

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Complaint Investigation

N834142064

FACILITY: Target Trucking, LLC		SRN / ID: N8341
LOCATION: BOHNE RD, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT:		ACTIVITY DATE: 10/16/2017
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Investigating dust complaints.		
RESOLVED COMPLAINTS:		

Minor Source

Facility Contact

Todd Burrell- Site Manager and brother of Owner

Jeff Burrell- Owner

ph 248-719-1660

targettruckingllc@yahoo.com

Purpose

On October 16, 2017, I conducted a compliant investigation of Target Trucking, LLC (Company) located near Grass Lake, Michigan in Jackson County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules also to investigate dust complaints.

Facility Location

The facility is in a rural area of Grass Lake Township. There are residential homes just outside the property boundaries on all sides except to the East. See attached aerial photo dated October 2016. Also see attached aerial photos supplied by one of the complainants.

Facility Background

The facility was last visited on September 9, 2016 and was found to be in compliance although the quarry area was not inspected. At that time, the property was still owned by Bailey Sand and Gravel that occasionally operated a non-metallic mineral crushing plant at this location under Permit to Install (PTI) 251-09. Within the last year, the Company has bought the property from Bailey Sand and Gravel.

Regulatory Applicability

Per Rule 285(2)(t): Equipment for the mining, loading, unloading, and screen of uncrushed sand, gravel, soil, and other inorganic soil-like materials is exempt from PTI requirements. This PTI exemption applies to the wash plant and 2 dry screening operations.

Rule 371: Based on substantive complaints, the AQD may require the Company submit a written fugitive dust control program for the property including requirements for haul trucks within six months of a request being made.

3 diesel powered engines estimate to be 300 hp or less and built prior on or before 2007. One powers a wash plant and 2 portable smaller ones power 2 separate dry screening operations. The 2 portable engines have been inside the property boundaries for at least one year. All three diesel engines are subject to 40 CFR Part 63, Subpart ZZZZ-National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Rule 201. A PTI is required for non-metallic mineral rock crushers.

Arrival & Facility Contact

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at 9:30 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Todd Burrell (TB)-Site Manager and brother of the Owner. I informed him of my intent to conduct a compliant investigation/ inspection and to review the various records as necessary.

TB extended his full cooperation during my visit and fully addressed my questions.

Pre-Inspection Meeting

TB outlined that the facility is operating from 7 am to 5 pm five days a week.

They produce sand and gravel with approximately 35 trucks(50 ton loads) per day but can be up to 60 truck loads per day on a busy day. About 90% of trucks contain sand; the rest gravel. There is one wash plant that produces about 300 tons per hour of product and 2 dry screening operations.

They also have a large pile of broken/waste concrete and another pile recycled asphalt material that is left over from the previous owner.(Bailey.) They have done little to these piles since they took over ownership.

TB indicated that due to citizen complaints received over the Summer, the Company has acquired a sweeper truck to help minimize track out onto Bohne Road. They also contracted with Barney's out of Howell to come in twice over the last few months to apply a dust suppressant solution to the haul roads in and out of the quarry.

Onsite Inspection

TB gave me a tour of the facility.

Overall, the facility appeared to be well maintained. No dust was noted anywhere although the ground was thoroughly soaked due to recent rains. Very minor amounts of track out was noted on Bohne road.

TB showed me the wash plant. The diesel engine that operates it was operating during the inspection but the wash plant wasn't on. TB estimated that diesel engine was about 300 hp in size. He didn't know how old it is was as it came with the property when they bought it. The engine had logged 9079 hours of operation. TB said they typically have it on 8 hours a day. It has a 250 gallon tank which is filled as needed every Monday. See attached photos.

TB walked me around the quarry showing me the various storage piles and water features. There was no obvious signs of contaminants in any of the surface water although a settling type pond associated with the wash plant was very cloudy as expected. The quarry itself isn't that deep nor are the side walls very steep in most locations. The tops of some residential homes were visible from the bottom of the quarry generally behind berms. I noted several acres of land in between storage piles that was free of vegetation with a very sandy moist surface. See attached photos.

