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

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| FACILITY: BOLEN ASPHALT PAVING, INC. | | SRN / ID: B4164 |
| LOCATION: 295 FAIRVIEW RD., WEST BRANCH | | DISTRICT: Bay City |
| CITY: WEST BRANCH | | COUNTY: OGEMAW |
| CONTACT: Matthew Bolen , Plant Supervisor | | ACTIVITY DATE: 06/30/2021 |
| STAFF: Nathanael Gentle | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Scheduled on-site inspection. Facility was found to be in compliance. | | |
| RESOLVED COMPLAINTS: | | |

On June 30, 2021, AQD staff conducted a scheduled, onsite inspection at Bolen Asphalt Paving, Inc, SRN B4164. Staff arrived onsite at 9:45 AM and departed at 10:30 AM. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment Great Lakes and Energy, Air Quality Division (AQD) Administrative Rules; and to evaluate compliance with the facilities Permit to Install (PTI), PTI No. 263-82N. AQD staff were assisted onsite by Mr. Matt Bolen. At the time of inspection, the facility was found to be in compliance.

Facility Description and History

Bolen Asphalt Paving, Inc owns and operates a hot mix asphalt (HMA) plant located at the Glancy Sand and Gravel Pit (SRN N6355) in West Branch Township, MI. The Glancy Sand and Gravel Pit is located at the end of Number 250 Road, east of South Fairview Road. The facility is located at approximately 44°19'51.7"N 84°12'12.3"W. A second HMA plant, owned and operated by Pyramid Paving & Contracting (SRN N7271), is also located at the Glancy Sand and Gravel Pit, west of Bolen Asphalt Paving, Inc.

The facility has previously reported to be constructed in 1972 and is therefore exempt from 40 CFR Part 60 Subpart I – Standards of Performance for Hot Mix Asphalt Facilities. Facilities constructed after June 11, 1973, are subject. Future modifications of the equipment may be subject to this NSPS.

MAERS reports for the facility are received in a timely manner. No complaints are of record for the facility since 2006. Bolen Asphalt Paving, Inc was last inspected on August 8, 2019. The facility was found to be in non-compliance during the 2019 inspection; AQD inspectors observed visible emissions in excess of a 6-minute average of 20% opacity exiting the plants stack. As part of the inspection on June 30, 2021, visible emissions at the facility were observed and verified to be in compliance.

Process Description

The facility operates under Permit to Install (PTI) No. 263-82N. The PTI was issued on March 3, 1998 for replacement of the previous air pollution device, a wet scrubber, with the facilities current air pollution control device, a baghouse. The plant consists of the following:

- A single drum mixer (Parallel flow)
- Control house

- Primary pollution control device (knock-out pot)
- Baghouse
- Two HMA silos with load-out
- Onsite propane tank
- Asphaltic concrete storage tanks
- Aggregate feeders with associated conveyors
- Assorted storage trailers

As one of two HMA plants owned and operated by Bolen Asphalt Paving, the plant operates based on product demand between late spring and late fall. The plant is rated for a capacity of 300 tons/hour. Onsite personnel report the facility has been observed to produce up to 230 tons/hour depending on weather conditions during production.

Compliance Evaluation

The HMA plant is fueled with propane, S.C.13. A propane storage tank was observed. In addition, onsite personnel confirmed propane was the only source of fuel used to power the plant.

Pursuant to S.C. 17, for each calendar day the asphalt plant is operated, records of tons of HMA produced, total hours of operation and the total pressure drop across the fabric filters in inches, water gauge shall be maintained. Copies of daily records of HMA produced during the 2020 operating season were requested and received. The plant began operating for the 2020 operating season in May and produced asphalt into November with the last batch of the season sold on November 9, 2020. Records are maintained detailing the date, client, batch type, and tons placed/sold for HMA produced. During the year 2020, a total of 82,035.74 tons of asphalt was produced at the facility, well below the permitted limit of 750,000 tons per calendar year, S.C. 16.

Copies of daily records for the total hours of operation were requested for June 2020, August 2020, and April 2021. Records were provided for June 2020 and August 2020. No records were available for April 2021 as the facility had not yet begun its operating season at this time. In June 2020, the facility operated a total of 39 hours and produced 6,651.08 tons of HMA. During August 2020, the facility operated a total of 60 hours and produced 10,146.75 tons of HMA.

