

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

B581772961

FACILITY: RIETH-RILEY CONSTRUCTION CO., INC.		SRN / ID: B5817
LOCATION: 2325 KIPP RD, MASON		DISTRICT: Lansing
CITY: MASON		COUNTY: INGHAM
CONTACT:		ACTIVITY DATE: 06/20/2024
STAFF: David Rauch	COMPLIANCE STATUS:	SOURCE CLASS: SM OPT OUT
SUBJECT: A routine inspection was conducted to ensure the facility is still in compliance with all conditions in PTI 1343-91C.		
RESOLVED COMPLAINTS:		

On June 20, 2024 the State of Michigan's Environment Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a routine inspection of Rieth-Riley Construction. The facility location is at 2325 Kipp Rd.

The Environmental Contact:

Daniel Larson, Area Manager, 517-721-0103, dlarson@rieth-riley.com

James Anderson, Corporate QC Area Manager, 219-977-0722 ext. 25321, janderson@rieth-riley.com

Facility Description:

This facility is a large asphalt plant that has storage piles of materials for use in the making road asphalt. This site is a seasonal facility that operates in late April through November.

Regulatory Overview:

This facility is classified as an Opt-Out source due to their production of PM and HAPs being higher than a minor source but not high enough to be considered Major. The facility has a single PTI 1004-90I that covers the plant's general processes and regulate the emissions from the site.

Fee Status:

This site is a fee subject source and must report emissions to the MiEnviro Annual Emissions Report.

Facility History:

This facility did not have any violations in their previous inspection; however this site has had odor complaints in the past.

Location:

This facility is located at 2325 Kipp Rd. in Mason. The surrounding area has lots of industry as well as an airport next to the site. To the east of this site is a high school as well as residential areas.

Inspection:

Arrived on site at approximately 11:00 a.m., where I was met by the front office staff. Dan Larson was not currently on site when I arrived, he was at the other Rieth-Riley location in the Lansing

area. I waited until his arrival where we discussed the permit. We went through the special conditions of the permit, and he was able answer what was applicable at the time. We then went onto the yard to observe the equipment. We started with walking through the asphalt filling station as trucks pulled in to get the trailers filled with asphalt aggregate. We went to the tower where all pressure drops were observed, and the plant is operated out of a command center. We then walked to the asphalt equipment where I was shown the mixer and tanks. Dan explained the site is run off compressed air to control the hydraulic lifts and movement of asphalt to the different holding tanks. We looked at the bag house and while observing it there were no visible emissions. The site was preparing to shut down as the temperatures were in the 90's and for staff safety they were closing early.

Emission Unit Identification

The following conditions apply to: EUHMAPLANT

Emission Limits

Pollutant	Limit ¹	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1a PM	0.04 gr/dscf	Test Protocol ³	SC 1.12, SC 1.16, SC 1.17, SC 1.19, SC 1.20	40 CFR Part 60, Subparts A & I
1.1b PM	0.04 lb per ton ²	Test Protocol ³	GC 14, SC 1.20, SC 1.25	R336.1205(1)(a), R336.1205(3)
1.1c CO	0.201 lb per ton ²	1 hour	SC 1.13, SC 1.15, SC 1.24, SC 1.25	R336.1205(1)(a), R336.1205(3), R336.1224, R336.1225, R336.1702
1.1d CO	85.4 tpy	12-month rolling time period as determined at the	SC 1.23, SC 1.25	R336.1205(1)(a), R336.1205(3)

Pollutant	Limit ¹	Time Period end of each calendar month.	Testing/ Monitoring Method	Applicable Requirements
1.1e SO₂	0.1656 lb per ton²	1 hour	SC 1.3, SC 1.13, SC 1.21, SC 1.25, SC 1.26	R336.1205(1)(a), R336.1205(3)
1.1f SO₂	70.4 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 1.3, SC 1.18, SC 1.23, SC 1.25, SC 1.26	40 CFR 52.21(c)&(d)
1.1g Lead	2.0x10⁻⁶ lb per ton²	Test Protocol³	GC 13, SC 1.3	R336.1901
1.1h Benzene	0.001 lb per ton²	Test Protocol³	GC 13, SC 1.15, SC 1.24	R336.1225
1.1i Toluene	0.006 lb per ton²	Test Protocol³	GC 13, SC 1.15, SC 1.24	R336.1225
1.1j Ethylbenzene	0.001 lb per ton²	Test Protocol³	GC 13, SC 1.15, SC 1.24	R336.1225
1.1k Xylene	0.001 lb per ton²	Test Protocol³	GC 13, SC 1.15, SC 1.24	R336.1225
1.1l Naphthalene	0.001 lb per ton²	Test Protocol³	GC 13, SC 1.15, SC 1.24	R336.1225
1.1m Formaldehyde	0.01 lb per ton²	Test Protocol³	GC 13, SC 1.15, SC 1.24	R336.1225
1.1n Acrolein	0.00021 lb per ton²	Test Protocol³	GC 13, SC 1.15, SC 1.23, SC 1.24	R336.1225

