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

B706872878

FACILITY: GMI - HMA Plan	19	SRN / ID: B7068
LOCATION: 2675 TREAT R	D, ADRIAN	DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: David Benecke	, Environmental Manager	ACTIVITY DATE: 07/11/2024
STAFF: Brian Merle	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Announced sche	duled compliance inspection.	
RESOLVED COMPLAINTS		

Facility Contact

Dave Benecke, Environmental Manager

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419-533-7701 Ext. 107

Purpose

On July 11th, 2024, an announced scheduled compliance inspection was conducted at Gerken Materials, Inc., HMA Plant 19, 2675 Treat Road, Adrian, Michigan. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly with the Michigan Natural Resources and Environmental Protection Act 451 of 1994, Part 55, Air Pollution Control and the administrative rules, and the conditions of Permit to Install (PTI) No. 783-79G.

Facility Location

The facility is located on the southeast side of Adrian, Michigan.

Facility Background

The facility was last inspected August 26th, 2020, and found to be in compliance. In January of 2024, the facility contacted AQD Staff Brian Carley to inquire about changes that they had made to their process equipment. The facility had submitted a permit application in February 2021 which was not received by the AQD. The facility reconstructed their drum/dryer/mixer as well as installed a new burner and baghouse. Brian Carley issued the facility a Violation Notice citing Rule 201 for failure to obtain a permit.

Regulatory Applicability

The facility operates under PTI No. 783-79G, which is a facility wide synthetic minor opt-out permit.

Arrival

Prior to my inspection, I reviewed the facilities 2023 emissions submittal to determine compliance with the limits in their permit. The facility reported emissions over their permitted limits for Arsenic, Nickel, and Manganese.

I arrived 12:55 PM and proceeded to the office. No visible emissions or odors were observed. I parked and met with Dave, and we headed inside.

Pre-Inspection Meeting and Records Review

We entered the plant office and met with the operator. The facility keeps all of its records on site and had prepared them for my inspection.

I began by asking about the status of their permit application in response to their VN. Dave explained that they would have it in soon.

We then went through the permit and the corresponding records.

EUHAMPLANT

SC II.1 The facility only uses natural gas. They are in compliance with this condition.

SC II.2 The facility does not use any asbestos containing materials. They are in compliance with this condition.

SC II.3 The records reviewed did not show the facility exceeding 50% RAP. They are in compliance with this condition.

SC II.4 For the facility's 2023 Annual Emissions Report, they reported a yearly throughput of 100,538 tons of HMA. This was confirmed by the 12-month rolling calculations seen in Image 2. This is in violation of the 100,000 tons of HMA paving materials per 12-month rolling time period.

SC II.5 Image 3 shows the facility exceeded the 225 tph for a daily average on June 7th, 20th, 22nd, and 24th, violating this condition. This was explained by the facility as having inaccurately recorded the operating hours, which were updated and provided for the months of May and June 2024 (Attachment 1). These demonstrate compliance with the 225 tph condition.

SC III.1 The facility has implemented the Fugitive Dust control Plan specified in Appendix A. They maintain records of duct control activities at the plant, which I reviewed on site. The company has a sweeper that travels between their different properties and is brought to the facility as needed. The aggregate they receive is washed stone and rarely needs attention for fugitive dust. All roadways for HMA haul vehicles were paved and watered weekly and as needed. The facility does not currently have a sign indicating the speed limit of 10 mph as specified in 1.b of the Fugitive Dust Control Plan. The facility committed to installing a sign during my inspection.

SC III.2 The facility has implemented the Preventative Maintenance Program specified in Appendix B. The facility records the pressure drop for the dust collector and records it at least once per day. They also keep an inventory of bags and blacklight powder on site. They also keep records of visual inspections, black light inspections, bag replacements, and maintenance activities. The facility did not perform a blacklight inspection before the 2024 paving season began, as required in the preventative maintenance plan in Appendix B.6. Once notified of this condition during my visit, the facility planned to conduct a blacklight inspection. The facility performed the blacklight inspection on Saturday, July 13th following my inspection.

