

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

P079859116

FACILITY: Palmer Farms, Inc.		SRN / ID: P0798
LOCATION: 2779 Ruth Road, DECKERVILLE		DISTRICT: Bay City
CITY: DECKERVILLE		COUNTY: SANILAC
CONTACT: Jarret Palmer ,		ACTIVITY DATE: 07/07/2021
STAFF: Nathanael Gentle	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled On-site Inspection.		
RESOLVED COMPLAINTS:		

On July 7, 2021, AQD staff conducted a scheduled, onsite inspection at Palmer Farms, Inc, SRN P0798. Staff arrived onsite at 9:55 AM and departed at 11:50 AM. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment Great Lakes and Energy, Air Quality Division (AQD) Administrative Rules; and to evaluate compliance with the facilities Permit to Install (PTI), PTI No. 41-17. AQD staff were assisted onsite by Mr. Jarret Palmer. Requested records were provided by Mrs. Susie Palmer.

Facility Description and History

Palmer Farms, Inc owns and operates a portable nonmetallic mineral crushing facility. As a portable crusher, the facility is transported to job sites where it is used to crush concrete down into smaller pieces. Process products including top-soil, concrete, and recyclable metal are separated based on material size and composition using a screener and magnets. At the time of inspection, the facility was located off Boyne Rd in Marlette, MI 48453. The coordinates of the location were 43°22'49.6"N 83°04'48.5"W. The facility operates under Permit to Install (PTI) No. 41-17, issued on March 10, 2017. PTI No. 41-17 is a general PTI for nonmetallic mineral crusher. MAERS reports for the facility are typically received in a timely manner.

Two Violation Notices (VN) are on record for the facility. Palmer Farms was issued a VN in May 2018 for not having equipment equipped with water sprayer or baghouse dust collector controls and not submitting a notice of intent to relocate and associated documentation to the appropriate district office and the Permit Section not less than 10 days prior to the scheduled relocation. A response was received from the facility stating water sprays were installed on the equipment, but they were not running at the time as they were testing to see how the material would crush. The facility said they would always run water when the equipment was operating in the future. Regarding not submitting the relocation notice, the response letter said the owner of the facility was undergoing medical treatments and forgot to submit the notice. The facility said more individuals would be aware of the need to submit the notice to ensure it was not forgotten again.

Palmer Farms was issued a VN in May 2019 for operating the crusher with visible emissions in excess of emission limits. A response letter was received from the facility stating that a water shuttle was onsite and being run at a low rate. The facility said the crusher would be always operated with full spray. During the onsite inspection conducted on July 7, 2021, water sprayers were observed to be operating. Excess visible emissions were not observed.

Process Description

In the original permit application, the facility was listed to consist of a CEC model 133x115 Horizontal Impact Crusher, a Marco Conveyor, a Finlay Conveyor, and an Exotec Conveyor. During the onsite inspection, a screener was observed. Mr. Palmer said the original permit application was submitted by his father and he was not aware all the equipment was not listed. A Process Information Form (EQP5756) was provided. Mr. Palmer said he would fill out the form and submit an updated list of equipment in the process. Based on our discussion, the only additional equipment not listed was the screener and an additional conveyor. In a follow up email after the inspection, Palmer Farms was reminded a copy of the updated equipment list should be included with all relocation notifications.

Compliance Evaluation

The onsite inspection for Palmer Farms was originally scheduled for May 25, 2021. Shortly after scheduling the inspection, some bearings went out on the crushing unit. As a result, the facility was unable to operate until the equipment was repaired. The onsite portion of the inspection was postponed ensuring equipment operation could be observed as part of the inspection. Palmer Farms reached out on June 17, 2021, once equipment was repaired. While equipment was being repaired, a records request was submitted to the facility on May 27, 2021. Mrs. Susie Palmer provided the requested records on June 3, 2021.

FGCRUSHER

Records of annual amounts of material processed for the years 2019 and 2020 were requested and provided. In 2019 the facility processed a total of 6900.1 tons of material. The month with the most amount of material processed was May with 2246.7 tons of material processed. The facility was not operated during the months of January, February, March, November, and December in 2019. During the year 2020, the facility processed 6099.7 tons of material. The month with the most amount of material processed was July with 1499.9 tons of material processed. The facility was not operated during the months of January, February, March, April, November, and December in 2020. Special Condition (S.C.) 1.3 limits the facility to processing no more than 2,000,000 tons of any non-metallic mineral through FGCRUSHING per year per site. Based of the provided records, the facility is well below this limit.

