

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N834136528

FACILITY: BAILEY SAND & GRAVEL		SRN / ID: N8341
LOCATION: BOHNE RD, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: Jerry Bailey , President		ACTIVITY DATE: 09/13/2016
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: To Determine Status of the Crusher Plant(Eagle 1000 Impact Crusher SRN N8341) and its Location		
RESOLVED COMPLAINTS:		

**SRN: N8341 PTI 251-09 (Site specific PTI Nonmetallic Mineral Crusher Permit) NSPS/FEE
APPLICABILITY: N/A**

COMPANY ADDRESS: 6505 W. Michigan Ave; Jackson, MI 49201

QUARRY LOCATION: 13650 Bohne Road, Grass Lake, MI

CONTACT PERSON: Mr. Jerry Bailey, President (Ph: 517-750-4889; Cell: 517-937-5258; Email: djmsg@gmail.com)

On September 13, 2016, AQD Staff Mike Kovalchick and Zack Durham conducted a self initiated compliance inspection of a portable non-metallic mineral processing plant owned and operated by Bailey Sand and Gravel (Company) whose last plant location was reported as being at 13650 Bohne Road, Grass Lake, Michigan.

The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; New Source Performance Standards NSPS Subpart OOO for Non-Metallic Mineral Processing Plants, and Permit to Install (PTI) #251-09 for a non-metallic mineral crushing plant. PTI #251-09 is not a General PTI for non-metallic mineral crushing plant as is normally the case as the Company was not eligible for a General Permit due to a Rule 201 violation for operating a crushing plant with no PTI back in 2009.

Upon arrival at the site at 1:45 PM, AQD staff introduced themselves and stated the purpose of the visit to Mr. Ted Burrell who is the foreman of the Quarry.

He indicated that in October, 2015 his company, Target Trucking, LLC that is based at 2149 Fyke Drive, Milford, Michigan 48381 assumed the lease from Bailey Sand & Gravel and are now the operators at this location. Bailey no longer has a crusher plant there but did leave Target Trucking some of the conveyors etc. Target Trucking is now simply operating a 700 ton per hour wash plant that is exempt from permitting requirements per Rule 285(t) at the quarry and AQD staff elected not to inspect the quarry since there is no permit requirements and no dust was noted coming from the quarry. Attachment 1 is photo of a hand draw diagram that shows the current configuration of the quarry operations. Mr. Burrell further indicated that there are 5 people employed at the plant and they are shipping about 50 to 70 truck loads of material out the gate per day between 7 AM and 5 PM during the week. AQD staff asked Mr. Burrell about some piles of concrete blocks that found near the location of the office. (See Attachment 2.) Mr. Burrell stated that this concrete was left over from when the quarry was being operated by Bailey. He indicated that he might bring in a contractor in the future to crush the concrete. AQD staff informed Mr. Burrell that it was okay to crush the concrete but to make sure the contractor/operator of the crusher had a proper PTI permit prior to allowing them to crush the concrete and to ensure that the crushing doesn't generate significant amounts of dust. Upon leaving the facility, AQD staff noted some minor amounts of track out/dust on Bohne road.

AQD Staff then proceeded to the Bailey Sand & Gravel home office to inquiry about location/status of their crusher. The office is located at 6505 W. Michigan Avenue in Jackson. AQD Staff met with Jerry

Bailey who is the president of Bailey. Mr. Bailey stated that the crusher in question was located in the back of the office and was currently being refurbished. (See Attachment 3.) AQD staff were able to confirm based on the model/serial numbers that this crusher is the one associated with PTI 251-09 and SRN N8341. AQD staff inquired about the capacity of the crusher. Mr. Bailey stated that the crusher's capacity was exactly 150 tons per hour. (Note that applicability to NSPS regulations kick in at just over the 150 TPH. AQD staff further inquired what this was based on. Mr. Bailey responded that it was based on the realities of the actual operation; not the over inflated manufacturing specifications that salesmen use for marketing purposes. AQD staff informed Mr. Bailey that we go by the manufacturing specification in determining applicability. AQD staff asked Mr. Bailey about production records for the crusher and whether the PTI requirement to notify the AQD were being followed. Mr. Bailey responded the records are available but will need to get them from Tammy Bailey who works between 8 AM to 12 PM during the week. He indicated that she has been making the required notifications. AQD staff discussed with Mr. Bailey on what should be done with PTI 251-09 since they no longer base that site specific crusher out of the Bohne Road location but out of the home office location instead. AQD staff concluded that they would get back to Mr. Bailey on a decision on how to address the permitting issue.

At 9 AM on September 14, AQD staff contacted Ms. Tammy Bailey to request production records for the last 12 months for the crusher plant and the original specification sheet for the Eagle 1000 crusher. A couple more requests were made without result so a violation notice (VN) will be sent to the Company. Furthermore, it was concluded that the Company will need a new PTI and will need to prove that they are not subject to NSPS OOO as a review of online vender documentation suggests hourly design capacity of the crusher is in excess of 150 tons per hour.

