

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

N724640082

|  |                               |                           |
|--|-------------------------------|---------------------------|
| FACILITY: RIETH-RILEY CONSTRUCTION CO., INC.       |                               | SRN / ID: N7246           |
| LOCATION: 08699 Woodward Road, ELMIRA              |                               | DISTRICT: Cadillac        |
| CITY: ELMIRA                                       |                               | COUNTY: CHARLEVOIX        |
| CONTACT: John Berscheit , Asphalt Plant Specialist |                               | ACTIVITY DATE: 06/01/2017 |
| STAFF: Kurt Childs                                 | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: 2017 Full Compliance Evaluation.          |                               |                           |
| RESOLVED COMPLAINTS:                               |                               |                           |

**2017 Full Compliance Evaluation (FCE)**

I conducted an FCE inspection and records review on 6/1/2017. The Rieth-Riley Hudson plant is an ROP opt-out source operating under PTI 75-03C. The plant began operation for the 2017 season on May 8, 2017. The PTI covers emission units for the hot mix asphalt plant (EUHMAPLANT), plant yard (EUYARD), asphalt cement tanks (EUACTANKS), and storage silos (EUSILOS) as well as a flexible group for the entire facility (FGFACILITY). PTI 75-03C was issued to increase the allowable amount of RAP that could be used in the HMA mix from 30% to 50%. The permit has previously been revised to increase the allowable halogen concentration in RUO used at the facility to 4000 ppm. During the inspection I met with the plant operator Mr. Brian Sobleski, John Berscheit is the MAERS contact as well as the contact for any air permit issues and records that are not maintained at the plant.

At the time of the inspection the skies were overcast and winds were around 10mph from the west. The air temperature was 60 degrees F.

**EUHMAPLANT**

The asphalt plant is a Gencor unit and includes the following equipment:

1. Raw material feed for aggregate and RAP each including bins (7 for agg., 2 for RAP) a screen and conveyors.
2. Asphalt tanks (3).
3. Tack tank (1).
4. Used oil tanks (2).
5. Asphalt tank heater (natural gas fired).
6. Drum dryer.
7. Baghouse.

At the time of the inspection the asphalt plant was operating and I did not observe any visible emissions from the baghouse stack or fugitive emissions from the material handling equipment. This plant is rated for 350 tons per hour but normally does not run above 300. At the time of the inspection process monitors indicated it was operating at 190 tons per hour. The plant is still burning natural gas and has not used Recycled Used Oil (RUO) since July, 2012.

There were no recent shipments or use of RUO so there were no recent analysis to be reviewed. At this time Reith Riley plans to continue using natural gas.

The asphalt plant is equipped with a baghouse as indicated above, there were no visible emissions though the plant was running (although somewhat below its maximum capacity). There was a small detached water vapor plume present. The baghouse differential pressure was 2.8" WC which is consistent with past observations and recordkeeping. Plant records indicate the average differential pressure was 3.1" for 2016. The PTI requires a minimum differential pressure of 2" WC unless a large number of bags have been changed or other acceptable conditions exist and indicates the proper operating range is 2-8" WC.

PTI 75-03C limits RAP usage to 50% of the asphalt mixture based on a monthly average. Plant records indicate the annual average RAP usage for 2016 was 32% of RAP in mixes. However the monthly summary report Rieth Riley provided indicated the monthly average for October 2016 was an average of 75% RAP mix.. I notified Mr. Berscheit who did not think this was possible. He investigated and found that a decimal point was left off the entry for October 30 which added 23,988 tons of RAP instead of 239.88 (see attached documents). With the correction the

monthly average for October 2016 was 20% RAP and the 2016 average was 21.5% instead of 32%.

The plant is limited to 490,000 tons of HMA production per year. Plant records indicate 219,903 tons were produced during 2016. 2016 MAERS records also indicate the following annual air contaminant emissions:

PM = 14293.7 lbs.

CO = 28587.39 lbs.

SO<sub>2</sub> = 750 lbs.

NO<sub>x</sub> = 5717.48 lbs.

VOC = 7036.9 lbs.

Lead = 0.38 lbs.

