

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N050337065

FACILITY: LYON SAND & GRAVEL CO - RAP PLANT		SRN / ID: N0503
LOCATION: 51455 W 12 MILE ROAD, WIXOM		DISTRICT: Southeast Michigan
CITY: WIXOM		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 10/10/2016
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced site inspection of RAP Plant operating at Ace-Saginaw Asphalt Plant #9, Crow Island, Saginaw Michigan.		
RESOLVED COMPLAINTS:		

On Monday, October 10, 2016, AQD District Staff arrived onsite to conduct a self-initiated site inspection for the Lyon Sand & Gravel Co. Portable Crusher (SRN N0503). A relocation notice had been received by the Saginaw Bay District Office on September 23, 2016, indicating that the portable plant would be relocating to the Ace-Saginaw Paving Company – Plant #9, Crow Island, 4711 Veterans Memorial Parkway, Saginaw, Saginaw County, Michigan. Site inspection was conducted with the intent of confirming operational status as well as compliance with the AQD general permit for the portable plant. Both Ace – Saginaw Paving Company and Lyon Sand & Gravel Co. are part of the Edw. C Levy Company.

The plant was operating upon arrival. No Visible Emissions (VEs) were noted during the site inspection. Jeff Fenslau, was the operator at the time of the inspection.

FACILITY DESCRIPTION

The portable crusher is permitted under General Permit No. 199-09, approved on August 28, 2009. The equipment had previously been permitted under Air Permit No. 400-85AB. At that time Wayne County Department of the Environment Permit to Install No. C-11697 was also voided. No modification was of record for the referenced permit at the time of the inspection. An application for modification was submitted following discussions of the compliance evaluation for the site with Edw. C Levy Company Staff.

The present location is the Ace-Saginaw Paving Company – Plant #9, Crow Island, 4711 Veterans Memorial Parkway, Saginaw, Saginaw County, Michigan. This location is an asphalt plant located along the Saginaw River to the east and M-13 (aka Veterans Memorial Highway) to the west.

Recycle piles at the referenced facility are located at the northeast corner of the site. It should be noted that the actual location on site of the crusher is different than that identified in the relocation submittal, however the closest offsite building is still located greater than 500 feet. Per the most recent relocation notice, the plant was scheduled to be at this location from 9/27/2016 to 10/25/16.

Process equipment associated with the referenced general permit at the time of the inspection included:

EQUIPMENT PERMITTED	PERMIT EQ ID	COMPANY ID #	ONSITE 10/10/2016	NSPS SUBJECT	VE TEST DATE
Grizzly Feeder	Feeder	PF53	Y	Y	8/14/97
Under Crusher Conveyor	Under Crusher		Y	Y	8/14/97
Hazemag Crusher 1313 (APSE-1313Q, SN Hu1632)	Hazemag		Y	Y	8/14/97

Screen Feed Conveyor (American Bin & Conveyor)	Screen Feed	CV295	Y	Y	8/14/97
Double Deck Screen (Deister TFM-3P-2620)	Screen	6DD25	Y	Y	11/5/2010
Cross Conveyor 1	Cross Conveyor 1		UNK	Y	8/14/97
Cross Conveyor 2	Cross Conveyor 2		UNK	Y	8/14/97
Recycle Conveyor	Recycle		Y	Y	8/14/97
Transfer Conveyor 1	Transfer Conveyor 1		Y	Y	8/14/97
Transfer Conveyor 2	Transfer Conveyor 2	CV267	Y	Y	8/14/97
Radial Stacker (Superior)	Telestacker 150	SK-67	Y	Y	8/14/97
Conveyor	Under screen discharge		Y	Y	8/14/97

It was noted by the inspector that the screening unit and the feeder-crusher units have what appears to be built in conveyor systems associated with them.

The company is in the process of converting over to a new electronic records system, and each component/device (ex. the under screen discharge conveyor) is being labeled individually with asset ID no.s. At the time of the inspection it was noted that some of the equipment such as the McCloskey conveyor were not yet labeled with the new ID No.s, and did not appear to be part of the permitted equipment. When questioned, the operator reported that the equipment was associated with the site itself, and not the portable plant, and had not yet been labeled with the asset ID no. So at the time of inspection there were two different identification systems in use, and one McCloskey conveyor and one feeder not included in the permit.

District Staff contacted Edw. C Levy Staff regarding the unpermitted equipment, and explained that any equipment operated with the portable plant needed to be included in the permit, even if the permit was dedicated to one site, and was not relocated when the portable plant moved. The Company initiated activities for a permit modification that same week, and the application was received by Permits Staff on October 17, 2016. The application added the two identified pieces of unpermitted equipment, as well as assigned an asset ID no. to each piece of plant equipment. The permit application indicated that the two added pieces of equipment would be tested on November 2, 2016 for VEs.

COMPLIANCE HISTORY

The facility has been determined to be subject to NSPS OOO based on the reported capacity for the crusher of 400 tons per hour and a reported 1995 manufacture date. With the exception of the Deister

Double Deck Screen, all of the conveyors and associated equipment was also reported to have been manufactured in 1995. The Deister Double Deck Screen was reported to have been manufactured in 2005.

The above referenced relocation notice indicates that with the exception of the Deister Double Deck Screen, the equipment associated with the plant was tested for Visible Emissions (VEs) as required by NSPS OOO on August 14, 1997. The Deister Double Deck Screen was tested on November 5, 2010. As reported earlier, the permit modification application indicates that the two new pieces of equipment will be tested on November 2, 2016.

