

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B185136227

FACILITY: RIETH RILEY CONSTRUCTION CO INC		SRN / ID: B1851
LOCATION: 5621 E FIRST STREET, LUDINGTON		DISTRICT: Cadillac
CITY: LUDINGTON		COUNTY: MASON
CONTACT: Randy Misener , Project Manager		ACTIVITY DATE: 08/25/2016
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of this opt out source		
RESOLVED COMPLAINTS:		

Inspected this opt out source pursuant to Permit to Install number 975-91C. This facility uses a batch process to produce aggregate asphalt used to pave roads. The main parts of the facility are the raw material handling equipment used prior to introduction of material to the plant, a countercurrent flow asphalt drum which is fired on natural gas and controlled by a baghouse, and a storage silo and loadout area for storage of the completed material and loadout in to trucks. The drum is permitted to run on recycled used oil but has not done this for several years.

Prior to entering the facility, no visible emissions were noted from the stack or at any other point in the process including the material handling areas. No odors were noted downwind of the facility. Following are the findings of this inspection by applicable permit condition.

**Permit 975-91C Special Conditions:**

13. Particulate emissions are limited to 0.10 pounds per 1000 pounds of exhaust gas. Compliance with this limit is through proper operation of the baghouse including daily pressure drop readings across the baghouse. At the time of the inspection, the baghouse was in operation, no visible emissions were noted, and the pressure drop was approximately 3 inches of water, gauge.
14. Visible emissions from the plant are not to exceed 20% opacity. At the time of the inspection, no visible emissions were noted.
15. The baghouse must be installed and operating properly. There is no formal written procedure on what proper operation of the baghouse is. However, the baghouse was installed, was in operation at the time of the inspection, had zero visible emissions during plant operation, and was being monitored daily for pressure drop should a bag fail.
16. Collected air contaminants are to be disposed of properly. Collected air contaminants at the facility are re-entrained back in to the process.
17. The stack must be at least 60 feet above the ground. The stack parameters at the facility appear correct and do not appear to have been recently modified.
18. The facility is required to submit an initial waste oil analysis if asked for in writing by the District Supervisor. This request has not been made in the last 12 months and is not recommended as the facility has no waste oil on site and has not used it in several years.
19. The facility is allowed to use fuel oil to fire the drum. The drum has only run on natural gas in the last 12 months.
20. Fuel oil is limited to 1000 ppm total halogens. The drum has only run on natural gas in the last 12 months.
21. The facility is limited to 3168 total hours of operation per year. The facility tracks daily hours of operation and has operated a total of 1091 hours in the last 12 months.
22. The facility must comply with all rules relating to burning used oil. The facility has not burned used oil in the last 12 months.

23. The facility must have a fugitive emissions plan and must follow it. A fugitive emissions plan is on file. During the inspection, it was noted that housekeeping around the facility was good with no spillage noted. Stockpiles of raw material demonstrated no fugitive emissions. Paved roads were clean. Unpaved roads appeared to have been treated with dust suppression. No truck traffic was noted during the inspection.

24. The facility shall comply with all applicable requirements of Attachment A. Please see below.

**Attachment A conditions:**

1. Not applicable

2. CO, SO<sub>2</sub>, VOC, NO<sub>x</sub>, and PM-10 emissions are limited to 99 tons per year. Compliance with this limit is based on emissions calculations based on emission factors formulated by the type of fuel used at the facility. These calculations are being performed and demonstrate compliance. Please see attached for a sample of these records.

3. HAP emissions are limited to 10 tons per year individual and 25 tons per year aggregate. Compliance with this limit is based on emissions calculations based on emission factors formulated by the type of fuel used at the facility. These calculations are being performed and demonstrate compliance. Please see attached for a sample of these records.

4. The baghouse must be installed and operating properly. There is no formal written procedure on what proper operation of the baghouse is. However, the baghouse was installed, was in operation at the time of the inspection, had zero visible emissions during plant operation, and was being monitored daily for pressure drop should a bag fail.

5. The baghouse and pressure drop gauge shall be maintained and operated. A log of maintenance shall be kept. This log is part of the operator's log for the facility and maintenance and repair records were available for inspection.

6. The pressure drop gauge for the baghouse must be in operation when the baghouse is in operation. Pressure drop readings are taken on each day of operation. No missing readings were noted upon inspection of records.

7. The baghouse is required to have a working pressure drop gauge. This baghouse was so equipped.

8. Not applicable as the facility does not have a wet scrubber.

9. The facility is required to keep records of pressure drop across the baghouse. These records are taken once daily.

10, 11. Not applicable as the facility has not burned recycled oil in the last 12 months.

12. The facility is required to maintain operating equipment and log maintenance and repair activities. This log is part of the operator's log for the facility and maintenance and repair records were available for inspection.

13. The facility is required to keep monthly records of the amount of HMA production and the amount and type of fuel used to make it. These records are being kept.

14-16. Not applicable as the facility has only used natural gas as fuel in the last 12 months.

17. The amount of virgin aggregate and RAP is to be recorded daily. These records are being kept and were available for review.

18. The facility is required to keep monthly the amount of RAP used each calendar month. These records are being kept.

19-21. Emission calculations for CO, SO<sub>2</sub>, VOC, NO<sub>x</sub>, and PM-10 emissions are to be calculated and reported annual as part of the MAERS emission inventory system. This reporting is being performed,

please see MACES for details.

At the time of the inspection, this facility was in compliance with their opt out permit.

NAME 

DATE 8/30/16

SUPERVISOR 