TB showed me 2 dry screening operations on the east side of the quarry. Both were not operating and one of them was surrounded by water due to the recent heavy rains. TB showed me the diesel engine associated with the screening operation that wasn't surrounded by water. The engine had logged 9773 hours of operation. TB indicated that both of the screening engines were brought in approximately a year ago. They are portable but have not left the facility in the last year. TB estimated the engines to be approximately 180 hp in size.

TB showed me a small portable rock crusher (less than 150 tons/hour capacity) powered by diesel engine that was located adjacent to a large pile of native rock. TB indicated that it had been site for 2 weeks but now the engine was broken. It was brought in by D & L Equipment as the Company was investigating the feasibility of crushing the large native stones that were essentially a waste product from the wash plant. A small pile of processed product was noted. TB indicated that crusher was not equipped with an operating water spray bar and wasn't being used on a production basis. (Note: Rule 283 exemption can't be used since crusher being operated without control device.)

Recordkeeping/Permit Requirements Review

N/A.

Post-Inspection Meeting

I held a brief post-inspection meeting with TB. I noted to him that I would be sending him a letter regarding the 3 diesel engines since they are subject to federal RICE MACT requirements. I also indicated that I would require a fugitive dust control program if/when I can verify dust is negatively impacting nearby residents. I further indicated to him that rock crushing requires a permit. He said they are still investigating on whether they should purchase their own crusher unit and simply bring in a portable unit owned by somebody to take care of the concrete, asphalt and native stone. He said they are currently working with the township on some permitting issues related to the crushing.

I thanked him for his time and cooperation, and I departed the facility at approximately 10:50 am.

Compliance Summary

The Company is out of compliance with the following:

Rule 201-No PTI for portable rock crusher.

40 CFR Part 63 Subpart ZZZZ (RICE MACT) for 3 diesel engines.

A Violation Notice (VN) will be sent to the Company that outlines these violations. The Company will have 21 days to respond.



Image 1(Aerial photo) : Aerial photo of Target Trucking.



Image 2(Quarry 1 image) : One of 3 photos supplied by complainant.



Image 3(Quarry Photo 2) : One of 3 photos supplied by complainant.



Image 4(Quarry photo 3) : One of 3 photos supplied by complainant.



Image 5(Sweeper) : Sweeper that was purchased 2 or 3 months ago.



Image 6(Bohne Road) : Minor track out on Bohne Road



Image 7(Haul Road) : Sand haul road going into quarry.

