

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

P067850216

FACILITY: Fuoss Gravel Company PTI 4-16		SRN / ID: P0678
LOCATION: 777 Busha Road, OWOSSO		DISTRICT: Lansing
CITY: OWOSSO		COUNTY: SHIAWASSEE
CONTACT: James Fuoss , President		ACTIVITY DATE: 08/13/2019
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled inspection of Fuoss Gravel Company for compliance with general permit 4-16		
RESOLVED COMPLAINTS:		

On August 13, 2019, I conducted a scheduled inspection of Fuoss Gravel Company – Grand River Pit, with one (1) portable non-metallic mineral crushing plant located at 2190 W. Grand River Road, Owosso, Michigan 48867. The facility was not inspected when the 777 Busha Road pit was inspected on December 8, 2015.

Facility Contact:

Mr. Jim Fuoss, President, 989-725-2084, fuossgravel@gmail.com
Mr. Kris Fuoss, on-site contact

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 (P0678) 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

The crushing plant is permitted under General Permit to Install (GPTI) 4-16 which is a general permit for nonmetallic mineral crushing.

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 GPTI 4-16 is not subject to the requirements of 40 CFR 60, Subpart 000. The affected crushing plant is 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: 11:10 AM
Departed: 12:20 AM

Weather: 75°F, Wind NNE, UV Index 5

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 Mr. Kris Fuoss. The purpose of my visit and the status of the facility operations were discussed. The crusher at this pit runs about once a week to process recycle asphalt and concrete.

There is some exempt equipment on-site: wash plant, screening plant (Finley, 390), and conveyors. The equipment is exempt per Rule 285(2)(t) as it is not part of a crushing plant or processing crushed materials.

The crushing plant is 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. One engine is a Katolight (Cummins) that powers the jaw crusher. The engine that powers the cone crusher is a 12-cycle Detroit Diesel.

GPTI 4-16

Equipment On-Site and Company IDs listed on the EQP5756 form for GPTI 4-16:

Device ID #1 – Primary Jaw Crusher: Austin-Western 25x40; Serial #151PT106; 100 ton/hr capacity; Mf. Date Unknown; Water spray installed: mobile water spray bars and water tanker

Device ID #2 – Secondary Cone Crusher: Allis Chalmers 6-45; Serial #537x153; 125 ton/hr capacity; Mf. Date 1979; Water spray installed: mobile water spray bars

Device ID #3 – Feed Conveyor (cone): Shop made; Mf. Date unknown; 125 ton/hr capacity

Device ID #4 – Conveyor (cone): Shop made; Mf. Date unknown; 150 ton/hr capacity; Water spray installed: mobile water spray bars

Device ID #? – Stacking Conveyor (cone): Grason 100 ft; 10030P2600; Mf. Date 1978; 150 ton/hr capacity

Device ID #? – Stacking Conveyor (jaw crusher): Shop made 50 ft; Mf. Date unknown; 100 ton/hr capacity

Not listed

Return conveyor (cone): Carters Material Handling

Yellow transfer conveyor (jaw crusher): 50 ft.

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. Material storage piles were not dusty as they contain a lot of natural moisture. Roads were watered down (wet) around the plant and entrances.

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 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.

- 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) are sent to the main office and compiled monthly. The records requested for this inspection are attached to the inspection report for the Busha Pit (P0623) and summarized below.

Year	Grand River tons
2016	5,180
2017	5,470
2018	5,128
2019	2,063

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 with the exception of two (2) conveyors. (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 GPTI applications and the plant has not moved.

For SC 1.13c, a minimum of 500 feet from a residential or commercial establishment is required. The closest residence is greater than 1000 feet away to the east of where the crushing plant is located on-site.

Summary:

Compliance with state rules and regulations, and GPTIs 4-16 was demonstrated. The equipment list on the GPTI needs to be updated to include the two missing conveyors.

