

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

N362655371

FACILITY: WYOMING ASPHALT PAVING INC		SRN / ID: N3626
LOCATION: PLOPPER S PIT 46TH ST N OF 64TH, LAWRENCE		DISTRICT: Kalamazoo
CITY: LAWRENCE		COUNTY: VAN BUREN
CONTACT: David Vaughn , President		ACTIVITY DATE: 08/05/2020
STAFF: Rachel Benaway	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection to verify compliance with PTI #301-88A and all state and federal air use regulations.		
RESOLVED COMPLAINTS:		

Due to Covid-19 health and safety precautions, all AQD inspections are now announced and scheduled prior to entry to a facility. The purpose of this scheduled inspection on 8/5/2020 by AQD staff, Rachel Benaway, was to verify Wyoming Asphalt (N3626) compliance with air use PTI #301-88A and all state and federal air use regulations. Wyoming Asphalt (62820 46<sup>th</sup> St., Lawrence, MI), a Hot Mix Asphalt (HMA) plant, is a synthetic minor for HAPS, CO, and PM and a minor source of SO<sub>x</sub>, NO<sub>x</sub>, and VOCs. The facility is subject to FESOP (Synthetic Minor Opt-outs and 208a Sources). John Rachac is the Operations Manager for the facility. Mr. Rachac passed along the rumor that this is the oldest operating HMA plant in the U.S.

Permitted equipment at the facility consists of aggregate conveyors, batch mix drum, cedar rapids dryer, cyclone and wet venturi scrubber (EUHMAPLANT). Fugitive dust sources are the roadways, yard, storage piles, and material handling operations (cold feed aggregate bins) (EUYARD).

There were no visible emissions observed or odors detected from the equipment as staff approached the facility as it was not running. The facility has 2 employees operating between the months of April and November. There are no boilers, emergency generators, or parts washers present.

#### EUHMAPLANT

Batches are made and loaded as trucks arrive and take approximately 2 minutes to produce. There are only 2 to 3 batch recipes used by this facility. Although no trucks arrived for HMA product during the time of the inspection, Mr. Rachac started the equipment so that the conveyors, drum, dryer, and scrubber could be observed. While running, no equipment emitted fugitive dust in excess of permit limits.

#### PTI #301-88A

EUHMAPLANT CONDITION	COMPLIANT?
SC II.1 Burn only natural gas and fuel oil – NO recycled used oil or waste oil	Y
SC II.2 Sulfur content of fuel oil shall not exceed 1.5% by weight	NA
SC II.3 No Asbestos tailings or waste materials containing asbestos	Y
SC II.4 No RAP without prior notification to and approval by AQD	Y
SC IV.1 Shall not operate w/out cyclone and wet venturi scrubber are installed/maintained	Y

This facility is not equipped to utilize recycled asphalt product (RAP). The only fuel type used is natural gas and have not used fuel oil for approximately 30 years. This makes SC II.2 not applicable. The cyclone and scrubber are maintained 2-3 times a year with nozzle checks and cleaning and leak checks.

#### Monitoring/Recordkeeping

##### PTI #301-88A

EUHMAPLANT CONDITIONS	COMPLIANT?
SC VI.2 Keep record of sulfur content (% by weight) and higher heating value (Btu/lb) of all fuel oils combusted	NA
SC VI.3 Keep record identifying all components of asphalt paving material mix	N

Although staff made multiple attempts to obtain records from the owner David Vaughn, no records were submitted. A violation notice will be issued for lack of maintaining and submitting the records required by the PTI.

EUHMAPLANT does not appear to be in compliance with permit conditions at this time.

#### EUYARD

The fugitive dust sources (roadways, yard, storage piles, and material handling operations) were observed during the time of the inspection. Water had been recently applied to the roadways, surrounding yard, and

storage piles. The facility uses a nearby pond for water access and waters EUYARD every day as needed.

**PTI #301-88A**

CONDITION	COMPLIANT?
SC III.1 shall not operate unless applicant applies water/calcium chloride to yard and roads as needed or required to minimize fugitive dust	Y

EUYARD appears to be in compliance with permit conditions at this time.

**FGFACILITY**

FGFACILITY includes all process equipment covered by other permits, grand-fathered equipment, and exempt equipment.

**PTI #301-88A**

FGFACILITY CONDITION	COMPLIANT?
SC II.1 Shall not process more than 440,000 tons HMA per 12-month rolling time	N
SC VI.2 Monthly and 12-month rolling time period records of HMA paving materials produced	N
SC VI.3 Monthly and 12-month rolling time period CO and PM10 emission calculations records	N
SC VI.4 Keep following on a monthly basis: -Individual and aggregate HAP emission mass balance calculations determining -the monthly emission rate of each in tons per calendar month and -the annual emission rate of each in tons per 12-month rolling time period	N N N

The facility submitted no records. Staff was unable to verify compliance with permit conditions regarding tons of HMA produced (FGFACILITY SC II.1, VI.2, and VI.3) or HAP emissions (FGFACILITY VI.4).

A violation notice will be issued for failing to maintain or produce any records required by this permit. FGFACILITY does not appear to be in compliance with permit conditions at this time.

NAME *Rachel Fenaway* DATE 8/5/2020 SUPERVISOR RIL 10/1/20