

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N287730232

FACILITY: PAYNE & DOLAN INC C19		SRN / ID: N2877
LOCATION: 19320 E KISKILA ROAD HANCOCK #250-91B, HANCOCK TWP		DISTRICT: Upper Peninsula
CITY: HANCOCK TWP		COUNTY: HOUGHTON
CONTACT: Jim Laux , Operator		ACTIVITY DATE: 07/15/2015
STAFF: Ed Lancaster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: This plant was taking part in a research trial with Michigan Tech using crumb rubber as part of the mix. On the days of my inspection they were running a normal hot-mix asphalt with 25% RAP and 30% RAP when producing the warm crumb rubber mix.		
RESOLVED COMPLAINTS:		

When I arrived on Wednesday morning at the plant it was not operating, as the company was waiting for the haul trucks to arrive. I met with MTU's Dave Perram, DEQ's Mike Marshall, and BTEC and Payne & Dolan staff. The purpose of this inspection was to observe part of the stack test, MTU was conducting to determine the emission rates of benzene, toluene, ethylbenzene, xylene, naphthalene and formaldehyde during normal operations (Wednesday), during "hot crumb rubber" operation (Thursday) and during "warm crumb rubber" operation (Friday). The paving project was occurring on the Gay-Mohawk Road, east of US 41.

Mr. Marshall informed me the crumb rubber was not on site, the first shipment was expected later in the morning and the next shipment tomorrow.

At approximately 1015 hours the plant was started and I walked over to the control house where I met the operators Dan Bishop and Jim Laux.

The Company was issued PTI No. 250-91B for the asphalt plant, which at the time was fired with fuel oil. Mr. Bishop informed me the plant was converted over to only firing with natural gas a few seasons ago. The fuel oil on site now is for the loader and other heavy equipment. Special Condition (SC) Nos. 16, 22, 23, 24, and 25 are no longer applicable to this plant since the conversion to natural gas.

Mr. Bishop informed me the asphalt plant is equipped with 2-110 ton silos for storing the hot asphalt. The plant was producing 242 tons per hour using 25% RAP and 5.82% A/C in the mix. The drum temperature was 319 degrees Fahrenheit and the pressure drop across the baghouse was 3.2 inches (SC Nos.17 and 18). The only visible emissions (VEs) I observed from the baghouse stack was steam. The stack exhausted vertically upward with no obstructions and appeared to be in compliance with the dimensions identified in SC No.20. The load out area VEs were quite high when loading the trucks, but would dissipate within seconds (SC No. 14).

To date the company has not been asked by the Department to verify their particulate emission rates (SC Nos.13 and 15).

On Friday, July 17, 2015, I returned to the site to observe the operations running the warm crumb rubber mix. The drum was operating at 271 degrees Fahrenheit, producing 221 tons of asphalt per hour. The mix contained 30% RAP and 5.7% A/C in the mix. The pressure drop across the baghouse was 2.8 inches. There were no VEs from the stack nor from the loadout area. It appeared the lower temperature of the mix dramatically reduced the VEs when filling the trucks.

Between my visits to the site I reviewed the company's MAERS reports and I noted the company has reported operating the asphalt plant 1500 hours per year, each year since 2010, running 10 hour shifts, 150 days per year, a violation of SC No. 21, which limits the annual hours of operation to 1,320. I mentioned this discrepancy to Mr. Bishop and he replied the employees are there 10-hours per day but the asphalt plant typically does not operate for the whole shift. He then pointed out a non-resettable hour meter on the control panel that records when the asphalt plant is running. At the end of each day the number of hours are recorded and a copy of the days production is filed. On Monday, I contacted James Mertes, Payne and Dolan's Environmental Manager, and asked that he send me records showing the hours of operation for the plant for the last two years.

NAME Ed Lancaster

DATE 7/21/15

SUPERVISOR _____