

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

P075554280

<b>FACILITY:</b> Weber Sand & Gravel, Inc. PTI 170-16		<b>SRN / ID:</b> P0755
<b>LOCATION:</b> 4242 Fish Lake Road, NORTH BRANCH		<b>DISTRICT:</b> Lansing
<b>CITY:</b> NORTH BRANCH		<b>COUNTY:</b> LAPEER
<b>CONTACT:</b> Gregg Weber , Owner		<b>ACTIVITY DATE:</b> 07/21/2020
<b>STAFF:</b> Daniel McGeen	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled inspection of portable crusher operating under site-specific PTI No. 79-19, for the location of 14235 N. Saginaw Road, Clio, Genesee County. This crusher also operates under general PTI No. 170-16.		
<b>RESOLVED COMPLAINTS:</b>		

On 7/21/2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the Weber Sand & Gravel portable nonmetallic mineral processing plant with SRN P0755. It was operating at 14235 N. Saginaw Road, Clio, Genesee County, with site-specific Permit to Install (PTI) No. 79-19.

**Environmental contact:**

Mr. Gregg Weber, Owner; 801-614-4783; [gregg.a.weber@gmail.com](mailto:gregg.a.weber@gmail.com)

**Process description:**

This is a portable non-metallic mineral processing plant; subject to the site-specific PTI No. 79-19, and 40 CFR Part 60 Subpart OOO.

**Emission units:**

- C320; Terex CR004 impact crusher, manufactured in 2012, rated at 200 tons per hour.
- SC2; screening unit
- UC: McCloskey conveyor; manufactured 2010
- BF: McCloskey belt feeder; manufactured 2010
- SFC; McCloskey conveyor; manufactured 2010

**Regulatory overview:**

This facility is considered a minor source of criteria pollutants, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A major source of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants, and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or area source for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

This facility is subject to 40 CFR Part 60, Subpart OOO - *Standards of Performance for Nonmetallic Mineral Processing Plants*. This New Source Performance Standard (NSPS) was updated on 4/22/2008. Table 3 to Subpart OOO sets a 12% crusher opacity limit, and a 7% screen opacity limit, for affected facilities (as defined in Section 60.670 and 60.671) that commenced construction, modification, or reconstruction on or after 4/22/2008.

With a setback distance from the nearest residence, commercial establishment, or place of public assembly being only 185 feet, the current temporary location, 14235 N. Saginaw Road, Clio, Genesee County, could not meet the 500 foot setback criteria for the AQD general crusher PTI. Therefore, the company applied for and received a site-specific PTI, No. 79-19, approved on 5/20/2019. This allows for operation at the temporary site, but limits throughput to 50,000 tons, and has stricter opacity limits than the general PTI, including a 12% crusher and a 7% screen opacity limit. These opacity limits

are also required by Subpart 000 for affected crushers and screens which commenced construction, modification, or reconstruction on or after 4/22/2008.

This crusher is currently permitted under general PTI No. 170-16. It has also been issued the following site-specific permits, in addition to PTI No. 79-19: Nos. 155-17, 15-18, 73-19, 104-19, and 153-19.

**Fee status:**

This portable plant is considered a Category D subject fee source, because it is subject to the NSPS, Subpart 000. It reports air emissions annually via the Michigan Air Emissions Reporting System (MAERS).

**Location:**

As noted above, this location could not meet the minimum 500 foot setback requirement to obtain an AQD general crusher permit. The nearest residence to the north, as viewed by me in Google Maps, was approximately 185 feet away from the processing plant. The nearest residence to the northeast was about 575 feet away. The nearest residences to the southeast were slightly less than 300 feet away and slightly over 300 feet away from the plant. To the immediate east and west were undeveloped land. The nearest business was a concrete redi-mix facility about 550 feet to the south.

**Testing:**

The process equipment successfully tested for the NSPS on the following dates:

- C320; Terex CR004 impact crusher, NSPS tested 12/12/2015
- SC2; screening unit; NSPS tested in 2014 or 2015; I was unable to find the exact date it was tested on, while working remotely
- UC: McCloskey conveyor; NSPS tested 11/20/2014
- BF: McCloskey belt feeder; NSPS tested 11/20/2014
- SFC; McCloskey conveyor; NSPS tested 11/20/2014

**Recent history:**

The site-specific PTI was issued on 5/20/2019. The portable crusher with SRN P0755 has never been the subject of an air pollution complaint, from my review of the AQD Michigan Air Compliance and Enforcement System (MACES) database, from 2007 through the present day.

