DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B416740719

FACILITY: ELMER'S CRANE AND DOZER, INC.		**SRN / ID:** B4167
LOCATION: 3638 RENNIE SCHOOL RD, TRAVERSE CITY		**DISTRICT:** Cadillac
CITY: TRAVERSE CITY		**COUNTY:** GRAND TRAVERSE
CONTACT: Tom Wolf ,		**ACTIVITY DATE:** 07/13/2017
STAFF: Kurt Childs	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: 2017 FCE		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation (FCE)

I conducted an FCE including site inspection and records review at Team Elmer's B4197 facility in Traverse City to evaluate the asphalt plant's compliance with PTI 7-00C and the Air Pollution Control Rules. I met with Mr. Tom Wolf at Team Elmer's office and provided him with a copy of the Environmental Inspections Brochure. Mr. Eric Seeburg accompanied me on the inspection of the asphalt plant which is in the plant yard at the same location.

At the time of the inspection the old plant (EU002) was operating, the new plant (EU001) has been sold and removed from the site. The weather was clear though it had rained the previous night. Prior to entering the plant I made off-site observations and noted that there was a detached water vapor plume from EU002. No visible emissions were observed at the stack from off-site. I did not observe any visible emissions from the plant yard.

Inside the plant property I observed the asphalt plant up close. There were no visible emissions from the stack or silos. There did not appear to be any smoke escaping from the truck loading enclosure, most of the smoke appeared to be captured. Many areas of the plant yard are now paved and were free of accumulated dirt/sand/gravel. There were no observed visible emissions from the roads, yard or storage piles which appeared to still be wet from rain or treatment. I also observed that the asphalt cement tanks were equipped with a condenser and there were no odors.

We proceeded to the EU002 control room and met with the plant operator Scott. At that time the plant was producing a product called "Low Vol. Superpave" used in road construction. Elmer's has only burned natural gas this year and is not using RUO or fuel oil. The mix temperature was 295 degrees F at an operating rate of 336 tons per hour. Recycled Asphalt Product represented around 18% of the mix the permit allows up to 50%. The baghouse is inspected weekly in accordance with the approved Malfunction Abatement Plan and bags changed as necessary. Baghouse inspections are documented in the plant recordkeeping. At the time of the inspection the baghouse differential pressure was 3.8" based on the control room gauge which was functioning.

I reviewed the plant records that were provided by Ms. Kirsten Bott who readily accessed the various daily log sheets and records that are entered into the facility's computer system. This system is used to produce any of the necessary recordkeeping including the daily operating records (example for 7/7/17 attached) which are based on the daily log sheet filled out by the plant operator. Annual emissions calculation records were also easily produced and the records for 4/01/2017 through 7/12/17 are attached and the data included in the table below. The records indicate that daily and annual production rates as well as emissions are within the permit limits.

EU002

Parameter	Permit Limit	Actual	Compliance
Asphalt paving materials (tons annualy)	895,000	156,950 (year to date)	Yes (projected)
Asphalt paving materials (tons per hour)	325 (based on a 24 hr. rolling time period)	Varies, nine days with >325 tph (based on plant operating hours each day)	Yes
PM (TPY)	17.9	< 1	Yes
SO2(TPY)	71.6	<1	Yes
NOx(TPY)	53.7	5	Yes
CO(TPY)	89.9	11	Yes
VOC(TPY)	26.0	<1	Yes
Lead(TPY)	9.0E-4	0.1 lbs (0.00005 tpy)	Yes

Emissions testing required by the permit was conducted in June and July 2002. Emission factors from the stack test are used to calculate asphalt plant emissions.

The asphalt paving material production rate is limited to 325 tons per hour based on 24 hr. rolling time period as determined at the end of each hour. The asphalt plant does not operate on a 24 hour schedule, it operates from 8 – 16 hours per day. Currently plant records calculate the asphalt production rate based on plant operating hours each day. So far this year there have been nine days when the asphalt production rate was greater than 325 tons per hour but only based on the actual hours of operation which ranged from 7.8 hours to 15.1 hours. Past inspections have found asphalt production rates well below 325 tons per hour based on plant operating hours so this was not previously an issue. Clarification provided by the AQD Permits Unit indicated that the daily production could be averaged over 24 hours including zero production hours. Based on this information the HMA production rates are all below the 325 tons per hour limit. The 24 hour limit is no longer used do to changes in screening levels for air toxics and the Permits Unit agreed that it would be wise to update this permit so I have made that recommendation to Team Elmer's. Revision of the permit could include the removal of obsolete conditions for EU001.

The asphalt plant baghouse inspection sheets were also maintained in a file by Ms. Bott and my review of these records indicates that the weekly inspections are occurring and bags are being replaced as necessary. Records indicate burner tuning and CO emissions monitoring data (twice per month) have been completed as required. A record is also maintained regarding plant yard dust control. The records indicate whether sweeping, watering, or rain have taken place each day. As indicated above, at the time of the inspection the yard looked good with no visible fugitive emissions from roadways or storage piles.

Consent Order 18-2004 requires compliance with PTI 7-00C and does not appear to have been terminated yet.

The only report required to be submitted during the past year was MAERS which was submitted in a timely manner and was reviewed at that time.

NAME _____ DATE 7-20-17 SUPERVISOR _____