

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

N138431422

FACILITY: RIETH-RILEY CONSTRUCTION CO., INC.		SRN / ID: N1384
LOCATION: 20251 E 19 MILE RD, BIG RAPIDS		DISTRICT: Grand Rapids
CITY: BIG RAPIDS		COUNTY: MECOSTA
CONTACT: Chad Waldo , Area Manager		ACTIVITY DATE: 09/15/2015
STAFF: Denise Plafcan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: A scheduled announced inspection. The company was notified prior to AQD staff leaving the Grand Rapids District Office.		
RESOLVED COMPLAINTS:		

Denise Plafcan (DP) conducted an announced scheduled inspection to determine compliance with Title V Opt-out Permit to Install (PTI) 401-86K, state and federal Air Quality rules and regulations. Since the plant is over one hour away from the office DP contacted the company to confirm that they were open and operating before leaving the morning of the inspection. After arriving in the area staff conducted surveillance prior to the inspection. There weren't any obvious issues of concern with odors, malfunctions or fugitive emissions. DP met with, Chad Waldo, Area Source Manager, after a brief introduction and discussion, DP explained the purpose of the inspection and reviewed the Environmental Inspection brochure. Chad was also the escort around the plant during the inspection.

The company only uses natural gas and does not use any Recycled Used Oil (RUO). All conditions related to RUO were removed from this compliance inspection report. No testing was required as part of this compliance inspection report and those conditions have been removed from this report. A VN was issued last year for TAC limits that were added during the recent modification. MaryAnn Dolehanty, Permit Section Supervisor said they could use stack test data from a "similar representative" plant and use that data to demonstrate compliance. Stack test data was submitted with the VN response and used to demonstrate compliance.

SPECIAL CONDITIONS
EMISSION UNIT SUMMARY TABLE

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUHMAPLANT	Hot mix asphalt (HMA) facility including: Aggregate conveyors 300 tons per hour parallel flow drum mixer Fabric filter dust collector	FGFACILITY
EUYARD	Fugitive dust sources including: Plant roadways Plant yard Material storage piles Material handling operations (excluding cold feed aggregate bins)	FGFACILITY
EUACTANKS	Liquid asphalt cement storage tanks	FGFACILITY
EUSILOS	Hot Mix Asphalt (HMA) paving material product storage silo	FGFACILITY

The following conditions apply to: EUHMAPLANT

DESCRIPTION: 300 ton per hour parallel flow drum mix asphalt plant

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Dillman 72M-10 X 816 two piece bag house

EMISSION LIMITS

MATERIAL LIMITS

The permittee shall not burn in EUHMAPLANT any hazardous waste (as defined in state or federal law). Air Quality Division staff could not verify compliance as part of this inspection.

The permittee shall not use any asbestos tailings or waste materials containing asbestos in EUHMAPLANT pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. Air Quality Division staff could not verify compliance as part of this inspection.

The permittee shall limit the asphalt mixture processed in EUHMAPLANT to a maximum of 50 percent RAP material based on a monthly average. They use between 25-30% RAP. At the time of the inspection they were loading 70 tph RAP out of 232 tph total asphalt which is 30%.

The permittee shall not process more than 890,000 tons of HMA paving materials in EUHMAPLANT per 12-month rolling time period as determined at the end of each calendar month. 241,117 tons produced as of August 2015 for 12-months.

The permittee shall not process more than 350 tons of HMA paving materials in EUHMAPLANT per hour based on a 24-hour rolling time period as determined at the end of each hour. At the time of the inspection they were operating at 124 tons per hour. Based on the August production and hours they are at 212.2 tons per hour. Both well below the permitted limit.

PROCESS/OPERATIONAL RESTRICTIONS

The permittee shall not operate EUHMAPLANT unless the Fugitive Dust Control Plan for EUYARD specified in Appendix A has been implemented and is maintained. Roads had been recently watered and the plant operator tracks daily watering or rainfall on the computer.

The permittee shall not operate EUHMAPLANT unless the Preventative Maintenance Program specified in Appendix B has been implemented and is maintained. DP evaluated replacement parts located on site in the mezzanine of the storage building and the company maintains adequate replacement bags and miscellaneous parts. In addition, there are numerous plant locations within an hour if there is a need for an emergency part replacement.

The permittee shall not operate EUHMAPLANT unless the Emission Abatement Plan for Startup, Shutdown and Malfunctions specified in Appendix C has been implemented and is maintained. This condition was not evaluated as part of this compliance inspection. Based on maintenance performed and documented it appears compliant with Appendix C.

The permittee shall maintain the efficiency of the EUHMAPLANT drum mix burners, to control CO emissions, by fine tuning the burners for proper burner operation and performance. This shall be done at the start of each paving season or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data. CO

emissions are being monitored and readings were taken on May 28, 2015 and August 25, 2015.