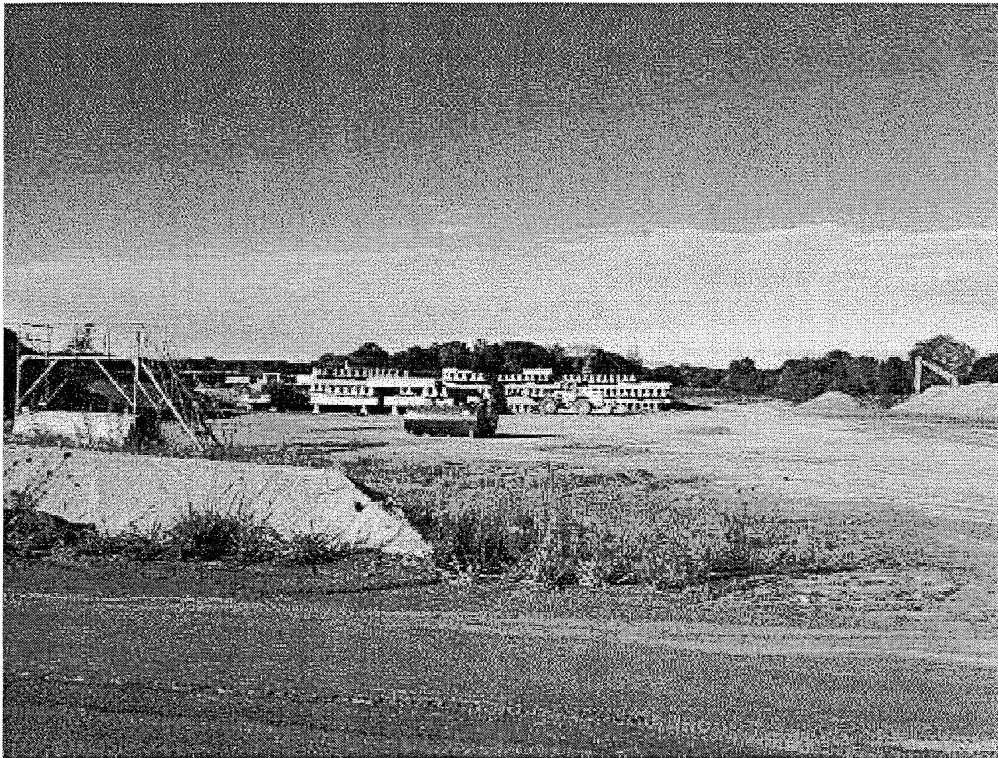


Image 8(Cement dividers) : Cement dividers owned by Bailey Sand & Gravel. Bailey is in the process of slowly removing them.

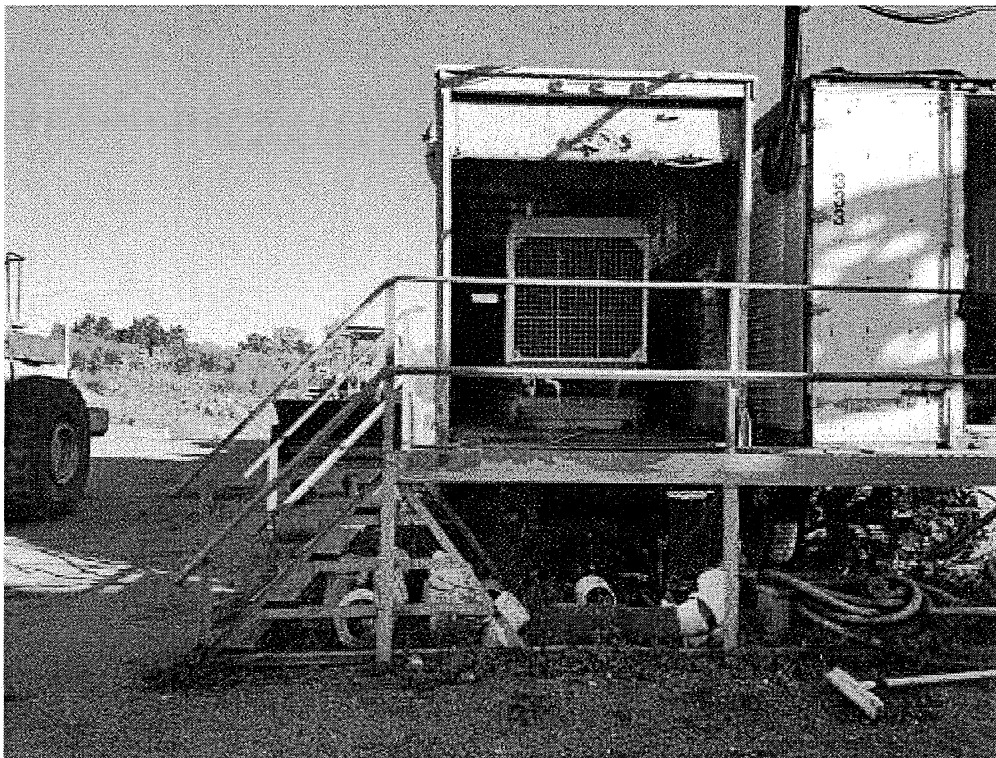


Image 9(Diesel engine) : Diesel engine for wash plant.

