



REGION 1

BOSTON, MA 02109

Clean Air Act Inspection Report

Report Date: December 10, 2024

I. Background

Inspection Date: November 22, 2024

EPA Inspector: Grace Perry, Environmental Engineer, Air Compliance Section

GRACE PERRY Digitally signed by GRACE PERRY
Date: 2024.12.10 13:20:58 -05'00'

EPA Reviewer: John Melcher, Senior Enforcement Coordinator, Air Compliance Section

JOHN MELCHER Digitally signed by JOHN MELCHER
Date: 2024.12.10 13:33:59 -05'00'

Facility Name: Dunning Sand & Gravel

ICIS Air ID#: CT0000000900302444

Facility Location: 105 Brickyard Road Farmington, CT 06032

Mailing Address: 105 Brickyard Road Farmington, CT 06032

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Inspection Attendees:

Name	Title	Organization
Grace Perry	CAA Inspector	EPA R1
Davianna Vasconcelos	CAA Inspector	EPA R1
Jacob Felton	Director, Enforcement Division	CT DEEP, Bureau of Air Management
Neil Lajeunesse	Vice President	Dunning Sand & Gravel
Marc Ciechoski	Operations Foreman	Dunning Sand & Gravel

Facility/Process Description:

Dunning Sand & Gravel (“Dunning”) is a sand and aggregate processing and distribution company that was established in 1917 in Farmington, Connecticut. The company operates at three facilities: the sand and gravel processing plant, as well as a hardscape showroom, and a nursery. The plant, which consists of a main crusher and a set of jaws, processes four stone sizes and three sand products. Dunning mines sand and stone from a quarry onsite.

Potentially Applicable Federal Air Regulations:

The following federal air regulations may be applicable to the Facility:

- 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants (“Subpart OOO”)
- 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (“Subpart 4I”)
- 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engine (“Subpart 4J”)
- 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (“Subpart 4Z”)

State Air Regulations:

Regulations of Connecticut State Agencies 22a-174-3b (“Exemptions from permitting for construction and operation of external combustion units, automotive refinishing operations, emergency engines, nonmetallic mineral processing equipment and surface coating operations”)

Previous Enforcement Actions:

A “Detailed Facility Report” from EPA’s Enforcement and Compliance History Online database indicates that there have been no informal or formal enforcement actions taken against the facility in the last five years.

II. Inspection

A. Opening Conference:

The inspection was announced to the facility on November 18, 2024.

EPA Inspectors Grace Perry and Davianna Vasconcelos arrived at the facility at approximately 9:50 a.m. and they met with Neil Lajeunesse, Vice President, and Marc Ciechoski, Operations Foreman, of Dunning. The group proceeded to an office space inside the facility, where Ms. Perry presented her credentials and initiated an opening conference. CT DEEP representative Jacob Felton joined the opening conference at 10:03 a.m.

Ms. Perry said that if the facility considered any information provided during the inspection to be confidential business information to let the EPA representatives know, so it could be handled appropriately.

Facility representatives provided the information described in the Facility/Process Description. Mr. Lajeunesse told the inspectors that Dunning has 44 employees, 35 of which are full time employees, and that they operate from 7:00 a.m. to 3:00 p.m. Monday through Friday. Ms. Perry gave the facility representatives a copy of the EPA Small Business Resources Information Sheet.

Ms. Perry asked if the facility was currently operating. Mr. Lajeunesse said that the main crusher is done operating for the season and will restart in the spring, but that the jaws are always running so they are currently in operation. Ms. Perry asked when the equipment was originally installed. Mr. Lajeunesse said it was installed during the 1960's but had undergone upgrades since installation. Ms. Perry asked if the equipment modifications had been recorded, and Mr. Lajeunesse said he did not have records of all changes made to the equipment.

Ms. Perry asked if the facility had any portable crushers. Mr. Lajeunesse said that the facility owned two portable crushers, but they had not been in operation since 2010. Mr. Lajeunesse told the inspectors that all asphalt and concrete crushing that is done onsite is contracted out and performed by a different company.

