

To: Sharon Township Mineral Licensing Board

From: Sharon Preservation Society

Date: December 20, 2021

Re: Aggregate Industries Application to Expand Mining on M-52

COMMENTS ON AIR QUALITY CONCERNS

- Appendix A of the permit application addresses Fugitive Dust Control. Item III (a) states “other acceptable and approved fugitive dust control compounds” will be used in the plant yard... “Other” compounds can include the use of oil field brine. This compound should not be allowed because it sinks into the aquifer and carries with it petroleum hydrocarbons contaminating both surface and groundwater. Please provide more information about fugitive dust control during mining, processing, storage and shipping. Chemical analysis of the brine used for dust control should be kept and provided upon request.
- The extreme dangers of crystalline silica dust have long been known by the aggregate industry, as evidence by their publication, “The Aggregates Handbook”. Excerpted are pages 6-16, 6-22 and 6-23 which suggest a medical monitoring program for employees.
- Crystalline silica dust has proven links to diseases that lead to death including COPD, silicosis, an irreversible respiratory condition, COPD, asthma, lung cancer, renal failure and kidney disease. This is such a pressing emerging issue that EGLE has begun researching the documented dangers of crystalline silica dust exposure to residential communities.
- Silica dust particles are divided into 2 major groups. Particles that are BIG are between 2.5 and 10 micrometers (from about 25 to 100 times thinner than a human hair), and SMALL particles, smaller than 2.5 micrometers (100 times thinner than a human hair).
- A wind study commissioned by Washtenaw County from 2008-2009 showed that Sharon Township has the highest wind speeds anywhere in Washtenaw County. Air currents are very complex with regard to, among many factors, direction, speed, updrafts and downdrafts. This point is critical because the smaller the particulate matter, the farther crystalline silica dust travels, and therefore, the more hazardous it becomes to the community at large.
- The general crushing permit from EGLE is exempt from monitoring fugitive carcinogenic silica dust, which means that no “offsite” or residential, monitoring is required. The Mineral Safety Health Administration has strict requirement for *workers’* exposure to silica but no one monitors what occurs offsite, where people can be exposed 24/7, unlike a 40-hour work week used to determine the exposure allowed for the workers. How will the residents be protected?
- Diesel exhaust is another critical concern. Additional trucks equate to an increased exposure and risk to harmful fumes and particles. The U.S. EPA classifies diesel exhaust as “likely to be carcinogenic to humans”.
- Crystalline silica dust is dangerous and deadly - the *new asbestos*. . .What do you plan to do to protect your residents?