

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

N057944768

FACILITY: KLETT CONSTRUCTION DIVISION		SRN / ID: N0579
LOCATION: MICHIGAN PAVING & MATERIALS CO, PAW PAW		DISTRICT: Kalamazoo
CITY: PAW PAW		COUNTY: VAN BUREN
CONTACT: Tom Vasquez , Plant Operator		ACTIVITY DATE: 06/08/2018
STAFF: Amanda Chapel	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

On June 8, 2018, AQD's Amanda Chapel (staff) conducted an unannounced inspection of Michigan Paving Materials, Klett Plant located in Paw Paw, Van Buren County. The purpose of this inspection was to determine compliance with Permit to Install 269-98D covering the asphalt plant, yard, AC Tanks, and silos on site, and all applicable state and federal air regulations. The following will summarize facility operations and compliance status.

I arrived at the facility at 10:30 am. The plant was not running at the time but had run that morning between 5:00-7:00am to produce the asphalt for the day's deliveries. There were no odors detectable at the facility or visible emissions since the equipment was not running. I drove on site and parked in the paved parking area and walked toward the plant office. I was met outside by Mr. Tom Vasquez, Plant Operator. I gave him a card and showed him my inspector credentials. He was familiar with having an air inspection, so I said I would like to walk around the site and then do a records review. Records were emailed to me on Thursday June 14, 2018.

The last inspection of the facility was on October 24, 2014 and the facility was in compliance with the permit at the time. There are no boilers on site, only a hot oil heater which is used to heat the asphalt. There are no emergency generators. There is a parts washer on site in the maintenance area. This was viewed during the inspection.

First, the raw materials are stored in bins. The materials are then conveyed to the main drum where they are heated. It is then conveyed to the mixing drum where the asphalt is mixed. Once mixed, it is conveyed into one of the four silos where it is stored until a truck comes for a delivery. The recipe for the day is programmed into the computer and executed. Belt scales are used to monitor the virgin and RAP feed rate continuously. There are two RAP feeders on site, 10 cold or virgin feeders, 4 AC tanks, a baghouse, and four silos. The facility uses three different types of RAP, coarse, fine, and crushed. About 90% of the RAP they used is crushed. On the day of the inspection, a virgin asphalt was made. The baghouse inlet was at 98 degrees and the outlet was at 112 degrees. Typically, Thompson Recycling is used to crush the RAP.

Mr. Vasquez showed me around the site. In the maintenance area, a Chem Search parts washer is located in a small shed. It was not in use and the lid was open. The parts washer is exempt under Rule 281(2)(k). There are also two welders on site, an electric and a diesel. The welding equipment is exempt under Rule 285(2)(i). The pressure drop on the baghouse is monitored in the control room. We viewed the storage bins for both the virgin feed and RAP, the baghouse, the conveyors, the AC tanks, and the silos.

The facility does not burn hazardous waste, fuel oil or RUO, or asbestos. They only burn natural gas even though they got a permit update to allow the burning of RUO. Mr. Vasquez said they hadn't burned RUO since he has worked there starting in 2009. The total amount of RAP used in 2018 was 3% in April, 18% in May, and 7% in June. The permit limit is 50% based on a monthly average. The highest percentage of RAP was 18% in June and August 2017. The highest 12-month rolling total HMA produced was in August 2017. They produced 191,673 tons of HMA. The permit limit is 890,000 tons in a 12-month rolling time period. The facility appears to be in compliance with these limits.

The facility has a fugitive emissions control plan. They water or put down sodium chloride on the site daily to control fugitive emissions. The plan requires them to water twice a week. A truck was out laying sodium chloride during the inspection. Speed limit signs were posted on site and all roads and parking area were paved. I observed numerous covered trucks with retractable coverings receive asphalt on site. A vapor recovery system was installed on the AC tanks a few years ago. All four AC tanks have a

cooling and knock out system. There is an emissions capture system at the beginning of the conveyor to the silos which draws negative air from the top of the silos down the conveyor.

The plant started up on April 25-26, 2018. CO readings were taken at the time of startup. Records for this were provided via email after the inspection. The average ppm for the readings was 68 ppm. The readings were done on May 15, 2018. The baghouse was checked. The bags were checked and a blacklight test to detect any leaks was completed. Any significant repairs at the facility are documented in their recordkeeping. The pressure drop is monitored in the control room. Since the plant was not running, there was no pressure drop reading at the time. Fuel usage rate is monitored daily.

Records that are being kept at the facility include; daily fuel log, daily production rate, maintenance records, CO readings, daily emissions calculations, monthly summaries, and daily and monthly print sheets. The recipe in the computer allows the facility to monitor all the components of the paving mixture, continuously. The monthly summary records show calculations for all criteria pollutants and HAPs listed in the permit. There do not appear to be any overages. PM emissions were reported in MAERS, per the permit requirement.

I thanked Mr. Vasquez for showing me the site, asked for the records to be emailed to me to allow for a more thorough review. I received the records the following week. I left the site about 11:45am. The facility appears to be in compliance with all permit requirements.

NAME Ann Cheryl

DATE 6/18/18

SUPERVISOR YMA 6/19/2018