

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

P024045748

FACILITY: GERKEN MATERIALS INC HILLSDALE SAND AND GRAVEL		SRN / ID: P0240
LOCATION: 11671 TRIPP RD, WALDRON		DISTRICT: Jackson
CITY: WALDRON		COUNTY: HILLSDALE
CONTACT: Jim Scheub , Regulatory Compliance Manager		ACTIVITY DATE: 08/23/2018
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Mr. Jim Sheub, Regulator Compliance Manager

Phone: 419-533-7807

Email: jscheub@gerkenpaving.com

Purpose

This was a targeted, unannounced inspection of Hillsdale Sand & Gravel. The purpose of the inspection was to determine compliance with General Permit-to-Install (PTI) #69-11 for a non-metallic mineral crushing plant. This facility is a true minor source and is subject to 40 CFR Part 60 Subpart OOO for non-metallic mineral processing plants. I arrived at the facility and with Mr. J.R. Booher, Plant Supervisor.

Background

This facility is a wet mining operation. Sand and gravel are dredged from a lake within the gravel pit by a PLM clam shell crane. The dredged sand and gravel are processed by sending it through a wash plant and a Nordberg impact crushing plant. Equipment used by the crushing plant includes the following: 1 impact crusher, 2 conveyors, 2 screens, and 3 stackers. None of the process equipment associated with the wash plant is subject to NSPS Subpart OOO since crushing does not occur within this part of the plant.

Compliance Evaluation

The wash plant and the crushing plant were operating at the time of the inspection. Because this plant is a wet mining operation there are no baghouse dust collectors (Special Condition (SC) No. 1.1). Potential fugitive dust production from the crushing plant is being controlled by applying water to the material at the triple deck screen. The material is already very wet prior to being sent to the crushing plant since it was previously sent through the wash plant. No visible emissions were observed from the impact crusher or its screens, conveyors, transfer points, and storage piles at the time of the inspection (SC 1.2). The company's 2018 MAERS report showed that the facility processed 308,184 tons of material in 2017, well below the 2,000,000 tons limit (SC Nos. 1.3 and 1.4). Mr. Booher responded that they do not or will not crush any asbestos containing material at the site (SC No. 1.5).

The plant is abiding by the Fugitive Dust Control Plan contained in Appendix A of its PTI. 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 tarped before leaving the site; water is applied to roadways and the plant yard when necessary; material spills are immediately cleaned up; and storage piles are watered when necessary. Very little to no fugitive dust was observed from the operation of the crusher or from the plant's yard. Some fugitive dust was observed being produced from vehicle traffic during the inspection. The amount of dust generated from vehicle traffic was not too excessive but should be taken care of before it becomes excessive. Mr. Booher agreed and quickly assigned someone to water the roadways. The facility is not recording the date and time of water applications to the plant yard and roadways. Mr. Booher indicated that he would begin immediately recording instances of water applications in his daily operational log.

Gerken Materials contracted Mr. Chip Tokar of Natural Resource Management Company to conduct the visible emission evaluation required by NSPS Subpart OOO and Special Condition 1.8 of its PTI. The visible emission evaluation was completed on October 2013, no VEs were observed at any of the screens, transfer points or other equipment covered by the NSPS (see file). The plant's crushers, screens, conveyors, and stackers need to be relabeled in a conspicuous location with the correct ID number. Mr. Booher said that he would contact Jim Scheub, Regulatory Compliance Manager for Gerken, to get new labels for the equipment. No residences or commercials establishments are located within 500 feet of the plant. Therefore, the plant is maintaining the setback distances required under SC 1.13c of its PTI.

Compliance Determination

Based on my observations during my inspection and my audit of the MAERS submittal, I have determined that they are in compliance with their permit. However, if the equipment isn't labeled and the date and time of when

the plant's roadway and yard are not being recorded when this facility is next inspected, a violation notice may be issued as these will be considered as on-going non-compliance concerns.

NAME Brian Carley

DATE 9/7/18

SUPERVISOR 