SC III.3 The facility has implemented the Emission Abatement Plan for Startup, Shutdown, and Malfunctions specified in Appendix C. They are in compliance with this condition.

SC III.4 The facility performs yearly burner tuning. They are in compliance with this condition.

SC IV.1 The facility recently replaced their fabric filter dust collector (see above for VN). The facility continuously monitors the pressure drop of the baghouse while it is operating. They are in compliance with this condition.

SC IV.2 The facility uses a device to continuously monitor the feed rates of both virgin and RAP. They are in compliance with this condition.

SC VI.2 The facility uses a device to continuously monitor the feed rates of both virgin and RAP. They are in compliance with this condition.

SC VI.3 The facility performed their yearly CO testing May 7th, 2024. The testing showed 8 CO readings under 500 PPM, meeting the condition of their permit (Image 1). However, they were conducted over a period of less than 30 minutes, violating the condition.

SC VI.5 The facility keeps all maintenance records on site. These were reviewed and found to be in compliance.

SC VI.6 The facility keeps monthly records of tons of HMA containing RAP produced, as well as the average percent of RAP per ton of HMA produced with RAP, on site (Image 2). These were reviewed and found to be in compliance.

SC VI.7 Daily records of virgin aggregate feed rate, RAP feed rate, asphalt material product temperature, and information sufficient to identify all components of the asphalt paving material mixture (Image 3). These were reviewed for the month of June 2024 and found to be in compliance. The initial mix design and subsequent mix designs and their corresponding times are recorded by the operator.

SC VI.8 Monthly and 12 month rolling time period emission records for all criteria pollutants and TACs listed in the Emission Limit Table for EUHAMPLANT are kept on site (Image 4). The facility does not use stack test results to calculate these emissions, instead using the applicable emission factor listed in the Emission Limit Table is used for each pollutant. These were reviewed on site for June 2024 and show compliance with the emission limits of SC I.1-14.

SC VI.9 Records of CO emissions as described in SC VI.3 were reviewed (Image 1).

SC VI.10 Average daily, monthly, and 12 month rolling time period records of the amount of HMA paving materials produced were reviewed on site and found to be in compliance (Image 2).

EUYARD

SC III.1 The facility has implemented the fugitive dust control plan specified in Appendix A. They are in compliance with this condition.

SC VI.2 The facility submitted their fugitive dust emissions with their 2023 MiEnviro Annual Emissions Report. They are in compliance with this condition.

EUSILOS

SC III.1 I was able to observe the emission capture system on the top of each silo during my inspection. They are in compliance with this condition.

SC III.2 I was able to observe the load-out area controlled by the Blue Smoke collection system (Image 5). They are in compliance with this condition.

FGFACILITY

SC VI.2 The facility maintains individual HAP emission calculations for monthly and 12-month rolling time periods. All HAPs are below the 9.0 tpy specified in the permit. They facility does not calculate the aggregate value, but this was calculated to be 1.07 tpy on a 12-month rolling basis for the month of June, which is below the 22.5 tpy limit specified in the permit. They are in compliance with this condition, but it is recommended to calculate the monthly and 12-month rolling aggregate total.

Inspection

Dave took me out to the plant yard and explained the entire process. Aggregate is loaded from the yard into hoppers (seen in back left of Image 6). This is then transferred by conveyor into the rotary drum (Image 7) where it is heated with the binder to produce asphalt. I asked Dave about their current production, and he said they typically operate at 50-60 tph, but they process is capable of reaching 300 tph. The permit is currently permitted for 225 tph, but they were planning on submitting a modification to increase this limit. The new baghouse was observed to be in good working order (Image 6). We then went over to the asphalt storage tanks, where the material is transferred by conveyor from the drum into the asphalt storage tanks (Image 5, behind Blue Smoke collection system). This is also where the Blue Smoke collection system is located (Image 5). The facility also has a sign posted for drivers to remember their tarps as required in the Fugitive Dust Control Plan (Image 8). Dave explained that any particulate collected by the baghouse is kept in a storage pile at the facility or put back into the process. Overall, the yard and process equipment appeared to be well maintained and clean. No emissions or fugitive dust were observed from the process.

