

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

N665872326

<b>FACILITY:</b> ROSEVILLE CRUSHED LLC		<b>SRN / ID:</b> N6658
<b>LOCATION:</b> 29765 Groesbeck, ROSEVILLE		<b>DISTRICT:</b> Warren
<b>CITY:</b> ROSEVILLE		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Anthony Rau , Owner		<b>ACTIVITY DATE:</b> 06/11/2024
<b>STAFF:</b> Robert Joseph	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled inspection of Non-Metallic Mineral Processing Plant		
<b>RESOLVED COMPLAINTS:</b>		

On June 11, 2024, I, Michigan Department Environment, Great Lakes, and Energy-Air Quality Division staff Robert Joseph, conducted an on-site scheduled inspection of Roseville Crushed LLC (SRN: N6658) also referenced as “the facility” located at 29765 Groesbeck Highway, Roseville, Michigan 48066. The purpose of the inspection 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; the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and conditions of the facility’s Permit to install (PTI) 143-11A.

### **Opening Introduction**

Roseville Crushed, LLC (RC) now owned and operated by Rauhorn Electric, was formerly owned by North American Excavating Trucking and titled Roseville Crushed Concrete, LLC. The previous owners notified the AQD on September 26, 2022, of their intent to retire from the industry and sell the facility’s operating rights to Rauhorn Electric. The new owners, Rauhorn Electric, began ownership at the site in January 2023 and changed the facility’s name to the present name of Roseville Crushed, LLC. The facility is a non-metallic mineral processing plant that supplies aggregate material for construction projects primarily in southeast Michigan. The facility either supplies the material using its fleet of vehicles or to trucking companies that transport the material to its destination.

### **Background History**

The facility's current PTI, 143-11A, was issued under the previous ownership on August 23, 2019, after the facility contacted the AQD in May 2019 indicating that they intend to replace the facility’s 75-ton/hr maximum capacity crusher with the current 300-ton/hr maximum capacity crusher. In addition, the facility also operated under Consent Judgement (CJ), 15-676-CE, which was issued in April 2016 due to the facility’s non-compliance with its original permit, 143-11, after violation notices were issued regarding insufficient recordkeeping and inadequate fugitive dust practices. A request to terminate the CJ from the previous ownership was received by the AQD on January 3, 2023, given their eligibility to do so and their recent compliance history. A Certificate of Satisfied Judgment was received by the AQD via the Attorney General’s Office on February 21, 2023, and Consent Judgment 15-76-CE, was terminated as new ownership began operations later that Spring.

Upon beginning operations by the new ownership (Rauhorn Electric), the AQD received 10 complaints against the facility alleging fugitive dust was impacting the surrounding community due to the facility’s concrete crushing operations between April 2023 – December 2023. Violation notices (VNs) were issued to the facility on June 1, 2023, and August 30, 2023, as complaint investigations revealed operations generating fugitive dust

plumes and vehicular sedimentation track-out material onto the adjacent roadway – both causing nuisances to the surrounding community. Both VNs were resolved as the facility implemented additional fugitive dust controls.

### **Facility Tour**

I arrived on-site at approximately 11 a.m. and entered the facility's office. I met the facility's receptionist and introduced myself displaying my credentials and stating the purpose of my visit. The facility operates daily and some weekends primarily from 7 a.m. - 5 p.m. during the construction season – as well as other periods when necessary to meet customer demand. There are four employees on-site, a receptionist, and three field crew. I met with Chris and Jerry (site manager) and requested that they provide me with a tour of the facility's operations and equipment. The following details the observations noted during the site inspection per the facility's permit, 143-11A.

**PTI 143-11A** (only those sections with referenced conditions are detailed).

### **General Conditions**

The facility modified the process equipment with the addition of an unpermitted conveyor belt which violates the state of Michigan - Air Pollution Control Rule 201 – Permit to Install. This condition will be detailed in a violation notice to be issued to the facility.

***EU-PROCESS*** - (A combination of process equipment; screens, and crushers with a maximum rated capacity of 300 tons/hr, feeders, conveyors, etc., and control methods that include water sprays).