Emission limits are in units of pounds of pollutant per ton of HMA produced. Using the MAERS data for emissions and HMA production generates the following emission rates for each pollutant:

| Pollutant       | Emission Limit               | 2016 MAERS Emissions           | Compliant | Stack Test            |
|-----------------|------------------------------|--------------------------------|-----------|-----------------------|
| PM              | 0.04 lb./ton                 | 0.065 lb./ton                  | NO        | 0.022 lb./ton         |
| CO              | 0.201 lb./ton                | 0.134 lb./ton                  | Yes       |                       |
| SO <sub>2</sub> | 0.025 lb./ton                | 0.0034 lb./ton                 | Yes       |                       |
| NO <sub>x</sub> | 0.12 lb./ton                 | 0.026 lb./ton                  | Yes       |                       |
| VOC             | 0.0575 lb./ton               | 0.032 lb./ton                  | Yes       |                       |
| Lead            | 2.0x10 <sup>-6</sup> lb./ton | 0.173x10 <sup>-5</sup> lb./ton | NO        | 1.92x10 <sup>-6</sup> |

EUHMAPLANT has been stack tested for HAPs and PM. Testing has not been conducted for other criteria pollutants though CO emissions are checked annually using a portable CO monitor for the purpose of tuning the drum mixer burners. Results of the HAPS testing indicated emissions were below the emission limit/factors. R-R is using MAERS emission factors for the annual emissions reporting not the stack test data which show lower emissions.

As discussed in past activity reports plant records for 2016 emissions are equivalent to the emission limits.

Portable CO detector test results for 2016 were available at the plant, two separate tests had been conducted in June and September during the year. The printouts of those tests indicated 8 readings over at least 30 minutes were conducted as required. The results indicated proper combustion (CO <500 ppm) and no changes to the burner were necessary. Mr. Sobleski informed me that Mr. Berscheit was on his way to the plant to conduct the first test of 2017 that day.

I also reviewed maintenance records that were up to date and included black light inspections of the baghouse. According to these records, all bags were replaced in 2015. I obtained a copy of the Daily Plant Report and Weekly Plant Summary which are the basis of the recordkeeping for material use and emissions calculations. I also requested and received the Weekly Plant Summary records from the 2016 operating season. Following the inspection I requested the final monthly report from Rieth Riley that summarizes the weekly plant reports all of the above are attached. The records indicate that all data required by the PTI is being collected and indicates compliance with the PTI. The monthly data is included as are updated 12-month rolling totals.

There have been no changes to EUHMAPLANT including stack parameters which appear to comply with the PTI.

#### **EUYARD**

R-R has an approved fugitive dust plan (attached as Appendix A to the PTI) and appeared to be in compliance with all aspects. At the time of the inspection, the location of EUHMAPLANT was paved as was the road used by haul vehicles and a new paved storage area adjacent to the truck loadout. Working areas of the gravel pit that the vehicles must travel through are not paved but are treated with water or dust suppressant as needed. Plant records included dates of watering or treatment. The gravel roads used by non-haul vehicles as well as other areas of the yard were either wet or treated with dust suppressant and there was minimal fugitive dust from the yard. Speed limit signs were posted and there did not appear to be any fugitive dust from storage piles. Drop heights from conveyors and from the loader appeared to be minimized. The MAERS report for this facility did use the correct emission factors for fugitive dust reporting (MAPA Worksheet).

**EUACTANKS**

The tanks were equipped with a vapor condensation and recovery system that was operating properly. There were no visible emissions or odors. The natural gas fired asphalt tank heater is not subject to either the Major or Area source boiler and process heater NESHAPs because process heaters are not subject to Subpart JJJJJJ and Natural gas fired process heaters are not subject to Subpart DDDDD.

**EUSILOS**

The silos are equipped with an emissions capture system that routes emissions back to the burner of the drum mixer. The loadout is equipped with an enclosure that is vented to a "blue smoke" system. I observed several trucks being loaded and there were no fugitive emissions from the loadout area or visible emissions from the blue smoke vessel stack.

**FGFACILITY**

Monitoring and recordkeeping for FGFACILITY is maintained and records were available and up to date (copy attached).

As a result of the inspection, records review and MAERS review the facility appeared to be in compliance with PTI 75-03C and the Air Pollution Control Rules.

NAME 

DATE 6-8-17

SUPERVISOR 