

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

P062350215

FACILITY: Fuoss Gravel Company		SRN / ID: P0623
LOCATION: 777 BUSH RD, OWOSSO		DISTRICT: Lansing
CITY: OWOSSO		COUNTY: SHIAWASSEE
CONTACT: James Fuoss , President		ACTIVITY DATE: 08/13/2019
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of Fuoss Gravel Company for compliance with a general permits 126-15 and 5-16		
RESOLVED COMPLAINTS:		

On August 13, 2019, I conducted a scheduled inspection of Fuoss Gravel Company, with two (2) portable non-metallic mineral crushing plants located at 777 Busha Road, Owosso, Michigan 48867. The facility was last inspected on December 8, 2015.

**Facility Contact:**

Mr. James Fuoss, President, 989-725-2084, fuossgravel@gmail.com

**Facility Description:**

This facility is a family owned gravel pit that sells sand and gravel products to contractors and the general public. The business has been in operation since 1947. Fuoss Gravel Company has two pits. One is located at 777 Busha Road which has the business office, and the other pit is located off Grand River.

The facility is located in Owosso Township in a mainly rural area with some residential house located along main roads.

Fuoss Gravel Company (P0623) is a minor source due to the potential to emit of less than 250 tons per year (tpy) of any regulated air contaminant. The facility is considered minor for emissions of hazardous air pollutants (HAPs) with a potential to emit less than 10 tpy of any single HAP and 25 tpy of aggregate HAPs. The facility is not subject to the Title V - Renewable Operating Permit Program

Two (2) crushing plants are located at the Busha Road pit and permitted under General Permit to Install (GPTI) 126-15 and GPTI 5-16 which are general permits for nonmetallic mineral crushing. The portable crushing plants are minor sources of any regulated air contaminants.

Equipment that is part of a portable crushing plant could be subject to the New Source Performance Standard (NSPS) in 40 CFR 60, Subpart 000 — 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.

The equipment permitted on GPTIs 126-15 and 5-16 are not subject to the requirements of 40 CFR 60, Subpart 000. The affected crushing plants are not capable of processing greater than 150 tons per hour, and each piece of equipment was constructed before August 31, 1983.

**Michigan Air Emissions Reporting System (MAERS):**

The facility is not required to report to MAERS.

**Inspection:**

Arrived: 9:15 AM

Departed: 10:40 AM

Weather: 71°F, NE 7 MPH, UV Index 1

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

I was met on-site by Lisa who is in the office. Mr. James Fuoss was off-site the day of the inspection. The purpose of my visit and the status of the facility operations were discussed with Lisa. She contacted Butch, the operator on-site, for the plant tour. The crushers at Busha process a lot of recycle materials: concrete, asphalt, red brick, and some crushed stone.

There is some exempt equipment on-site: wash plant (not currently operational), screener, conveyors and a dirt screener (310, Finlay). The equipment is exempt per Rule 285(2)(t) as it is not part of a crushing plant or processing crushed materials.

The crushing plants are powered by diesel fuel-fired engines that are exempt per Rule 285(2)(g). They are considered portable engines, not stationary which could make them subject to 40 CFR 63, Subpart ZZZZ.

#### GPTIs 126-15 and 5-16:

Equipment On-Site and Company IDs listed on the EQP5756 form for GPTI 126-15:

Device ID #01 – Jaw Crusher: Wisconsin Foundry 18-38; Serial #HAC43-A; 100 ton/hr capacity; Mf. Date Unknown; Water spray installed: mobile water spray bars and tank of water.

Device ID #02 – Cone Crusher: Allis Chalmers 9-45; Serial #B58841; 125 ton/hr capacity; Mf. Date 1980; Water spray installed: mobile water spray bars

Device ID #03 – Screening plant: Universal Handling 6416-F-3-4-0; Serial #805x287C; 100 ton/hr capacity; Mf. Date 1960; Water spray installed: mobile water spray bars

Device ID #04 – Conveyor: Shop made; Mf. Date 1979; 100 ton/hr capacity

Device ID #05 – Conveyor: Shop made; Mf. Date 1979; 100 ton/hr capacity; Water spray installed: mobile water spray bars

Device ID #06 – Conveyor: Shop made; Mf. Date 1979; 100 ton/hr capacity

Device ID #07 – Stacking Conveyor: Shop made; Mf. Date 1979; 100 ton/hr capacity; Water spray installed: mobile water spray bars

Equipment On-Site and Company IDs listed on the EQP5756 form for GPTI 5-16:

Device ID #2 – Jaw-roll Crusher: Cedarapids 575 – Iowa Manf Co.; Serial #36122; Mf. Date 1978; 100 ton/hr capacity; Water spray installed: mobile water spray bars if needed. (Not used in about 2 years.)

Device ID #3 – Conveyor: Shop made; Mf. Date 1980; 100 ton/hr capacity

#### Visible Emission (VE) Limits

Special Condition (SC) 1.2 contains visible emission limits for crushers, screens, conveyors, material storage piles, and truck traffic.

- Neither plant was operating during the inspection. Material storage piles were not dusty as they contain a lot of natural moisture. Roads were watered down (wet) around the plants and entrances.