The facility's permit references the following infrastructure in Appendix A:

<b>Equipment Description</b>	<b>ID Number</b>	<b>Opacity Limit (Percent)</b>	<b>Control Device</b>
-Crusher	Eagle Crusher – E1	10	Water Spray
-Crusher	Diamond Crusher #2	10	Water Spray
-Screen	Simplicity Screen #02 – S02	10	Water Spray
-Conveyor	Conveyor #001	10	Water Spray
-Conveyor	Conveyor #008	10	Water Spray
-Conveyor	Conveyor #003	10	Water Spray
-Conveyor	Conveyor #005	10	Water Spray

### **I. EMISSION LIMITS**

There were no visible emissions from the drop point and transfer point portions of the operations.

### **II. MATERIAL LIMITS**

The facility does not process any asbestos or asbestos-containing waste within its operations. Based on the facility's limited recordkeeping and its 2024 Annual Emission Report, the facility does not appear to produce more than 3,000 tons of material per day, nor 150,000 tons of material per 12-month rolling time-period as determined at the end of each calendar month.

### III. PROCESS/OPERATIONAL RESTRICTIONS

There were no opacity exceedances observed with the facility's equipment during operation. The facility failed to adequately implement the conditions of Appendix B (Nuisance Minimization Plan for Fugitive Dust) as no records were maintained regarding fugitive dust control equipment inspections nor dust suppression activities detailing the date, time, observations, or the reason for the dust control activity – as well as actions performed. The facility has not complied with the Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60 Subparts A and OOO, as the unpermitted conveyor has not undergone visible emissions testing, Method 9. All other process equipment on-site met this requirement in September 2020. The facility did not operate each conveyor's control device (water sprays) as specified in SC IV.I noted below. These conditions will be documented as violations in a VN to be issued to the facility.

### IV. DESIGN/EQUIPMENT PARAMETERS

Two conveyor belts were operating without water sprays, and three other conveyors were operating with either a single or multiple water sprays. Jerry stated the water sprays were moved from the two conveyors to the other conveyors to ensure adequate dust suppression was applied to those requiring it. Jerry was informed that all operating conveyors must have water sprays as designated, at minimum. This condition will be documented as a violation in a VN to be issued to the facility.

### V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility has complied with the testing requirements for EU-PROCESS per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO, Visible Emissions, Method 9 for all equipment (performed September 2020) except for the additional conveyor belt that was operating on-site. This condition will be documented as a violation in a VN to be issued to the facility. The AQD has not required additional testing since the last performance test. There were no visible emission concerns on-site at the time of inspection.

### VI. MONITORING/RECORDKEEPING

The facility failed to complete all required calculations by the 15<sup>th</sup> day of the calendar month for the previous month. In addition, the facility failed to adequately maintain monthly calculations of the amount of material processed through EU-PROCESS by tracking the monthly hours of EU-PROCESS using the maximum rated capacity of the crusher (300 tons/hr). Records appear to indicate only monthly totals for 2023 but monthly hours were not tracked, nor was the maximum rated capacity of the crusher utilized. The facility provided the yearly hours in its 2024 Annual Emissions Report and was informed upon its submittal to modify its throughput total utilizing the maximum rated capacity of the crusher (300 tons/hr).

Also, the facility failed to maintain throughput records of EU-PROCESS on a 12-month rolling time-period basis. The facility also failed to track the daily hours of EU-PROCESS and did not use the maximum rated capacity of the crusher to determine its monthly throughput.

Roseville Crushed, LLC also failed to verify compliance with the visible emission limit in SC I.1 by taking six-minute visible emission readings from EU-PROCESS, a minimum of once per calendar operating day during maximum routine operating conditions. In addition, the facility failed to provide daily inspection records of the process equipment and the associated control devices prior to process start-up for each calendar operating day.

The facility also did not maintain records of visible emission readings from EU-PROCESS, nor did the facility maintain a log of maintenance activities conducted and repairs made to EU-PROCESS and to the control devices. Maintenance and daily inspection records for the EU-PROCESS fugitive dust control equipment were also not maintained.

All permitted conditions under Section VI. will be documented as violations in a VN to be issued to the facility.