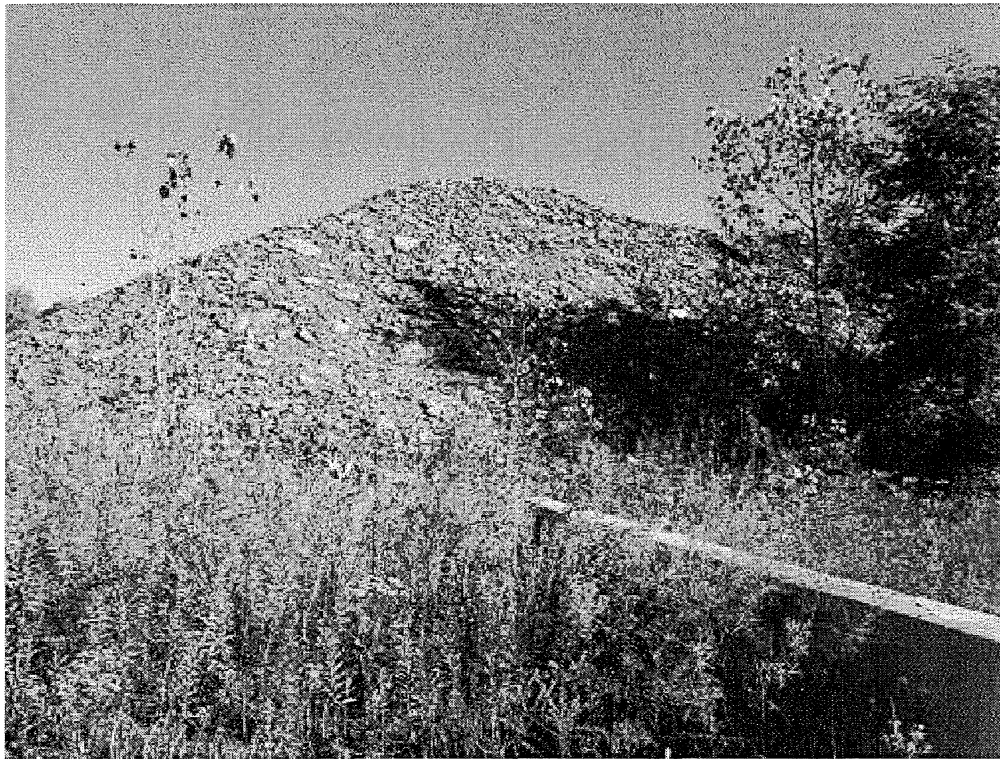


Image 10(Recycled asphalt) : Recycled asphalt pile.



Image 11(Rock Crusher) : Portable rock crusher. Note pile of finished product on the rock and large pile of uncrushed stone in background.



Image 12(Quarry floor) : Quarry floor and distant screening operations.

