

P0947
MANILA

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

P094764768

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: 09/22/2022
STAFF: Gerald Krawiec	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled for FY22		
RESOLVED COMPLAINTS:		

Inspection – 9/22/2022

Contacts – Alicia Ramsdell, Environmental Engineer, (313-402-5823)
Scott Couture, Aggregate Distribution Coordinator, (248-255-1294)

AQD staff conducted a scheduled inspection for FY 2022 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.

Like last year due to continuing public health concerns of COVID-19, AQD is coordinating inspections. The date and time of this inspection was coordinated with Alicia Ramsdell. At that time, I requested to have copies of all recordkeeping and/or logs required to be kept by AQD's PTI No. 136-18 for the last 12 months. A copy of the Certificate of Operation with Fugitive Dust Plan issued by the City of Detroit's Buildings, Safety Engineering, and Environmental Department (BSEED) would be helpful.

Scheduling inspections and procuring copies of required recordkeeping/logs is intended to reduce the amount of time that AQD staff are on site and in close contact with company employees. Records will be reviewed off site and additional information if required can be transmitted by email.

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 August 2018, the Edw. C. Levy Co. Brennan Street Dock applied for and on September 21, 2018, was issued an Operating Program (PTI No. 136-18). The purpose of this PTI is to describe the tools and methods used to control fugitive dust emissions in accordance with Section 5524 of the Natural Resources and Environmental Protection Act, being MCL 324.5524, *Fugitive dust sources or emissions*.

This site was last inspected by AQD on 9/2/2021 and found in compliance. There is no history of citizen complaints.

Facility Description:

The source is an existing aggregate dock and a true minor source. The primary industrial activity at this 16-acre site is the importing and exporting of construction aggregates. Aggregates are delivered to the site by both ship and truck, and then stockpiled utilizing conveyors and front-end loaders. Front-end loaders are also used to move aggregate piles and load construction aggregate into outbound trucks. Construction aggregates are loaded onto and off ships utilizing a conveyor system. Limestone and most other aggregates on-site must meet MDOT specifications.

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 3 employees at this site (1 scale operator and 2 equipment operators). The scale operator is housed in a small building that is heated by propane gas from a 500-gallon propane tank on-site. Off road diesel fuel is stored in a 100-gallon fuel tank and used for the on-site heavy equipment.

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 particulate emissions were below major source thresholds. The PTE for controlled PM10 emissions equals 18.2 tpy based on material throughput of 1,000,000 tpy. The material throughput for the year 2021 was 733,699 tons.

Control Device:

Emissions from unpaved roadways and stockpiles are controlled with water spray and/or other dust suppressants that are in compliance with MCL 324.5524. Wet street sweepers are utilized to control track-out onto Brennan Street and other paved roadways.

Inspection Narrative:

Prior to this inspection surveillance was conducted several dates (5/5/22, 6/10/22, plus) while I was working in this area and on 9/22/2022 before entering the facility to conduct this inspection. No fugitive dust emissions were observed on-site. Today there was a wet sweeper working on Brennan Street when I arrived.

Upon arrival, I conducted a pre-inspection conference while outside of the office building with Ms. Ramsdell, and Mr. Couture. Ms. Ramsdell stated that the City of Detroit, BSEED was on-site in the spring and is expected in about 2 or 3 weeks to conduct the 2nd fugitive dust inspection for 2022. We discussed the purpose of this

inspection and general operations. Ms. Ramsdell emailed all the information that I requested; all recordkeeping/logs required to be kept by AQD's PTI No. 136-18 for the last 12 months. Also, a copy of the Certificate of Alternative Compliance issued by the City of Detroit's Buildings, Safety Engineering, and Environmental Department. These records will be reviewed off site and additional information if required can be provided via email.

All three (3) of us entered the pick-up truck for a tour of the site. There is some activity currently. Both front-end loaders onsite were operating. Driving around the site there were 10 piles of various sizes and grades of aggregate material. Some piles as high as 45 feet, the permitted limit is 50 feet. The unpaved roadways had been recently treated with calcium chloride. No dust was observed from the vehicle as we drove around the site, and speed limit signs are in place. The conveyor system was not in operation. Limestone and other aggregates use by MDOT must meet strict specifications.

Post Inspection:

Upon return to the office area, we discussed the conditions that I observed. I stated that I felt the company was continuing to do a good job controlling fugitive emissions. The records I requested were emailed to me just yesterday and I have not had the time to review anything before this inspection. Therefore, before I can determine full compliance, those records need to be printed and reviewed. The company is confident that I was provided everything I need and that the records are in good order.

The company received its CERTIFICATE OF ALTERNATE COMPLIANCE issued by the City of Detroit, Buildings, Safety Engineering and Environmental Department. The expiration date is 12/20/2022.

Compliance Determination:

Based upon the records review and the on-site inspection of Edward C Levy Company aka; Levy Aggregates Brennan Street Dock, and Brennan Street Dock located in the City of Detroit, it appears this facility is operating in compliance with AQD's 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 is 9785 Brennan (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 is located. This matter of perhaps an incorrect address on PTI No. 136-18 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 another time.

NAME *Lyk Lawson*

DATE *10/17/22*

SUPERVISOR *JK*