On 7/16/2020, Mr. Weber emailed AQD to indicate that this crusher was running at 14235 N Saginaw, Clio, Genesee County, under site-specific PTI No. 79-19. This notification complies with SC No. FGCRUSHING VII. 1 and 2, to provide notification upon completion of installation or construction, pursuant to Rule 201(7), and Section 60.7 of 40 CFR, respectively. Weber Sand & Gravel has an exemplary track record on properly informing AQD of relocations.

**Safety apparel required:**

For visiting any crushing operation, AQD staff should wear a hard hat, safety glasses, steel-toed boots, hearing protection, and a high visibility safety vest. Additionally, due to the COVID pandemic, I was wearing a disposable paper mask, per EGLE requirements for conducting field work (discussed further below). In addition, I was also trying out a clear plastic face shield which affixed to my hard hat, as a voluntary extra layer of protection against the risk of the coronavirus.

**Arrival:**

During the current COVID-19 pandemic, EGLE guidance to inspectors, as of July 2020, on conducting inspections was as follows:

- pre-arrange inspections with facilities, to facilitate a plan to conduct the inspection while adhering to facility guidelines for safety.
- always wear a mask, while conducting field work.

Therefore, the inspection had been somewhat pre-arranged with the facility. Mr. Gregg Weber, President, knew that I would be coming out to inspect the crusher at some point during this week,

July 20-24, and he advised me to come out on any day that I was available. This still allowed for some element of an unannounced inspection. I was given the contact name of Mr. Ryan Andrews for the site.

Today, 7/21/2020, I saw no fugitive dust as I approached the site. Weather conditions were cloudy, humid, and 75 degrees F, with winds 5-10 miles per hour out of the north.

The site was very compact, so I parked in a location so as to be out of the way of site traffic. There was a paved entrance drive. Recent rains had left unpaved site roadways damp, with occasional standing water. I saw no fugitive dust from vehicle traffic.

I spoke with an operator, Eddie, who accompanied me around the site. Mr. Ryan Andrews was operating an excavator, at this time. I was informed that they had arrived at the site on 7/11/2020, and would run here until the middle of the week of 7/28. They would crush about 10,000 tons of concrete and some RAP here, I was told.

#### Inspection:

The plant was running at this time. The crusher was labeled C320, and the screening unit was labeled SC2, with conveyors labeled UC, BF, and SFC. (I initially had mistaken UC as "4C" and SFC as "5FC".) Unlike the general PTI for non-metallic mineral processing plants, having the equipment be labeled was not a requirement of PTI No. 79-19, however.

Fugitive dust from the crusher looked to be around 15%, on an instantaneous basis. This was above the 12% limit instantaneously, and it was possible that a 6-minute average might exceed the 12% limit. I explained my concern to the operator, Eddie. Currently, there was one water hose applying water to the crusher, and one applying water to the screening unit. He therefore offered to move the water hose from the screening unit to supply additional water to the crusher. I considered this to be an acceptable resolution.

A belt on the crusher suddenly began to smoke, and the crusher was immediately shut down. Eddie explained that it was possible that a chunk of concrete had gotten caught in a rotor. He began to work on repairing the crusher. As it would probably be some time before the crusher was running again, I did not wait around to see the crusher running with two hoses supplying water to the crusher. I left the site at 1:26 PM.

#### Conclusion:

No instances of noncompliance were observed. Fugitive dust from the crusher had looked to be at or above the 12% limit, instantaneously, when the company had one water hose applying water to the crusher and one to the screening unit. However, the operator, Eddie offered, to relocate the hose from the screen to the crusher, so that it would have two hoses supplying water. I considered this to be an acceptable resolution. I was not able to see the crusher running with both hoses, however, due to a smoking belt, which necessitated repairs. My determination of compliance was based on the verbal commitment to have two hoses supply water to the crusher.

NAME Daniel W. Maheen

DATE 12/14/2020

SUPERVISOR B. M.