	Pollutant	Limit ¹	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1o	Arsenic	1.0x10⁻⁶ lb per ton²	Test Protocol³	GC 13, SC 1.3	R336.1224, R336.1225
1.1p	Nickel	1.0x10⁻⁴ lb per ton²	Test Protocol³	GC 13	R336.1224, R336.1225
1.1q	H₂SO₄	0.0032 lb per ton²	Test Protocol³	GC 13	R336.1224, R336.1225
1.1r	Manganese	5.0x10⁻⁵ lb per ton²	Test Protocol³	GC 13	R336.1224, R336.1225

¹ Limits based on 850,000 tons HMA paving material production.

² Pound pollutant per ton of HMA paving material produced.

³ Test Protocol shall specify averaging time.

Compliance, site emissions records reviewed.

Material Usage Limits

1.2 The permittee shall not burn any fuel other than natural gas, propane, virgin No. 2 fuel oil, or specification recycled used oil in EUHMAPLANT. [R336.1224, R336.1225, R336.1702]

Compliance, site records indicate the site is using only Natural gas.

1.3 The permittee shall not burn in EUHMAPLANT any hazardous waste (as defined in state or federal law), blended fuel oil or specification recycled used oil (RUO) containing any contaminant that exceeds the following concentrations or for which the flash point, ash content, or acidity vary from the standards specified in the following table. [R336.1201(3), R336.1224, R336.1225, R336.1901]

Compliance, site only used natural gas.

Contaminant	Limit	Units
Arsenic	5.0	ppmw
Cadmium	2.0	ppmw
Chromium	10.0	ppmw
Lead	100.0	ppmw
PCBs	1.0	ppmw
Total Halogens	1,000.0	ppmw
Sulfur	1.0	Weight %
Minimum Flash Point	100.0	°F
Maximum Ash Content	1.0	Weight %
Acidity	Minimum pH = 4 Maximum pH = 10	N/A

1.4 The permittee shall not use any asbestos tailings or asbestos-containing waste materials in EUHMAPLANT pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. [R336.1225, R336.1901, 40 CFR Part 61 Subparts A & M]

Compliance, discussion with Dan Larson, stated no asbestos containing materials are used.

1.5 The permittee shall limit the asphalt mixture process in EUHMAPLANT to a maximum of 50 percent RAP material based on a monthly average. [R336.1224, R336.1225, R336.1702]

Compliance, based on site records for 2022-2024 the percent RAP used was between 30-25%.

1.6 The permittee shall not process more than 850,000 tons of HMA paving materials in EUHMAPLANT per 12-month rolling time period as determined at the end of each calendar month. [R336.1205(1)(a), R336.1205(3), R336.1225, R336.1227(2)]

Compliance, in 2023 the highest average of HMA used was 367,000 tons.

1.7 The permittee shall not process more than 350 tons of HMA paving materials in EUHMAPLANT per hour based on a daily average, which shall be determined by dividing the daily HMA production by the daily operating hours. [R336.1224, R336.1225, R336.1702]

Compliance, upon review of records the site highest tons per hour was 272 tons per hour in 2023, site is well below the hourly ton limit.

Process/Operational Limits

1.8 The permittee shall not operate EUHMAPLANT unless the Compliance Monitoring Plan (CMP) for RUO specified in Appendix C, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. [R336.1201(3), R336.1225, R336.1371, R336.1372, R336.1910, R336.1911, Act 451 324.5521, 40 CFR 60.50c(c)]

Compliance, site no longer uses recycled oil.

1.9 The permittee shall not operate EUHMAPLANT unless the program for fugitive emissions control for EUYARD specified in Appendix A has been implemented and is maintained. [R336.1371, R336.1372, Act 451 324.5524]

Compliance, site uses water trucks to keep the yard dust free.

