

P0947
MAWILA

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

P094749702

FACILITY: Edward C Levy Company		SRN / ID: P0947
LOCATION: 9690 Brennan Street, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Alicia Ramsdell , Enviromental Engineer		ACTIVITY DATE: 07/29/2019
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled Inspection for FY 2019		
RESOLVED COMPLAINTS:		

AQD staff conducted a scheduled inspection for FY 2019 of Edward C Levy Company aka; Levy Aggregates Brennan Street Dock and, Brennan Street Dock, located at 9690 Brennan in the City of Detroit. The purpose of the inspection is to determine the facility's compliance with AQD's PTI No. 136-18, applicable state and federal air pollution rules and regulations. Scale Operator, Chris Barron, coordinated this inspection with AQD staff.

Background:

This is the former site of Marblehead Lime, which operated at this address until February 28, 1996. This source is an existing aggregate dock located along the River Rouge near Jefferson. The Facility property, and all adjacent parcels are zoned M4 intensive industrial. A Fugitive Dust Plan was signed by the owners and tenants for this property in November 1997 and presented to Wayne County Air Pollution Control.

In 2018, the Edw. C. Levy Co. Brennan Street Dock developed and implemented an Operating Program (PTI No. 136-18). The purpose of this program is to describe the tools and methods used to control fugitive dust emissions in accordance to Section 5524 of the Natural Resources and Environmental Protection Act, being MCL 324.5524, *Fugitive dust sources or emissions*.

Facility Description:

The primary industrial activity at this Site is the importing and exporting of construction aggregates. Aggregates are delivered to the Site by both ship and truck, and stockpiled utilizing conveyors and front-end loaders. Front-end loaders are also used to load construction aggregate into outbound trucks. Construction aggregates are loaded onto and off ships utilizing a conveyor system.

The Brennan Street Dock typically operates 5 days/week in the winter months and 6 days/week in the summer. Hours of operation during the week are 5:30 a.m. – 3:00 p.m. and on Saturday's 6:00 a.m. – 12:00 noon. Typically, there are 2-3 employees this site.

Emissions:

Potential emissions from the storage and handling of aggregate materials and dust emissions from paved and unpaved roads were calculated by the company. The emissions were below

major source threshold (18.2 tpy of PM10).

Control Device:

Emissions are controlled with water spray or other dust suppressants that are in compliance with MCL 324.5524.

Inspection Narrative:

Prior to this inspection surveillance was conducted on 7/11/19 and 7/29/19 before entering the facility to conduct this inspection. No evidence of fugitive dust was observed on-site. On 7/29 minor track-out is observed on Brennan Street from truck traffic leaving the site but does not extend to Jefferson.

Upon arrival, I conducted a pre-inspection conference with Scale Operator, Chris Barron. She asked if I had an appointment with Alicia, I answered that this is an unannounced inspection. Ms. Barron stated that Alicia is an Environmental Engineer with Levy that handles this type of inspection and she would call her. Ms. Barron also stated that the City of Detroit made a fugitive dust inspection about 3 weeks ago and Alicia was present for that scheduled inspection. After leaving a voice message for Alicia, Ms. Barron suggested I drive around the site while she awaits a return call from Alicia.

After waiting in the office for awhile and having reviewed the fugitive dust logs kept daily, I decided to drive around the site. There was no activity at this time, 2 front-end loaders with drivers seemed to be waiting for a work assignment. Driving around the site there were 8 large piles of aggregate material. Very little dust was observed or kicked up by my vehicle, speed limit signs are in place. The conveyor system was not in operation.

Post Inspection:

Upon return to the office, Ms. Barron stated that Alicia called and is unable to come to the site but would like to talk with me. After talking with Alicia on the phone, it was clear that she is very familiar with AQD's PTI No. 136-18 and its requirements. She will send a summary copy of the operating logs for the sweeper and water trucks from September 2018 to July 2019 (records received the next day and are included in this report).

During our conversation, I brought the track-out condition on Brennan Street to her attention. Alicia stated that she would have the company's water truck come out this afternoon.

The company has a CERTIFICATE OF OPERATION with Fugitive Dust Plan issued by the City of Detroit, Buildings, Safety Engineering and Environmental Department.

Note – AQD staff left the site approximately 2:45 and returned about 2 hours later. At that time Brennan Street had been cleaned and the site was closed but it was easy to determine that the site had also been treated.

Compliance Determination:

Based upon this inspection of Brennan Street Dock located in the City of Detroit, it appears this facility is operating in compliance with PTI No. 136-18 and other the applicable air quality rules and regulations.

Note – PTI No. 136-18 identifies the facility address as 9690 Brennan Street with SRN: P0947 at this address is a VACANT building. The adjacent property address 9785 Brennan with SRN: B8737 has a small building identified as the Scale House in a diagram included in PTI No. 136-18. That is an occupied building housing an office space where Scale Operator, Chris Barron was contacted. This matter was brought to the attention of Environmental Engineer, Alicia Ramsdell, she stated that the PTI had the correct information.

This issue may require further review at the next inspection.

NAME *J. Krawiec*

DATE *11/21/19*

SUPERVISOR *JK*