

**Material Processing --**

In SC 1.3, the permit limits material throughput to 2,000,000 tons per year per site. The plant operates well below the material throughput limit.

For SC 1.5, no asbestos containing materials shall be crushed. The plant processes virgin material that does not contain asbestos.

**Process/Operational Limits --**

For SC 1.6, the program for continuous fugitive emissions control in Appendix A of GPTI 125-04 must be followed in order to operate the crushing plant. The facility has a program for fugitive dust control in place. Water is available on-site from the lake created by mining. They dump water on the roads using a front end loader when needed. They also chloride the roads, but had not ordered any chloride for the season.

**Equipment --**

For SC 1.7, each crusher and screen is required to have water spray equipped (or bag house).

Water spray / garden hose was installed on the crusher. Water is provided to the equipment from the on-site lake.

**Testing --**

SC 1.8 requires verification of visible emissions from 40 CFR 60, Subpart OOO subject equipment. No equipment is subject.

**Recordkeeping (Monitoring) --**

SC 1.9 requires daily and annual records of material processed. About 7,000 yards of road gravel/crushed stone were produced last year.

The annual records for the last 5 years are attached:

The largest amount of material produced by the jaw crusher was 2196.3 tons in 2014.

The largest amount of material produced by the roll crusher was 6698.44.3 tons in 2017.

Daily records were not being kept but Dick knows he must keep them now.

**Permit Dates --**

SC 1.11 requires that equipment be labeled with company IDs. The equipment did match the process information form for GPTI 125-04. (See above for list.)

**Miscellaneous/Allowed Modification --**

The notice of intent to relocate per the requirements of SC 1.13b was received on March 18, 2013 listing the date that the plant is to be located at the site as 12-2012 to 12-20-2019. Notification is required to be sent to the district office not less than 10 days prior to the relocation. Notification was provided approximately four (4) months after the plant was relocated, but it was not operating until after May 2013. This all was noted on the last inspection report.

For SC 1.13c, a minimum of 500 feet from a residential or commercial establishment is required. The closest residence is located approximately 550 feet to the west of where the roll crushing plant could be located on-site according to Google Earth.

**Fugitive Dust Control Plan – Appendix A**

When I was out walking around the pit, the roads were a little dusty at the entrance. There did not appear to be much track out due to truck traffic between the gate and the road. Dust suppressants used includes water and chloride. Records of dust suppressants on roadway and yard do need to be kept.

A chloride tank sits beside the office, but it had not been filled for the year. On July 16, 2018, Mr. Jim Miller let me know that the roads had been chlorided.

**Summary:**

The facility has some compliance issues. A violation notice was sent for Rule 201 (no permit) for the roll crusher. However, material throughput at the facility is well below the limit of 2,000,000 tons per year per site with both crushers operating. Records of daily production and dust suppressant application need to

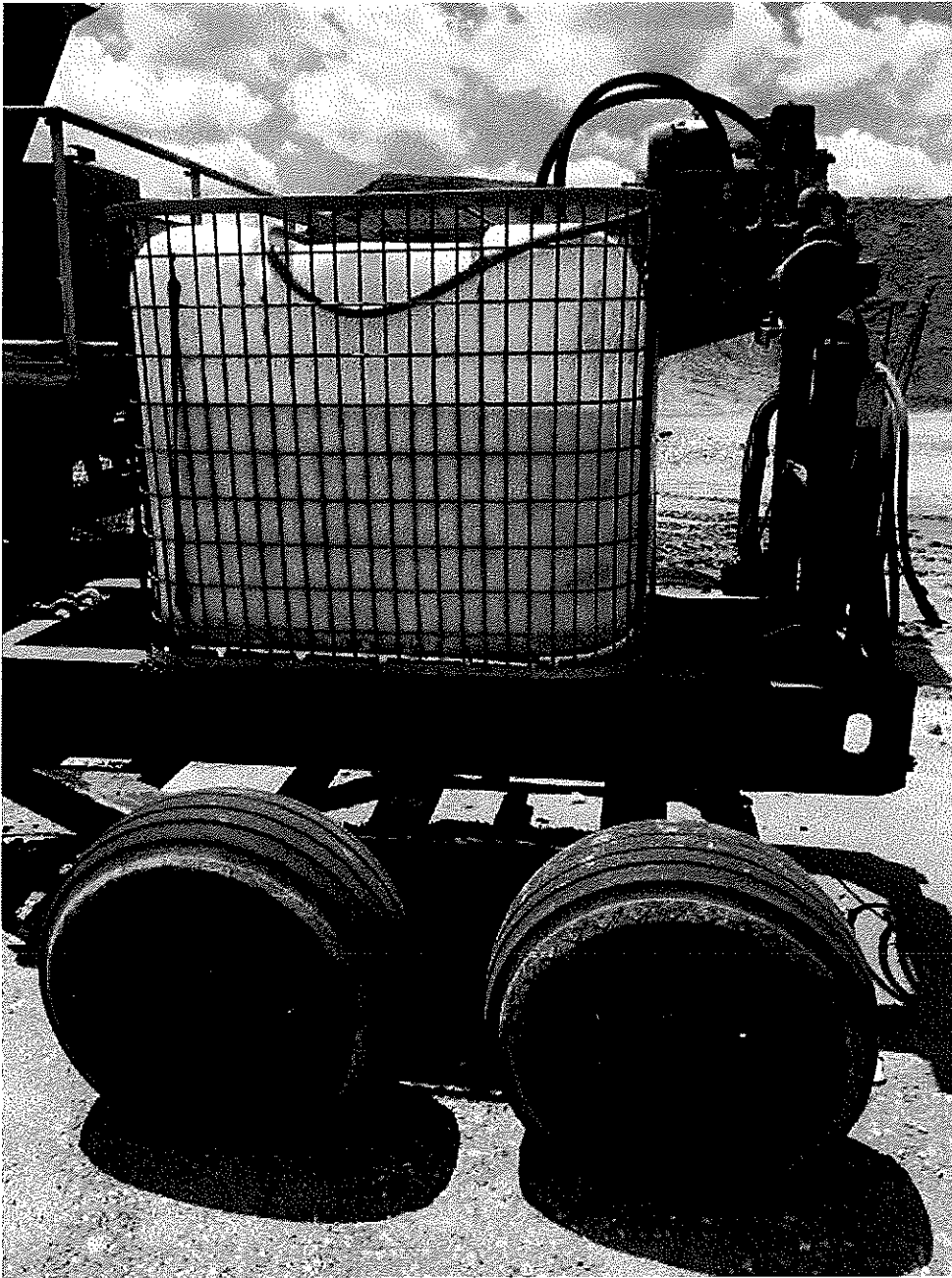
be kept.



**Image 1(019) :** Jaw crusher plant (PTI 125-04)



**Image 2(018)** : Unpermitted roll crusher



**Image 3(017)** : Water wagon for roll crusher



**Image 4(020)** : Wash plant



**Image 5(030)** : Dry screening plant

NAME Julie L. Brown

DATE 7/25/18

SUPERVISOR B.M.

