

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

P139472982

<b>FACILITY:</b> BROW CRUSHING INCORPORATED		<b>SRN / ID:</b> P1394
<b>LOCATION:</b> 1564 WEST STOREY ROW, SAULT S MARIE		<b>DISTRICT:</b> Marquette
<b>CITY:</b> SAULT S MARIE		<b>COUNTY:</b> CHIPPEWA
<b>CONTACT:</b> Eric Brow , Owner		<b>ACTIVITY DATE:</b> 07/23/2024
<b>STAFF:</b> Drew Yesmunt	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Targeted Inspection FY24		
<b>RESOLVED COMPLAINTS:</b>		

**Facility: Brow Crushing Incorporated (SRN: P1394)**

**Location: 1564 W Storey Row, Sault Sainte Marie, Chippewa County, MI**

**Contact(s): Eric Brow, Owner; Jaimee Brow, Manager**

### Regulatory Authority

*Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.*

### Facility Description

Brow Crushing Incorporated is a sand and gravel company based out of Sault Ste. Marie, MI. The company operates two portable nonmetallic crusher plants throughout the Upper Peninsula of Michigan. The facility conducts its secondary crushing operation under PTI No. 92-23.

### Process Description

A crushing plant produces smaller size aggregate from larger size rock. A crushing plant may consist of loaders, haul trucks, generators, crushers, screens, conveyors, and stockpiles. The plant is normally located within a quarry and crushes stone generated from blasting. The final product may be used for a variety of applications, including infrastructure projects and landscaping.

The process begins with raw material being fed into a primary crusher via loader, producing an initial size product. From the primary crusher, the product is conveyed into a screen plant that separates the crushed aggregate into various sized products. Smaller material is filtered out and leaves on separate conveyors to stockpiles, while larger material is transported to a secondary crusher. The secondary crusher will break the aggregate down to a smaller size aggregate before it enters the screen plant again or continues to a tertiary screen and crusher. A crushing plant

may have several crushers, screens, and conveyors depending on how many sizes of aggregate are to be produced.

### Emissions

Non-metallic mineral crushing can cause point and fugitive emissions of PM, PM10, and PM2.5. Emissions from process operations are considered fugitive unless the source of emissions is vented through an air pollution control device or contained and emitted through a force-air vent or stack. Fugitive sources of emissions are generated from machine movement and wind erosion. Emission sources can include hauling, crushing, screening, and transferring of material. The primary factors affecting PM emissions are wind and the moisture content of the material. Moisture on the surface of the material can cause fine particles to adhere resulting in a dust suppression effect.

### Emissions Reporting

The facility is subject to the federal New Source Performance Standards (NSPS) Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants and is required to report annual emissions to MiEnviro each year. The facility did not operate in 2023 and reported zero emissions to MiEnviro.

### Compliance History

The facility has not received a violation notice in the past five years. The facility began operating in 2024 and has not been previously inspected.

### Inspection

On July 23, 2024, AQD staff (Drew Yesmunt and Michael Conklin) conducted a targeted inspection of Brow Crushing Incorporated at the Graymont Eastern Quarry in Trout Lake, MI. The purpose of the inspection was to ensure compliance with PTI No. 92-23 and all other applicable air pollution control rules and federal regulations. Prior to the inspection, it was explained to AQD staff that the facility's crusher was broken down until parts could be delivered. AQD staff arrived onsite and observed that the facility was not operating, and no personnel were present.

The facility has been consistent in submitting relocation notices electronically as the plant moves throughout the Upper Peninsula of Michigan. At the time of inspection, the plant had relocated three times in 2024 after commencing operations on April 5.

AQD staff observed that all permitted equipment was present onsite. The facility operates one McCloskey Impact Crusher (I44) and one Barford conveyor. AQD staff noted prior to inspection that the conveyor did not have a designated device ID on the facility's process information form, and the facility had not yet conducted Method 9 visible emissions testing on all applicable equipment.

During the inspection, the facility appeared to be following all requirements of its fugitive dust plan. No visible emissions were observed while on-site, and water sprays were observed on all necessary equipment.

Following the inspection, AQD staff sent the facility a records request. The request included material processing records and dust suppressant application records for 2024, an updated process information form to include a device ID for the Barford conveyor, and for Method 9 visible emissions testing to be scheduled for the crusher plant.

During records review, it was shown that the facility produced approximately 73,000 tons of material in 2024 to date, under the facility's limit of 2,000,000 tons per year. The facility also provided records of the amount of water used onsite for dust suppression during each day of operation. For 2024 to date, approximately 25,700 gallons of water were used as dust suppression. The facility also provided an updated process information form designating the conveyor's device ID as TR10048, matching an existing label on the conveyor that AQD staff observed onsite. The facility also stated that Method 9 visible emissions testing was arranged to take place in September 2024. AQD staff requested that once testing is complete, the facility sends the results to AQD.

### Compliance

Based on this inspection and the records reviewed, Brow Crushing Incorporated appears to be in compliance with PTI No. 92-23 and all other applicable air pollution control rules and federal regulations. It was conveyed to the facility that no violations were observed during the on-site inspection.



**The facility's McCloskey Impact Crusher (I44) and Barford conveyor (TR10048)**

NAME *Drew Yerman*

DATE 8-26-2024

SUPERVISOR *Michael Kaplan*