

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

P108661815

<b>FACILITY:</b> Dani's Transport		<b>SRN / ID:</b> P1086
<b>LOCATION:</b> 225 East Columbia Avenue, PONTIAC		<b>DISTRICT:</b> Warren
<b>CITY:</b> PONTIAC		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Jeremy Raymo , Operations Manager		<b>ACTIVITY DATE:</b> 01/20/2022
<b>STAFF:</b> Robert Joseph	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled inspection of transportation facility		
<b>RESOLVED COMPLAINTS:</b>		

On January 20, 2022, I, Michigan Department Environment, Great Lakes, and Energy-Air Quality Division staff Robert Joseph, conducted a complaint investigation and a scheduled on-site inspection of Dani's Transport (SRN: P1086) located at 225 E. Columbia Avenue, Pontiac, Michigan 48340. The purpose of this visit was to determine the facility'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; and the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and to verify the source of alleged fugitive dust complaint received by the AQD that day on January 20, 2022.

### **Facility Overview**

Dani's Transport is a transportation trucking facility that receives and delivers aggregate material (crushed rock and topsoil which is stored on-site generally in piles) to commercial and residential customers. This location is in Pontiac and there are several locations in southeast Michigan - including South Rockwood, Milford, and Ruby.

The facility does not perform concrete crushing operations, however, at least two portable Non-Metallic Mineral Processing Plants have visited the site within the last two years on occasion to perform aggregate crushing operations; Rock Recyclers (N6837) which was cited for several permit violations in January 2019, and most recently Great Lakes Aggregates (P1016) has also been on-site.

The facility itself has also been cited by the AQD with two letters of violations; October 2019 and May 2021 due to the unreasonable interference caused by fugitive dust from the facility's aggregate piles and roadways. The facility has since been more cognizant of preventing this from being a nuisance to the surrounding community. It was previously suggested to the facility that all dust suppression activities be documented and recorded in an attempt to prevent/minimize this after the initial violation notice was issued.

The complaint today was the first complaint alleged against the facility since the 2nd violation was issued in May 2021. Today's fugitive dust complaint was not alleged to have been due to the facility's storage piles or untreated roadways, but rather due to an unknown portable nonmetallic mineral processing plant that was operating on-site.

### **Complaint Investigation**

I arrived at the abandoned General Motors parking lot located just east of the facility at approximately 1 p.m. This is the only area where the facility can be viewed off-site given the surrounding topography of the area. There is a large eight-foot-high fence which runs north/south and separates the abandoned General Motors parking lot and the facility's property line. From this position the facility's rear roadways and aggregate piles can

be observed. The sky conditions were cloudy with a wind speed and direction just under 10 mph west from the north/northwest (accuweather.com). From this location, I did not observe fugitive dust plumes leaving the site.

The State of Michigan Air Pollution Control Rules Part 9; Emission Limitations and Prohibitions - Miscellaneous, R.336.1901 Air contaminant or water vapor; prohibition state the following:

Notwithstanding the provisions of any other rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:

(a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property

(b) Unreasonable interference with the comfortable enjoyment of life and property.

In the professional judgment of the AQD, after 30 minutes of viewing the site with wind gust present, there was no fugitive dust observed leaving the site or causing a nuisance to the surrounding community.

### **Facility Inspection**

I proceeded to visit the facility and arrived there shortly before 2 p.m. Upon arriving, I observed the non-metallic mineral processing plant operating on-site. I approached the site foreman, James, and I introduced myself and presented my identification and stated the purpose of my visit. James indicated the portable plant is known as Great Lakes Aggregate, however, this was not the same Great Lakes Aggregate entity that was on-site previously. There are over a dozen nonmetallic mineral processing plants in the state with this common name. The operating equipment was operating with water on the crusher, screens, and conveyors and there did not appear to be fugitive dust leaving the site.

