

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

B730060699

<b>FACILITY:</b> RIETH RILEY CONSTRUCTION CO., INC.		<b>SRN / ID:</b> B7300
<b>LOCATION:</b> 11101 Levering Rd, MUNRO TWP		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> MUNRO TWP		<b>COUNTY:</b> CHEBOYGAN
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 10/28/2021
<b>STAFF:</b> Kurt Childs	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> 2022 FCE.		
<b>RESOLVED COMPLAINTS:</b>		

### 2022 Full Compliance Evaluation

I conducted an FCE inspection of this facility on 10/28/2021. AQD Gaylord Field Office staff David Bowman accompanied me on the inspection. The Rieth-Riley Levering plant is an ROP opt-out source operating under PTI 369-81Z. The plant began operation for the 2021 season in May. The PTI covers emission units for the hot mix asphalt plant (EUHMAPLANT), plant yard (EUYARD), asphalt cement tanks (EUACTANKS), and storage silos (EUSILOS) as well as a flexible group for the entire facility (FGFACILITY). During the inspection, we met with Rieth-Riley asphalt plant operator Mr. Tyler Socolovitch. John Berscheit is the MAERS contact as well as the contact for any air permit issues and records that are not maintained at the plant.

At the time of the inspection the skies were scattered and winds were around 5 mph from the southeast. The air temperature was 49 degrees F.

#### EUHMAPLANT

The asphalt plant includes the following equipment:

1. Raw material feed for aggregate and RAP each including bins a screen and conveyors.
2. Asphalt tank trailers (2).
3. Asphalt tank heaters.
4. Drum dryer.
5. Baghouse.
6. Propane tank.

At the time of the inspection the asphalt plant was not operating, Mr. Socolovitch was waiting to hear if they would run later in the day. As a result, we were not able to observe plant operating conditions but the plant records were available and up to date. We also visually inspected the plant for any changes to the equipment. The only thing new was a small back up generator. We were also able to inspect the condition of the roads and yard with respect to fugitive dust. We did not observe any visible emissions from the plant yard and storage piles. The plant roadways appeared to have been swept and yard areas appeared to have been treated with dust suppressant. Daily plant reports indicated that the roads and yard areas have been watered as needed as well.

This plant is rated for 250 tons per hour and PTI 369-81Z limits hourly production to 300 TPH HMA. Recycled used oil is no longer used. There is a large propane tank on-site and this provides fuel for the plant.

The asphalt plant is equipped with a baghouse is equipped with a differential pressure gauge. The differential pressure reading is also available on the plant control panel. The most recent daily log indicated a differential pressure of 3.4 inches WC. The PTI requires a minimum differential pressure of 2" WC unless a large number of bags have been changed or other acceptable conditions exist and indicates the proper operating range is 2-8" WC. As noted in the previous report, an extension has been added to the baghouse stack and it much higher than the 40' minimum specified in the permit, probably closer to 70'. Maintenance records indicate the baghouse has been checked regularly and no bags were replaced this season.

PTI 369-81Z limits RAP usage to 40% of the asphalt mixture. Plant records indicate the average RAP usage for 2021 was 22% of RAP in mixes. The plant is limited to 895,000 tons of HMA production per year. Records indicate 66,034 tons were produced during 2021. Monthly records show the plant emissions for CO, SO<sub>2</sub>, and NO<sub>x</sub> are below the permitted limit of 89.9, 89, and 89 tpy respectively.

Particulate Emissions 1.32 Tons

Nitrogen Oxide Emissions 3.96 Tons

Sulfur Dioxide Emissions 1.65 Tons

Lead Emissions 0.00 Tons

HCL Emissions 0.20 Tons

Portable CO detector test results for 2021 were available at the plant, the printouts of those tests indicated 8 readings over at least 30 minutes were conducted as required. All CO readings were less than 500ppm Limited plant records were available at the time of the inspection. The plant operator had his daily plant foreman reports and other records required by the permit. Those records indicated that all of the recordkeeping required by the PTI is being maintained and the material throughput and operating parameters were in compliance with the permit requirements. Monthly records are maintained by Mr. Berscheit and were provided upon request.

#### **EUYARD**

R-R has an approved fugitive dust plan (attached as Appendix A to the PTI) and appeared to be in compliance with all aspects. At the time of the inspection, the location of EUHMAPLANT was paved as was the road used by haul vehicles. Working areas of the gravel pit that the vehicles must travel through are not paved but are treated with water or dust suppressant as needed. Plant records included dates of watering, rain, or treatment. The gravel roads used by non-haul vehicles as well as other areas of the yard were either wet or treated with dust suppressant and there was minimal fugitive dust from the yard. Speed limit signs were posted and there did not appear to be any fugitive dust from storage piles.

#### **EUACTANKS**

The tanks were equipped with a vapor condensation and recovery system that was operating properly. There were no visible emissions or odors. The asphalt tank heater is not subject to either the Major or Area source boiler and process heater NESHAPs because process heaters are not subject to Subpart JJJJJ and Natural gas fired process heaters are not subject to Subpart DDDDD.

#### **EUSILOS**

The silos do not appear to be equipped with an emissions capture system that routes emissions back to the burner of the drum mixer. This is not required by PTI 396-81Z but could be a source of odors and smoke. The truck loadout area beneath the silo is not enclosed, this is not required but can contribute to odors.

#### **FGFACILITY**

Monitoring and recordkeeping for FGFACILITY is maintained and records were provided and up to date (copy attached).

As a result of the inspection, records review and MAERS review the facility appeared to be in compliance with PTI 369-81Z.

NAME \_\_\_\_\_

DATE \_\_\_\_\_

SUPERVISOR \_\_\_\_\_