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

N760154471

FACILITY: AMERICAN AGGREGATES OF MICHIGAN INC - METSO PLANT		**SRN / ID:** N7601
LOCATION: 275 RAY ROAD, OXFORD		**DISTRICT:** Southeast Michigan
CITY: OXFORD		**COUNTY:** OAKLAND
CONTACT: Alicia Ramsdell , Environmental Engineer		**ACTIVITY DATE:** 07/28/2020
STAFF: Shamim Ahammod	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT: Conducted a scheduled inspection to determine the company's compliance with the permit no. 73-20.		
RESOLVED COMPLAINTS:		

On July 28, 2020, Michigan Department of Environment, Great Lakes and Energy-Air Quality Division (EGLE-AQD) staff, I (Shamim Ahammod) conducted a scheduled inspection of American Aggregates of Michigan Inc (SRN: N7601) located at 275 Ray Road, Oxford, Michigan. The purpose of the inspection was to determine the company'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 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of General Permit to Install (PTI) No. 73-20 for a non-metallic mineral crusher and its associated equipment.

Permit History
General Permit to Install (PTI) No. 73-20 for a non-metallic mineral crusher and its associated equipment was approved on June 24, 2020. Previous both General PTI No. 208-18 and PTI No. 207-09 for non-metallic mineral crushing plants were voided on June 24, 2020.

Inspection Arrangement
Due to the COVID-19 pandemic, I prearranged this announced inspection on July 28, 2020. I also requested the record-keeping information before the inspection day to reduce the inspection time. Ms. Alicia Ramsdell, Environmental Engineer, of American Aggregate of Michigan Inc sent me the requested information via email before the inspection day.

Onsite Inspection
On July 28, 2020, at 11.15 AM, I arrived at the facility and was greeted by Ms. Ramsdell and Mr. Shawn Johnson, Plant Manager of American Aggregate of Michigan Inc. I introduced myself, provided credentials, and stated the purpose of the inspection. Hard hat, Safety vests, safety goggles and safety shoes are required to visit this facility. Mr. Johnson, Ms. Ramsdell, and I toured to the facility. Ms. Ramsdell explained the process of the operation.

Source Description
The facility is a nonmetallic mineral (sand and gravel) crushing facility consisting of crusher(s) and associated process equipment including grinding mills, drills, screening operations, bucket elevators, belt conveyors, loading and bagging operations, and storage bins. Each crusher and screen are equipped with a water spray. Dredger is used to extract the sand and gravel. Screen is used to separate fine material from coarser material. The coarser materials are then loaded into hopper, conveyed to cone crusher. The sand, gravel and aggregate are sold to the road contractors and asphalt plants.

REGULATORY ANALYSIS

FGCRUSHING

Emission Limits

Per SC 1.1, the particulate matter (PM) emissions from each baghouse dust collector portion of FGCRUSHING shall not exceed 0.04 pound per 1,000 pounds of exhaust gases, calculated on a dry basis. The permittee does not have any baghouse. Instead of having baghouse, the facility's screens and crushers are equipped with water sprays. However, PTI SC 1.7 states: "Each crusher and screen shall be equipped with a water spray. A baghouse dust collector may be installed in lieu of water spray for any particular piece of equipment. The control equipment shall be properly operated as necessary to comply with all emission limits." According to this condition, water spray is sufficient control for the process.

Material Usage Limits

Per SC 1.3, the permittee shall not process more than 2,000,000 tons of any non-metallic mineral through FGCRUSHING per year per site. The total material throughput in FGCRUSHING for 2019 was 1,511,754 tons.

Per SC, 1.5, the permittee shall not crush any asbestos tailings or asbestos containing waste materials, as defined by the National Emission Standard for Hazardous Air Pollutants regulations, in FGCRUSHING. The permittee does not crush asbestos tailings or asbestos containing waste materials, according to Ms. Ramsdell.

Equipment

Per SC 1.7, each crusher and screen shall be equipped with a water spray. A baghouse dust collector may be installed in lieu of water spray for any piece of equipment. At the time of inspection, I observed the facility's screens and crushers are equipped with water sprays.

Testing

Per SC 1.8, within 60 days after achieving maximum production rate, but not later than 180 days after initial startup of FGCRUSHING, verification of visible emission rates and particulate emission rates from all NSPS subject crushers, screens, all transfer points on conveyors, and all other miscellaneous equipment associated with FGCRUSHING. General PTI No. 73-20 for a non-metallic mineral crusher and its associated equipment was approved on June 24, 2020. The permittee plans to schedule visible emission testing for August 2020, according to Ms. Ramsdell.

Monitoring

Per SC 1.9, the permittee shall keep, in a satisfactory manner, daily and annual records of the amount of material processed for each site at which the facility operates. At the time of inspection, I checked the daily records of the amount of material processed for this facility. I received monthly and annual records of the material processed at this facility via email.

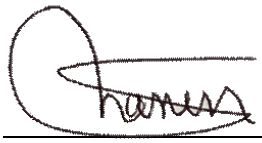
Fugitive Dust Control Plan

The plant is not equipped with a baghouse. I observed, fugitive dust from plant's operation was controlled by applying water directly into the crusher while crushing was taking place. It can be noted that the raw materials (sand and gravel) are mined from a watered-in gravel.

The company is abiding by the Fugitive Dust Control Plan in Appendix A of its permit. Specifically, the following measures are being taken by the plant to control fugitive dust: the drop distance at each transfer point and storage pile is being minimize; all vehicles are covered before leaving the site; a truck applies water to the roadways and plant yard whenever necessary; material spills are immediately cleaned up; storage piles are watered whenever necessary; and the time and date of each water application is being recorded. The plant also applies calcium chloride to its roadways and plant yard when necessary to control potential fugitive dust emissions. AQD staff verified that the plant is not being operated within 500 feet of any residence or commercial establishment during the inspection.

Ms. Ramsdell sent me the calcium chloride application records from August 2019 through July 2020. Records indicated the amount of calcium chloride (in gallon) applied to the plant and date of application.

Conclusion
Based on the on-site inspection, it appears American Aggregate of Michigan is in compliance with the requirements of PTI No. 73-20.

NAME  DATE August 5, 2020 SUPERVISOR