Ms. Perry asked if the rock crushing equipment had any air pollution control devices. Mr. Lajeunesse said there is a wet suppression system and that nozzle inspections are tracked in the facility's general maintenance records.

Ms. Perry asked if the facility had ever performed Method 9 testing. Mr. Lajeunesse said that no Method 9 testing had been performed since he started working at the company and that he has no documentation of prior testing.

Ms. Perry asked if there were any generators onsite. Mr. Lajeunesse said that there were two diesel generators at the facility. One generator operates the rock sizing plant and one generator operates the topsoil stacker. Mr. Lajeunesse said that each generator runs approximately 400-500 hours each year, and that the facility maintains a record of fuel receipts. Mr. Lajeunesse said that he was unsure if the facility had manufacturer's certifications for the generators, and that the generators are maintained in

house by two full time mechanics. Mr. Lajeunesse said that the generators were portable, but neither had been moved in over two years.

B. Facility Tour

1. Main Crusher and Jaws

At approximately 10:20 a.m., the inspectors and the Facility representatives visited the main crusher and jaws. At the time of inspection, the main crusher was not operating, and the jaw at the bottom of the hopper was running but was not being used to crush any material. The equipment was being used to sort and size raw gravel. Ms. Vasconcelos took photographs of this area.

Mr. Lajeunesse said that there is a wet suppression system in the hopper to wet material before it arrives at the jaws, and that all screen boxes have water systems. Mr. Lajeunesse said that a majority of the material that goes through the hopper is sand, and that approximately 100,000 tons of raw gravel are processed through the plant annually, with approximately 15,000-20,000 tons being rock.

2. Topsoil Plant Generator

At 10:34 a.m. the inspectors and the facility representatives visited the topsoil plant generator. Ms. Vasconcelos took photographs of the generator, available nameplate, and available emissions label. All photo documentation is included in the inspection file. Documented generator information can be found in Attachment 1.

3. River Round Generator

At 10:46 a.m. the inspectors and the facility representatives visited the Rock Sizing Generator, also known as the River Round Generator. Ms. Vasconcelos took photographs of the generator, available nameplate, and available emissions label. All photo documentation is included in the inspection file. Documented generator information can be found in Attachment 1.

D. Closing Conference

At 11:13 a.m. the inspectors and facility representative returned to the office space for the closing conference. Ms. Perry asked for clarification on the plant's capacity per hour. Mr. Lajeunesse said that the crusher capacity is approximately 175-225 tons per hour, and that 15-20% of that throughput is rock.

Mr. Lajeunesse said that he did not have Certificates of Conformity for the generators on hand, and Ms. Vasconcelos explained how he could likely find Certificates of Conformity for the generators online.

Ms. Perry asked for copies of diesel fuel invoices. Mr. Lajeunesse said that the facility has two fuel tanks: a 500-gallon tank for off-road fueling that supplies the generators and the crusher, and a 1,000-

gallon tank that supplies on-road vehicles. Mr. Lajeunesse said that the facility received fuel deliveries of approximately 200 gallons almost daily. Mr. Lajeunesse sent Ms. Perry copies of the last five off-road diesel fuel invoices via email detailing type of fuel and amount of fuel purchased.

The inspectors explained to the facility representatives the regulations that may be applicable to the facility (listed above). Mr. Felton explained to the facility representatives the state permitting exemption rule.

Ms. Perry told the facility representatives that she would send them an inspection report within 70 days of the inspection, and the EPA representatives thanked everyone for their time. EPA and CT DEEP representatives departed the facility at 11:38 a.m.

Attachment 1

Generator Number	#1 Topsoil Plant Generator	#2 River Round Generator
Manufacturer	John Deere	John Deere
Model #	4045TF280D	6068TF250C
Serial #	PE4045L120450	T06068T903859
Manufacture Date	May 2010	2002
Capacity	63 kW	124 kW
Hour Meter Reading	4375	3926.9
Fuel Type	Diesel	Diesel
Purpose	Provides power to the topsoil stacker	Provides power to the rock sizing plant
EPA Engine Family Number	AJDXL04.5112	2JDXL06.8014