DESIGN/EQUIPMENT PARAMETERS

The permittee shall not operate EUHMAPLANT unless the fabric filter dust collector is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the fabric filter dust collector requires a pressure drop range between 1 and 9 inches of water column. The minimum pressure drop shall not be less than 1 inches, water gauge, except when a large number of filter bags have been replaced or other reason acceptable to the AQD. The dust collector was operating properly and no fugitive emissions were evident. However, the gauge in the control tower was reading 0.9 inches of water. A VN will not be issued since it is so close to the requirement, however, the company will be requested to verify the gauge is operating properly.

MONITORING/RECORDKEEPING

All required records are being maintained and were available but the computer is controlled by the corporate offices. Staff need corporate assistance to be able to pull up and provide historical records. Corporate staff was contacted for 2015 operating records.

The permittee shall monitor, in a satisfactory manner, the virgin aggregate feed rate and the RAP feed rate to EUHMAPLANT on a continuous basis. All feed rates are monitored including Warm / Water asphalt and were verified during the inspection.

CO monitoring was conducted in May and August of 2015 highest reading was in May at start-up at 496 ppm close to the 500 ppm maximum, in August the highest reading was 361.

The permittee shall conduct all necessary maintenance and make all necessary attempts to keep all drum mixer/burner and fabric filter dust collector components of EUHMAPLANT maintained and operating in a satisfactory manner at all times. The owner or operator shall maintain a log of all significant maintenance activities conducted and all significant repairs made to EUHMAPLANT. Maintenance records for the fabric filter dust collector shall be consistent with the Preventative Maintenance Program specified in Appendix B. All records shall be kept on file and made available to the Department upon request. Maintenance records were available and reviewed on site copy of baghouse replacement is attached.

The permittee shall keep intermittent daily records of the following production information for EUHMAPLANT:

- a) The virgin aggregate feed rate.
- b) The RAP feed rate.
- c) The asphalt paving material product temperature.
- d) Information sufficient to identify all components of the asphalt paving material mixture.

Upon start-up, the initial mix design and time shall be recorded. When a new mix design is activated after start-up, the time and new mix design shall be recorded. All records shall be kept on file until the end of the paving season in which they were recorded and made available to the Department upon request. Records are being maintained on site and summarized at the corporate headquarters in Indiana. See attached.

The permittee shall keep records, as described in SC VI.3, of all CO emissions and related production data including the dates and times emissions were monitored. This data shall be used to ensure proper operation of the drum dryer or associated burner. All records shall be kept on file and made available to the Department upon

request. Records are being maintained on site and summarized at the corporate headquarters in Indiana. See attached

The permittee shall keep, in a satisfactory manner, daily, monthly and 12-month rolling time period records of the amount of HMA paving materials produced from EUHMAPLANT. All records shall be kept on file and made available to the Department upon request. Records are being maintained on site and summarized at the corporate headquarters in Indiana. See attached

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Stack vent dimensions and height were not verified as part of this compliance inspection.
SVHMAPLANT	72	99	

The following conditions apply to: EUYARD

DESCRIPTION: Fugitive dust sources including: Plant roadways, Plant yard, Material storage piles, Material handling operations (excluding cold feed aggregate bins)

Flexible Group ID: FGFACILITY

PROCESS/OPERATIONAL RESTRICTIONS

The permittee shall not operate EUYARD unless the fugitive dust control plan specified in Appendix A has been implemented and is maintained. It appeared that the Appendix A dust control plan was being followed and watering was done on that day.

The following conditions apply to: EUSILOS

DESCRIPTION: Hot Mix Asphalt (HMA) paving material product storage silo

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Emission capture system

PROCESS/OPERATIONAL RESTRICTIONS

The permittee shall not operate EUSILOS unless the emission capture system for the top of each storage silo is installed, maintained, and operated in a satisfactory manner. Silo emissions are being captured but truck loadout is not captured. Odors were relatively low for operating without load out control.

FLEXIBLE GROUP SUMMARY TABLE

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGFACILITY	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.	EUHMAPLANT, EUYARD, EUACTANKS, EUSILOS

The following conditions apply Source-Wide to: FGFACILITY

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment

Emission Units: EUHMAPLANT, EUYARD, EUACTANKS, EUSILOS

EMISSION LIMITS

Pollutant	Limit	Time Period	HAPs records were extensive and for each individual aspect of the operation. However operation totals were not combined. This will be included in a VN
Each Individual HAP	Less than 8.9 tpy *	12-month rolling time period as determined at the end of each calendar month	
Aggregate HAPs	Less than 22.4 tpy *	12-month rolling time period as determined at the end of each calendar month	

Based on the physical inspection and review of records this facility appears to be in noncompliance with recordkeeping requirements and having the records readily available as required a VN will be issued.

NAME *Donna O'Keefe*

DATE 9.30.15

SUPERVISOR *PAB*

