



July 5, 2023

SENT VIA EMAIL

Ms. Gina McCann
Environmental Quality Specialist
EGLE Bay City District Office
Water Resources Division

Re: Response to June 14, 2023 Violation Notice for Ace-Saginaw Paving Co-Plt 9 (SRN N1580)

Dear Ms. McCann:

This letter is in response to the June 14, 2023 Violation Notice (VN) regarding findings of a Department of Environmental, Great Lakes, and Energy (EGLE) air permit compliance inspection at Ace-Saginaw Paving Co-Plt 9 located at 4711 Veterans Memorial Parkway, Saginaw, Michigan.

The VN letter states that the emission unit, EU-001 – Hot Mix Asphalt (HMA) facility, exceeded the permitted production limit of 400 tons/hour on twelve days in 2022. The alleged dates of violation and HMA feed rates listed in the VN letter are as follows:

Alleged Date Exceeded	Alleged HMA feed Rate (tph)
5-9-2022	400.86
5-23-2022	402.64
5-24-2022	406.91
6-2-2022	480.69
6-3-2022	412.31
7-12-2022	402.98
7-25-2022	406.24
7-26-2022	406.55
8-2-2022	406.86
9-1-2022	404.18
9-9-2022	412.18
9-23-2022	411.73

On June 9, 2023, we fulfilled EGLE's request for air permit records related to the air permit compliance inspection. Based upon those records, the alleged HMA feed rate in the VN is incorrect for May 9, and June 2. The Daily HMA Production Information records provided to EGLE have an HMA feed rate of 398.97 tph on May 9, and 408.69 tph on June 2.

Upon further investigation of our records and the facility processes, we identified an oversight in our recordkeeping, and did not exceed the permitted daily HMA production rate. The column "Plant Production Hours" in the air permit records sent to EGLE on June 9, is actually the liquid asphalt cement (AC) pump run time. The AC pump does not run during the entire plant operating time. The plant is turned on for 30 minutes



at start up every day to dry out the baghouse and warm the drum in preparation for receiving aggregate and liquid AC. This 30 minutes of operation at startup is integral to the safe operation of the plant and required pollution control equipment, and therefore, is part of the plant operating time.

We have corrected the Daily HMA Production Information records to include the additional 30 minutes of plant operating time before the AC pump is turned on. With this correction, there are no exceedances of the 400 tph daily HMA production rate as shown in the table below.

Alleged Date Exceeded	Alleged HMA feed Rate (tph)	Actual HMA Production Rate (tph)
5-9-2022	400.86	381.16
5-23-2022	402.64	381.67
5-24-2022	406.91	391.02
6-2-2022	480.69	390.45
6-3-2022	412.31	393.39
7-12-2022	402.98	384.50
7-25-2022	406.24	387.08
7-26-2022	406.55	374.29
8-2-2022	406.86	390.71
9-1-2022	404.18	384.56
9-9-2022	412.18	387.35
9-23-2022	411.73	397.43

Copies of our corrected Daily HMA Production Information records for May through September 2022 are enclosed, and we have corrected our air recordkeeping files for future use.

If you have any questions regarding this response, please contact me at (313) 402-5823.

Sincerely,
EDW. C. LEVY CO.

Alicia Ramsdell
Environmental Engineer

Enclosures

cc: Jenine Camilleri, EGLE
Thomas Green, Edw. C. Levy Co.
file

HMALog

Saginaw Asphalt- Plant 9 -Air Permit Compliance (178-87G)

Please enter data from daily log sheet in these cells
 These cells contain permit limits for your site - PLEASE DO NOT EDIT