1.10 The permittee shall maintain the efficiency of the EUHMAPLANT drum mix burners, by fine tuning the burners for proper burner operation and performance, to control CO emissions. This shall be done at the startup of the drum mix fuel burners, upon each paving season, after every 500 hours of operation thereafter, or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data, whichever occurs first. [R336.1205, R336.1901]

Compliance, site provided maintenance records as well as daily documents for checks on all equipment.

1.11 The permittee shall not operate EUHMAPLANT unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns and malfunctions has been submitted to the AQD District Supervisor. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. [R336.1911, R336.1912]

Compliance, site keeps plan on site and has plan shutdown if needed for any malfunction.

Equipment

1.12 The permittee shall not operate EUHMAPLANT unless the fabric filter dust collector is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the fabric filter dust collector requires a pressure drop range between 3 and 7 inches of water column. [R336.1910]

Compliance, site keeps record of the filters that are changed out and how long the filters are in use for changing them in a timely fashion.

Testing

1.13 Verification and quantification of emission rates of SO₂ from EUHMAPLANT, by testing at owner's expense, in accordance with Department requirements, will be required for continued operation when RUO is used as a fuel. The permittee shall notify the AQD in writing within seven days after RUO is first used as a fuel in EUHMAPLANT. Testing shall be completed within 180 days after the first day RUO is fired in EUHMAPLANT. No less than 30 days before beginning testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results within 60 days of the last date of testing. [R336.2001, R336.2003, R336.2004, 40 CFR 52.21(c)&(d)]

Compliance, site does not use RUO on site.

Monitoring

1.14 The permittee shall monitor, in a satisfactory manner, the virgin aggregate feed rate and the RAP feed rate to EUHMAPLANT on a continuous basis. [R336.1224, R336.1225, R336.1702]

Compliance, site maintains records of all the feed rates, records sent via email.

1.15 The permittee shall monitor, with a handheld CO monitor, the CO emissions from EUHMAPLANT and the production data associated with the time the emissions data were collected. One data set shall be recorded for each of the following occurrences:

- a) Upon start-up of each paving season.**
- b) Upon a malfunction.**
- c) After every 500 hours of operation.**

A data set shall consist of at least eight separate CO readings and shall be taken over a total time period of thirty minutes or longer. Any request for an alternate monitoring schedule shall be submitted in writing to the AQD District Supervisor for review and approval. Data collected by this method shall be used for determining proper burner operation. However, data collected by this method shall not supersede the results of a performance test meeting Department requirements. [R336.1205(1)(a), R336.1205(3), R336.1224, R336.1225, R336.1702, R336.1901]

Compliance, site provided records for CO tests from 2022-2024.

1.16 The permittee shall monitor emissions and operating information for EUHMAPLANT in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and I. [40 CFR Part 60 Subparts A & I]

Compliance, site maintains records for EUHMAPLANT and monitoring is both paper and electronic.

1.17 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor, by observation, the pressure drop across the fabric filter dust collector in EUHMAPLANT once per day. The device shall be certified by the

manufacturer to be accurate within ± 2 inches water gauge pressure and must be calibrated on an annual basis in accordance with manufacturer's instructions. [R336.1331, R336.1901]

Compliance, while on site, observed monitors for pressure drop and calibration records site get pre-calibrated equipment that is installed each operating year.

1.18 The permittee shall monitor, in a satisfactory manner, the fuel usage rate for EUHMAPLANT on a daily basis in gallons per day. [R336.1205(1)(a), R336.1205(3), R336.1225, R336.1402]

Compliance, site uses natural gas.

Recordkeeping/Reporting/Notification

1.19 The permittee shall keep records of emissions and operating information to comply with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and I for EUHMAPLANT. All source emissions data and operating information shall be kept on file for a period of at least five years and made available to the Department upon request. [40 CFR Part 60 Subparts A & I]

Compliance, site monitors emissions and records them on a daily/monthly basis as well as a rolling 12-month average.

1.20 The permittee shall conduct all necessary maintenance and make all necessary attempts to keep all components of EUHMAPLANT maintained and operating in a satisfactory manner at all times. The owner or operator shall maintain a log of all significant maintenance activities conducted and all significant repairs made to EUHMAPLANT. Maintenance records for the fabric filter dust collector shall be consistent with the preventative maintenance program attached as Appendix B. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1910, R336.1911]

Compliance, site does a daily check list of equipment on site to ensure proper operating condition.

