

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

P121474360

FACILITY: Techni-Comp Composting Specialist		SRN / ID: P1214
LOCATION: 4152 Dove Road, PORT HURON		DISTRICT: Warren
CITY: PORT HURON		COUNTY: SAINT CLAIR
CONTACT: Mr. Edward Forton , Owner		ACTIVITY DATE: 10/22/2024
STAFF: Jillian Cellini	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Inspection to determine compliance with state and federal rules and the conditions of the Permits to Install (PTI) #44-21 and #28-23.		
RESOLVED COMPLAINTS:		

On October 22, 2024, I (Jillian Cellini, EGLE-AQD) conducted a scheduled inspection of Techni- Comp Composting (P1214) located at 4152, Dove Road, Port Huron, Michigan. The purpose of the inspection was to determine 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 the Permits to Install (PTI) #44-21 and #28-23.

I arrived at the site at around 9:30 AM I met Mr. Edward Forton (Owner) in the main office at the facility. According to the Techni-Comp website (<https://www.technicomp.info/>), this facility specializes in demolition, driveways, lot clearing, and topsoil and concrete removal. They also sell and deliver product (topsoil, 21A crushed concrete, gravel, asphalt millings, and clean fill) by the yard. The website states that deliveries are limited by yardage (20 – 25 yd³). The facility is open from 8 AM until 5 PM and only has 2 employees (Edward and another employee who works in the office). The facility is located near other businesses including a building material supplier, a truck rental company, an ice-skating rink, and a garbage collection service. The nearest residential area is ~1,000 feet away and the Huffman Drain is ~1,700 feet away. The property itself is wooded and the area where the crushing operation is located is surrounded by trees.

After I arrived at the site and Edward answered a few general questions, we drove to the back area of the facility where the crushing is done. I observed that the two crushers, one impact crusher (No. 1) and one jaw crusher (No. 2), identified in PTI #44-21 were labeled properly and equipped with spray bars. I also observed a water spraying trailer which is used to keep dust down in the yard. Edward stated that he has not added any more equipment to the crushing operation since the last inspection (September 2022, https://www.egle.state.mi.us/aps/downloads/SRN/P1214/P1214_SAR_20220929.pdf). He also stated that any time he crushes, he wets down the material to keep dust down. He stated he also waters the piles if he sees the area getting dusty, but he does not keep records of watering. He stated he also does not use any other chemicals (e.g., CaCl₂) to reduce dust. During my time at the facility, I did not notice any visible dust emissions. As records of watering have not been kept as part of the Fugitive Dust Control Plan (Appendix A, III.(d)), this is a violation of PTI #44-21 (Process/Operational Limits, 1.6). Edward also stated he has not had testing to verify visible emission rates and particulate emission rates from the crushers. As it has been over 180 days since the initial start-up of the crushers, this is a violation of PTI #44-21 (Testing, 1.8) and 40 CFR Part 60 Subparts A and OOO. During the inspection, I notified Edward that watering records must be kept, and the emissions testing should be completed to be in compliance with PTI #44-21.

This facility did not complete an annual equipment inventory review or report emissions for 2023 in MiEnviro. As this facility is subject to 40 CFR Part 60 Subparts A and OOO, this

facility is required to report emissions according to EGEL-AQD's Policy and Procedure AQD -013. As this facility did not report their emissions for 2023, this is a violation of R 336.202 (Rule 2, Annual Reports).

Edward stated that the last time the crushers had been used was about 8 months prior and he is currently unable to operate either crusher at the facility as they are both down for repairs (one needs new hammers and the other will not turn on). I observed rust on both crushers where material enters the crusher. Edward explained it was rusty because they are not used often as the rust gets removed from that part of the crusher with use. He estimated he uses the crushers once a year for ~7-10 days in total. He stated that he tries to get all the crushing done for the year in that period as he does not use much material and has had mechanical problems with the crushers. He does not weigh any of the materials at any time during the crushing process or keep records of any of the materials that are crushed. As records of crushing (daily and annually) have not been kept, the facility is in violation of PTI #44-21 (Monitoring, 1.9). During the inspection, I notified Edward that daily and annual crushing records must be kept to be in compliance with PTI #44-21.

