

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

N158067632

<b>FACILITY:</b> Ace-Saginaw Paving Company - Plant 9		<b>SRN / ID:</b> N1580
<b>LOCATION:</b> 4711 VETERANS MEMORIAL HIGHWAY, SAGINAW		<b>DISTRICT:</b> Bay City
<b>CITY:</b> SAGINAW		<b>COUNTY:</b> SAGINAW
<b>CONTACT:</b> Corey Graveline ,		<b>ACTIVITY DATE:</b> 06/05/2023
<b>STAFF:</b> Gina McCann	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Inspection of PTI 178-87H. Plant limited to 400 tph, records for several months show exceedance. Sending VN.		
<b>RESOLVED COMPLAINTS:</b>		

**Ace-Saginaw Paving Company/ EGLE-AQD staff present during the inspection:**

- Gina McCann (EGLE-AQD, Environmental Quality Specialist)
- Cory Graveline (Ace-Saginaw Paving, Plant 9, Plant Operator)

Ace-Saginaw Paving Company-Plant #9 (Crow Island) is located at 4711 Veterans Memorial Highway in Saginaw Michigan. The plant is operated under PTI # 178-87H and consists of a 400 ton per hour (tph) counter flow hot mix asphalt (HMA) plant, EU-001. The PTI is a HAPs synthetic minor opt-out permit and has restrictions on HAPs emission. The PTI also includes emissions from the liquid asphalt cement storage tanks (EUACTANKS), the HMA paving material product storage silo (EUSILOS) and sources of fugitive dust emissions (EUYARD). At the time of the inspection, the plant appeared to be in compliance with PTI #178-87H and applicable state and federal regulations.

### EU-001

EU-001 is a hot mix asphalt (HMA) facility including: Aggregate conveyors, 400 tons per hour CMI drum mixer. Controlled by a fabric dust collector rated at 102,000 acfm. The load out emissions are directed back to the burner. When I arrived on site the plant was idling down due to the related job being paused, because of rain.

Special Condition (SC) I.2 restricts PM emissions to less than 27.8 ton per year (tpy), based on a 12 -month rolling time period as determined at the end of the calendar month. SC VI.8. is the associated monitoring and recordkeeping requirement. I reviewed PM emissions data for the 12-month rolling time period ending April 2023. PM emissions were 1373.90 pounds.

SC I.4. restricts CO emissions to less than 59.7 tpy, based on a 12-month rolling time period as determined at the end of the calendar month. SC VI.8. is the associated monitoring and recordkeeping requirement. I reviewed CO emissions data for the 12-month rolling time period ending April 2023. CO emissions were 2289.80 pounds.

SC II.1. limits the plant to only burn propane, natural gas, virgin fuel oil, blended fuel oil, or recycled used oil (RUO). The plant only burns natural gas.

SC II.2. prohibits burning of hazardous waste in EU-001. This restriction is based on the ability to use RUO. SC VI. 6. requires the plant to maintain records for each calendar month that EU-001 is operated; the amount of fuel combusted (in gallons) and the sulfur content (%by weight), specific gravity, flash point, and higher heating value (Btu/lb). The plant only burns natural gas and does

maintain records of the amount of fuel combusted on their daily logs. The second half of this condition appears to be intended for RUO combustion. The facility does not use RUO and the sulfur content, specific gravity, flash point, and higher heating value would be that of natural gas.

SC II.3. prohibits use of asbestos tailings of waste material containing asbestos in EU-001. The plant said years ago they had used shingles but had since moved away from using them. It was not producing the product they wanted. They use recycled asphalt (RAP), aggregate and asphaltic cement (AC). I did not see any evidence to suggest they were using materials containing asbestos.

SC II.4. limits the asphalt mixture processed in EU-001 to a maximum of 50 percent RAP material based on a monthly average. SC VI.2 and VI.6 are the associated monitoring and recordkeeping requirements. I reviewed records from May 2022 through April 2023. Monthly RAP percentage, averages, ranged from 18% to 28%.

