

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

B706854692

FACILITY: GMI - HMA Plant 19		SRN / ID: B7068
LOCATION: 2675 TREAT RD, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: David Benecke, Environmental Manager		ACTIVITY DATE: 08/26/2020
STAFF: Brian Carley	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled announced inspection		
RESOLVED COMPLAINTS:		

Facility Contact: David Benecke, Environmental Manager

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PURPOSE

I arrived at the facility and met with Dave Benecke and Larry Wilkerson, plant operator. They have one active permit at this time (PTI # 783-79G), which is a facility wide synthetic minor opt out permit. Prior to my inspection, I reviewed their MAERS submittal of their 2019 emissions and determined that they were in compliance with their Section I emission limits in Tables EUHMAPLANT and FGFACILITY of PTI #783-79G (see MAERS submittal for more information).

BACKGROUND

This is a 225 tons per hour hot mix asphalt plant that is equipped with aggregate conveyors, a counter flow drum dryer/mixer, and a fabric filter dust collector. There is also a paving material product storage silo with an emission capture system (top of silo) and load-out control to control silo process emissions and liquid asphalt cement storage tanks with a vapor condensation and recovery system for control. They are also required to control fugitive dust sources which includes plant roadways, plant yard, material storage piles, and material handling operations (excluding cold feed aggregate bins).

COMPLIANCE INSPECTION

For Table EUHMAPLANT, this covers the 225 ton/hr counter flow drum dryer/mixer. As stated before, they are in compliance with their emission limits listed in Section I. They only use natural gas as their fuel for this process as required in Special Condition (SC) II.1 and do not use any material that contains asbestos per SC II.2. They are averaging on a monthly basis between 18-28% RAP in the asphalt mixture processed, which is below their 50% limit (SC II.3). In 2019 they processed 89,748 tons of hot mix asphalt (HMA) paving materials and they cannot process more than 225 tons per hour because their equipment was designed to process no more than that rate (see attachment 1). Both of these are under their specified material limits (SC II.4 and 5). However, in June, July, and August of 2019, Gerken Materials - Adrian Asphalt Plant had 12 month totals of 109,983 tons, 107,308 tons, and 107,572 tons of asphalt, respectively. This is in violation of SC II.4 and a violation notice will be sent. They are following the fugitive dust plan in Appendix A as required in SC III.1 (see EUYARD for more details). They are also following the, emission abatement plan for startup, shutdown, and malfunctions in Appendix C (SC III.3). They have 40 spare bags for the baghouse, 5 lbs. of blacklight power, a whole box of caulk, and a list of the current supervisor and maintenance personnel posted at the plant as required by Appendix C. David had the information of the most recent burner test, which he showed me. The test results showed the highest CO readings was 404 ppm, which is under the 500 ppmv requirement (SC III.4 and VI.3 and 9). They have only operated 297 hours so far this year and have not had a malfunction where they need to do another CO test at this time. Larry records the tons of asphalt produced, hours of operation, how much virgin aggregate, RAP aggregate, and asphalt cement used, the temperature mix, and the pressure drop of the dust collector on daily log sheets (see attachment 2). They then enter that data into a calculation spreadsheet that will determine the average daily tons per hour and the percent RAP used (see attachment 3). They gave me a printout for the weeks of July 20th and July 27th of the initial mix design and time, and any changes to the mix and the time of the change as required by SC VI.7 (see attachment 4). They are also keeping their daily, monthly, and 12 month rolling time period of their emission calculations and toxic air contaminants (TACs), the amount of HMA paving materials produced

at this plant as required by SC VI.8 and 10 (see attachment (1 and 5)). They also keep track of the significant maintenance activities conducted and significant repairs for this plant and they showed me the most recent maintenance activity at this plant (SC III.2, SC VI.5, and preventative maintenance plan in Appendix B). The last stack test that included PM was conducted in 2011 and the test showed a PM emission limit of 0.004 gr/dscf which is below the limit of 0.04 gr/dscf per 40 CFR Part 60, Subpart I (SC VI.5). Due to production exceedances stated above, I have determined that they are not in compliance with this table.

For Table EUYARD, this covers the fugitive dust sources including plant roadways, plant yard, material storage piles and material handling operations (excluding cold feed aggregate bins). This table requires them to implement and maintain the fugitive dust control plan in Appendix A and to report the fugitive dust emissions in MAERS (SC III.1 and VI.2). They use hoses and sprinklers to control the fugitive dust and are reporting the emissions in MAERS. They are also keeping daily records of visible emission observations (see attachment 6) I determined that they are complying with the requirements of this table.

For Table EUACTANKS, this covers the liquid asphalt storage tanks. This table requires them not to operate EUTACTANKS unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner. After being shown the control device, I determined that they are in compliance with this table.

For Table EUSILOS, this covers the HMA paving material product storage silo. They are required to install, maintain, and operate in a satisfactory manner an emission capture system on each silo and a Blue Smoke collection system in the load out area. I was able to observe that these devices were installed. There wasn't any asphalt being loaded into a truck at the time of the inspection, so I was not able to see it operate. I determined that they are in compliance with this table.

For Table FGFACILITY, this covers the emission capture system and load out control, vapor condensation and recovery system, and fabric filter dust collector. As stated above they are in compliance with the Section I emission limits in this table. They are keeping records of the hazardous air pollutants by individual and aggregate pollutant in tons per month and tons per 12 month rolling time period (see attachment 7). Their records show that they are in compliance with this table.

COMPLIANCE DETERMINATION

Based on my inspection and their MAERS submittal, I determined that they are not in compliance with their permit due to the exceedance of the asphalt 12 month rolling time period production limits. As stated before, a violation notice will be sent will be sent to the Gerken Companies for these violations. I thanked them for their time and left.

NAME Brian Carley

DATE 9/8/20

SUPERVISOR 