

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N546665256

FACILITY: RIETH RILEY CONSTRUCTION CO INC		SRN / ID: N5466
LOCATION: 1289 S MEMORIAL HWY M 37 S, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT:		ACTIVITY DATE: 10/25/2022
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2023 FCE.		
RESOLVED COMPLAINTS:		

On 10/25/2022 I conducted an inspection of the Rieth-Riley N5466 portable asphalt plant to determine compliance with PTI 151-94C, 40 CFR 60, Subpart I, and the Air Pollution Control Rules. The requirements of PTI 151-94C include the NSPS requirements and the permit contains "Attachment A" the portable asphalt plant General Permit to Install requirements to limit potential emissions below major source thresholds. The plant is located in Grand Traverse county off of M-37 just south of "Chum's Corners", the intersection of US-31 and M-37. Though this is a portable plant, it has remained at this location and only runs intermittently. The weather at the time of the inspection was overcast with intermittent light rain, 62 degrees F, 5-10 mph winds from the south.

Prior to entering, I observed the plant from off-site. There was no plume from the asphalt plant stack and I observed a loader collecting material from a conveyor and hauling it away. There were no fugitive emissions. I entered the plant office and spoke with Rieth-Riley staff who stated that they were hoping to run the plant for a project at the Traverse City Airport but probably would not be able to due to the weather.

I was able to review plant records consisting of the daily operating log sheets and discuss other issues with the plant operator. The operating logs contain all of the information required by the PTI including: AC type gas use, mix type, rap percentage, hours of operation, and tons produced. Required information that is not on the daily operating log sheet includes the maintenance records (which are separate) and some operating data including the baghouse differential pressure which is entered into the electronic daily report along with the data from the daily operating logs.

The plant has a permanent electrical connection (no generator) and has been burning only natural gas in the asphalt tank heaters and asphalt plant for the past several seasons.

Emission Limits

PTI 151-94C and Attachment A contain the following emission limits:

Pollutant	Emission Limit
PM	0.04 gr/dscf

SO2	1.11 lbs./MMBtu
NOx	99 TPY
CO	99 TPY
VOC	99 TPY
Lead	99 TPY

Compliance is demonstrated through material limits and annual emission calculations. Annual emissions as reported for 2021 were as follows:

Pollutant	Emissions
PM10	1 Ton
SO2	< 1 Ton
NOx	1 Ton
CO	7 Tons
VOC	2 Tons
Lead	0.06 lbs.

Production/Process Restrictions

The plant is limited to material throughput of 1,000,000 tons of asphalt paving materials per 12-month rolling time period while burning natural and LP gas. Compliance is demonstrated through recordkeeping. Records for 2021 indicate total HMA production was 103,857 tons.

Records of significant maintenance activities are also required. Maintenance is conducted in the spring prior to plant start up and includes black light testing and bag replacement on the baghouse. Bag gaskets were also replaced this year according to the plant operator.

Proper operation of the baghouse is required for operation of the asphalt plant. This is demonstrated by monitoring the differential pressure and recording the reading daily. At the time of the inspection the differential the plant was not running but the operator stated that the normal differential pressure is around 2.5" wc.

Testing

Testing to demonstrate compliance with PM and SO2 limits has not been required.

Monitoring/Recordkeeping

PTI 151-94C requires that the following records are maintained:

The amount of asphalt paving material produced per 12 mos. Rolling time period.

1. Daily production report including the proportions of virgin aggregate and RAP for all mixtures used each day.
2. The total hours of operation each day (16 hr. per day and 2,350 hr. per year limits).
3. The amount of recycled asphalt product (RAP) used on a monthly average.
4. Records of any significant maintenance activities with respect to air emissions (burner, drum, venture scrubber, etc.)
5. Records of the type of fuel used. Additional requirements apply if fuel oil or recycled used oil are used.

1. Total HMA produced, 103,857 tons/12-mos. rolling was less than the 1,000,000 ton/12-mos rolling limit.
2. The daily production (operating) reports were reviewed on-site and contain the necessary information.
3. The total hours of operation per season were 780 hours in 2021 which is less than the 2,350 hr. limit.
4. RAP usage averages 19% which is less than the 40% limit.
5. Significant maintenance activities have been performed as necessary.
6. Recycled used oil (#400 fuel oil) was not used during operation of the plant.

Reporting

This source has reported annual emissions to the AQD through MAERS each year, the 2022 report was audited on 4/18/22.

Stack Parameters

The PTI limits stack diameter to 5' x 5' and a minimum height of 45'. At the time of the inspection a round stack with a diameter less than 5' and height of 101' (as measured using a hand-held range finder, average of three readings) was in place. It appeared that the diameter was compliant with the limit and the stack exceeds the minimum height requirement.

Summary

I returned to the plant on 11/01/22 to observe operation of the plant. There was no water vapor plume or visible emissions from the asphalt plant stack. It did not appear to be operating. There were no trucks or other equipment operating in the

yard. Again, the plant was not operating at the time of this inspection. There have been no complaints regarding this facility during current review period.

As a result of this inspection, it appears that this source is in compliance with NSPS 40 CFR 60, Subpart I, PTI 151-94C, and the Air Pollution Control Rules.

NAME  DATE _____ SUPERVISOR _____