SC II.5. restricts the plant to processing less than 595,000 tons of HMA paving materials I EU-001 per 12-moth rolling time period as determined at the end of each calendar month. SC VI.10. is the associated monitoring and recordkeeping requirement. For the 12-month rolling time period ending April 2023 the total HMA the plant produced was 11,392 tons.

SC II.6. limits the plant from processing not more than 400 tons of HMA paving materials in EU-001 per hour based on a daily average. SC VI.10. is the associated monitoring and recordkeeping requirement. I reviewed records from May 2022 through April 2023. The months of May, June, July, August, and September all had one or more days that exceeded the material limit.

SC III.1. requires the plant to implement the Fugitive Dust Control Plan for EUYARD. The plant brines when appropriate and at the time of the inspection the yard did not have excess fugitive dust emissions.

SC III.2. restricts operation of EU-001 unless the Preventative Maintenance program, in Appendix B, is implemented and maintained. SC VI.5 is the associated monitoring and recordkeeping requirement. In the last two years, the plant performed inspections and no bags needed to be changed. Blacklight check was performed too. The auger that feeds dust back into the drum was replaced. The housing had just become wore overtime.

SC III.3. requires the plant to have an acceptable startup, shutdown and malfunction plan in place. Because of the federal litigation surrounding SSM provisions and the removal of SSM language in all federal standards, I did not check for compliance with this condition.

SC III.4. requires the plant to have a Compliance Monitoring Plan (CMP) for RUO. The plant does not use RUO therefore, this condition does not apply.

SC III.5 requires the plant to maintain the efficiency of the EU-001 drum mix burners, to control CO emissions, by fine tuning the burners for proper burner operation and performance. SC VI.3. is the associated monitoring and recordkeeping requirement. The plant last checked the CO emission on May 18<sup>th</sup>. The permit does not have an action level, however, the plant uses this number to determine if the burner needs to be tuned. CO was below 500 ppm during the May testing event.

SC IV.1. restricts operation of EU-001 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 2 and 8 inches of water column ("W.C."). The plant was not in operation at the time of the inspection, and I could not verify this reading.

SC V. provides the District with the ability to request testing of the plant. The District will not be requesting testing at this time.

### **EUYARD**

**Fugitive dust sources including: Plant roadways, Plant yard, Material storage piles, Material handling operations (excluding cold feed aggregate bins).**

SC III.1. requires the plant to implement the Fugitive Dust Control Plan for EUYARD. The plant brines roadways when appropriate. At the time of the inspection the yard did not have excess fugitive dust emissions.

SC VI.2. requires the plant to calculate and submit the annual fugitive dust emissions for EUYARD to the Department through MAERS. The plant submits MAERS on an annual basis and includes their fugitive dust emissions.

### **EUACTANKS**

**Liquid asphalt cement storage tanks**

SC III.1. restricts operation of EUACTANKS unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner. I have viewed this system in previous inspections. It is a closed loop system with an interlock in place, which prevents truck drivers from overflowing or bypassing the system.

### **EUSILOS**

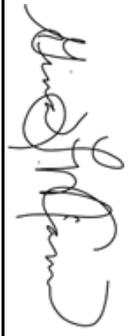
**No requirements under this emission unit.**

### **FGFACILITY**

**All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment. (EU-001, EUYARD, EUACTANKS and EUSILOS)**

**Controlled by a fabric filter: vapor condensation and recovery equipment.**

The PTI is A HAPs synthetic minor opt-out permit and has restrictions on HAPs emissions of less than 9.0 tpy for each individual HAP and less than 22.5 tpy for the aggregate of HAPs, based on a 12-month rolling time period as determined at the end of each calendar month. For the 12-month rolling time period ending April 2023, individual HAPs emissions were all under 1 tpy for this time period. Aggregated HAP emissions for this time period were 4,753.12 pounds.

NAME 

DATE 6/13/2023

SUPERVISOR 