

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

N165635240

FACILITY: ALBRECHT SAND AND GRAVEL		SRN / ID: N1656
LOCATION: 3790 W. Sanilac Rd., SNOVER		DISTRICT: Saginaw Bay
CITY: SNOVER		COUNTY: SANILAC
CONTACT: James Albrecht , Plant Manager		ACTIVITY DATE: 06/28/2016
STAFF: Sydney Bruestle	COMPLIANCE STATUS:	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite Inspection to determine compliance with PTI 547-87M and all other applicable state and federal air quality regulations		
RESOLVED COMPLAINTS:		

I (Sydney Lee Bruestle) conducted an onsite inspection at Albrecht Sand and Gravel on June 28, 2016. I arrived onsite (3501 Cat Lake Rd in Caro MI) around 10:00 am and met with Duane Mausolf. The plant is a Bituma-Stor parallel flow plant rated at 250 ton per hour and currently operates under PTI 547-87M.

The facility is rated at 250 tons per hour. On average the onsite plant production rate is 150-200 tons per hour. At the time of the inspection the facility was producing mix 13A, which contains 10% Reclaimed Asphalt Pavement (RAP). The plant can run on recycled used oil (RUO), but was operating on No. 4 oil at the time of my inspection. I collected three samples of oil. I sent two samples to Test America Labs in Canton Ohio for analysis (results attached). The analysis included metals content, total halogens content, PCB content, BTU rating, Flash Point, and sulfur content. Below is a summary of the results:

Element/Compound	Result	Limit
Arsenic	Non Detect at a reporting limit of 1.9 ppm	5.0 ppm
Cadmium	Non Detect at a reporting limit of 0.97 ppm	2.0 ppm
Chromium	1.2 ppm	10 ppm
Lead	4.5 ppm	100 ppm
Sulfur	860 ppm	% limit of 1.5
PCBs	Non detect at reporting limits of 0.5ppm	1.0 ppm
Flash Point	Greater than 200 Degrees F	Minimum of 100 Degrees F
BTU	20000 BTU/lb	17,000 Btu/lb minimum
Total Halogens	Non Detect at reporting limit of 200 ppm	4000 ppmw

The sampled oil is in compliance with all of the above limits.

Material Usage Limits:

The facility was burning No. 4 Oil at the time of the inspection, which is in compliance with condition 1.2. The Facility was using 10% RAP which is in compliance with the 30% limit in permit condition 1.5.

The facility processed 157, 000 tons of HMA paving Materials in EUHMAPLANT in the 12 month Rolling time period from June 2015- May 2016, which is below the 200,000 ton limit defined in permit condition 1.6 (records are attached)

The facility currently processes 150-200 tons of HMA paving materials in EU-HMAPLANT per hour (records reviewed onsite and attached).

Process/Operational Limits:

Mr. Mausolf was able to show me maintenance records for the fabric dust collectors and the drum mix burners. The facility maintains pressure drop records for the fabric filter collectors. The recorded pressure drop values range from 2.0- 2.9 inches WC which is in compliance with the range of 2-6 inches WC defined in permit condition 1.12.

Monitoring:

The facility monitored CO emissions from EUHMAPLANT with a handheld CO monitor upon start up on 05/17/2016. There were 8 readings taken. The recorded values ranged from 289-301 ppm. The facility will monitor the CO emission again at 500 hours on operation and during a malfunction.

The facility monitors and records the pressure drop across the fabric filter dust collector in EUHMAPLANT and the fuel usage rate once per day.

Record Keeping/Reporting/Notification

The calculated emission records are attached. I reviewed maintenance records onsite during my inspection.

The following records are kept for each calendar day EUHMAPLANT operates:

- Identification, type, and the amounts (in gallons) of all the fuel oils combusted
- Sulfur content (percent by weight), specific gravity, flash point, and higher heating value of all fuel oils combusted
- Tons of hot mix asphalt containing RAP produced, including the average percent of RAP per ton of hot mix asphalt produced containing RAP

The facility continuously monitors the virgin aggregate feed rate for EUHMAPLANT, the average value was around 177 tons per hour at the time of my inspection.

The facility continuously monitors the RAP feed rate, the average value was around 14 tons per hour at the time of my inspection.

The facility intermittently records the paving material product temperature, the average temperature was around 300 degrees F at the time of my inspection.

Upon start up the facility records the initial mix design and time, new mixes are recorded as they are activated through out the paving season.

The facility maintains monthly and 12 month rolling time period emission records for all criteria pollutants and HAPS listed in the permit (records are attached).

The facility maintains hourly, monthly, and 12-month rolling time period records of the amount of HMA paving materials produced from EUHMAPLANT (records attached).

The facility maintains hourly, monthly, and 12 month rolling time period records of the amount of fuel used for all fuels combusted, in gallons of fuel per ton of HMA paving materials produced.

FGFACILITY:

The facility maintains monthly and 12 month rolling time period records for Hazardous Air Pollutant (HAP) emissions (records attached). The emissions are well below the permit limits.

Fugitive Dust Control Plan:

It appears the facility was implementing the fugitive dust control plan (Appendix A).

Preventative Maintenance Program for the Fabric Filter Dust Collector:

The facility continuously measures the pressure drop across the fabric filter dust collector and records a daily value. It appeared all maintenance measures and inspections of the dust collector were being performed as required/necessary.

Compliance Monitoring Plan for the characterization of Recycled Used Oil (RUO):

The facility maintains the certificates of analysis provided by the supplier upon delivery of each truckload of recycled used oil. At the time of my inspection the facility was operating on Number 4 oil and provided the Certificate of Analysis (see attached).

Portable Equipment:

Permit Condition 1.29 (b) states "the installation of EUHMAPLANT as the geographical site shall be of temporary nature lasting not more that 24 consecutive months." AQD records show this facility commenced operation at 3051 Cat Lake Road in Caro, Michigan starting June 9th, 2016 and should have relocated by June 9, 2016. Albrecht Sand and Gravel is not in compliance with PTI 547-87M because EUHMAPLANT is not relocated. A violation notice was sent July 12, 2016.

Compliance Status:

Albrecht Sand and Gravel is not in compliance with PTI 547-87M. EUHMAPLANT has exceeded the permitted 24 month period for location/operation at 3051 Cat Lake Rd Caro, MI. A violation notice was sent to Albrecht Sand and Gravel on July 12, 2016. At the time of my inspection, it appeared the facility was in compliance with all other applicable state and federal air quality regulations.

NAME



DATE

07/19/16

SUPERVISOR