1.21 The permittee shall keep the following records for each calendar day that EUHMAPLANT is operated:

- a) Identification, type and the amounts (in gallons) of all fuel oils combusted.
- b) Sulfur content (percent by weight), specific gravity, flash point, and higher heating value (Btu/lb) of all fuel oils being combusted.
- c) Tons of hot mix asphalt containing RAP produced, including the average percent of RAP per ton of hot mix asphalt produced containing RAP.
- d) Determination of SO₂ emissions in lb/MMBtu based on worst case specification of fuel oil used.
- e) All records required in Appendix C, "Compliance Monitoring Plan for Recycled use Oil."

All records shall be kept on file for at least five years and made available to the Department upon request. [R336.1205(1)(a), R336.1205(3), R336.1224, R336.1225, R336.1301, R336.1402, R336.1702, R336.1901]

Compliance, Site records reviewed, natural gas is used on site.

1.22 The permittee shall keep records of the following production information for EUHMAPLANT on the basis indicated:

- a) The virgin aggregate feed rate (continuous).
- b) The RAP feed rate (continuous).
- c) The asphalt paving material product temperature (intermittent).
- d) Information sufficient to identify all components of the asphalt paving material mixture (continuous).

Upon start-up, the initial mix design and time shall be recorded. When a new mix design is activated after start-up, the time and new mix design shall be recorded. All records shall be kept on file until the end of the paving season in which they were recorded and made available to the Department upon request. [R336.1205(1)(a), R336.1205(3), R336.1224, R336.1225, R336.1702, R336.1901]

Compliance, site maintains records. Records reviewed.

1.23 The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records of all criteria pollutants and HAPs listed in the Emission Limit Table for EUHMAPLANT. If stack test results for EUHMAPLANT exist for any of the aforementioned pollutants, those stack test results may be used to estimate pollutant emissions subject to the approval of the AQD. In the event that stack test results do not exist for a specific pollutant, the applicable emission factor listed in the Emission Limit Table shall be used to estimate the emissions of a pollutant from EUHMAPLANT. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a), R336.1205(3), R336.1224, R336.1225, R336.1702]

Compliance, records reviewed via email.

1.24 The permittee shall keep records, as described in Special Condition 1.15, of all CO emissions and related production data including the dates and times emissions were monitored. This data shall be used to calculate the pounds of CO emitted per ton of HMA paving materials produced. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a), R336.1205(3), R336.1224, R336.1225, R336.1702]

Compliance, records reviewed via email.

1.25 The permittee shall keep, in a satisfactory manner, hourly, monthly and 12-month rolling time period records of the amount of HMA paving materials produced from EUHMAPLANT. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a), R336.1205(3)]

Compliance, records reviewed via email.

1.26 The permittee shall keep, in a satisfactory manner, hourly, monthly and 12-month rolling time period records of the amount of fuel used for all fuels combusted, in gallons of fuel per ton of HMA paving materials produced, for EUHMAPLANT. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a), R336.1205(3)]

Compliance, records reviewed via email.

Stack/Vent Restrictions

Stack & Vent ID	Maximum Dimension (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirements
1.27 SVHMAPLANT	34 X 50	35	R336.1225, 40 CFR 52.21(c) & (d)

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.

Compliance, I did not have the range finder for stack heights, based on visual inspection, appears within limit of 35ft.

The following conditions apply to: EUYARD

Process/Operational Limits

2.1 The permittee shall not operate EUYARD unless the program for fugitive emissions control specified in Appendix A has been implemented and is maintained. [R336.1371, R336.1372, Act 451 324.5524]

Compliance, site has water trucks for dust control.

Recordkeeping/Reporting/Notification

2.2 The permittee shall calculate in a satisfactory manner, the annual fugitive dust emissions of particulate matter. The fugitive dust emissions shall be calculated using the current U. S. EPA Compilation of Air Pollutant Emission Factors (AP-42) or other emission factors approved by the Department such as those used in the MAERS. The actual emission levels for EUYARD shall be reported to the AQD through the annual emission reporting required under Section 5503(k) of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. [R336.1371, R336.1372, R336.1901]

Compliance, site records reviewed, and annual emissions were submitted.