Post-Inspection Meeting

We returned to the office, where I was able to take a look at the process monitoring parameters (Image 9). I thanked Dave for his time and left at 1:50 PM.

Post-Inspection Records Review

I called Dave on July 18th to clarify some of their records and get a firm date of their permit application submittal. Dave explained that they would have the permit application submitted by the end of July, at most the first week of August. I also asked about their HMA tons per hour calculations for the month of June, which showed them exceeding the permit condition of 225 tph on June 7th, 20th, 22nd, and 24th (Image 3). During my inspection, Dave explained that they had been inaccurately reporting the operating hours of the plant for June. During my call I asked Dave if the exceedances shown in their records would be changed by updating their true operating hours, which he said they would. He emailed me the updated records on July 26th, which showed

the daily average tons per hour below the permit limit (Attachment 1). This replaced the data provided in Image 3. He also provided updated monthly and 12-month rolling emission calculations for June 2024 as well as production data for the same month (Attachments 2 and 3). These updated calculations replace Images 2 and 4. He also provided proof that the facility added speed limit signs to the yard (Images 10 and 11) as well as proof of the blacklight inspection (Images 12 and 13).

Compliance Determination

At this time, the facility is not in compliance with their permit due to exceeding their 12-month rolling HMA production limit, not having a speed limit sign posted in the plant yard, not conducting a blacklight inspection of the baghouse before the paving season began, and not performing their CO testing in a 30 minute or more period of time. Additionally, they have not resolved the VN issued January 25, 2024 for failure to obtain a PTI in violation of Rule 201. They are in compliance with all other permit conditions. A violation notice will be issued for the cited violations above.

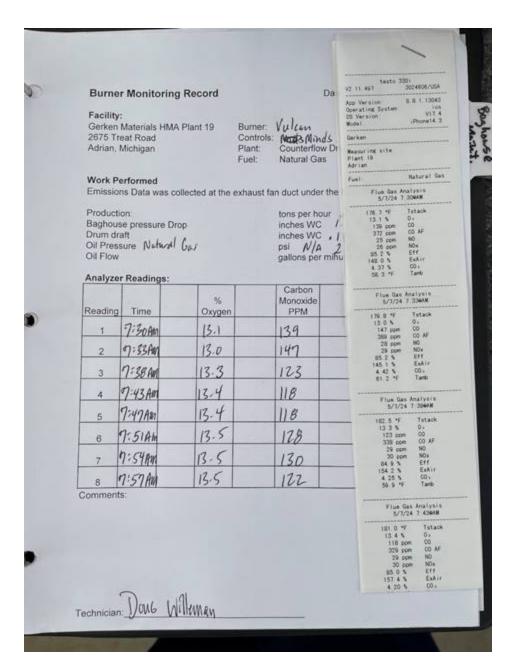


Image 1: CO testing data.

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Image 2: Monthly and 12-month rolling production data for June 2024.