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(051) : Cone crusher

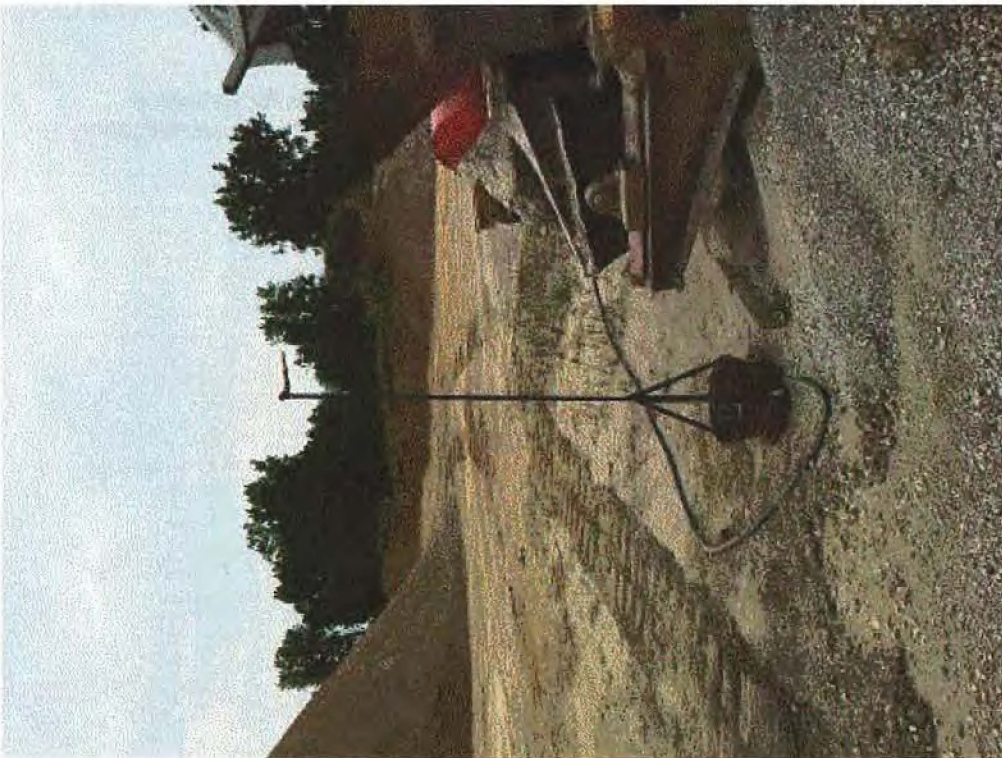


Image 2(297) : Water spray system



Image 3(674) : Jaw crusher

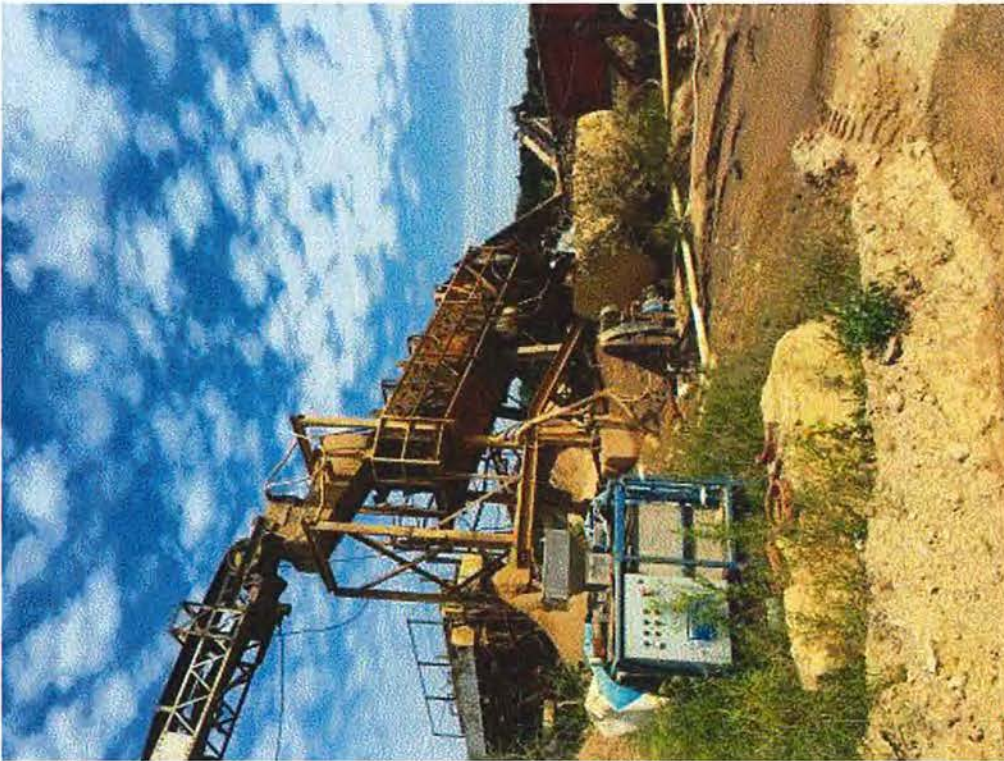


Image 4(474) : Part of the wash plant

NAME Julie P. Egan

DATE 9/6/19

SUPERVISOR B.M.