MONTH	Permit Limits		DAILY HMA PRODUCTION INFORMATION											
	RAP %	HMA Feed Rate	AC Pump Hours	Plant Production Hours	HMA Produced	AC%	RAP%	Virgin Agg %	HMA w/ RAP tons	RAP Tons	Virgin Agg Tons	HMA Production Rate (tph)	RAP Feed Rate	Virgin Agg Feed Rate
May-22														
1	50	400												
2	50	400	10.40	10.90	3,720.00	4.14	23.95	71.91	3720.00	890.94	2675.05	341.28	85.67	257.22
3	50	400												
4	50	400	8.90	9.40	2,820.00	4.68	22.66	72.66	2820.00	639.01	2049.01	300.00	71.80	230.23
5	50	400	7.30	7.80	2,610.00	4.78	21.66	73.56	2610.00	565.33	1919.92	334.62	77.44	263.00
6	50	400	8.10	8.60	3,247.00	5.57	2.45	91.98	3247.00	79.55	2986.59	377.56	9.82	368.71
7	50	400	1.30	1.80	401.00	4.12	30.47	65.41	401.00	122.18	262.29	222.78	93.99	201.76
8	50	400												
9	50	400	10.70	11.20	4,269.00	5.50	4.04	90.46	4269.00	172.47	3861.74	381.16	16.12	360.91
10	50	400	7.70	8.20	2,860.00	5.29	15.08	79.63	2860.00	431.29	2277.42	348.78	56.01	295.77
11	50	400	5.10	5.60	1,932.00	5.27	20.11	74.62	1932.00	388.53	1441.66	345.00	76.18	282.68
12	50	400	1.80	2.30	544.00	4.63	26.03	69.34	544.00	141.60	377.21	236.52	78.67	209.56
13	50	400	5.20	5.70	1,503.00	5.15	19.37	75.48	1503.00	291.13	1134.46	263.68	55.99	218.17
14	50	400												
15	50	400												
16	50	400	2.30	2.80	701.00	4.49	24.76	70.75	701.00	173.57	495.96	250.36	75.46	215.63
17	50	400	1.80	2.30	557.00	4.08	31.47	64.45	557.00	175.29	358.99	242.17	97.38	199.44
18	50	400	2.70	3.20	879.00	4.70	26.47	68.83	879.00	232.67	605.02	274.69	86.17	224.08
19	50	400	9.10	9.60	3,230.00	4.00	29.63	66.37	3230.00	957.05	2143.75	336.46	105.17	235.58
20	50	400	7.10	7.60	2,647.00	3.91	29.40	66.69	2647.00	778.22	1765.28	348.29	109.61	248.63
21	50	400												
22	50	400												
23	50	400	9.10	9.60	3,664.00	3.84	28.63	67.53	3664.00	1049.00	2474.30	381.67	115.28	271.90
24	50	400	12.30	12.80	5,005.00	3.99	26.81	69.20	5005.00	1341.84	3463.46	391.02	109.09	281.58
25	50	400	4.30	4.80	1,406.00	4.40	24.38	71.22	1406.00	342.78	1001.35	292.92	79.72	232.87
26	50	400	2.70	3.20	826.00	3.95	29.62	66.43	826.00	244.66	548.71	258.13	90.62	203.23
27	50	400												
28	50	400												
29	50	400												
30	50	400												
31	50	400	5.10	5.60	1,636.00	4.20	26.06	69.74	1636.00	426.34	1140.95	292.14	83.60	223.71
Monthly TOTALS / Averages			123.00		44,457.00	4.53	23.15	72.313		9,443.5	32,983.1	310.960802	78.688995	251.233246

HMA Log

Saginaw Asphalt- Plant 9 -Air Permit Compliance (178-87G)

Please enter data from daily log sheet in these cells
 These cells contain permit limits for your site - PLEASE DO NOT EDIT

