

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

N546645396

FACILITY: RIETH RILEY CONSTRUCTION CO INC		SRN / ID: N5466
LOCATION: 1289 S MEMORIAL HWY M 37 S, TRAVERSE CITY		DISTRICT: Cadillac
CITY: TRAVERSE CITY		COUNTY: GRAND TRAVERSE
CONTACT:		ACTIVITY DATE: 07/25/2018
STAFF: Kurt Childs	COMPLIANCE STATUS:	SOURCE CLASS: SM OPT OUT
SUBJECT: 2018 FCE.		
RESOLVED COMPLAINTS:		

On 7/25/2018 I conducted an inspection of the Rieth-Riley N5466 portable asphalt plant to determine compliance with PTI 151-94C, 40 CFR 60, Subpart I, and the Air Pollution Control Rules. The requirements of PTI 151-94C include the NSPS requirements and the permit contains "Attachment A" the portable asphalt plant General Permit to Install requirements to limit potential emissions below major source thresholds. The plant is located in Grand Traverse county off of M-37 just south of "Chum's Corners", the intersection of US-31 and M-37. Though this is a portable plant, it has remained at this location and only runs intermittently.

Prior to the inspection I contacted Rieth-Riley to find out the operating schedule for the plant. The day I arrived to inspect the plant, it was operating, and I observed the plant from off-site. The weather was clear with light west winds and air temperature of 75 degrees F. There was a faint attached water vapor plume from the stack but no tail off of particulate emissions. I travelled downwind of the plant and could detect mild odors (odor scale, level 1) on Hoosier Valley Rd. east of the plant.

Mr. Mike Francosi was the plant operator at the time of the inspection and answered my questions about the plant and showed me the electronic recordkeeping. The plant has a permanent electrical connection (no generator) and has been burning only natural gas in the asphalt tank heaters and drum for the past several seasons.

Emission Limits

PTI 151-94C and Attachment A contain the following emission limits:

Pollutant	Emission Limit
PM	0.04 gr/dscf
SO2	1.11 lbs./MMBtu
NOx	99 TPY
CO	99 TPY
VOC	99 TPY
Lead	99 TPY

Compliance is demonstrated through material limits and annual emission calculations. Annual emissions as reported for 2017 were as follows:

Pollutant	Emissions
PM10	2 Tons
SO2	< 1 Ton
NOx	< Ton
CO	3 Tons
VOC	< 1 Ton
Lead	0.08 lbs.

Production/Process Restrictions

The plant is limited to material throughput of 1,000,000 tons of asphalt paving materials per 12-month rolling time period while burning natural and LP gas.

Compliance is demonstrated through recordkeeping. Records for 2017 (attached) indicate total HMA production was 46,812 tons. 2018 records indicate that around 42,000 tons have been made already this year.

Records of significant maintenance activities are also required. R-R provided a record of spring 2018 maintenance activities including black light testing and bag replacement on the baghouse.

Proper operation of the baghouse is required for operation of the asphalt plant. This is demonstrated by monitoring the differential pressure and recording the reading daily. At the time of the inspection the differential pressure gauge (manometer) was not functioning, records indicate that it has worked in the past and the normal differential pressure is around 5" wc.

Testing

Testing to demonstrate compliance with PM and SO2 limits has not been required.

Monitoring/Recordkeeping

PTI 151-94C requires that the following records are maintained:

1. The amount of asphalt paving material produced per 12 mos. Rolling time period.
2. Daily production report including the proportions of virgin aggregate and RAP for all mixtures used each day.
3. The total hours of operation each day (16 hr. per day and 2,350 hr. per year limits).
4. The amount of recycled asphalt product (RAP) used on a monthly average.
5. Records of any significant maintenance activities with respect to air emissions (burner, drum, venture scrubber, etc.)
6. Records of the type of fuel used. Additional requirements apply if fuel oil or recycled used oil are used.

Following the inspection records were requested and provided by R-R. These records demonstrate:

1. Total HMA produced, 46,812 tons/12-mos. rolling was less than the 100,000 ton/12-mos rolling limit.
2. The total hours of operation per season were 209 hours in 2017 which is less than the 2,350 hr. limit.
3. 21.56% RAP was used in 2017 which is less than the 40% limit.
4. Significant maintenance activities at the start of the 2018 season are detailed in the attached records.
5. Recycled used oil (#400 fuel oil) was not used during operation of the plant.

Reporting

This source has reported annual emissions to the AQD through MAERS each year. The 2017 MAERS emissions comparison reports are attached.

Stack Parameters

The PTI limits stack diameter to 5' x 5' and a minimum height of 45'. At the time of the inspection a round stack with a diameter less than 5' and height around 80' was in place. It appeared that the diameter was compliant with the limit and that the stack exceeded the minimum height requirement.

Summary

As a result of this inspection it appears that, with the exception of the inoperable differential pressure gauge, this source is in compliance with NSPS 40 CFR 60, Subpart I, PTI 151-94C, and the Air Pollution Control Rules. I have requested that Rieth-Riley investigate and notify me regarding operation of the monitor to ensure that it is continuously operating.

NAME



DATE

8-6-18

SUPERVISOR

