

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

N741567691

FACILITY: RIETH-RILEY CONSTRUCTION CO INC		SRN / ID: N7415
LOCATION: 911 HATFIELD AVENUE, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: John Berscheit , Environmental Compliance Specialist		ACTIVITY DATE: 05/09/2023
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced, scheduled inspection. Staff, Monica Brothers arrived on-site at about 10:10 am. Upon arrival, I could see that the plant was running, and I noticed a lot of smoke/particulate matter coming from the top of the silos and truck-loading operation. I parked outside of the facility, in the parking lot of Light Truck Parts, to observe the silos and truck-loading and took a few photos and videos of the opacity. At times, the plumes migrated to where I was standing, and I could smell the smoke and asphalt fumes. This is a violation of their permit, as well as Rule 910. A Violation Notice will be sent for this. When I arrived inside the facility boundaries, I first went to the office, and let the secretary know that I was there to conduct an air quality inspection. She told me to drive up to the control tower where Nolan Ender, Plant Operator, would meet me. I introduced myself to Nolan and briefly explained the inspection process. When I asked him about records, he said that I would need to contact John Berscheit, the Environmental Compliance Specialist, and that they do not keep most records on-site. During the inspection, I spoke with Mr. Berscheit on the phone, and he said that he would email me whatever records I needed. I also told him about the excessive opacity and smoke that was seen coming from the silo that morning and asked him how often they change the filters for this process. He said that he did not know the last time that these filters were changed and that they usually change them "as needed". He said that it was entirely possible that these filters were overdue for a change. I let him know that Rieth-Riley would be receiving a Violation Notice for this issue. After records were discussed, Brady Reynolds, Quality Control Laboratory Manager, guided me through a tour of the facility.

Michigan Paving and Materials is a hot-mix asphalt facility. They are an Opt-Out facility for HAPs and are currently operating under PTI# 262-04B. The plant runs from late April to around Thanksgiving each year, and their shifts vary depending on asphalt demand. They typically run one 12-hour shift per day, 5-6 days per week. They do not have any emergency generators or parts washers at the facility. They do have a hot oil-boiler that circulates to the AC tanks, which runs on natural gas. The facility also has a warm-mix asphalt system, which is considered exempt under Rule 285(2)(b). An exemption demonstration for this was submitted to the Kalamazoo District Office in November 2019.

EUHMAPLANT and FGFACILITY:

The plant uses only natural gas and does not take in any material that would have asbestos. They are permitted for 400 tons/hour of product, on a 24-hour rolling timescale, and their records show that they are consistently under that limit. They usually run between 150-250 tons/hour, and the highest I saw in the records that I reviewed was 288 tons/hour in September 2022. They also have a limit of 940,000 tons/year of HMA produced on a 12-month rolling timescale, and the highest since 2020 was only 331,787 tons/year in June 2022.

They are doing daily pressure drop readings for the baghouse, and they are consistently within their permitted range of 2-10 inches of water. During the inspection, the baghouse showed the pressure drop to be 2.47 inches of water, which is in compliance with their permit. They are limited to using up to 50% reclaimed asphalt pavement (RAP), and their records show that they are under this limit, with 30% being their highest for the records I reviewed during this inspection. They continuously monitor the virgin aggregate and RAP feed rate. They have records of their CO monitoring, which should occur upon start-up of each paving season and after every 500 hours of operation. They are doing at least 8 readings per monitoring session. Their records show that their CO readings have been under the required 500 ppm. They are doing daily opacity readings on the baghouse, and their records show that they have not seen any opacity this season. John sent me some baghouse maintenance and inspection records and said that they haven't had to change any bags in the system for the past two years.

They are keeping records of their natural gas usage, the amount of HMA containing RAP they produce, and the average percent of RAP/ton of HMA on a monthly basis. They are keeping the required daily records of the virgin aggregate feed rate, the RAP feed rate, and the asphalt product temperature.

They are also keeping records 12-month rolling records and monthly records of all criteria pollutants and HAPs emitted at the facility. They are limited to less than 90.0 tons/year each of CO, and 9.0 tons/year for each individual HAP and 22.5 tons/year for aggregate HAPs. Their records show that they are under these limits.

During the inspection, I measured the height of the stack for EUHMAPLANT with a rangefinder. The rangefinder measured the stack to be 88 feet above ground level. Their permit requires the stack to be 60 feet or higher above ground, so the stack was in compliance with the permitted limit.

EUYARD:

During the facility tour, the roadways and yard areas seemed to be pretty clean. The speed limits posted for vehicles is 10 mph, and their permit requires it to be 10 mph or less. They also have signs at the entrances saying that trucks need to be tarped. They have a sprinkler system that automatically waters their roads every few hours. They are keeping records of their fugitive dust control activities and are submitting fugitive dust emissions calculations to MAERS each year.

EUACTANKS:

The AC tanks are above ground and have a vapor recovery system.

EUSILOS:

The emissions from the silos and the truck load-out area go through a blue smoke filter, which is a 2-stage filter that filters particulate and condenses the gases. As stated at the beginning of this inspection report. The blue smoke filter did not seem to be operating properly, with excessive opacity being observed coming from the truck loading area and the top of the silos. A Violation Notice will be sent for this.

APPENDIX A: FUGITIVE DUST CONTROL PLAN

They are keeping track of their fugitive dust control activities and are watering at least two times per month. The speed limits are at 10 mph, as required by their PTI. During the inspection, the unpaved roadways seemed to be below the limit of 5% opacity, and the trucks that I observed coming and going from the facility were covered.

APPENDIX B: MAINTENANCE PROGRAM FOR THE FABRIC FILTER DUST COLLECTOR

They are recording their daily pressure drop checks, and they are consistently above the required 2.0 inches of water. The baghouse has a high temperature alarm that is set at 400°F and will begin shutting down the plant if the issue is not quickly resolved. Their records indicate that they have not seen any opacity from the baghouse so far this season. They have records of their blacklight tests, which are conducted at least once per paving season. They did a blacklight test on April 17, 2022 and then again on April 12, 2023. During the inspection, Nolan and Brady showed me that they are keeping at least 15 filter bags, 5 lbs of blacklight powder, and two tubes of caulk on hand, as required by their permit. John sent me some baghouse maintenance and inspection records and said that they haven't had to change any bags in the system for the past two years.

APPENDIX C: START-UP, SHUT-DOWN, MALFUNCTION ABATEMENT PLAN

The facility is keeping records of significant plant maintenance, inspections conducted, and repairs made to plant equipment.

At the time of inspection, the facility was not in compliance. A violation notice will be sent for the malfunctioning silo filters.

NAME 

DATE 6/15/23

SUPERVISOR RIL 6/15/23