

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

P052627766

FACILITY: Heritage Resources, Inc.		SRN / ID: P0526
LOCATION: 9449 Sand Road, BELLEVUE		DISTRICT: Grand Rapids
CITY: BELLEVUE		COUNTY: EATON
CONTACT: Kirk Velling, Vice President		ACTIVITY DATE: 10/22/2014
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	
SUBJECT: Self-initiated compliance inspection, in large part because this facility has not been inspected since its initial startup in July.		SOURCE CLASS:
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author) and Keisha Williams, AQD Toxics  
Personnel Present: Mark Cerajewski (plant operator)

Other relevant personnel: Kirk Velling (kirk@portableriprap.com)

**Purpose:** Conduct an unannounced, self-initiated compliance inspection by determining compliance with Heritage Resources' General Permit to Install (PTI) No. 99-14 for a nonmetallic mineral crushing facility. Heritage Resources had submitted a relocation notice received October 20, 2014 to the Gall Brig site located at 703 W. Shepard in Charlotte. There is no documentation in MACES that this facility had been inspected in the past. The relocation notice did not include a site map; the inspection was mainly to ensure that the equipment was at or greater than 500' from residences.

**Facility Background/Regulatory Overview:** Heritage Resources' P0526 is a portable non-metallic mineral crushing operation that was newly permitted in July 2014 and which recycles concrete.

According to the construction dates of the equipment, the Impact Crusher and Screen are NSPS 000-subject affected facilities because they were constructed after August 31, 1983 and they are portable, capable of processing more than 150 tons per hour (relocation notice specified a capability of processing 350 tons per hour). A test report was received October 20, 2014 for initial testing of the Impactor1 and 6x20 Screen for visible emissions.

**Inspection:** This was an unannounced self-initiated compliance inspection. At approximately 1:30 p.m. on October 22, 2014 I met with Mark Cerajewski, plant operator. There were no signs of opacity upon entering the site. The roads were wet and muddy. I sent K. Velling a DEQ "Environmental Inspections: Rights and Responsibilities" brochure via fax on November 10, 2014.

General Permit, Special Conditions, PTI No.99-14

The following equipment was present onsite:

Equipment	Make	Manufacture date	serial #	Device ID	Max. rated capacity (ton/hr)
Impact Crusher	KPI-JCI FT5260	2014	414059	Impactor1	350
Screen	KPI-JCI FT6X20300-3	2014	T130212	6x20 Screen	350
Portable Conveyor	McCluskey Bros 36x105	2000	11356	MCB 63x105	350

(The Impactor1 was reported with a Make/Model number of KPI-JCI FT620300-3 in the relocation notice; however, the correct Make/Model number for this unit is KPI-JCI FT5260, as reported in the table above)

**Visible Emission Limits**

The crusher and associated equipment were not being operated during the inspection; therefore, 0% opacity was observed throughout the site. Prior to meeting with M. Cerajewski the crusher and screen had been operating, but I did not see any opacity at that time. The crusher, Impactor1, and the Screen are both newer models (see attached for manufacturer's specifications and additional information). These newer models enclose the crushing and screening processes. I spoke with a representative of KPI-JCI who said that dust is likely only to be present if the wind is blowing at the right speed and direction. According to the October 20, 2014 test report for the VE readings on the crusher and screen, the average opacity for both units was 0.3%. The permit requires that no more than 15% opacity be seen from the crusher and 10% opacity coming from the screen. Heritage Resources is in compliance with the permit's visible emission limits at this time.

**Pollution Control Equipment**

Each crusher and screen is required to have water spray equipped. It is not readily apparent that these newer model crushers and screens have water spray attached. M. Cerajewski said that the water spray nozzles are located within the enclosures. I

verified this via phone call with KPI-JCI representative, Josh, on 11/12/14, that these models are equipped with water spray. Heritage Resources is in compliance with condition 1.7 at this time.

#### **Material Processing/Recordkeeping**

The permit limits material throughput to 2,000,000 tons per year per site. According to the past relocation notices for this year, this is the first time P0526 crusher has been located at this site. The relocation notice states that 8,000 – 10,000 tons of material are planned to be processed at this site until early November. During this period Heritage Resources would not be exceeding the 2,000,000 ton per year limit and is therefore in compliance with this material limit (condition 1.3) at this time.

#### **Operational Parameters**

The program for continuous fugitive emissions in Appendix A in the permit must be followed in order to operate the crushing facility.

#### Site Roadways/Plant Yard

All roadways located at this site, other than the entrance, are unpaved. All unpaved surfaces were wet due to precipitation.

#### Truck Traffic

I was not able to verify compliance with the "Truck Traffic" fugitive dust condition because no trucks were being loaded while I was onsite; however, all roadways were very moist and/or supersaturated with water, where it would be unlikely that dust from truck traffic could be created.

#### Storage Piles

I saw no opacity being generated from the storage piles onsite.

Heritage Resources is in compliance with the Operational Parameters conditions at this time.

#### **Reporting/Notifications**

Condition 10 requires that within 15 days of initial startup of the plant, Heritage Resources must notify the AQD of the actual date of initial startup. K. Velting sent the AQD an initial startup notification indicating that the P0526 plant started operation July 15, 2014. Heritage Resources is in compliance with this condition.

#### **Miscellaneous**

Condition 13 requires that upon relocation, the crusher shall be located a minimum of 500 feet from any residential or commercial establishment or place of public assembly. Prior to the inspection I had printed a Google map of the crushing site. I showed M. Cerajewski the map and both he and I agreed on the location that the crusher and screen had been placed (see attached map #1). Using the google maps distance scale, the crusher was located within approximately 250' of residences (east side of crushing site). I called K. Velting and asked him to provide me with his evaluation of the location of the crusher with respect to residences and he agreed that the crusher was too close. On 10/28/14 K. Velting faxed a map of the new location of the crusher, which, according to the Google map scale is 530' away from residences (see attached map #2). It should be noted, therefore, that this location for crushing has locations present onsite where the setback distance of the crusher from residences has the potential to be less than 500'. Heritage Resources is currently in compliance with this condition, provided the crusher has been moved to the mapped new location.

#### **MAERS**

This source is subject to NSPS Subpart OOO. Because it is an NSPS-subject source, it is also required that Heritage Resources report annual emissions to MAERS. A request was made to Renee Denison on October 30, 2014, to have Heritage Resources added to the MAERS database and flagged 'Yes' so that Heritage Resources P0526 appears on the 2014 MAERS Master List.

**Compliance Statement:** Heritage Resources is in compliance with all state and federal regulations at this time.

NAME Melvin Lybros DATE 11-14-14 SUPERVISOR M. McC