MONTH	Permit Limits		DAILY HMA PRODUCTION INFORMATION											
Jun-22	RAP %	HMA Feed Rate	AC Pump Hours	Plant Production Hours	HMA Produced	AC%	RAP%	Virgin Agg %	HMA w/ RAP tons	RAP Tons	Virgin Agg Tons	HMA Production Rate (tph)	RAP Feed Rate	Virgin Agg Feed Rate
1	50	400	8.00	8.50	2,613.00	4.12	27.42	68.46	2613.00	716.48	1788.86	307.41	89.56	223.61
2	50	400	10.70	11.20	4,373.00	3.83	28.19	67.98	4373.00	1232.75	2972.77	390.45	115.21	277.83
3	50	400	10.40	10.90	4,288.00	3.95	29.29	66.76	4288.00	1255.96	2862.67	393.39	120.76	275.26
4	50	400												
5	50	400												
6	50	400	1.50	2.00	467.00	4.43	29.96	65.61	467.00	139.91	306.40	233.50	93.28	204.27
7	50	400	3.70	4.20	1,158.00	4.16	29.39	66.45	1158.00	340.34	769.49	275.71	91.98	207.97
8	50	400	5.70	6.20	2,014.00	4.32	29.24	66.44	2014.00	588.89	1338.10	324.84	103.31	234.75
9	50	400	6.40	6.90	1,923.00	4.66	18.32	77.02	1923.00	352.29	1481.09	278.70	55.05	231.42
10	50	400	7.60	8.10	2,562.00	5.19	9.63	85.18	2562.00	246.72	2182.31	316.30	32.46	287.15
11	50	400	8.20	8.70	2,731.00	5.84	0.42	93.74	2731.00	11.47	2560.04	313.91	1.40	312.20
12	50	400												
13	50	400	8.30	8.80	2,690.00	5.35	7.14	87.51	2690.00	192.07	2354.02	305.68	23.14	283.62
14	50	400	8.10	8.60	2,770.00	5.56	7.68	86.76	2770.00	212.74	2403.25	322.09	26.26	296.70
15	50	400	9.40	9.90	3,676.00	4.47	30.34	65.19	3676.00	1115.30	2396.38	371.31	118.65	254.93
16	50	400	5.20	5.70	1,818.00	4.75	29.03	66.22	1818.00	527.77	1203.88	318.95	101.49	231.52
17	50	400	8.60	9.10	3,065.00	4.54	30.98	64.48	3065.00	949.54	1976.31	336.81	110.41	229.80
18	50	400												
19	50	400												
20	50	400												
21	50	400	4.30	4.80	1,376.00	4.58	29.71	65.71	1376.00	408.81	904.17	286.67	95.07	210.27
22	50	400	7.00	7.50	2,287.00	4.08	30.28	65.64	2287.00	692.50	1501.19	304.93	98.93	214.46
23	50	400	9.40	9.90	3,667.00	3.90	29.06	67.04	3667.00	1065.63	2458.36	370.40	113.36	261.53
24	50	400	9.90	10.40	3,509.00	3.95	29.73	66.32	3509.00	1043.23	2327.17	337.40	105.38	235.07
25	50	400												
26	50	400												
27	50	400	10.20	10.70	3,806.00	3.82	30.20	65.98	3806.00	1149.41	2511.20	355.70	112.69	246.20
28	50	400	9.40	9.90	3,371.00	3.81	29.94	66.25	3371.00	1009.28	2233.29	340.51	107.37	237.58
29	50	400	2.60	3.10	750.00	3.61	29.97	66.42	750.00	224.78	498.15	241.94	86.45	191.60
30	50	400	3.10	3.60	890.00	3.67	30.85	65.48	890.00	274.57	582.77	247.22	88.57	187.99
	50	400												
Monthly TOTALS / Averages			157.70	168.70	55,804.00	4.39	24.85	70.7563636		13,750.4	39,611.9	316.992081	85.9452291	242.532178

HMA Log

Saginaw Asphalt- Plant 9 -Air Permit Compliance (178-87G)

Please enter data from daily log sheet in these cells
 These cells contain permit limits for your site - PLEASE DO NOT EDIT

MONTH	Permit Limits		DAILY HMA PRODUCTION INFORMATION											
Jul-22	RAP %	HMA Feed Rate	AC Pump Hours	Plant Production Hours	HMA Produced	AC%	RAP%	Virgin Agg %	HMA w/ RAP tons	RAP Tons	Virgin Agg Tons	HMA Production Rate (tph)	RAP Feed Rate	Virgin Agg Feed Rate
1	50	400												
2	50	400												
3	50	400												
4	50	400												
5	50	400	5.80	6.30	1,848.00	3.79	27.58	68.63	1848.00	509.68	1268.28	293.33	87.88	218.67
6	50	400	5.90	6.40	2,024.00	3.76	29.43	66.81	2024.00	595.66	1352.23	316.25	100.96	229.19
7	50	400	6.90	7.40	2,751.00	3.89	29.65	66.46	2751.00	815.67	1828.31	371.76	118.21	264.97
8	50	400	4.40	4.90	1,383.00	3.91	29.84	66.25	1383.00	412.69	916.24	282.24	93.79	208.24
9	50	400												
10	50	400												
11	50	400	8.40	8.90	3,228.00	3.89	29.16	66.95	3228.00	941.28	2161.15	362.70	112.06	257.28
12	50	400	10.40	10.90	4,191.00	4.04	24.31	71.65	4191.00	1018.83	3002.85	384.50	97.96	288.74
13	50	400												
14	50	400	5.40	5.90	1,802.00	5.99	4.83	89.18	1802.00	87.04	1607.02	305.42	16.12	297.60
15	50	400	9.60	10.10	3,786.00	5.86	2.93	91.21	3786.00	110.93	3453.21	374.85	11.56	359.71
16	50	400												
17	50	400												
18	50	400	8.60	9.10	3,419.00	5.47	5.78	88.75	3419.00	197.62	3034.36	375.71	22.98	352.83
19	50	400	4.60	5.10	1,598.00	6.08	1.13	92.79	1598.00	18.06	1482.78	313.33	3.93	322.34
20	50	400	3.00	3.50	1,051.00	6.06	0.93	93.01	1051.00	9.77	977.54	300.29	3.26	325.85
21	50	400	6.30	6.80	2,348.00	5.91	0.89	93.20	2348.00	20.90	2188.34	345.29	3.32	347.35
22	50	400	4.10	4.60	1,265.00	4.03	30.07	65.90	1265.00	380.39	833.64	275.00	92.78	203.33
23	50	400												
24	50	400												
25	50	400	10.10	10.60	4,103.00	4.18	26.01	69.81	4103.00	1067.19	2864.30	387.08	105.66	283.59
26	50	400	5.80	6.30	2,358.00	4.07	29.75	66.18	2358.00	701.51	1560.52	374.29	120.95	269.06
27	50	400	2.20	2.70	682.00	4.21	30.34	65.45	682.00	206.92	446.37	252.59	94.05	202.90
28	50	400												
29	50	400	8.10	8.60	3,139.00	3.97	29.74	66.29	3139.00	933.54	2080.84	365.00	115.25	256.89
30	50	400												
31	50	400												
Monthly TOTALS / Averages			109.60	118.10	40,976.00	4.65	19.55	75.7952941		8,027.7	31,058.0	334.096087	70.6300203	275.796142