James indicated they had been operating on-site since December and were slated to remain there until mid-late February. James did not have the facility's permit information at the site. I asked if Mr. Thomas Downs is the project manager and he indicated that he is. I provided James my contact information and informed him I would contact Mr. Thomas Downs. Mr. Downs is manager of several Great Lakes Aggregates' plants in the state. Given that I was unable to view their permit, nor did I observe fugitive dust being generated from their operations, I proceeded to inspect the facility of Dani's Transport.

I went inside the office and met with Mr. Jeremy Raymo, General Manager, of the facility and I introduced myself and presented my identification and stated the purpose of my visit. I indicated to Mr. Raymo that I was here to conduct a scheduled on-site inspection of the facility and to investigate a fugitive dust complaint received by the AQD today. I informed him that I did not observe fugitive dust leaving the site's yard or due to the operations of the nonmetallic mineral processing plant.

I asked Mr. Raymo to provide some general information regarding the facility's staffing and operation hours. He indicated the facility operates six to seven days a week, typically from 6:00 a.m. to 6 p.m. with some maintenance staff on-site until 1 a.m. or later. The facility employs approximately 40 employees consisting of office and yard personnel, mechanics, and truck drivers.

The facility maintains a conveyor belt and an aggregate screen on site that is used to screen topsoil which is a permit-to-install exemption per Rule 285(2)(t); Equipment for the mining, loading, unloading, and screening of uncrushed sand, gravel, soil, and other inorganic soil-like materials.

This process was not operating and only operates between May-October for seasonal topsoil. The facility purchases the topsoil and also obtains excavated material from construction sites, and if suitable, is screened and sold to customers.

The facility maintains a 10,000-gallon water tank, 5,000-water wagon, and a 2,500-water truck on-site to ensure the facility's yard/roadways are free from fugitive dust leaving the site. The equipment is operated by the facility's primary operator or the mechanic on-site. In addition, a vac sweeper and a broce broom sweeper are maintained on site for sweeping the yard which is operated by the yard staff. Mr. Raymo indicated the facility contracts, Sweepmaster, to wet sweep the facility on a weekly basis and on an as need basis. The facility decided against using calcium chloride as discussed last year since pellets lack effectiveness when placed on a hardened surface such as concrete.

I requested to review the facility's fugitive dust records and Mr. Raymo indicated he was unaware that records were advised to be kept by the facility given that they do not have air use permit. He then contacted Mr. Mark Peyerck, Region Manager, via telephone and Mr. Peyerck informed him that staff was to be keeping records of all watering and sweeping activities occurring at the site. Mr. Raymo apologized for being unaware of this and indicated that he would ensure the facility would maintain this going forward. I informed him that it is strongly advised that the facility maintain records and that the facility would be subject to violation should future complaints be alleged and verified to be originating from the facility's yard. I left the facility without further concern and thanked Mr. Raymo for his time.

Shortly thereafter I received a telephone call from Mr. Jordan Stol, supervisor, for Great Lakes Aggregate. He provided the facility's SRN (N7618), permit information (160-06J), and the notification the facility previously submitted to EGLE regarding the location change from the Ajax-Rochester Hills plant to Dani's Transport-Pontiac. He also provided their water certificate coverage submitted previously to WRD. The processing plant anticipates producing ~ 30,000 tons during the approximate eight week stay at this current location. Mr. Stol assured me that his workforces would implement the fugitive dust plan as outlined in their nonmetallic mineral processing permit, and that he would communicate with Dani's Transport to ensure there are no further concerns. I informed him that should future complaints being received by the AQD alleging the plant to be the origin source that it would be investigated accordingly.

## **Conclusion**

Based on the AQD inspection, Dani's Transport is in compliance of the aforementioned requirements and the complaint alleged against Great Lakes Aggregate will be resolved based on this investigation. It is in my expert opinion that the fugitive dust was noticed by the complainant today, but it may have originated from the site during the overnight hours on Wednesday, January 19, when the wind conditions were gusty (between 15-20 mph) from the west/northwest with no onsite operations occurring at that time. Should additional

complaints be received against Great Lakes Aggregate or Dani's Transport they will be investigated accordingly.

NAME Robert Joseph

DATE 03-03-22

SUPERVISOR Joyce