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	30 300 2 Colle #03/c0 #6 300 2 Colle #0 300 2 Colle		Daty	wg Darly # Days	10							3.61	% variation 0.00						
		## 1 351 20 30 16074 72.74 8.28 200.56 0 170 73 500 3 Gathe 7. 0.48 190 79 30 30.31.31 14.22 2.00 40.47 0 89 30 300 2 Gathe 7. 0.48 190 79 30 30.31.31 14.22 2.00 0 40.47 0 89 30 300 2 Gathe 7. 0.48 190 79 30 30.31.31 14.22 2.00 0 40.47 0 89 30 30 2 Gathe 7. 0.48 190 79 30 30 30 30 30 30 30 30 30 30 30 30 30	## 1 251 29 36 166.74 72.74 8.28 296.56 0 170 73 560 3 Collection of the collection	250,7	10	118		29	30	189,74	72,16	5.40							The second second
20 360 76 8 361 20 30 160.74 72.76 8.28 250.76 0 170 73 800 3	73 800 3 000	25 49.47 0.48 100 29 30 33.21 14.25 2.00 0.047 0 00 30 20 20 20 20 20 20 20 20 20 20 20 20 20	Section Sect		240.06	-			30	169.74	72.74	8.28	250.76	0	170				
24 200.78 0 0 00 00 200 2		25 #50.07	25											0	69	30		2	Colles
25 49.47 9.49 100 0 SERVER SCHOOL STATE ST		27 800.00 5 180 29 80 559,20 227.00 30.10 503,20 0 177 40 80 20 20 80 802,20 4 183 20 30 441.00 194.10 293.00 0 100 44 800 2 Code 26 802,20 4 183 20 30 441.00 194.10 293.00 0 800.00 0	77 800.60 5 180 25 30 500,20 277,00 38-10 900.00 0 177 46 500 2 College 5 180 28 4 180 28 30 441.00 184.55 28 30 441.00 184.55 28 30 441.00 184.55 28 30 441.00 184.55 28 30 441.00 184.55 28 30 441.00 184.55 28 30 441.00 184.55 28 30 441.00 184.55 28 30 481.00 184.55 28 30 481.00 184.55 28 30 481.00 184.55 28 30 481.00 184.55 31.70 184.55 31.		49.47	0.48			- 00-	200	HOLD CONTRACTOR	SUCCESSORY.						100	
26 8,011/2 80,011/2 20 244,50 727,66 90,10 90,02 6 127 46 900 2	30 300 2 Colle	27 900.00 5 100 30 50 500,00 104.15 20.21 50.22 0 110 46 500 2 Collection	77 900.00 3 100 70 10 100 100 100 100 100 100 100 1						- 24	416.10	777.66	36.10		0	127	46	300	2	Coller
27 900.00 5 100 00 90 90000 9000 9000 9	30 300 2 Colle-	26 592,28 4 153 29 50 641.05 0.00 0 6.00.00 0 6.00.05 0.00 0.00.00 0.00	26 652.28 4 163 28 30 441.67 104.07 10.00 0 464.07 464.07 10.00 10.00 0 464.07 464.07 10.00 10.0	27	900.02	2.5								0					
26 652.26 4 163 28 30 441.62 154.15 25.21 155.01	30 300 2 Colle #01/07 46 300 2 Colle	20 606/07 606/07 000/07 000 0 000/07 606/07 000/07	29			-4	163		30	441.82	184.15	29.31		Marie Committee			200		- COMM
17 MARIE 1947 PARTE 000 0 KIND KIND	30 305 2 Calls #Dir/Ol 46 300 2 Calls 46 300 2 Calls	30 #00:00	00 800.00 900.00 800.00			-			THE REAL PROPERTY.	10000	10000	PARTICULA		0.00			_		
20 20 20 20 20 20 20 20 20 20 20 20 20 2	30 300 2 Colle #03/c0 #6 300 2 Colle #0 300 2 Colle	6/33.26 3/38.10 2/10.07 3643.35 2	66h 3843.55 31.79 584 27,27 4633.29 1598.18 211.07 5843.25 2							Manager 1988				4	#DN/01	NOW/OF	_		_
2033.29 3199.10 231.07	30 300 2 Colle #03/c0 #6 300 2 Colle #0 300 2 Colle		TAC MATOR			24 72				4033.29	1599.19			0.00					

Image 3: Daily production data for the month of June 2024.