Daily records of the amount of material processed for each site at which the facility operates shall be maintained, S.C. 1.9. Daily records for the months of May 2020, July 2020 and April 2021 were requested and provided. Daily amounts of material processed are recorded on a calendar. Amounts are tabulated to track amount of material processed each month. Material processed is measured by an integral scale. The facility was operated 6 days during May 2020 with a total of 1212.8 tons of material processed during the month. Of the day's material was processed during the month, May 18 had the highest production with 221 tons. May 25 had the lowest production with 184 tons. An average of 202.1 tons of material was processed each day. During July 2020, the facility operated a total of 7 days processing a total of 1499.9 tons. Of the day's material was processed during the month, July 17 had the highest production with 317 tons of material processed. July 21 had the lowest production with 33.5 tons of material processed. An average of 214.3 tons of material was processed each day. During April 2021, the facility operated a total of

9 days, processing a total of 1600 tons. Of the day's material was processed during the month, April 20 had the highest production with 226 tons of material processed. April 27 had the lowest production with 94.3 tons of material processed. An average of 177.8 tons of material was processed each day. Based on the records provided, appropriate records for material processed appear to be in place and demonstrate compliance with permit material limits.

As previously described, Palmer Farms received a VN for excess visible emissions in May 2019. As part of the July 7, 2021 inspection, the VN was verified to be corrected. The facility has a total of six sprayers installed on the crushing equipment. At the time of inspection, all sprayers were running, and excess visible emissions were not observed, S.C. 1.2. Personnel said water sprayers are always on when the facility is operated. A portable water tank is brought to sites in which water hook up is not available. Sprayer nozzles are inspected and cleaned daily to ensure proper operation. In addition, spare nozzles are kept available on job sites.

The PTI application for the facility listed the crusher as being rated for a max capacity of 100 tons/hour. Onsite personnel reported the crusher to be able to operate at a maximum of 100-120 tons/hour. Time was taken to research the capacity of the crusher. The company that manufactured the crusher is no longer in business and online searches were unsuccessful at finding specifications of the crusher. Mr. Jarret Palmer said he would look for documentation of the crusher specifications and provide a copy to AQD district staff once found. Based on the reported capacity, the portable crusher appears to have a capacity less than 150 tons/hour and therefore does not appear to be subject to testing required by 40 CFR Part 60 Subpart OOO.

Equipment at the facility is powered by a diesel generator. Because equipment was operating, we were unable to safely get close enough to view the tag on the engine. Mr. Palmer reported the generator is 20 kW and utilizes approximately 175 gallons of fuel in 12 hours of operation. This equates to 14.6 gallons/hour. Based on these specifications, the generator appears to be exempt from permitting based on exemption R. 336.1285(g).

The facility is aware of the requirement to submit a relocation notice at least 10 days prior to relocating the equipment. Facility personnel said they are able to visually estimate how much time it will take to finish up at a site based on the amount of observed material remaining. Relocation notices are submitted to correspond with timing estimates to ensure submittal at least 10 days prior to relocation. At the time of inspection, relocation notices for the facility were not being received. Prior to the onsite inspection, conducted on July 7, 2021, the most recent relocation notice for the facility was received on September 20, 2020. This was brought to the attention of the facility while onsite. Upon discussion, it was revealed the relocation notices were not being sent to the correct email address. The facility reported they were trying to email the relocation notices to egle/aqd/permits/michigan.gov. The email address for the Bay City AQD District Office Secretary was provided to the facility. It was requested they resubmit relocation notices the AQD was supposed to have received between 9/20/2020 and the date of the inspection. The facility promptly forwarded all the applicable records to the email address provided. The facility appears to have been filling out relocation notices and was unaware EGLE AQD was not receiving the documentation. At this time, a violation notice is not being sent. The facility is aware relocation notices need to be submitted and will make sure they are submitted on-time, complete, and to the correct email in the future. In a follow up email sent to the facility

after the onsite inspection, the requirements of relocation notices, including material required to be included, was reviewed, S.C. 1.13.

Dust control activities for onsite roadways and stockpiles are conducted on an as needed basis. Methods used to control the dust include spraying with a hose. The facility will also fill the bucket of the loader with water to spread on roadways. Personnel said depending on the site they are located at, often the owner of the site will maintain dust control on site roadways and piles. At the time of inspection, Palmer Farms did not have records available for dust suppressant activities conducted on site roadways and stockpiles. The facility was made aware this was a permit requirement and assured records will be maintained moving forward. During the onsite inspection, the facility was operating. Visible dust emissions were not observed on site roadways or material stockpiles as they were being used and manipulated.

Summary

On July 7, 2021, AQD staff conducted a scheduled, onsite inspection at Palmer Farms, Inc, SRN P0798. Palmer Farms, Inc owns and operates a portable nonmetallic mineral crushing facility. The purpose of the inspection was to evaluate compliance with applicable rules and regulations, the facilities Permit to Install (PTI), PTI No. 41-17 and to verify the VN issued in May 2019 for operating the crusher with visible emissions in excess of emission limits was corrected. At the time of inspection, the facility appears to be in compliance.

NAME *Nathanael Dentel*

8/3/2021
DATE

SUPERVISOR *Chris Hare*