

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

N743631214

FACILITY: Shook Asphalt Co. Inc.		SRN / ID: N7436
LOCATION: 8281 SNOWS LAKE RD., GREENVILLE		DISTRICT: Grand Rapids
CITY: GREENVILLE		COUNTY: MONTCALM
CONTACT: Tricia Grubaugh , Secretary		ACTIVITY DATE: 06/18/2015
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this visit was to determine compliance with PTI 37-05A, 40 CFR Part 60 Subpart I, and any other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

AQD Staff Eric Grinstern (EG) and Kaitlyn DeVries (KD) arrived at the facility at approximately 2:00 pm (6/18/2015) to conduct an unannounced scheduled inspection. The purpose of this visit was to determine compliance with PTI 37-05A, 40 CFR Part 60 Subpart I, and any other applicable Air Quality Rules and Regulations.

Facility Description:

Shook Asphalt (SA) is a Hot Mix Batch, Synthetic Minor Opt-Out facility that runs 4 days a week, and for less than 8 hours per day that has a capacity of 300 tons. The plant was just shutting down for the day when AQD staff arrived on 6/18/2015, thus visible emission and odor observations were not able to be conducted. The DEQ Environmental Inspections: Rights and Responsibilities brochure was presented and discussed with Tricia Eyer, Secretary. Tricia provided the staff with access to facility records, while Owner Gary Shook Jr. and Plant Operator Tom showed staff around the plant. EG and KD reviewed all records on site. EG and KD left the facility around 3:00 pm, and anticipate returning another day to see the plant in operation. EG and KD returned on September 16, 2015 to observe the facility in production in order to assess visible emissions, odors, and fugitive dust. However, SA was not operating.

Compliance Evaluation:

FGFACILITY:

The facility has 12 month rolling HAP emission limits of 8.9 tons per year (tpy) for individual HAPS and 22.4 tpy aggregate. Per the records, SA was at 262 lbs aggregate, and 125 lbs. individual.

EUHMAPLANT:

The emission records for the natural gas only plant appeared to be complete and properly recorded. The emission limits for PM, CO, Pb, benzene, toluene, ethylbenzene, xylene, naphthalene, formaldehyde, acrolein, arsenic, nickel and manganese are limited based on test protocol. The most recent stack testing was 2006, and was acceptable.

The plant is below their limit of 100,000 tons of HMA (12 – month rolling) at 14,000 tons (maximum in 2014) and their hourly limit of 150 tons, at 91 tons. A record of the temperature of the paving material was also properly documented, averaging 350 °F. Mr. Shook stated that the plant does not use any RAP (recycled asphalt pavement), RAS (recycled asphalt shingles), or asbestos. Additionally, they have not produced any cut-back asphalt in 2014 or 2015.

Mr. Shook stated that they had a black light, but black-lighting had not been conducted at the start of operations this year, in accordance with Appendix B, 6. Additionally, proper CO monitoring was not done at the start of the paving season as per Special Condition (SC) 1.16. A Violation Notice (VN) will be sent for these conditions.

Since the plant was not in operation at the time of the visit on 6/18/2015, verification of the pressure drop across the fabric dust collector could not be confirmed (SC 1.10), and there were no records for monitoring or calibration. Since Mr. Shook indicated they do not check this, EG explained the purpose of monitoring the pressure drop and KD helped Tricia set up a spreadsheet for tracking the pressure drop across the baghouse. This is a violation of SC 1.18 and Appendix B 1b, and will be included in the

VN. Tom indicated that there was an alarm system for the baghouse (BH) that had an auto shut off if the temperature exceeded 390°F. Extra bags for the BH were available on site. Other maintenance records for the BH were available to AQD staff, but no maintenance had been done in 2014 or thus far in 2015. Additionally, since the plant was not seen in operation, the fine tuning of the burners could not be confirmed.

While the stack measurements were not explicitly measured, there appeared to be no changes in the stack since the last inspection and the height appeared to be correct.

EUYARD:

The plant is located within a gravel pit, thus is inherently dusty. The gravel pit itself has a much higher risk for fugitive dust emissions than SA. The plant maintains records of fugitive dust emissions and documentation of watering to control the fugitive dust. All appropriate signs for haul trucks were posted appropriately and mileage records for the trucks maintained.

EUTANKS:

The vapor condensation and recovery system was installed and appeared to be working properly, per Mr. Shook.

Compliance Determination:

Based on the above results, it has been determined that Shook Asphalt is not in compliance with PTI 37-05A. A Violation notice will be issued for non-compliance of parts:

1. Special Condition 1.16 CO monitor was not used upon start-up of the paving season.
2. Special Condition 1.24 CO monitoring records in accordance with Special Condition 1.16
3. Special Condition 1.18 Pressure drop meter has not been calibrated and maintained
4. Special Condition 1.21 Appendix B 1.b no records for daily pressure drop readings.
5. Special Condition 1.21 Appendix B 6 Baghouse has not been black lighted.

Additionally, there was a crusher on site. When questioned, Mr. Shook stated that this has been on site since the early 1960's, and has had minimal maintenance, aside from some conveyor etc. This equipment is considered grandfathered. Previous inspection have also indicated this piece of equipment being grandfathered.

NAME Kaitlyn Davis DATE 9.21.15 SUPERVISOR PMB