

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

N165640136

FACILITY: ALBRECHT SAND AND GRAVEL		SRN / ID: N1656
LOCATION: 3790 W. Sanilac Rd., SNOVER		DISTRICT: Saginaw Bay
CITY: SNOVER		COUNTY: SANILAC
CONTACT: Laura Franzel , Vice President		ACTIVITY DATE: 06/01/2017
STAFF: Sydney Bruestle	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite inspection to determine compliance with PTI 547-87N 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 1, 2017. I arrived onsite (3501 Cat Lake Rd in Caro MI) around 9:00 am and met with Duane Mausolf and James Albrecht. The plant is a Bituma-Stor parallel flow plant rated at 250 ton per hour and currently operates under PTI 547-87N.

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 20AA, which contains 10% Reclaimed Asphalt Pavement (RAP). The plant was operating on recycled used oil (RUO) at the time of my inspection. The plant sent oil samples in for analysis and is waiting for results. Values listed on the Certificate of Analysis received with the oil are below:

Element/Compound	Result	Limit
Arsenic	0 ppm	5.0 ppm
Cadmium	0.2 ppm	2.0 ppm
Chromium	0.6 ppm	10 ppm
Lead	0 ppm	100 ppm
Sulfur	0.19 %	% limit of 1.5
PCBs	< 2	1.0 ppm
Flash Point	> 155 Degrees F	Minimum of 100 Degrees F
BTU	Not reported on C of A	17,000 Btu/lb minimum
Total Halogens	221 ppm	4000 ppmw

The sampled oil appears to be in compliance with all of the above limits. (The certificate of analysis is attached).

Material Usage Limits:

The facility was burning recycled used oil at the time of the inspection, which is in compliance with condition EUHMAPLANT II. 1. The Facility was using 10% RAP which is in compliance with the 30% limit in permit condition EUHMAPLANT II.4.

The facility processed 122, 375 tons of HMA paving Materials in EUHMAPLANT in the 12 month Rolling time period from May 2016- May 2017, which is below the 200,000 ton limit defined in permit condition EUHMAPLANT II. 5. (records are attached)

The facility currently processes 150-200 tons of HMA paving materials in EUHMAPLANT 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 were around 4 inches WC which is in compliance with the range of 2-6 inches WC defined in permit condition EUHMAPLANT IV. 1.

Monitoring:

The facility monitored CO emissions from EUHMAPLANT with a handheld CO monitor upon start up on 05/31/2017. There were 8 readings taken. The recorded values ranged from 280-292 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 175 tons per hour at the time of my inspection.

The facility continuously monitors the RAP feed rate, the average value was around 11.5 tons per hour at the time of my inspection.

The facility intermittently records the paving material product temperature, the average temperature was around 312 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.

EGFACILITY:

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). There were records available onsite.

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).

Truck Load out control/ Blue Smoke Control at top of silo:

The facility completed the installation of truck load out control and blue smoke collection at the top of the silos. I was able to see the new installations while onsite. Several trucks were loaded during my inspection, the blue smoke appeared to be well controlled.

Compliance Status:

At the time of my inspection it appeared Albrecht Sand and Gravel was in compliance with PTI 547-87N and all other applicable state and federal air quality regulations.

NAME SybilDATE 06/08/17 SUPERVISOR C. Gore