The following conditions apply to: EUACTANKS

Process/Operational Limits

3.1 The permittee shall not operate EUACTANKS unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner. [R336.1901]

Compliance, discussed on site with Dan Larson.

The following conditions apply to: FGFACILITY

Emission Limits

	Pollutant	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
4.1a	Each Individual HAP	Less than 8.9 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 4.2	R336.1205(1)(a), R336.1205(3)
4.1b	Aggregate HAPs	Less than 22.4 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 4.2	R336.1205(1)(a), R336.1205(3)

Recordkeeping/Reporting/Notification

4.2 The permittee shall calculate the actual emissions of HAPs from FGFACILITY based on the most recent calendar year. If stack test results for FGFACILITY exist for any of the aforementioned pollutants, those stack test results may be used to estimate pollutant emissions subject to the approval of the AQD. In the event that stack test results do not exist for a specific pollutant, the applicable emission factor listed in the Emission Limit Table shall be used to estimate the emissions of a pollutant from FGFACILITY. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1)(a), R336.1205(3)]

Compliance, site submitted records of emissions, HAPS were observed well below the 8.9tpy for individual HAPs and below the 22.4tpy. HAPS were 3.45 tons aggregate in 2023.

Appendix A

FUGITIVE DUST CONTROL PLAN

PURPOSE: This plan provides dust control strategies for the areas adjacent to and associated with the equipment operations involved in the manufacture of Hot Mix Asphalt (HMA) paving materials.

1. SITE MAINTENANCE.

a. Dust on all areas where vehicular traffic will travel shall be controlled by the application of water, sweeping, vacuuming, or other acceptable dust control method. This will occur a minimum of two times per month or more frequently as dictated by weather conditions and vehicular activity. The dust control method shall be acceptable as determined by the District Supervisor.

b. The speed of vehicles on the site will be limited to 15 miles per hour or less. Signs will be posted to advise drivers of the speed limitation.

c. Stock piling will be performed in a manner that minimizes freefall drop distance.

d. Piles will be maintained to prevent fugitive dust. This includes the use of watering, covering and encrusting agents.

2. MANAGEMENT OF ON-SITE ROADWAYS.

a. All the roadways on which the HMA haul vehicles will travel are paved with HMA. This includes the roadway on which the vehicles travel around the process equipment to be loaded with HMA paving materials.

b. During the operating season the paved plant roads shall be treated with water, vacuumed, or swept in a manner that minimizes the introduction of the dust to the ambient air to control fugitive dust emissions and track-out dust. This will occur a minimum of two times per month or more frequently as dictated by weather conditions and vehicular activity. The dust control method shall be acceptable as determined by the District Supervisor.

c. During the operating season, the unpaved travel surfaces shall be treated with water, or other acceptable dust control agents on a frequency sufficient to meet the visible emission opacity standard of five (5) percent opacity specified in Section 5524 of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

d. Any aggregate spillage on roads shall be removed immediately.

3. ON-SITE MANAGEMENT OF HAUL VEHICLES.

a. **INCOMING TRUCKS:** All trucks entering the site to deliver aggregates will be required to have the loads covered.

b. **OUT-GOING TRUCKS:** All trucks leaving the site with HMA paving materials will be required to cover their loads prior to leaving the site. A sign shall be posted to advise drivers of this requirement.

Appendix A - Continued

4. MANAGEMENT OF FRONT-END LOADER OPERATIONS.

The front-end loader operator shall be directed to avoid overfilling the bucket of the loader and the feed hoppers to prevent spillage, and to minimize the drop height of the material when loading the feed hoppers or transferring material to stockpiles.

5. RECORDKEEPING.

Records of dust control activities on travel surfaces and other surfaces where fugitive dust emissions occur shall be kept on file and made available to MDEQ staff upon request until the end of the paving season. The records will indicate the date,

time, what was observed or the reason for the dust control activity (routine or other), and what action was taken. The record shall be maintained in the Operations Log Book.

6. FUGITIVE EMISSIONS FROM PROCESS EQUIPMENT AND FABRIC FILTER DUST COLLECTOR.

Any fugitive emissions from leak(s) and malfunction(s) from any transfer system, storage bin, mixer, hopper, or fabric filter dust collector shall be immediately corrected to prevent further fugitive emissions.

Compliance, the site is in compliance with all conditions in Appendix A.

