

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

N710830532

FACILITY: Bit-Mat Products of Michigan Inc		SRN / ID: N7108
LOCATION: 401 Tiernan Road, BAY CITY		DISTRICT: Saginaw Bay
CITY: BAY CITY		COUNTY: BAY
CONTACT: Dwayne Scott , Site Manager		ACTIVITY DATE: 07/30/2015
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	
SUBJECT: Inspection of PTI 295-01.		SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:		

I (GLM) conducted an unannounced inspection at Bit-Mat Products. I met with Mr. Dwayne Scott, Facility Manager, and Ms. Jill Banaszak, Site Administration and Billing. The inspection included a tour of the tank storage area, thermal heater, truck loading facilities, and record review. The facility has submitted timely and complete MAERS reports and provided supporting documentation for the annual emission calculations and report. During the inspection the facility was not able to provide 12 month rolling monthly values as required. The facility's compliance status is non-compliant and a violation notice was sent on August 10, 2015 asking for a response by August 31, 2015.

The Bit Mat Products Bay City, MI facility produces emulsified asphalts for use in roadway paving. The basestock asphalt is delivered to the plant by both barge and truck. The basestock is stored in one of two large tanks (100 and/or 101) that are kept at 300F. The basestock asphalt is sent to a milling process where a customer specified soap mixture and soap volume is blended with the asphalt in a mill to produce asphalt emulsions. The emulsion/milling process normally occurs during the afternoon over a period of four to five hours. Per the facility's PTI application there are no emissions from the milling process (SBS polymer used, *see attached SDS*). The asphalt emulsion is stored in one of 15 tanks maintained at 165F. Trucks are usually filled with the asphalt emulsion during the mornings. Peak operating hours are at 2 a.m., when trucks are trying to gather material to transport to asphalt manufacturing facilities. The facility does not operate during cold weather months (normally December to February).

PTI #295-01 was issued to the company on May 3, 2002. VOCs from storage tank losses are the only emissions limited by the PTI #295-01. The facility is only subject to the reporting requirements of NSPS Subpart Kb (VOC liquid storage vessels). Compliance with this standard was not evaluated during this inspection. The PTI application states that there are no HAP emissions based on the MSDS for products handled on site. A 16,750,000 BTUs/hour, natural gas fired, thermal fluid heater, is used to heat storage tanks. The heater is exempt from Rule 201 permitting requirements per Rule 282 (b)(i).

FGBASESTOCK: Non-Compliant

The facility uses the TANK 4.0 software to track and report emissions to MAERS on an annual basis. Daily manual records of gallons in each tank are entered into a company inventory database used to determine throughput values each month. Sales volume is used to track the emulsified asphalt throughput. The permit requires that the throughput for each emission unit is tracked per 12-month rolling time period and shall not exceed 30 million gallons. While onsite the facility was able to determine a 12-month rolling time period ending June 2015. The facility used 8,848,456 gallons of basestock, which is below the permitted value. The 12-month rolling time period

required for VOC emissions is not being kept. The facility plans to run the TANKS program on a monthly basis and enter the VOC emissions into a spreadsheet to track. Copies of 12-month rolling time period for throughput, ending June 2015, are attached.

FGEMULSION: Non-Compliant

Annual emissions are based on the monthly data. The site did not have 12-month rolling emission values for VOCs available at the time of the inspection. The TANKS 4.0 program has all emission units entered but was not generating monthly values. The facility is working to correct this. They plan to run the TANKS program on a monthly basis and enter the VOC emissions into a spreadsheet to track the 12-month rolling time period. The permit requires that the throughput for each emission unit is tracked per 12-month rolling time period and shall not exceed 33.4 million gallons. While onsite the facility was able to determine a 12-month rolling time period ending June 2015. The facility used 5,325,084 gallons of emulsion, which is below the permitted value. The 12-month rolling time period required for VOC emissions is not being kept. The facility plans to run the TANKS program on a monthly basis and enter the VOC emissions into a spreadsheet to track. Copies of 12-month rolling time period for throughput, ending June 2015, are attached.

During the last inspection the facility was not keeping the appropriate records and had worked with previous staff to correct. Since then, the facility received a new facilities manager and this information was not passed on. While the facility is likely under the VOC limits for each of the emission units, proper recordkeeping shall be maintained.

NAME Linda L. McLann DATE 8/11/15 SUPERVISOR C. Aune