#### Material Processing

In SC 1.3, the permit limits material throughput to 2,000,000 tons per year per site.

- The plants operate well below the material throughput limits as demonstrated by the records.

For SC 1.5, no asbestos containing materials shall be crushed.

- Fuoss does process concrete and asphalt. They don't knowingly process asbestos containing materials but screening of materials that are brought in may need to be improved. If concrete and asphalt are coming from demolition projects, checking for an asbestos notification in addition to closer visible inspections of loads may be needed.

#### Process/Operational Limits

For SC 1.6, the program for continuous fugitive emissions control in Appendix A of the GPTI must be followed in order to operate the crushing plant.

- A calcium chloride tank is on-site if needed. Water is available on-site and there is a lot of natural moisture in the materials. Records of dust suppressants probably isn't really kept, but the conditions on-site were not dusty and roads were wet.

Equipment

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

- Water spray is installed or can be installed on the crushers and screens as the facility maintains mobile spray bars that are moved around.

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.

- NA

Recordkeeping (Monitoring)

SC 1.9 requires daily and annual records of material processed.

- Daily records of material processed (crushed stone, 0" – 1" concrete, recycled asphalt, crushed red brick) are sent to the office and compiled monthly. The records requested for this inspection are attached and summarized below.

Year	Busha tons
2016	1,761
2017	1,265
2018	413
2019	698

Permit Dates

SC 1.11 requires that equipment be labeled with company IDs.

- Equipment really was not labeled, but matched the process information provided with the GPTI applications. (See equipment list above.) The facility should repaint the numbers on the equipment for clarity.

Miscellaneous/Allowed Modification

The notice of intent to relocate per the requirements of SC 1.13b was received with the GPTI applications and the plants have not moved from the Busha pit.

For SC 1.13c, a minimum of 500 feet from a residential or commercial establishment is required. The closest residence is greater than 500 feet away to the north of where the crushing plant on GPTI 5-16 is located. The crushing plant on GPTI 126-15 is located almost 2000 feet to the southeast of the closest residence.

Summary:

Compliance with state rules and regulations, and GPTIs 126-15 and 5-16 was demonstrated. It is recommended that screening of concrete and asphalt coming from demolition projects for asbestos containing materials be more carefully done. Also, painting numbers on the equipment for easy identification should be completed.



**Image 1(93)** : Jaw Crusher, GPTI 5-16

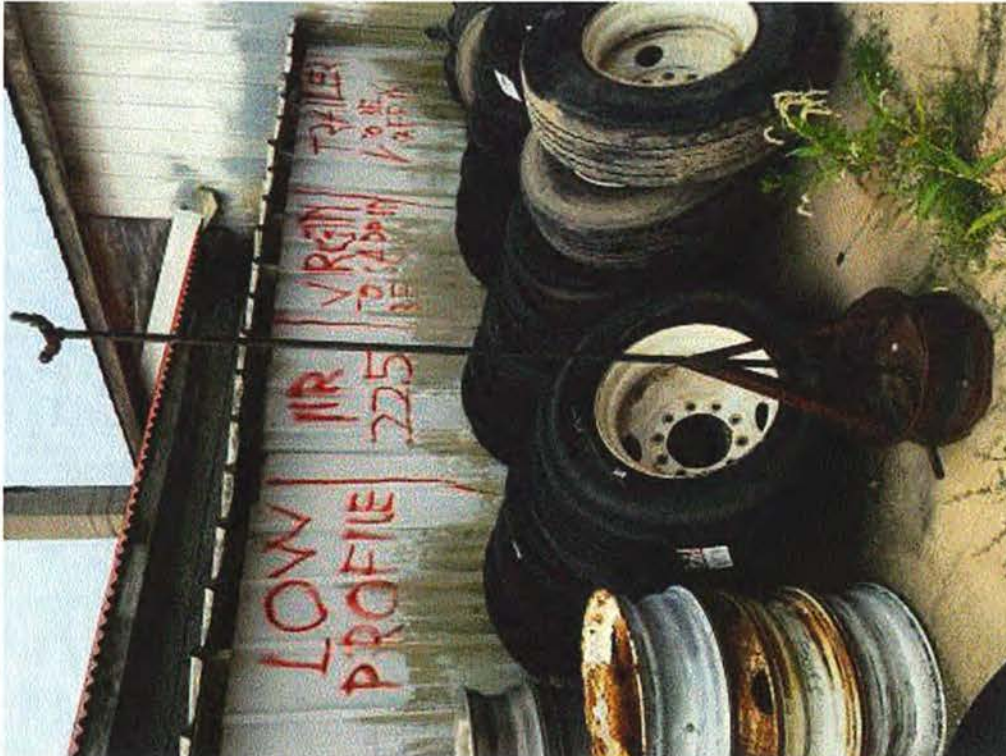


**Image 2(80)** : Wash plant





**Image 3(90)** : Cone crusher, GPTI 126-15



**Image 4(16)** : Mobile spray bar



**Image 5(190) :** Calcium chloride tank

NAME Julie L. Brown DATE 9/6/19 SUPERVISOR B.M.