Appendix B

PREVENTATIVE MAINTENANCE PROGRAM FOR THE FABRIC FILTER DUST COLLECTOR

The Preventative Maintenance Program for the Fabric Filter Dust Collector is for the purpose of keeping the dust collector in good operating condition, and thereby, maintaining the rated capture efficiency of the dust collector for the control of particulate matter. **ALL REFERENCES TO VISIBLE EMISSIONS IN THIS DOCUMENT, PARTICULARLY IN SEC. 5, REFER SPECIFICALLY TO VISIBLE EMISSIONS CAUSED BY A DUST (PARTICULATE) EMISSION.**

1. FABRIC FILTER DUST COLLECTOR OPERATING PRESSURE DROP.

a. The pressure drop across the fabric filter dust collector shall be continuously measured and the minimum pressure drop shall not be less than 2 inches, water gauge, except when a large number of filter bags have been replaced.

b. The pressure drop across the fabric filter dust collector shall be recorded at least once per day and kept in a bound notebook. These data shall be recorded in the Daily Operations Log Book.

2. **FABRIC FILTER DUST COLLECTOR /PLANT ALARM SYSTEM.**

The fabric filter dust collector shall be equipped with a high temperature sensor and alarm system. The alarm system shall be designed to set off an alarm when the high temperature set-point has been violated, and, to begin a sequential shut-down of the plant if the situation is not resolved within a very short period of time after the alarm sounds.

3. **HANDLING AND STORAGE OF FABRIC FILTER DUST.**

Accumulated fabric filter dust (particulate) shall be stored and/or be disposed of in a manner which minimizes the introduction of the air contaminants to the outer air.

4. **PIPING AND SEALS MAINTENANCE.**

Piping and seals shall be replaced as needed.

5. **VISIBLE EMISSIONS AND ACTIONS TO BE TAKEN IN THE EVENT OF.**

In the event visible emissions, which appear to exceed the standard allowed in General Condition No. 11 of this Permit to Install, are observed at the discharge point of the stack, the following actions shall be taken:

If no certified visible emissions reader can be on-site within 60 minutes of observing the visible emissions to verify the emission density, operations shall be ceased immediately and the cause of the visible emissions determined and corrected prior to operating the plant again.

REMINDER: If the visible emissions continue for more than two hours, in excess of an emission standard, an excess emissions report must be made to MDEQ.

Appendix B - Continued

6. BLACK LIGHT INSPECTIONS.

A black light test shall be conducted at least once per year - before operations begin for a paving season. Black light inspection equipment and materials shall be available for use at the facility and used as needed during the paving season.

7. INVENTORY OF FILTER BAGS.

An inventory of fabric filter bags shall be maintained by the facility owner or operator so that filter bags will be available to this site within four hours of requesting the filter bags. In addition, a minimum of 15 filter bags shall be kept on-site at all times. An inventory of other replacement parts for the fabric filter dust collector shall be maintained at all times.

8. FABRIC FILTER DUST COLLECTOR INSPECTION RECORD.

A written record in a bound notebook of the following shall be maintained by the owner or operator of the facility:

- Visual inspections of the interior components of the fabric filter dust collector, including date, time, and findings;
- Black light inspections, including date, time, and findings;
- Number of filter bags installed as a result of each inspection to replace filter bags already in use in the fabric filter dust collector, including date, time, location, and whether the replacement filter bag was brand new or a cleaned, previously used filter bag;
- An explanation (i.e., a description of the damage found) for each filter bag removed from the fabric filter dust collector and confirmation that another filter bag was installed to replace it;
- Each observation of visible emissions at the stack discharge point and description of response to the observed visible emission, including date and time of visible emission occurrence and results of EPA Method 9 observation, if any. A visible emission record sheet will be made available in the Daily Operations Log Book.
- All significant maintenance activities performed on the fabric filter dust collector.

Compliance, site is in compliance with all portions of Appendix B. Black Light conducted 04/16/2024.

Conclusions:

Upon review of records that were sent over via email from James Anderson in the headquarters of the company in Indiana, it was determined the site is in compliance with all applicable conditions.

Appendix C was removed from the report as this site does not use recycled oil and thus is not subject to the conditions currently. I did observe visible emissions for a small-time duration of maybe 5 seconds coming from the stack. Did not observe odors off-site, while on-site I could only smell asphalt where new asphalt had been poured on site. No dust was observed while on site. This facility is in compliance with PTI -1343-91C.

NAME David Rauch

DATE 08/06/2024

SUPERVISOR RB