



ROSEVILLE

— CRUSHED —

An Equal Opportunity Employer

Revised October 4, 2023

Project No. 231039

Robert Joseph

Warren District Office

Air Quality Division

Michigan Department of Environment, Great Lakes, and Energy

27700 Donald Court

Warren, MI 48092

Response to the Violation Notice Dated August 30, 2023

Additional Information

Roseville Crushed, LLC (SRN N6658)

Roseville, Michigan

This letter is in follow-up to the response to the EGLE-AQD Violation Notice dated August 30, 2023 (VN) which was submitted on September 20, 2023. The VN suggests that Roseville Crushed, LLC (RC) is in violation of its Fugitive Dust Plan because of track-out from the facility. The allegations cited in the VN are as follows:

Process Description	Rule/Permit Condition Violated	Comments
Site Roadways	PTI 143-11A – Appendix B: <i>Nuisance Minimization Plan Fugitive Dust, Section I.(G)</i>	The exit of the roadway must have rumble strips that are appropriately designed and maintained to minimize track out

The letter submitted on September 20 provided information regarding the referenced citations, including: the date the alleged violations occurred; an explanation of the causes and duration of the alleged violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations; the dates by which these actions will take place; and what steps are being taken to prevent a recurrence. This letter is intended to provide additional information requested by EGLE since the September 20th letter was submitted. This includes the specific information requested in Joyce Zhu's September 28th email.

As we noted in our prior letter, RC has made several improvements in the last six months to minimize dust generated at the facility. These include:

- Installation of a 40 gallons per minute (gpm) water well
- New water cannon with 180° oscillation to control dust from the crusher
- Increased sweeping of the paved areas
- Additional staff committed to housekeeping, including a supervisor



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As requested by EGLE, RC has purchased additional rumble strips to minimize track-out onto Groesbeck Highway. The rumble strips were ordered before the September 20th letter was submitted; and we have conservatively estimated that they will be installed before October 20, 2023. EGLE suggested that the strips be:

- 1) A minimum of 10 feet wide. **These strips are 10 feet wide.**
- 2) Able to accommodate five revolutions of the tire of the largest truck that comes onsite. **At 50 feet, if the largest truck tire is 3 feet in diameter, the circumference is 9.42 feet. Five times 9.42 feet is a total of 47.1 feet. The rumble strips' length exceeds the length that would allow five tire rotations of the largest truck. This also meets the minimum requirement established by the District Office.**

These are one foot shorter in length than EGLE originally requested, however, rumble strips are only available in specific lengths and the length does exceed five times the rotation of the largest truck. In addition, the facility now has more than 50% more in length than the previous owners had in place. Roseville Crushed will wash down these strips at least weekly and maintain records on washing the strips with our existing air permit records.

Although RC is committed to maintaining the proposed dust control measures, we do not believe that a permit to install (PTI) application is necessary to make the requirements enforceable. As EGLE noted in the August 30th letter, Section I.G of Appendix B of PTI 143-11A requires that RC have rumble strips or use an alternative method as approved by the AQD District Supervisor. The site is currently using rumble strips and has agreed to install an additional section as we indicated in our previous letter. The site will apply for a modified PTI in the event that additional equipment is installed or other changes at the site are considered that merit a PTI.

As we indicated in our Letter dated June 21, 2023, RC recently purchased the facility. We appreciate having some time to determine the best overall solution to the issue noted in the VN. Since purchasing the facility, we installed a gravel pad prior to the scale to minimize track-out onto the paved area. We also moved the rumble strips closer to the scale to allow materials from the truck wheels to drop out onsite rather than in the road. Because these measures have not proved to be adequate considering the extreme weather events we have had this summer, RC is also investigating different types of vacuum trucks available to come clean the paved area, and the frequency necessary to keep this area clean. As described in requirement I.A of Appendix B of the permit, RC is also investigating the proper frequency for brining and watering of the roads. If brine is applied, excessive watering of the road will remove the brine and reduce the control measures, while keeping in mind that excessive watering of unpaved areas can also increase track out onto the paved areas. RC is committed to minimizing fugitive dust at the site and to finding the best overall methodology and frequency to meet the opacity requirements found in the permit. RC appreciates the flexibility allowed in Appendix B of PTI 143-11A, which allows us to work with the EGLE District Supervisor to determine the best overall control strategies for all areas without the need to modify the permit. RC looks forward to working with EGLE as we implement new procedures and strive towards continuous improvement in these areas.



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Please note that many improvements have been made at the site and we will continue to work diligently to establish an effective fugitive dust program. We appreciate EGLE's patience while we finish the remaining action items. In addition, we appreciate the information on complaints you forwarded (even when you were on vacation), because we would like to address them as soon as possible. Please understand we have additional long-term plans to address dust and vehicle traffic and track-out at the site we can discuss during our October 10 meeting.

If you have any questions, please contact me at 586.405.7774 (Arau@rauhomelec.com).

Sincerely,

Anthony Rau
Operations, Roseville Crushed, LLC

Attachments

By email and USPS

Attachments

Copy: Jenine Camilleri – EGLE-AQD, Lansing