A review of Division databases appears to indicate that the facility submits annual emission reporting (MAERS) and in a timely manner. Based on the NSPS applicability, the facility is a fee subject site.

COMPLIANCE EVALUATION

The facility was operating upon arrival, as was the Ace –Saginaw Paving Co. Plant located on the same site.

Process Equipment- Equipment permitted under General Permit No. 199-09 included one primary crusher, one double screen, one feed hopper, eight conveyors and one telestacker. Each component was at the time of permitting provided with a device ID that stated the purpose/use of the device. Ex. Transfer #2 for transfer conveyor #2.

With the exception of the McCloskey Conveyor and the feed hopper referenced previously, process equipment was consistent with equipment specified in the September 23, 2016, relocation notice, and labeled consistent with the device IDs of the General Permit. (Special Condition 1.11). Wet suppression is provided to materials at the crusher by a spray bar and water source.

Power is provided by a generator mounted in a trailer, which is relocated with the plant. Based on size, these units have historically been exempt from permitting, and as mobile units are exempt from RICE requirements under subparts ZZZZ and/or JJJJ.

Material Use –Special Condition 1.3 of General Permit 199-09 limits the facility to a maximum of two million tons per site for the portable plant. 400 tons per hour is the maximum capacity of the equipment, and limits the throughput. The relocation notice for the location indicates that apx. 50,000 tons of material is anticipated for the apx. one-month operations at the site.. The MAERS for 2014 and 2015 submitted by the facility reported total annual production of 351,172 tons and 440,131 tons, respectively for the portable plant. Both the anticipated production and recent annual production by the portable plant are well below permit limits.

Special Condition 1.9 requires that records of daily and annual records of the amount of material the plant processes be kept. AQD staff confirmed that daily records are kept by the plant operator and provided to corporate office for supplemental record keeping activities. Monthly and annual totals are available upon request.

Special Condition 1.5 restricts the permit to non- asbestos containing material, and specifically restricts the crushing of any asbestos tailings and asbestos containing materials. Materials noted onsite for crushing appeared to be limited to asphalt piles for crushing and use as Recycled Asphalt Product (RAP), no asbestos containing materials are processed by the portable plant.

Visible Emissions – Special Condition 1.2a- 1.2h of General Permit 199-09 limits VEs for the Crusher and associated plant. VEs noted at the time of the inspection were well below permit limits.

Verification of VE rates for NSPS subject components of the plant (Special Condition 1.8) has been completed. District Staff noted that at the time of the 2009 General Permit, that the Deister Double Deck Screen indicated that testing had yet to be completed. The company confirmed that the testing had been completed November 5, 2010, and provided copies of testing results.

Special Condition 1.6 requires the plant to have and implement the continuous fugitive emissions control plan outlined in Appendix A of the General Permit. Recent rains had dampened the area. No fugitive dust was noted with respect to the plant, the roadways or the material stockpiles. Drop distances for plant devices were minimized, loads were covered, and filled to appropriate heights.

Other – Special Condition 1.13 covers limitations and requirements with respect to the location and relocation. This condition defines a minimum distance of 500 feet between the portable material crushing plant and the nearest residence, commercial establishment or place of public assembly. A review of data for the site indicated the permitted crusher is clearly less than apx. 500 feet from the nearest offsite structure, etc. Notification was received prior to relocation of the portable plant, the submittal was complete, and a copy of the general permit was posted on the work site.

Summary – On Monday, October 10, 2016, AQD District Staff arrived onsite to conduct a self-initiated site inspection for the Lyon Sand & Gravel Co. Portable Crusher (SRN N0503). A relocation notice had been received by the Saginaw Bay District Office on September 23, 2016, indicating that the portable plant would be relocating to the Ace-Saginaw Paving Company – Plant #9, Crow Island, 4711 Veterans Memorial Parkway, Saginaw, Saginaw County, Michigan. It should be noted that Lyons Sand & Gravel Co. is part of the Larger Edw. C. Levy Co.

The plant was operating upon arrival. No Visible Emissions (VEs) were noted during the site inspection. Jeff Fenslau, was the operator at the time of the inspection. Site inspection was conducted with the intent of confirming operational status as well as compliance with the AQD general permit for the portable plant.

As noted above, the company is in the process of identifying and labeling equipment with asset ID no.s as part of a new electronic records system. The equipment designations are not consistent with permitted device IDs, and included components that at the time of permitting had been considered part of a larger device. In addition, one conveyor and one hopper were identified that was not part of the general permit. When discussed with the plant operator, he indicated that the conveyor was not part of the portable plant, but was specific to the site and remained there when the plant relocated. Further discussions with Edw. C. Levy Company Staff clarified that the permit for an operating plant should include all equipment that will be associated with the plant, even if one or more pieces is not used at another location.

Discussions with the Company's Environmental Engineer have indicated that the existing General Permit will be modified to reflect the newer equipment designations as well as any other changes that may need to be made. The application for modification was received on October 17, 2016. The application included the two previously unpermitted pieces of equipment dedicated to the Carrolton site, assigned new asset ID No.s to all equipment associated with the portable plant, and reported that VE testing for the two new pieces of equipment would be conducted on November 2, 2016.

At the time of report preparation, all compliance issues have been resolved, and the facility will be in compliance with the issuance of the permit modification applied for. sgl

NAME Sharon U Blane

DATE 10/26/16

SUPERVISOR C. Gere