

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

N670535798

FACILITY: HUBSCHER AND SON, INC- CEDARAPIDS 443		SRN / ID: N6705
LOCATION: P.O. BOX 411, MOUNT PLEASNT		DISTRICT: Saginaw Bay
CITY: MOUNT PLEASNT		COUNTY: ISABELLA
CONTACT:		ACTIVITY DATE: 08/03/2016
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: unscheduled, self initiated site inspection for portable crusher that moves in and out of area annually.		
RESOLVED COMPLAINTS:		

On Tuesday, August 3, 2016, AQD District Staff arrived onsite to conduct a self-initiated, unannounced site inspection for relocated rock crushing equipment (General Permit No.192-99) (N6705) located at the Hubscher & Sons, Inc. Clare/Loomis Gravel Pit. The most recent site inspection for the portable unit was conducted on September 4, 2013.

Electronic notification of an upcoming relocation to the Loomis Gravel Pit was received on July 25, 2016. A relocation notice for the referenced portable crushing equipment was received on July 28, 2016.

FACILITY DESCRIPTION

Located at 6775 Clarabella Road, the referenced pit is located just east of intersection of Clarabella Road and Rogers Road, Clare, Michigan. Based on readily available plat maps it appears that the active pit is approximately 80 acres in size.

Per Hubscher personnel, the pit is over 10 years old. Sand and gravel is mined from the eastern end of the pit, using a dredge system and wash plant. No ponds were present on the site prior to initiation of mining activities onsite.

The wash plant consisted of a hopper which feeds (via conveyor) a screen which sorts coarser rock and gravels from the sands and conveys them to separate stockpiles. The resulting wet sands are pumped as slurry to a classifier thick separates out the sharp sands and stock piles them via a screw conveyor and stacker. The remaining water and flat sand (waste) is pumped to the "flats" where it is discharged to the surface. The existing wash plant is exempt under Rule 285(t).

The permitted crusher is relocated on an as needed basis to the pit to crush stone segregated out by the wash plant. Based on measurements from aerial photos, the crusher plant is located well over the 500 foot minimum set back required by permit [Special Condition (SC) V.5(c)]

EQUIPMENT

Equipment permitted under General Permit No. 192-99 includes the following pieces of equipment:

- Cedar Rapids 443-E Jaw/Roll Crusher with horizontal deck screen and 3 associated conveyors (No. 6219)
- Hartman Fabco feed hopper w/belt feeder (No. 6219A)
- Nordberg radial stacker (No. 6219B) (not in use at time of site inspection)
- Kolberg radial stacker (No. 6219C)

Equipment onsite is consistent with permitted equipment, and no modification was noted that would require permit modification. District staff noted that all pieces of equipment were appropriately labeled with ID No.s as required under SC IV.2.

Equipment Testing –

Equipment installed before August 31, 1983 is exempt from 40 CFR Part 60 New Source Performance Standards (NSPS) Subpart OOO for Nonmetallic Mineral Processing Plants. With respect to the permitted equipment only the Cedar Rapids Crusher (1958) is exempt from permitting based on age.

The hopper with belt feeder was installed in 1994, and VE testing was conducted on November 4, 1999. As was the Nordberg radial stacker was also installed in 1994, and based on records appears to have been utilized as a conveyor transfer point. It was also was tested on November 4, 1999.

The Kolberg radial stacker was installed in 1987. The referenced piece of equipment when used as a radial stacker reflects an end point and per Subpart OOO does not have a transfer point to test, as the material is going to the stockpile. No records of VE testing for the referenced piece of equipment was readily available on file.

COMPLIANCE HISTORY

No complaints or notices of violation associated with the referenced equipment (N6705) were found in the District Files.

COMPLIANCE EVALUATION

At the time of the inspection, the plant had been relocated and was operating. Special Conditions (SC) of General Permit 192-99 are discussed below. Please note that the “General Permit” for crushers has undergone some modifications since the referenced permit was issued. Differences in special condition numbers may vary between the 1999 version and the existing version. The referenced permit has not been modified since issuance.

Material Throughput

Under the existing General Permit, the facility is limited to less than 2 million tons of non-metallic mineral production per location per year (SC IV.6) In addition, the facility does not bring in materials to crush, and therefore does not crush any asbestos containing materials (SC IV.5).

Monitoring and Testing

Under the referenced permit, VE testing is required for those plant components subject to the NSPS Subpart OOO (SC III.B.1). As referenced above, the equipment all appears to be in compliance with testing requirements at the time of the inspection.

Fugitive Emissions

SCIV.4 requires implementation of fugitive dust controls as outlined in Appendix A of the General Permit.

Visible Emissions (VEs) are limited by permit to all components of the plant (SC I.C(1)). Water sprays installed at the crusher and/or screen (SC I.B, SC IV.3) provides adequate control of VE/fugitive emissions for the plant. VE/Fugitive emissions resulting from truck traffic, material storage piles, etc are controlled under the Appendix A continuous fugitive dust plan. (SC IV.4)

Record Keeping/Reporting

The subject site is required to report total annual emissions in the Michigan Air Emissions Reporting System (MAERS). The facility has submitted in a timely manner, and reported total emissions well below the 2 million ton per year per site permit limit (SC II.1).

Documentation of initial notification of startup (SC IV.1 and SC V.4) was not available in district files, and is believed to have been sent to records. Relocation notifications are submitted by the permittee in a timely manner and contain the required documentation (SC V.5).

SUMMARY

Site inspection was conducted with the intent of confirming operational status as well as compliance with the referenced permit. The portable plant was onsite at the time of the inspection, and appears to be operating in compliance with their permit. The existing wash plant is exempt under Rule 285(t). No visible emissions/fugitive dust was noted during the site inspection.

NAME Shavonette Blue

DATE 8/3/2016

SUPERVISOR C. Aare