HMALog

Saginaw Asphalt- Plant 9 -Air Permit Compliance (178-87G)

Please enter data from daily log sheet in these cells
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MONTH	Permit Limits		DAILY HMA PRODUCTION INFORMATION											
	RAP %	HMA Feed Rate	AC Pump Hours	Plant Production Hours	HMA Produced	AC%	RAP%	Virgin Agg %	HMA w/ RAP tons	RAP Tons	Virgin Agg Tons	HMA Production Rate (tph)	RAP Feed Rate	Virgin Agg Feed Rate
Aug-22	50	400	1.90	2.40	734.00	4.11	29.99	65.90	734.00	220.13	483.71	386.32	115.86	254.58
1	50	400	12.10	12.60	4,923.00	4.10	29.09	66.81	4923.00	1432.10	3289.06	390.71	118.36	271.82
2	50	400	0.30	0.80	85.00	7.21	21.29	71.50	85.00	18.10	60.78	283.33	60.32	202.58
3	50	400	8.20	8.70	2,970.00	3.99	29.26	66.75	2970.00	869.02	1982.48	362.20	105.98	241.77
4	50	400	6.80	7.30	2,663.00	3.99	29.97	66.04	2663.00	798.10	1758.65	391.62	117.37	258.62
5	50	400												
6	50	400												
7	50	400												
8	50	400												
9	50	400	6.20	6.70	2,067.00	3.83	29.72	66.45	2067.00	614.31	1373.52	333.39	99.08	221.54
10	50	400	5.20	5.70	1,678.00	4.70	24.30	71.00	1678.00	407.75	1191.38	322.69	78.41	229.11
11	50	400	6.50	7.00	2,579.00	3.77	29.75	66.48	2579.00	767.25	1714.52	396.77	118.04	263.77
12	50	400	3.10	3.60	960.00	4.08	29.54	66.38	960.00	283.58	637.25	309.68	91.48	205.56
13	50	400												
14	50	400												
15	50	400	2.50	3.00	809.00	4.59	24.86	70.55	809.00	201.12	570.75	323.60	80.45	228.30
16	50	400	7.40	7.90	2,632.00	3.79	29.61	66.60	2632.00	779.34	1752.91	355.68	105.32	236.88
17	50	400	7.30	7.80	2,756.00	4.55	24.42	71.03	2756.00	673.02	1957.59	377.53	92.19	268.16
18	50	400	4.90	5.40	1,673.00	3.94	29.99	66.07	1673.00	501.73	1105.35	341.43	102.39	225.58
19	50	400	7.30	7.80	2,418.00	4.46	24.87	70.67	2418.00	601.36	1708.80	331.23	82.38	234.08
20	50	400												
21	50	400												
22	50	400	4.70	5.20	1,533.00	3.93	29.97	66.10	1533.00	459.44	1013.31	326.17	97.75	215.60
23	50	400	5.90	6.40	1,929.00	3.91	29.54	66.55	1929.00	569.83	1283.75	326.95	96.58	217.58
24	50	400												
25	50	400	8.40	8.90	3,342.00	3.82	28.51	67.67	3342.00	952.80	2261.53	397.86	113.43	269.23
26	50	400	2.90	3.40	940.00	3.97	28.84	67.19	940.00	271.10	631.59	324.14	93.48	217.79
27	50	400												
28	50	400												
29	50	400	4.90	5.40	1,728.00	4.24	24.65	71.11	1728.00	425.95	1228.78	352.65	86.93	250.77
30	50	400	2.80	3.30	896.00	4.12	28.02	67.86	896.00	251.06	608.03	320.00	89.66	217.15
31	50	400	4.30	4.80	1,411.00	4.16	29.13	66.71	1411.00	411.02	941.28	328.14	95.59	218.90
Monthly TOTALS / Averages			113.60	124.10	40,726.00	4.25	27.87	67.8771429		11,508.1	27,555.0	346.765745	97.1926971	235.685452