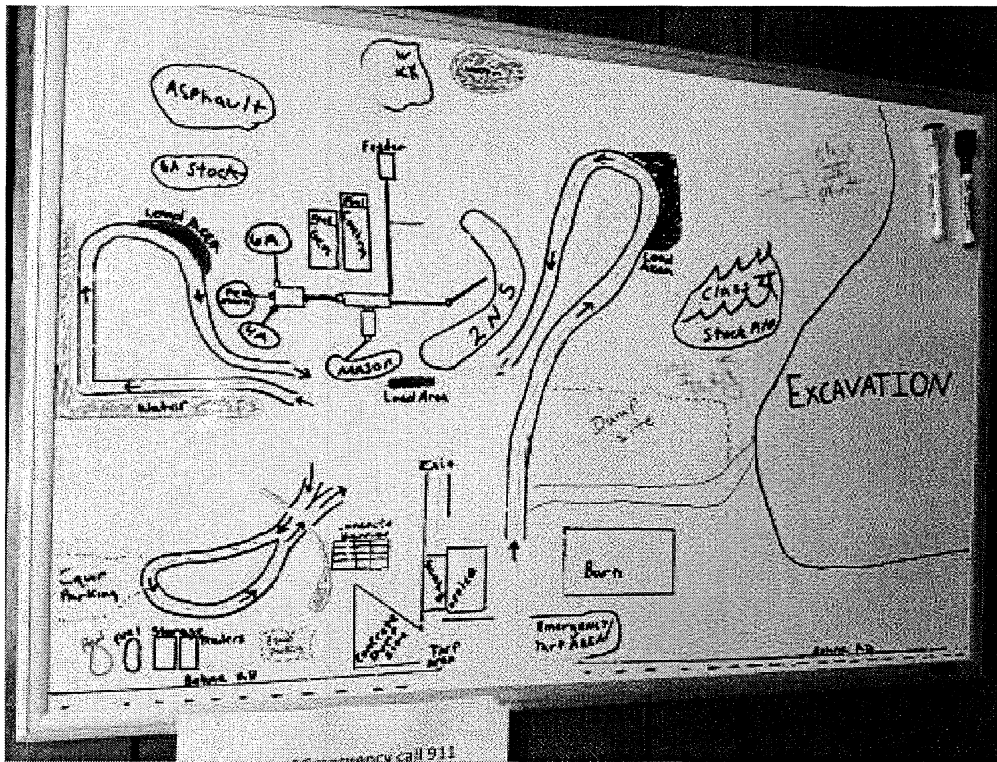


Image 1(Plant Diagram) : Photo of the plant diagram showing quarry operations.



Image 2(Plant Office) : Photo showing plant office and distant piles of uncrushed concrete behind and to the left of the office.

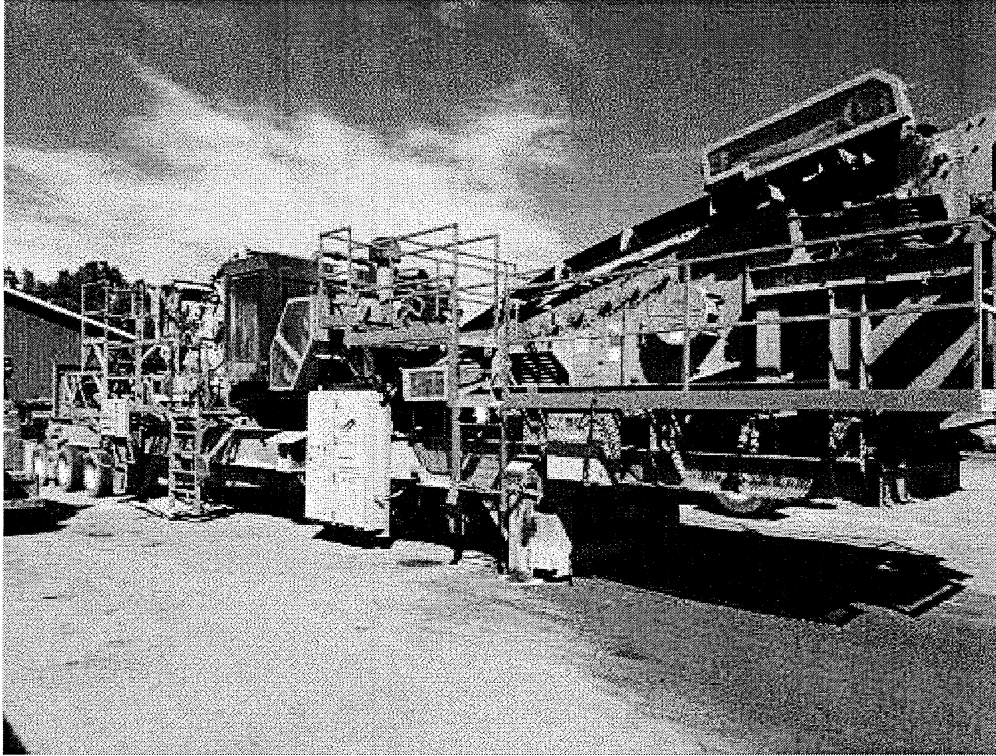


Image 3(Crusher) : Eagle 1000 Impact Crusher Plant

NAME *N. Kovalchuk*

DATE *10/18/2016*

SUPERVISOR *[Signature]*