						Gerker		Inc H an, MI 2 783-7		19					
Monthly E	mission Cal	culation	is (pound	s per mon	th)										
Emission Fo Month	Production (tone)	PM* 0.025	00 04	Lead 2.00E-06	Benzene 1.006-03		City/benzene 1.006-03	Xylene 1 005-03	Naphthalene 1.00E-03	Formuldayde 1.006-02	Acrolein 1.006-03	Arsenic 1 00E-06	Nickel 1.005-04	H2504 3.206-03	Manganese 5.00E-05
Jan-24	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00
Feb-24	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00
Mer-24		0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00
Apr-24	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00
May-24	7567.91	100	3027	8.02	7.67	45.41	7.67	7.67	7.67	75.68	7.57	0.008	0.76	24.22	0.36
Jun-24	15053.73	146	2337	0.01	5.64	35.06	5.84	5.84	5.84	58.44	5.84	0.006	0.58	18.70	0.29
Aug-23	10003.73	391	6261	0.03	15.65	99.92	15.65	15.65	10.65	156.54	15.66	0.016	1.67	50:09	0.78
Sep-23	12263.23	307	4905	0.02	10.73	73.58	10.73	10.73	10.73	107.35	10.73	0.011	1.07	34.35	0.54
061-23	31936.83	798	12776	0.00	31.94	191.62	31.94	12.26	12.26	122,63	12.26 31.94	0.012	3.10	102.20	1.60
Nov-23	3575.27	80	1430	0.01	3.58	21.45	3.55	3.58	3.50	35.75	3.58	0.004	0.36	11.44	0.18
Dec-23	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	9.00	0.00	0.000	0.00	9.00	0.00
Rolling 12 Total	67575.07	2189	35030	0.15	67.55	525.46	87.58	87.58	67.56	875.75	87.58	0.068	8.76	280.24	4.38
TM emission	Rolling 12 Emissions in p	Emission counds per	ns rolling 12 n	nonths							-			100000	20000
	Jan-24	PM* 2513	40215	Lead 0.20	100 54	Toluene 603.23	Ethylbenzene 100.54	Xylene 100.54	Naphthalene 100.54	Formaldayde 1005.38	Acroteis 100.54	Arsenie 0.101	Mickel 10.05	H2504 321.72	Manganese 5.03
	Feb-24	2513	40215	0.20	100.54	603.23	100 54	100.54	100 54	1005.36	100.54	0.101	10.05	321.72	5.03
	Mar 24	2513	40215	0.20	100.54	603.23	100.54	100.54	100.54	1005.38	100.54	0.101	10.05	321.72	5.00
	Apr 24	2466	39779	0.20	99.45	89.760	99.45	99.45	99.45	994.47	00.45	0.099	9.94	318.23	4.97
	May-24	2334	37342	0.19	93.35 87.58	500.13 525.45	93.35 87.58	93.35 87.58	90.35 87.58	933.55 875.75	93.35 97.58	0.003	8.76	258.72	4.67
	Jun-24 Jul-23	2188	35030 34405	0.17	87.56	516.97	86.16	90.18	96.16	861.62	80.16	0.086	0.62	280.24	4.38
	Aug-23	2156	34503	0.17	86.26	517.54	86.26	80.25	86.26	802.57	80.25	0.086	8.63	276.02	4.31
	Sep-23	2273	36362	0.18	90.91	545,43	90.91	90.91	90.91	909.05	90.91	0.091	9.09	290.90	4.55
	Oct-23	2553	40854	0.20	102.14	612.61	102.14	102 14	102.14	1021 36	102.14	0.102	10.21	326.83	5.11
	Nov-23	2513	40215	0.20	100.54	603.23	100:54	100.54	100.54	1005-38	100.54	0.101	10.05	321.72	5.03
	Dec-23	2513	40215	0.20	100.54	803.23	100.94	100.04	100.34	1005.36	100.54	0.101	10.05	321.72	5.00

Image 4: Monthly and 12-month rolling emission data for the month of June 2024.



Image 5: Blue Smoke collection system with storage tanks.



Image 6: Baghouse with aggregate hoppers to the back left.



Image 7: Rotary drum. Aggregate is fed from the left, and exits the drum to the right and is conveyed up into the storage tanks.



Image 8: Tarp sign at facility.



Image 9: Production diagram.



Image 10: Speed limit sign posted following my inspection.

