

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

N741550224

FACILITY: RIETH-RILEY CONSTRUCTION CO INC		SRN / ID: N7415
LOCATION: 911 HATFIELD AVENUE, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Mike Flory , Plant Manager		ACTIVITY DATE: 07/30/2019
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced, scheduled inspection. Staff, Monica Brothers arrived on-site at about 1:45pm. Upon arrival, the plant did not seem to be running. I first went to the office, and met with Mike Flory, Plant Operator. We then drove up to the control tower to review records, before going on a tour of the plant.

Michigan Paving and Materials is a hot-mix asphalt facility. They are an Opt-Out facility for HAPs and are currently operating under PTI# 262-04B. The plant runs from late April to around Thanksgiving each year, and their shifts vary depending on asphalt demand. They do not have any emergency generators or parts washers at the facility. They do have a hot oil-boiler that circulates to the AC tanks, which runs on natural gas. The facility also has a warm-mix asphalt system, which might be exempt under Rule 285 (2)(b). However, during the last inspection in 2014, the AQD inspector Dorothy Bohn let the facility know that they needed to submit an exemption determination document in order to be considered exempt, but this document was never received by the Kalamazoo district office. A violation notice will be sent for this.

**EUHMAPLANT and FGFACILITY:**

The plant was not operating at the time of inspection. They use only natural gas and do not take in any material that would have asbestos. They are permitted for 400 tons/hour of product, on a 24-hour rolling timescale, and their records show that they are consistently under that limit. They usually run at about 250 tons/hour, and the highest I saw in their records for the past two years was 265 tons/hour in July 2018. They also have a limit of 940,000 tons/year of HMA produced on a 12-month rolling timescale, and the highest for the past couple years was only 344,379 tons/year.

They are doing daily pressure drop readings for the baghouse, and they are consistently within their permitted range of 2-10 inches of water. They are limited to using up to 50% reclaimed asphalt pavement (RAP), and their records show that they are under this limit, with 36% being their highest for the past couple of years. They continuously monitor the virgin aggregate and RAP feed rate. They have records of their CO monitoring, which should occur upon start-up of each paving season and after every 500 hours of operation. They are doing at least 8 readings per monitoring session. Their records show that their CO readings have been under the required 500 ppm. They are doing daily opacity readings on the baghouse, and their records show that they have not seen any opacity this season. Mike was able to show me a few maintenance records for 2015 and 2016, but other than that, the facility could not provide maintenance records for the baghouse or the rest of the equipment on site. A violation notice will be sent for lack of maintenance and equipment inspection records.

They are keeping records of their natural gas usage, the amount of HMA containing RAP they produce, and the average percent of RAP/ton of HMA on a monthly basis. They are keeping the required daily records of the virgin aggregate feed rate, the RAP feed rate, and the asphalt product temperature.

They are also keeping records 12-month rolling records and monthly records of all criteria pollutants and HAPs emitted at the facility. They are limited to less than 90.0 tons/year each of CO, and 9.0 tons/year for each individual HAP and 22.5 tons/year for aggregate HAPs. Their records show that they are under these limits.

**EUYARD:**

During the facility tour, the roadways and yard areas seemed to be pretty clean. The speed limits posted for vehicles is 10 mph, and their permit requires it to be 10 mph or less. They also have signs at the entrances saying that trucks need to be tarped. They have a sprinkler system that automatically waters

their roads every few hours. They are keeping records of their fugitive dust control activities and are submitting fugitive dust emissions calculations to MAERS each year.

**EUACTANKS:**

The AC tanks are above ground and have a vapor recovery system.

**EUSILOS:**

The emissions from the silos and the truck load-out area go through a blue smoke filter, which is a 2-stage filter that filters particulate and condenses the gases. I did not observe any trucks being loaded during the inspection.

**APPENDIX A: FUGITIVE DUST CONTROL PLAN**

They are keeping track of their fugitive dust control activities and are watering at least two times per month. The speed limits are at 10 mph, as required by their PTI. During the inspection, the unpaved roadways seemed to be below the limit of 5% opacity, and the trucks that I observed coming and going from the facility were covered.

**APPENDIX B: MAINTENANCE PROGRAM FOR THE FABRIC FILTER DUST COLLECTOR**

They are recording their daily pressure drop checks, and they are consistently above the required 2.0 inches of water. The baghouse has a high temperature alarm that is set at 385°F and will begin shutting down the plant if the issue is not quickly resolved. The plant was not operating at the time of inspection, so I did not get an instantaneous baghouse temperature reading. Their records indicate that they have not seen any opacity from the baghouse so far this season. They have records of their blacklight tests, which are conducted at least once per paving season. They did a blacklight test on April 19, 2018 and then again on April 12, 2019. During the inspection, Mike showed me that they are keeping at least 15 filter bags, 5 lbs of blacklight powder, and two tubes of caulk on hand, as required by their permit. The facility could not provide the required fabric filter inspection records or records of maintenance activities performed on the baghouse. A violation notice will be sent for this.

**APPENDIX C: START-UP, SHUT-DOWN, MALFUNCTION ABATEMENT PLAN**

The facility could not provide records of their daily or annual inspections, or for preventative maintenance performed during these inspections. A violation notice will be sent for this.

At the time of inspection, the facility was not in compliance. A violation notice will be sent.

NAME 

DATE 9/27/19

SUPERVISOR RIL 9/30/19