

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

P029045191

FACILITY: CARL SCHLEGEL INC		SRN / ID: P0290
LOCATION: 9690 WEST M-21, OVID		DISTRICT: Lansing
CITY: OVID		COUNTY: SHIAWASSEE
CONTACT: Mark Schlegel , Owner		ACTIVITY DATE: 06/28/2018
STAFF: Julie Brunner	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of Carl Schlegel, Inc. portable non-metallic mineral crushing plant located at 9690 West M-21, Ovid, Michigan		
RESOLVED COMPLAINTS:		

On June 28, 2018, I conducted a scheduled inspection of Carl Schlegel, Inc. portable non-metallic mineral crushing plant located at 9690 West M-21, Ovid, Michigan 48866. This crushing plant has never been inspected.

Arrived: 9:05 AM

Departed: 11:40 AM

Weather: 70°F, W 5 MPH, UV Index 2 Low

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

Facility Contact:

Mr. Mark Schlegel, Member, 517-487-5961, markc@schlegelsand.com

Facility Description:

Carl Schlegel, Inc. owns and operates a portable non-metallic mineral crushing plant on General Permit to Install (PTI) No. 159-11 (P0290). The non-metallic mineral crushing plant commenced operation in 2012. It is located at the Ovid Pit that is being mined for sand and gravel. 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.

Some of the equipment permitted on GPTI 159-11 is subject to the requirements of 40 CFR 60, Subpart OOO, but it is not indicated on the GPTI Application form that the equipment has been tested. An affected facility is capable of processing greater than 150 tons per hour, and each piece of equipment was constructed after August 31, 1983.

The crushing plant operates 8 months out of the year, about 40 hours per month, 9 – 10 hours per day.

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, producing pea stone.

Michigan Air Emissions Reporting System (MAERS):

The facility is a regulated facility, fee Category II, and should be reporting to MAERS. It is subject to 40 CFR 60, Subpart OOO which requires reporting. No MAERS reporting has been submitted since the start of operations.

Inspection:

I was met on-site by Mr. Mark Schlegel. (His office is located in Lansing.) The purpose of my visit and the status of the facility operations were discussed. It is estimated that the Ovid Pit will be played out by August. The pit will then be closed.

The roads were well watered upon my arrival. The crusher on GPTI 159-11 was not operating. The wash plant was operating. The crusher on GPTI 159-11 produces 29A stone. It basically takes pea stone from the wash plant and makes it more angular for use on roads.

Equipment On-Site and Company IDs listed on the EQP5756 form:

Device ID - Description; Make and model (# on equipment); serial # (# on equipment); Max. rated capacity (ton/hr); Notes / Subpart OOO tested

CR012 – VSI Crusher; Trio TV95B; 231; 250 ton/hr; Mf. Date 2010 / Water spray not installed / Tested? No
C311 – conveyor; Shop built on Trio VSI plant; N/A; 250 ton/hr; Mf. Date pre-1983 / Dust cover / Not subject

C312 – conveyor; Peerless24" x 60'; N/A; 250 ton/hr; Mf. Date pre-1983 / Not Subject

SCR013 (C313, C314, C315) – Screen plant w/ conveyors; Simplicity 6' x 20' w/ shop built conveyors; 3620-LPI40A-1819; 250 ton/hr; Mf. Date pre-1983 / Water spray not installed / Not Subject

C313 – Conveyor; Shop built 24" x 9' Middle Deck on 6' x 20' Chassis of screen plant; -----; 200 ton/hr; Mf. Date pre-1983 / Not Subject

There is more equipment associated with the crushing plant than detailed on the EQP5756 form. A modification of the GPTI will be submitted. A copy was emailed on July 10th. See attached information for the listing of additional equipment (minus the exempt wash plant) that is summarized below:

Device ID - Description; Make and model (# on equipment); serial # (# on equipment); Max. rated capacity (ton/hr); Notes / Subpart OOO tested

C316 – conveyor; Hartman Fabco 29" x 60'; N/A; 250 ton/hr; Mf. Date pre-1983 / Not Subject

C317 – conveyor; Hartman Fabco 30" x 150'; N/A; 250 ton/hr; Mf. Date post-1983

/ Tested? No C104 – conveyor Peerless 36" x 50' 13109 250 ton/hr Mf. Date pre-1975 / Not Subject

CMW001 - Coarse material washer; Eagle; 13109; 125 ton/hr; Mf. Date pre-1975 / Water spray / Not Subject

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 operating during the inspection so VEs could not be evaluated.

There were no VEs from the piles of crushed materials and truck traffic.

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 125-11 must be followed in order to operate the crushing plant. The facility has a program for fugitive dust control in place. There is a water truck and chloride tank on-site. It is equipped with spray bars to put water on the roads. Everything was wet, and the gravel roads were saturated. Water is available on-site from the lake created by mining. The records of water application weren't exactly being kept, but they are now.

Equipment

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

Water spray was not installed on the crusher and screen at the time of the inspection. Water spray was installed on the crusher and screen by July 3rd. Pictures attached. Water is provided to the equipment from the on-site lake. If the facility is relying on upstream water sprays to control fugitive emissions and monthly periodic inspections of the system are conducted, then they are exempt from the 5-year repeat testing requirement per 40 CFR 60.674(b).

Testing

SC 1.8 requires verification of visible emissions from 40 CFR 60, Subpart OOO subject equipment 60 days after achieving maximum production but not later than 180 days after initial startup.

CR012 – VSI Crusher and C317 - Hartman Fabco 30" x 150' conveyor are subject equipment. Testing of this equipment has not been done. A test protocol to do the VE testing was received on July 16, 2018. No test date has been scheduled yet.

Recordkeeping (Monitoring)

SC 1.9 requires daily and annual records of material processed.

Daily records of material processed were not being kept. It was estimated since plant startup that at maximum, 625 tons of gravel per day have been produced .

Records were requested and obtained since plant start-up in 2012. The highest production year was 2014 with 4,178.77 tons of 29A and 38,866.51 tons of 8 x 30 man sand produced.

The owner/operator now knows that daily and annual records of material processed are needed. The records requested for this inspection are attached.

Permit Dates

SC 1.11 requires that equipment be labeled with company IDs. Equipment was labeled. Some equipment did match the process information form for GPTI 159-11 and some needed to be added to the plant. (See table above.)

Miscellaneous/Allowed Modification

The notice of intent to relocate per the requirements of SC 1.13b has never been received because the plant has not moved from the originally permitted location. Notification is required to be sent to the district office not less than 10 days prior to the relocation.

For SC 1.13c, a minimum of 500 feet from a residential or commercial establishment is required. The closest residence is located approximately 1,200 feet to the north of where the crushing plant is located on-site.

Fugitive Dust Control Plan – Appendix A

When I was out walking around the pit, the roads were not dusty. There did appear to be a little track out of mud 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 were started in June. The highest amount of water used in a day was 6,000 gallons and the highest amount of chloride used in a day was 1500 gallons.

Summary:

The facility has some compliance issues with GPTI 159-11 and 40 CFR 60, Subpart OOO. A violation notice was sent for no VE testing of subject equipment and no emission reporting to MAERS since facility startup. The facility is addressing the recordkeeping short comings, and submitted a modification to update the equipment list on the GPTI.



Image 1(014) : Tank and truck for dust suppression.



Image 2(015) : VSI crusher

NAME Julie L. Bruner

DATE 7/17/13

SUPERVISOR B. M.