A device to indicate the pressure drop across the fabric filters was installed and operational, S.C. 20. At the time of inspection, a pressure drop of 4" H_2O was observed. Pressure drop across the fabric filters is monitored and recorded daily. Daily records for June 2020, August 2020 and April 2021 were requested. Records for June 2020 and August 2020 were provided. As previously mentioned, no records were available for April 2021 as the facility had not yet begun its operating season at this time. Of the daily pressure drop measurements recorded in June 2020, an average of 4.2" H_2O was observed. Of the daily pressure drop measurements recorded in August 2020, an average of 4.65" H_2O was observed.

In addition, to daily records required by PTI No. 263-82N, other parameters are monitored and recorded. Daily records of morning and afternoon ambient temperatures, observed weather conditions, and amount of propane used are also maintained.

As previously discussed, the facility was found to be in non-compliance during the onsite inspection conducted on August 8, 2019. The facility was out of compliance with S.C. 15 which requires that visible emissions from the asphalt plant shall not exceed a 6-minute average of 20%

opacity except as specified in Rule 301(1)(a). A violation notice was issued following the 2019 inspection. Upon arrival on June 30, 2021, the plant was in between making batches of HMA and was not running. Soon after AQD arrival, the plant was fired back up. AQD staff were able to view stack opacity emissions during startup and operation of the plant. Upon startup of the plant, intermittent opacity plumes of 5% or less were observed exiting the stack. After a few minutes, visible emissions were no longer observed to be exiting the stack; heat waves could still be seen. Based on these observations, a Method 9 evaluation was not deemed necessary. The facility appeared to be back in compliance with S.C. 15. Onsite personnel reported they periodically observe stack emissions to verify opacity emissions remain in compliance. Mr. Bolen says he has previously completed Method 9 certification training. Baghouse bags are replaced as needed to ensure the baghouse is operating properly, S.C. 19. Facility personnel are currently in the process of replacing all the bags in the baghouse, over 600 total. Staff are working on weekends when the plant is not operating to change out filter bags. Rows of filter bags are being replaced in thirds. Spare bags are kept onsite. The facility maintains at least 100 spare bags onsite. In addition, spare cages for the baghouse are also stored onsite. Material collected in the baghouse is redirected and fed into the drum mixer where it is reincorporated into asphalt batches, S.C. 21.

Recycled asphalt material (RAP) is not utilized and incorporated into asphalt mixtures produced at the facility. The facility is therefore below their permitted limit of 30% RAP, S.C. 24. Material containing asbestos is not added to the produced hot mix. Aggregate added to the mix comes directly from Glancy Sand and Gravel Pit at which the plant is located. Recycled shingles or other material that may contain asbestos is not used, S.C. 26.

Dust control activities are conducted in areas in which vehicle traffic occurs. Records of dust activities completed up until June 10, 2021, in the 2021 operating season were requested and provided. The facility maintains a log with the dates and a description of what dust control activities were completed. Watering of load out travel areas was completed on 9 days in May 2021 and 2 days from June 1 to June 10. Water from an onsite well is used to fill a loader bucket and is then applied to roadways as needed. Facility personnel report dust from onsite stockpiles is monitored. They said rainfall tends to lock up and form a crust on the top layer of the piles. As a result, periodic watering is not needed to be applied at the same frequency it is to the onsite roadways.

The facility is equipped with a push button load out system. Drivers picking up HMA push a button to load their own asphalt. A scale is in place to measure how much asphalt each truck takes. Signs are posted within the plant yard advising drivers the speed limit is 10 MPH. A sign is posted advising drivers they are required to cover their loads.

In the event malfunctions were to occur, the facility is capable of performing a loaded stop. The facility can shut down equipment, regardless of production status, to address and correct any malfunctions.

Summary

Bolen Asphalt Paving, Inc (SRN B4164) owns and operates a hot mix asphalt (HMA) plant located at the Glancy Sand and Gravel Pit (SRN N6355) in West Branch Township, MI. The facility operates under PTI No. 263-82N. A scheduled onsite inspection was conducted on June 30, 2021. At the time of inspection, the facility appears to be in compliance.

nathanael Dente

NAME

7/12/21 DATE

SUPERVISOR Chris Hare