

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

N641369291

FACILITY: RIETH RILEY CONSTRUCTION CO., INC.		SRN / ID: N6413
LOCATION: Bay Shore Pit, BAY SHORE		DISTRICT: Cadillac
CITY: BAY SHORE		COUNTY: CHARLEVOIX
CONTACT: Paul Glotzhofer , Aggregate Manager		ACTIVITY DATE: 08/31/2023
STAFF: Caryn Owens	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Field Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Thursday, August 31, 2023, Caryn Owens of the Department of Environment, Great Lake, and Energy (EGLE) – Air Quality Division (AQD) conducted an on-site field inspection and records review of Rieth Riley Construction Co. (SRN: N6413). At the time of the inspection the crusher and associated equipment were located at the Pit at 411 M-68 in Afton, Cheboygan County, Michigan. More specifically, the site was located on the north side of M-68, approximately 1.3 miles east of Afton Road and M-68 intersection. The field inspection and records review were to determine compliance with Permit to Install (PTI) 485-99. The crusher and associated equipment at the site currently operate under a General Permit and is considered a minor source for particulate matter (PM) criteria air pollutants. Majority of the equipment, including the crusher are subject to New Source Performance Standards (NSPS) of Performance for Nonmetallic Mineral Processing Plants under 40 CFR, Part 60, Subpart OOO.

Evaluation Summary

The activities covered during this scheduled field inspection and records review indicates the site is in violation with PTI 485-99. Specific permit conditions that were reviewed are discussed below.

Source Description

The Crusher and associated equipment are considered a portable source and moves from pit to pit on a “as needed” basis throughout the construction season, typically April through November. The operations during the inspection were for crushing earth material for local construction sand and gravel projects. The associated equipment to the crusher consisted of a screener, a primary crusher, some conveyors to separate the different size particles of earth material into piles, and a secondary crusher and associated conveyors to storage piles of different particle size.

On-site Inspection:

During the field inspection it was sunny with calm winds between 0 to 5 miles per hour, and approximately 70 degrees Fahrenheit, and winds from the northwest. I inspected the equipment associated with the crusher, which all appeared labeled. I observed the following equipment connected to the crusher at the time of the inspection:

- PAC-11: Crusher,
- Overlander Conveyor,
- Grey Feeder Conveyor,
- Orange Feeder Conveyor,
- PBS-1: Conveyor,
- PCA-57: Conveyor,
- PAC-11: Lippman Crusher,
- PCA-59: Conveyor,
- PCA-30; Conveyor,
- PSS-37: Screener,
- PCA-35: Conveyor,
- PCA-52: Conveyor,
- PCA-2; Conveyor,
- PCA-50: Scale Belt,
- PCA_56: Conveyor,
- PCA-51: Conveyor (tristack),
- PCA-39: Telestack Conveyor

Review of General PTI:**Visible Emission Limits:**

During the inspection, there were dust plumes observed from the gravel pit while I was waiting for a representative to take me to the pit, but the dust quickly dissipated, and did not appear to go off-site. A method 9 visible emissions test was not conducted during the inspection. When I was at the pit, no dust plumes were observed, and the water sprays appeared to be operating. There were no buildings, rock drills, or equipment controlled by a baghouse located at the area of the crusher.

Material Usage Limits:

Based on the 2022 MAERS report and through records from Mr. Paul Glotzhofer, the Aggregate Manager of Rieth Riley, crushing operation was below the 2,000,000 tons of non-metallic material through the crushers from January 2022 through August 2023.

Only earth material is processed, screened and separated at this location. No asbestos containing materials are crushed at this pit.

Process/Operational Parameters:

Rieth Riley has a fugitive dust plan for the site included in Appendix A of the PTI, the haul roads appeared to be generally in good condition. There was some tracking at the entrance of the plant, and I requested the facility to get that swept up. As previously stated, some visible emissions were observed from the crusher inside the pit, but quickly dissipated. No visible emissions were present from the remaining drop points, storage piles, and the loaders feeding the crusher. According to the on-site representative, the plant is watered daily, and the records of when the plant was watered were up to date in the on-site binder.

Equipment:

I observed water sprays connected to the crushing and screening equipment at the site. No equipment contained a baghouse, and the equipment was in compliance with the visible emission limits during the inspection.

Testing:

The equipment that I observed at the plant is subject to the NSPS 40 CFR, Part 60, Subpart OOO. AQD does not have record of some of the conveyors at the plant tested for visible emissions. Since the conveyors have not had visible emissions testing completed on the equipment, this is a violation of testing Condition SC 1.8 of the PTI.

Monitoring:

Daily and annual records were kept onsite in the trailer at the pit. According to the on-site representative in the operator's tower, the plant was operating at 300 tons per hour, and between 3,500 to 4,000 tons per day. A records request was submitted to Rieth Riley for the actual amount of material crushed with this equipment since the plant began operating.

Recordkeeping/Reporting/Notification:

According to Mr. Glotzhofer, the plant relocated to this site May 8, 2023 and will be located here through September 1, 2024.

Permit Dates:

Majority of the equipment at the site was labeled. There was a gray conveyor that feeds to an orange conveyor that feeds to the overlander conveyor that were not labeled. The remainder of the equipment was labeled with identifying numbers.

Miscellaneous/Allowed Modifications:

New or additional equipment added to the process shall be submitted to the permit section and District Supervisor within 10 days before installing the additional equipment. There were 10 conveyors that were not covered on the EQP5756 forms for this PTI. This is a violation of PTI SC 1.12.a, c, d, and e of PTI 485-99.

The facility has had no outstanding, unresolved violations with AQD. Relocation notices have been submitted to AQD along with a geographical map with the portable equipment identified as well as residential and commercial establishments identified and distances between the two noted. The crusher is located further than 500 feet from residential and commercial establishments. During the field inspection, a copy of the permit was in a binder in the trailer by the crushing activities.

NAME Camp Owens

DATE 11-14-23

SUPERVISOR Shane Nixon