

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

P053441684

FACILITY: Elmer's Crane & Dozer, Inc.		SRN / ID: P0534
LOCATION: 1033 Kasson Center Rd., MAPLE CITY		DISTRICT: Cadillac
CITY: MAPLE CITY		COUNTY: LEELANAU
CONTACT:		ACTIVITY DATE: 09/19/2017
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Tuesday, September 19, 2017, Caryn Owens of the Department of Environmental Quality (DEQ)-Air Quality Division (AQD) conducted a scheduled field inspection of Team Elmer's – Hulbert Pit (SRN: P0535 and P0534). At the time of the inspection the crusher and associated equipment were located at 1033 West Kasson Center Road in Maple City, Leelanau County, Michigan, except for the Lippmann V crusher under SRN P0535, which is not currently used, and is at Team Elmer's headquarters in Traverse City, Michigan. More specifically, the site was located on the south side of West Kasson Center Road, and the entrance of the pit is located approximately 1/2 mile east of West Kasson Center and South Coleman Roads. The field inspection and records review were to determine compliance with Permit to Install (PTI) #114-14 for SRN P0534 and PTI 115-14 for SRN P0535. The crushers and associated equipment currently operate under General permits and are considered a minor source for particulate matter (PM) criteria air pollutants. The equipment, including the crushers are subject to New Source Performance Standards (NSPS) of Performance for Nonmetallic Mineral Processing Plants under 40 CFR, Part 60, Subpart 000.

Evaluation Summary

The activities covered during this scheduled field inspection and records review appears to be in compliance with PTIs 114-14 and PTI 115-14. Specific permit conditions that were reviewed are discussed below.

Source Description

This site is considered a dry operation, where there is minimal water spray at the site. There are two crushers (a jaw crusher and a cone crusher) and associated equipment consisting of screeners and conveyors. The operations at the Hulbert Pit were used to crush rocks into different size gravel. The sand separated from the rock was used as backfill for the excavated areas of the site. I observed two scales during the inspection. The site operates Monday through Friday, and the hours of operation are restricted by a county ordinance. During the inspection, AQD observed a new tarp shell over the top of the main screener at the site (Unit #1145) to control fugitive dust emissions where AQD has had complaints in the past. The crusher that was formerly at the site, which is covered under PTI #115-14 (SRN; P0535) is no longer at the site, and is stored at Elmer's headquarters in Traverse City. According to Michigan Air Emission Reporting System (MAERS), Crusher 959 under PTI #115-14 did not operate last year, and has not operated this year as well.

Additionally, AQD observed a wash plant on the southern portion of the site, all the equipment at the wash plant were properly labeled. AQD observed an on-site water well that was used to wash the sand at this plant. Elmer's claims that the wash plant meets exemption R 285(2)(t).

On-site Inspection:

During the field inspection it was cloudy with calm winds between 5 to 10 miles per hour from the north-northeast, and 70 degrees Fahrenheit. I checked in at the office prior to arrival, and looked at the records on file. The records indicated that the site processes between 2,500 tons to 8,500 tons of material a day.

AQD followed Mr. Tom Wolf of Team Elmer's to the Hulbert Pit, and who escorted AQD throughout the site. I inspected the equipment associated with the crushers, which were labeled accordingly.

I observed the following equipment connected to the crusher at the time of the inspection::

958:	Cone Crusher	1122:	Conveyor - 36"x100'
961:	Stacker Conveyor – 24"x90'	1124:	Conveyor with scale - 36"x60'
978:	Conveyor with scale - 24"x90'	1125:	Conveyor - 36"x30'
980:	Conveyor – 30"x120'	1127:	Screener – 6'x20'
990:	Conveyor – 30"x80'	1130:	Stacker Conveyor –

			36"x150'
1038:	Conveyor - 36"x225'	1132:	Conveyor - 36"x30'
1046:	Jaw Crusher	1133:	Conveyor - 36"x702'
1058:	Conveyor - 24"x60'	1139:	Conveyor - 30"x120'
1062:	Conveyor - 30"x90'	1146:	Conveyor - 36"x225'
1073:	Stacker Conveyor - 30"x120'	1143:	Conveyor - 36"x225'
1092:	Conveyor - 30"x70'	1145:	Screeener Deck with water sprays - 7'x20'
		1150:	Conveyor - 24"x60'

During the inspection, the crushing operations were not operating, however, AQD observed front end loaders loading sand and gravel into semi-trucks. AQD staff observed minimal visible emissions from the truck loading operations. Daily load records were kept at the office at the M-72 Pit approximately 2 miles from the site. AQD was at the M-72 Pit earlier and saw the binder that contains the Hulbert Pit records.

Review of PTI:

Visible Emission Limits:

During the inspection, I observed no visible emissions greater than 5 percent. At the time of the inspection, the site was within the fugitive emission limits of the PTI.

Material Usage Limits:

Based on the 2016 MAERS report and the amount of time the equipment was out of commission during the summer, the facility was below the 2,000,000 tons of non-metallic material through the crushers from August 2016 through August 2017. Only earth material is processed, screened and separated at this location. No asbestos containing materials are crushed at this pit.

Process/Operational Parameters:

Team Elmer's has and follows a fugitive dust plan for the site, the haul roads were in good condition. I observed no visible emissions from the storage piles at the site.

Equipment:

I observed water sprays connected to the crushing and screening equipment at the site. No equipment contained a baghouse. As previously stated, the equipment was not operating during the inspection.

Testing:

All equipment subject to the NSPS 40 CFR, Part 60, Subpart OOO has been tested. Team Elmer's submitted test protocols in a timely manner, and communicated with the DEQ regarding the testing activities at this site.

Monitoring:

Daily and annual records are kept in a binder at the M-72 pit office, and scanned to Team Elmer's headquarters for record retention purposes.

Recordkeeping/Reporting/Notification:

The equipment at this site, even though portable, stays at this site. DEQ understands the equipment begins operation in April and shuts down in November (weather permitting). As previously stated, the former jaw crusher labeled 959 is no longer operating at the site, and is currently stored at Elmer's headquarters.

Permit Dates:

All equipment at the facility was labeled with identifying numbers.

Miscellaneous/Allowed Modifications:

Team Elmer's submitted a PTI Modification for the three new conveyors on June 30, 2017 that were added to the processes at the site, and complied with the NSPS, Subpart OOO testing requirements. As stated previously, although portable, the equipment at this site, stays located here and is not transported to different locations. The crushers are located at least 500 feet from the closest residence, and there are no outstanding violations associated with the site.

NAME Caryn Owens DATE 9/19/17 SUPERVISOR SAU