Edward stated that these crushers could be portable, but he only used them for that purpose once a few years ago. EGLE-AQD was notified of that portable crushing operation located at 16410 Stephens Dr. Eastpointe, MI (P1214) on February 3, 2023 when all the information required to be submitted for a PTI was received. A PTI for this operation (PTI #28-23) was approved on February 15, 2023. The PTI application states that the operation would be "crushing 1000 yards of concrete, approximately 90 ton/hour, crushed to approximately 1 by 3, emissions controlled by sprayed water. Approximately 8 hours a day for 10 days starting February 6, 2023, weather permitting" in the "Equipment or Process Description" section. If the facility crushed 90 tons of concrete/hour for 8 hours/day for 10 days, then this operation would have crushed approximately 7,200 tons of concrete. This is within the material usage limit of 10,000 tons per 12-month rolling time period outlined in PTI #28-23 (EUPROCESS, SC II.2). However, records of crushing (daily and annual) and watering (according to the Fugitive Dust Plan, Appendix B, I.(A)) have not been kept for this site, so the facility is in violation of PTI #28-23 (EUPROCESS, SC III.2 and SC VI.2).

In the "Equipment or Process Description" section, it also states that the crushers used at this location are the same (they have the same serial numbers) as the crushers currently located at the Port Huron location. This was confirmed by using Google Earth Pro as the latest image of that address was taken on 2/2024 and no crushing equipment was observed at the location. The same crushers were used at both locations and visible emissions testing was not done at either location. As it has been over 180 days since the initial start-up of the crushers, this is a violation of PTI #28-23 (EUPROCESS, SC V.1) and 40 CFR Part 60 Subparts A and OOO.

To operate the crushers, a diesel generator is used. I was not able to identify the make/model or the heat input for the generator. Edward stated that he got the generator from an auction and that it was very old and potentially an old military generator. The physical size of the generator (including the housing) was approximately 7 ft x 4.5 ft x 5 ft, which is much smaller than the typical physical size of a generator with a 10,000,000 Btu/hr heat maximum. Crushing operations usually have generators with heat inputs between 4,500,000 Btu/hr and 2,000,000 Btu/hr. Generators that are less than 10,000,000 Btu/hr heat input are exempt from PTI per R 336.1285(2)(g). The generator was not operating at the time of the inspection.

Edward stated that his main business, also operated at the same site, is an interstate freight/trucking operation (Forton's Express, Inc). He stated he has been stripping the property of topsoil to make a parking lot for the trucking operation. The products listed above are for sale, but he stated he has mainly been using the crushing materials generated at Techni-Comp to pave the driveway and parking lot for the freight/trucking operation and does not use the crushers very often. Edward explained that he usually sells product by the truck full (standard pick-up truck), but he does not do much business this way. Edward stated that when people pick up materials, they drive their vehicle up to the pile and then a loader loads the selected material into the vehicle. Edward stated that he estimates that the facility crushes between 2,000 and 3,000 yd³ of concrete and 1,000 yd³ of asphalt millings every year. According to <https://calculatorasphalt.com/crushed-concrete-calculator/>, crushed concrete has an average density of 2,400 – 2,900 lbs/yd³ (1.2 – 1.45 tons/yd³) and according to <https://www.gravelshop.com/shop/calculate-cubic-yard-foot-ton.asp?groupid=34&productid=388>, asphalt millings have a density of 1.21 tons/yd³. If the facility produces 3,000 yd³ per year of cement at a density of 1.45 tons/yd³ and 1,000 yd³ of asphalt millings at a density of 1.21 tons/yd³ the total weight of material produced from the facility per year is 5,560 tons. This is within the material usage limit of 2,000,000 tons outlined in PTI #44-21 (Material Usage Limits, 1.3).

According to Edward, he does accept some “scrap concrete” for crushing but does not crush any building materials. He stated the concrete he accepts is usually washed out from cement trucks from a nearby cement company. Edward stated he does not crush any asbestos tailings or any materials that could contain asbestos (PTI #44-21, Material Usage Limits, 1.5 and PTI #28-23, EUPROCESS, SC II.1).

Conclusion

Observations made during the inspection indicate Techni-Comp Composting (P1214) located at 4152, Dove Road, Port Huron, Michigan is not in compliance with PTI #44-21 or 40 CFR Part 60 Subparts A and OOO. Records of watering have not been kept as part of the Fugitive Dust Control Plan (PTI #44-21, Appendix A, III.(d) and PTI #28-23, Appendix B, I.(A.)), this is a violation of PTI #44-21 (Process/Operational Limits, 1.6) and PTI #28-23 (EUPROCESS, SC III.2). Records of crushing (daily and annual) have not been kept; the facility is in violation of PTI #44-21 (Monitoring, 1.9) and PTI #28-23 (EUPROCESS, SC VI.2). It has been over 180 days since the initial start-up of the crushers and emissions testing has not been completed, this is a violation of PTI #44-21 (Testing, 1.8), PTI #28-23 (EUPROCESS, SC V.1), and 40 CFR Part 60 Subparts A and OOO.

NAME Jilliam Celline

DATE 11/21/2024

SUPERVISOR K. Kelly