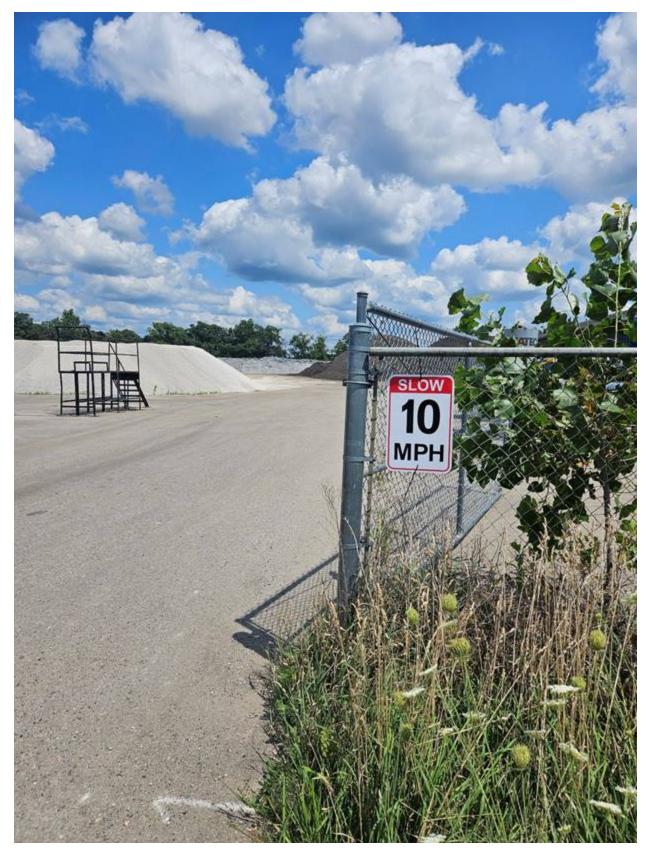


Image 11: Speed limit sign posted at entrance following my inspection.

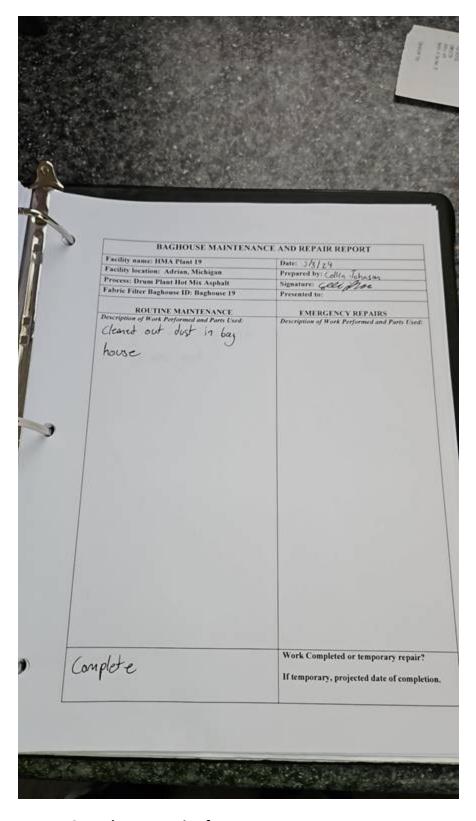


Image 12: Baghouse service form.

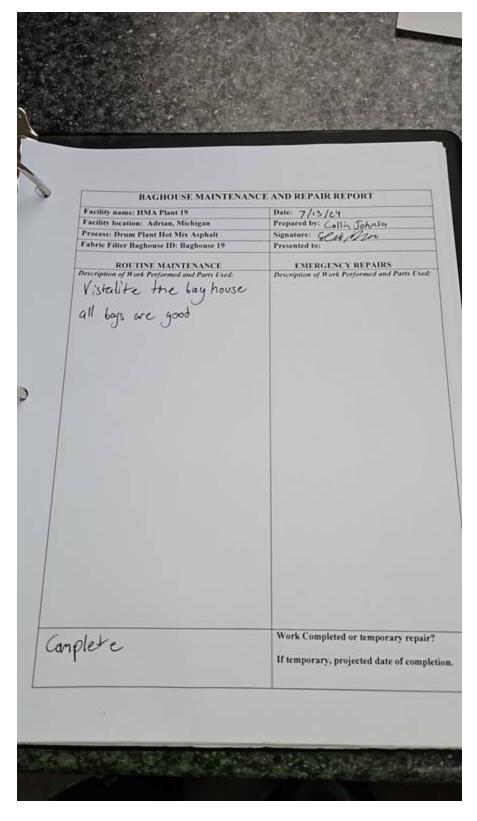


Image 13: Baghouse blacklight inspection form completed after my inspection.

NAME	DATE 08/02/2024	SUPERVISOR_	Seg