HMA Log

Saginaw Asphalt- Plant 9 -Air Permit Compliance (178-87G)

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MONTH	Permit Limits		DAILY HMA PRODUCTION INFORMATION											
	RAP %	HMA Feed Rate	AC Pump Hours	Plant Production Hours	HMA Produced	AC%	RAP%	Virgin Agg %	HMA w/ RAP tons	RAP Tons	Virgin Agg Tons	HMA Production Rate (tph)	RAP Feed Rate	Virgin Agg Feed Rate
Sep-22	50	400	9.80	10.30	3,961.00	3.73	28.41	67.86	3961.00	1125.32	2687.93	384.56	114.83	274.28
1	50	400												
2	50	400												
3	50	400												
4	50	400												
5	50	400												
6	50	400	7.10	7.60	2,433.00	3.89	29.31	66.80	2433.00	713.11	1625.24	320.13	100.44	228.91
7	50	400	8.60	9.10	3,215.00	3.69	28.53	67.78	3215.00	917.24	2179.13	353.30	106.66	253.39
8	50	400	9.70	10.20	3,801.00	3.88	25.87	70.25	3801.00	983.32	2670.20	372.65	101.37	275.28
9	50	400	7.80	8.30	3,215.00	3.84	28.04	68.12	3215.00	901.49	2190.06	387.35	115.58	280.78
10	50	400												
11	50	400												
12	50	400												
13	50	400	7.10	7.60	2,456.00	4.88	19.80	75.32	2456.00	486.29	1849.86	323.16	68.49	260.54
14	50	400	8.80	9.30	3,051.00	4.87	16.16	78.97	3051.00	493.04	2409.37	328.06	56.03	273.79
15	50	400	9.00	9.50	3,436.00	4.07	22.61	73.32	3436.00	776.88	2519.28	361.68	86.32	279.92
16	50	400	8.40	8.90	3,350.00	3.85	28.87	67.28	3350.00	967.15	2253.88	376.40	115.14	268.32
17	50	400												
18	50	400												
19	50	400	5.70	6.20	2,271.00	4.90	14.28	80.82	2271.00	324.30	1835.42	366.29	56.89	322.00
20	50	400	5.60	6.10	1,837.00	4.74	17.94	77.32	1837.00	329.56	1420.37	301.15	58.85	253.64
21	50	400	5.20	5.70	2,020.00	4.89	15.38	79.73	2020.00	310.68	1610.55	354.39	59.75	309.72
22	50	400	10.50	11.00	4,155.00	4.72	15.86	79.42	4155.00	658.98	3299.90	377.73	62.76	314.28
23	50	400	13.90	14.40	5,723.00	4.97	9.38	85.65	5723.00	536.82	4901.75	397.43	38.62	352.64
24	50	400	2.80	3.30	883.00	5.06	14.76	80.18	883.00	130.33	707.99	267.58	46.55	252.85
25	50	400												
26	50	400												
27	50	400												
28	50	400	6.70	7.20	2,162.00	4.87	28.27	66.86	2162.00	611.20	1445.51	300.28	91.22	215.75
29	50	400	7.80	8.30	2,750.00	4.57	26.00	69.43	2750.00	715.00	1909.33	331.33	91.67	244.79
30	50	400	3.10	3.60	1,009.00	4.26	29.40	66.34	1009.00	296.65	669.37	280.28	95.69	215.93
	50	400												
Monthly TOTALS / Averages			137.60	146.60	51,728.00	4.43	22.16	73.4138889		11,277.3	38,185.1	343.540957	81.4913755	270.933217