#### **IX. OTHER REQUIREMENT(S)**

The facility failed to label all equipment as multiple conveyors were not labeled per the ID Numbers in Appendix A.

### ***EU-TRUCKTRAFFIC***

#### **I. EMISSION LIMITS**

There were no visible emissions exceeding 5% opacity from all wheel loaders and truck traffic.

#### **III. PROCESS/OPERATIONAL RESTRICTIONS**

Per Appendix B – Truck Traffic, all trucks leaving the site had a cover over the material load and the sign was posted advising this requirement. There were no on-site vehicles with contents that were dropping, leaking, blowing, or escaping.

#### **V. TESTING/SAMPLING**

Per federal NSPS Subpart OOO, the facility met the testing requirements for EU-TRUCKTRAFFIC in 2012 per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO.

#### **VI. MONITORING/RECORDKEEPING**

The facility failed to maintain records for visible emission readings of EU-TRUCKTRAFFIC a minimum of once per calendar day during maximum routine operating conditions.

All permitted conditions under EU-TRUCKTRAFFIC not being met will be documented as violations in a VN to be issued to the facility.

### ***EU-STORAGE***

## I. EMISSION LIMITS

There were no visible emissions exceeding 5% opacity from the storage piles.

## III. PROCESS/OPERATIONAL RESTRICTIONS

Per Appendix B – Storage Piles, the facility appears to be minimizing the materials drop distance to control fugitive dust concerns, however, they have failed to maintain records of all watering/dust suppressant applications.

## V. TESTING/SAMPLING

Per federal NSPS Subpart OOO, the facility met the testing requirements for EUSTORAGE in 2012 per the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subparts A and OOO.

## VI. MONITORING/RECORDKEEPING

The facility failed to maintain records for visible emission readings of EU-STORAGE a minimum of once per calendar day during maximum routine operating conditions.

All permitted conditions under EU-STORAGE not being met will be documented as violations in a VN to be issued to the facility.

## **APPENDIX A – Company ID Numbers**

The facility failed to properly label all process equipment.

## **APPENDIX B - Nuisance Minimization Plan for Fugitive Dust**

### I. Site Roadways/Plant Yard

The facility maintains a water truck to apply water to all truck traffic surfaces as there was little fugitive dust on-site, but no fugitive dust appeared to be leaving the site during the inspection. In addition, the facility has installed a fugitive dust curtain (December 2023) along the west side of the plant to aid in the prevention of fugitive dust from impacting the surrounding community.

The facility maintains a sign posted on-site indicating the speed limit to be under 4 miles per hour for all truck traffic. All input roadways appear to be paved with asphalt and crushed concrete surrounds the process equipment and material storage piles.

The facility exit utilizes three rubberized rumble strips, each 16' x 10'.

### II. Plant

The drop distance at each transfer point appears to be reduced to the minimum the equipment can achieve.

### III. Storage Piles

The stockpiles did not appear to be generating fugitive dust and the material drop distance appears to be minimized, however, the facility failed to maintain water/dust suppression activities.

#### IV. Truck Traffic

The facility maintains a posted sign informing all out-going trucks to cover their loads with tarps prior to leaving the site. In addition, there were no on-site vehicles with contents that were dropping, leaking, blowing, or escaping.

#### V. Management of Front-End Loader Operations

While on-site, it appears the facility's front-end loader was attempting to minimize drop height to avoid spillage of a material.

#### VI. Process Equipment

There did not appear to be any excessive fugitive dust emissions or malfunctions from any transfer system, storage bin, mixer, or hopper, and the water spray systems appeared to be maintained by those operating on the equipment.

#### VII. Recordkeeping

The facility failed to maintain daily records of the fugitive dust control equipment inspections and the dust control activities on travel surfaces as well as other surfaces.

All permitted conditions under Appendix B not being met will be documented as violations in a VN to be issued to the facility.

### Conclusion

Roseville Crushed LLC is not in 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; the Michigan Department Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, conditions of the facility's Permit to install (PTI) 143-11A. The facility appears to have improved its operations regarding fugitive dust control but has failed to maintain production and dust suppression records, therefore, a VN will be issued detailing all the violated permit conditions.

NAME Robert Joseph

DATE 06-21-24

SUPERVISOR Joyce