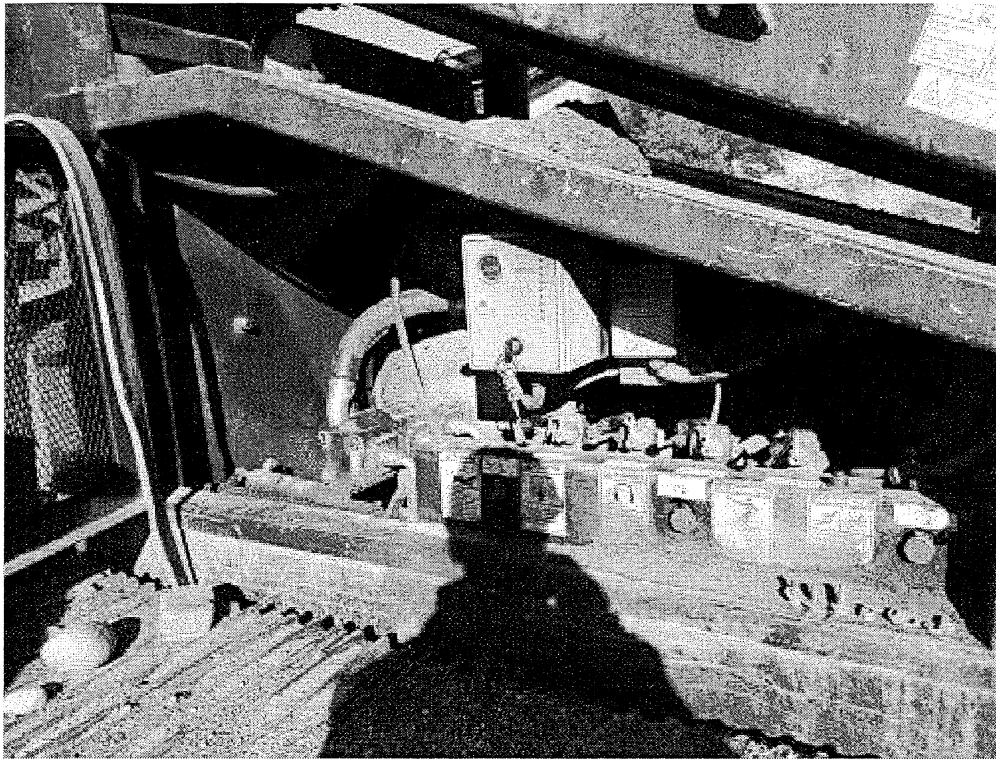


Image 13(Diesel engine) : Diesel engine for one of the dry screening operations.



Image 14(Dry Screening) : Dry screening operation not accessible due to mud. This operation also has a diesel engine.



Image 15(Dust) : Dust on Bohne Road. (From one of the complainants.)

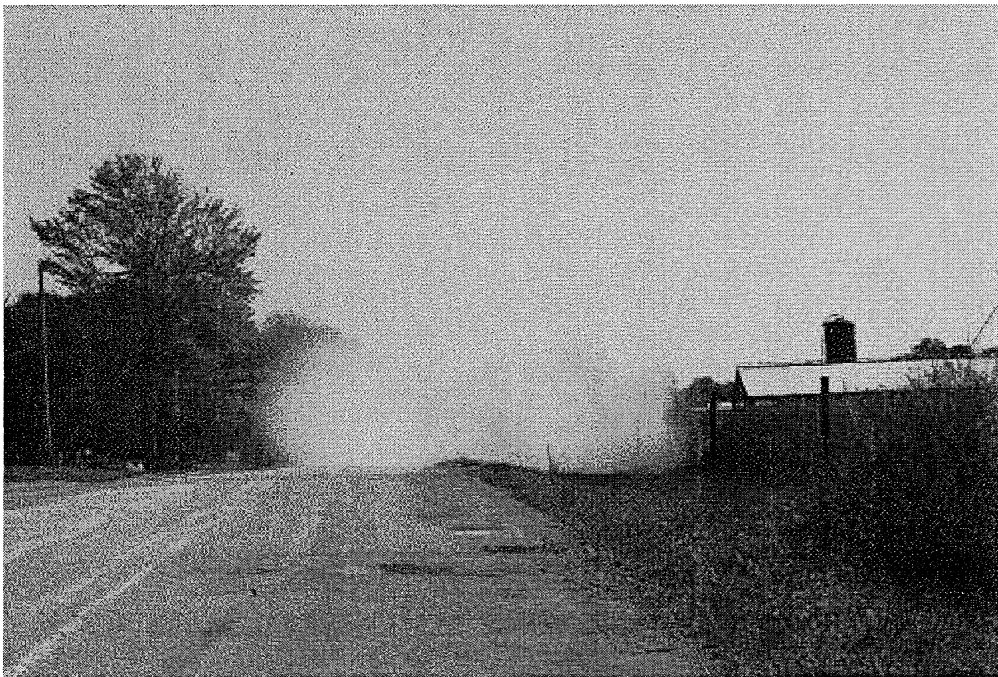


Image 16(Dust) : Dust on Bohne road near quarry entrance. (Photo supplied by complainant.)

NAME M. Kovalchuk

DATE 10/17/2017

SUPERVISOR [Signature]