DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

P054536907		
FACILITY: SAND PRODUCTS CORPORATION		SRN / ID: P0545
LOCATION: 5021 W US-2, MORAN		DISTRICT: Upper Peninsula
CITY: MORAN		COUNTY: MACKINAC
CONTACT: ROBERT COOK, FACILITY MANAGER		ACTIVITY DATE: 09/30/2016
STAFF: Ed Lancaster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Conducted sched	uled compliance inspection.	
RESOLVED COMPLAINTS:		

Directions: Sand Products Corporation is located between the Villages of Epoufette and Brevort, in Moran Township, Mackinac County, at 5021 West U.S. 2. My contact for the inspection was Mr. Robert Cook, Mine Superintendent, 906.292.5432.

Facility: The facility was started in 1963. The sand mine is located on the north side of U. S. 2, in 1980 the sand processing wash plant was completed and began operations on the south side of U.S. 2, on the shore of Lake Michigan. In 1984, the first ship was loaded with sand from the plant.

The company screens "bank run sand" to less than one-quarter inch and conveys it under the highway to a surge pile. From the surge pile the sand is conveyed to a transition scrubber to remove organic matter and other large material. This process is conducted under a roofed structure with no sidewalls. From this point, the washed sand is pumped inside the plant for further processing. The native sand has a clay content of 0.5 - 1.25%, the company uses three cyclones to remove this material. After further conditioning the final products are stored inside until they are loaded for transport on ships. Most of the sand is used in foundries.

The plant typically operates 30 weeks per year from April through November, running two 10-hour shifts, five day a week.

Permits: All of the equipment at the facility meets the Rule 285(t) exemption for the mining and screening of uncrushed native sand and gravel.

On November 18, 2014, Permit to Install No.134-14 was issued, for a sand and screened limestone conveying system at an existing sand mining and distribution (barge loading) facility. Email correspondence (dated October 27, 2014) between the Permit Section and Company made it clear the permit was intended for the "new" material handling equipment and storage piles identified in EUPROCESS, EUTRUCKTRAFFIC and EUSTORAGE.

Inspection: At the time of the inspection it was not clear, to my understanding, that the permit only applied to the "new" equipment. Mr. Cook informed me the company had not begun construction of the new plant, which was designed to process limestone from the Graymont mine, north of Brevort, which was not expected to be operational for another one to two years.

We began the inspection reviewing the permit conditions.

<u>EUPROCESS</u>: The "bank-run" sand has a high moisture content and I did not observe any visible emissions/fugitive dust as the sand fell from the conveyor onto the surge pile (Special Condition (SC) No.I.1). Mr. Cook assured me that the company does not process nor does the sand contain any asbestos material, SC No. II.1. Company weekly records show through the end of August, the plant has processed 429,651 tons of raw material, and has not processed more than 1,000,000 tons of material for any 12-month rolling time period, SC Nos.II.2 and VI.1-2.

The company applies water and calcium chloride as needed to maintain fugitive emissions to a minimum. Mr. Cook produced receipts for calcium chloride applications by a local contractor and the purchase of chloride flakes and a spreader applicator (SC No. III.1). Vehicle traffic is limited to employee and vendor trucks as all the sand is shipped out by barge.

<u>EUTRUCKTRAFFIC:</u> As mentioned above, there is no truck traffic associated with this plant, therefore the conditions in this emission unit are not applicable.

<u>EUSTORAGE</u>: The native mined sand typically has a high moisture content and most of the processes at the facility are wet operations therefore there I did not observe any visible emissions from the surge storage pile, all other sand piles are stored inside (SC No. I.1).

Mr. Cook informed me the two process/storage buildings on site do not have the capacity to store 1,000,000 tons of material at any given time (SC No. II.1).

Based on my observations and comments by Mr. Cook, the company is complying with the Nuisance Minimization Plan for Fugitive Dust in Appendix A of their permit (WC No. III.1).

At the time of my inspection the company appeared to be in compliance with the Air Pollution Control Rules and the applicable conditions of their Permit.

NAME & PUCOSTU

DATE 11/21/16 SUPERVISOR