DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

P103155092

FACILITY: A & E Aggregates, Inc.		SRN / ID: P1031
LOCATION: 8800 Pinckney Road, PINCKNEY		DISTRICT: Lansing
CITY: PINCKNEY		COUNTY: LIVINGSTON
CONTACT: Pete Granzow,		ACTIVITY DATE: 08/12/2020
STAFF: Shamim Ahammod	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Conducted a scheduled inspection to determine the company's compliance with the requirements of PTI No. 90-19.		
RESOLVED COMPLAINTS:		

On August 12, 2020, Michigan Department of Environment, Great Lakes and Energy-Air Quality Division (EGLE-AQD) staff, I (Shamim Ahammod) conducted a scheduled inspection of A & E Aggregates (SRN: P1031) located at 51500 Napi Dr, Shelby Charter Twp, Michigan. The purpose of the inspection was to determine the company's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of General Permit to Install (PTI) No. 90-19 for a non-metallic mineral crusher and its associated equipment.

Permit History

General Permit to Install (PTI) No. 90-19 for a non-metallic mineral crusher and its associated equipment was approved on June 11, 2019.

Inspection Arrangement

Due to the COVID-19 pandemic, I prearranged this announced inspection on August 12, 2020. I also requested the record-keeping information before the inspection day to reduce the inspection time. Mr. Pete Granzow, General Manager, of A & E Aggregates sent me the requested information via email after the inspection day.

Onsite Inspection

On August 12, 2020, at 1.35 PM, I arrived at the facility and was greeted by Mr. Granzow, General Manager of A & E Aggregate. I introduced myself, provided credentials, and stated the purpose of the inspection. Hard hat, Safety vests, safety goggles and safety shoes are required to visit this facility. Mr. Granzow and I toured to the facility. Mr. Granzow explained the process of the operation.

Source Description

The facility is a nonmetallic mineral crushing facility consisting of crusher(s) and associated process equipment including grinding mills, drills, screening operations, bucket elevators, belt conveyors, loading and bagging operations, and storage bins. Each crusher and screen is equipped with a water spray. Screen is used to separate fine material from coarser material. The coarser materials are then loaded into hopper, conveyed to cone crusher. The sand, gravel and aggregate are sold to the road contractors and asphalt plants.

REGULATORY ANALYSIS

FGCRUSHING

Emission Limits

Per SC 1.1, the particulate matter (PM) emissions from each baghouse dust collector portion of FGCRUSHING shall not exceed 0.04 pound per 1,000 pounds of exhaust gases, calculated on a dry basis. The permittee does not have any baghouse. Instead of having baghouse, the facility's screens and

crushers are equipped with water sprays. However, PTI SC 1.7 states: "Each crusher and screen shall be equipped with a water spray. A baghouse dust collector may be installed in lieu of water spray for any particular piece of equipment. The control equipment shall be properly operated as necessary to comply with all emission limits." According to this condition, water spray is sufficient control for the process.

Material Usage Limits

Per SC 1.3, the permittee shall not process more than 2,000,000 tons of any non-metallic mineral through FGCRUSHING per year per site. At this site, the permittee started operating on November 26, 2019. The total material throughput in FGCRUSHING from 11/26/2019 to 8/19/2020 was 119133.91 tons.

Per SC, 1.5, the permittee shall not crush any asbestos tailings or asbestos containing waste materials, as defined by the National Emission Standard for Hazardous Air Pollutants regulations, in FGCRUSHING. The permittee does not crush asbestos tailings or asbestos containing waste materials, according to Mr. Granzow.

Equipment

Per SC 1.7, each crusher and screen shall be equipped with a water spray. A baghouse dust collector may be installed in lieu of water spray for any piece of equipment. At the time of inspection, I observed the facility's screens and crushers are equipped with water sprays. A & E does not utilize a baghouse. Water or chloride is used to control processes and fugitive emissions.

Testing

Per SC 1.8, within 60 days after achieving maximum production rate, but not later than 180 days after initial startup of FGCRUSHING, verification of visible emission rates and particulate emission rates from all NSPS subject crushers, screens, all transfer points on conveyors, and all other miscellaneous equipment associated with FGCRUSHING. The permittee has verified the visible emission rate and particulate emissions rates on July 24,2019.

Monitoring

Per SC 1.9, the permittee shall keep, in a satisfactory manner, daily and annual records of the amount of material processed for each site at which the facility operates. I received daily, monthly and annual records of the material processed at this facility via email from from the period of 11/26/2019 to 8/19/2020.

Fugitive Dust Control Plan

The plant is not equipped with a baghouse. I observed, fugitive dust from plant's operation was controlled by applying water directly into the crusher while crushing was taking place.

The company is abiding by the Fugitive Dust Control Plan in Appendix A of its permit. Specifically, the following measures are being taken by the plant to control fugitive dust: the drop distance at each

transfer point and storage pile is being minimize; all vehicles are covered before leaving the site; a truck applies water to the roadways and plant yard whenever necessary; material spills are immediately cleaned up; storage piles are watered whenever necessary; and the time and date of each water application are being recorded. The plant also applies calcium chloride to its roadways and plant yard when necessary to control potential fugitive dust emissions.

Mr. Granzow sent me the calcium chloride application records from May 2019 through July 2020. Records indicated the amount of calcium chloride (in gallon) applied to the plant and date of application.

Conclusion

Based on the on-site inspection, it appears A & E Aggregate is in compliance with the requirements of General Permit to Install (PTI) No. 90-19.

NAME

DATE September 14, 2020 SUPERVISOR