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

P127873022

FACILITY: NORTHEAST ASPHA	ALT INC	SRN / ID: P1278				
LOCATION: N13064 BLACK RIV	/ER ROAD, IRONWOOD	DISTRICT: Marquette				
CITY: IRONWOOD		COUNTY: GOGEBIC				
CONTACT: James Mertes , Environmental Manager		ACTIVITY DATE: 08/01/2024				
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT				
SUBJECT: Targeted inspection for FY 24.						
RESOLVED COMPLAINTS:						

Facility: Northeast Asphalt (SRN: P1278)

Location: PO Box 781, N3W23650 Badinger Rd, Waukesha, WI 53187

Contact: Jim Mertes, Environmental Manager, 262-524-1849

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Payne & Dolan, Inc. (P&D) is an asphalt material producer and pavement contractor based out of Waukesha, WI. P&D is one of several companies that make up the Walbec Group, which is a collection of companies that provides construction and engineering services. The company owns and operates several portable and stationary asphalt plants in Wisconsin and Michigan. Northeast Asphalt is a portable HMA plant operating under Permit to Install (PTI) No. 73-23. The HMA plant consists of aggregate and reclaimed asphalt pavement (RAP) storage piles, cold feed bins, conveyors, screens, drum dryer, fabric filter, asphalt cement storage tanks, silos, loaders, and haul trucks.

Process Description

HMA is produced by the drying and mixing of aggregate, RAP, and liquid asphalt cement. HMA plants can be categorized as either batch or continuous mix. Continuous mix plants are further subdivided based on the type of dryer, which can be either a parallel-flow drum or counter-flow drum.

The HMA process begins with the transfer of aggregate, consisting of sand and crushed rock, from storage piles into cold aggregate feed bins. From the bins, material is dispensed onto conveyors that transport the material into screens and then into the drum dryer. The quantities of the type and size of aggregate are determined from the control room. The virgin aggregate is heated by a recycled used oil (RUO)-fired burner to remove moisture. Once the virgin aggregate reaches a certain length of the dryer, RAP is dispensed from a separate bin and added to the dryer. The RAP and aggregate continue to be heated and are then mixed with asphalt cement prior to exiting the dryer. After exiting the dryer, HMA is conveyed to storage silos where it is loaded into trucks to be hauled off-site.

Emissions

The primary source of emissions from all three types of plants is the dryer. Air contaminants emitted include PM from aggregate drying and gaseous pollutants from the combustion process of the dryer. The gaseous pollutants consist of sulfur dioxide (SO₂), nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC). The quantities of gaseous pollutants emitted varies based on the type of fuel being burned and operating parameters. A fabric filter collector is primarily used as PM control for the dryer. Other sources of emissions at HMA plants include fugitive emissions of PM and VOCs from storage silos, truck load-out operations, liquid asphalt cement storage tanks, aggregate storage and handling, and vehicle traffic. Dust suppressants, such as water or calcium chloride, can be used to control fugitive PM emissions.

Emissions Reporting

Northeast Asphalt is a synthetic minor source and is subject to the New Source Performance Standards (NSPS), Subpart I – Standards of Performance for Hot Mix Asphalt Facilities. This facility is required to report its annual emissions. This is a new source that was permitted in May 2023 and has not operated in Michigan since the PTI was issued. So no emissions were reported for 2023.

Compliance History

There have been no prior inspections at this source.

Regulatory Analysis

Northeast Asphalt is subject to PTI No. 73-23, issued on May 26, 2023, for a portable HMA plant. The facility is considered a synthetic minor for HAPs because the source took emission limits to restrict its potential-to-emit (PTE) to below major source thresholds of 10 tpy for individual HAPS and 25 tpy for combined HAP emissions. The source is subject to NSPS Subpart I, because the source is defined as a hot mix asphalt facility that commenced construction after June 11, 1973.

<u>Inspection</u>

On July 31, 2024, an email was sent to Zach Leitner (Environmental Coordinator) requesting the operating status and plans for the Northeast Asphalt Plant. Mr. Leitner responded back stating the plant is currently in Wisconsin and that there are no plans for it to operate in Michigan this year. Since the plant hasn't operated in Michigan since it was permitted in May 2023, there are no records to be reviewed to determine compliance with PTI No. 73-23.

Compliance

Based on the off-site inspection performed, Northeast Asphalt appears to be in compliance with PTI No. 73-23.

his hull bether				Mi Andl	Walter
NAME	_{DATE} 8-9-2024 s	SUPERVISOR_	J' isuce.		