

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

N774045747

FACILITY: Tackett & Sons Materials, LLC		SRN / ID: N7740
LOCATION: 1660 E Chicago Rd, JONESVILLE		DISTRICT: Jackson
CITY: JONESVILLE		COUNTY: HILLSDALE
CONTACT:		ACTIVITY DATE: 08/23/2018
STAFF: Brian Carley	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Tim Fraley, Operator  
 Company Contact: Lucinda Stone  
 Phone: 517-568-5884  
 Email: [lucinda@qualityasphalt.com](mailto:lucinda@qualityasphalt.com)

**Purpose**

This was a targeted, unannounced inspection of Tackett & Sons Materials. The purpose of the inspection was to determine compliance with Permit-to-Install (PTI) #369-06A for a hot mix asphalt plant. This facility is a synthetic minor opt-out source and is subject to 40 CFR Part 60 Subpart I for hot mix asphalt facilities. I arrived at the facility and with Mr. Tim Fraley, Operator.

**Background**

This facility is a hot mix asphalt (HMA) plant that is rated at 250 tons/hour. This facility employs a drum dryer in its process and the emissions are controlled by a fabric filter dust collector. Also, the facility has a batch tower that can hold up to 10,000 pounds of product. It is permitted to use No. 2 fuel oil, No. 4 fuel oil, blended fuel oil, recycled used oil (RUO), or natural gas. Even though it is permitted to use natural gas as a fuel, there is no natural gas line near this facility. They are limited to a maximum of 50% RAP material and can only process up to 200,000 tons of HMA paving materials per 12 month rolling time period as determined at the end of each month. This facility is a small batch plant that mainly works with local contractors and usually operates only a few hours a day (usually 1-3 hours/day).

**Compliance Evaluation**  
EUHMAPLANT

The plant was not operating at the time of the inspection and had been down since August 15<sup>th</sup> due to an equipment malfunction with the liquid asphalt binder tank. Mr. Fraley expected to be operating by next Monday once they reached the proper temperature in the tanks. They use RUO as their main fuel to run their operations with No. 2 fuel oil as their secondary fuel (Special Condition (SC) II.1). Mr. Fraley provided me for my review with their purchase orders of the RUO and the analyses of the RUO. The analyses showed that they were well under the limits specified under S.C. II.2, which allowed them to use the RUO as fuel. He also stated that they are in compliance with S.C. II.3 as they do not use any asbestos tailings or waste materials containing asbestos. They have a limit of 50% RAP that they can use in their mix (S.C. II.4) and according to Mr. Fraley the highest amount of RAP that they are using in their mix is ~15% RAP. They are also not allowed to exceed 100,000 tons per 12-month rolling time period and 250 tons/hr of HMA paving material (S.C. II.5 & II.6). They produced 35,790 tons of HMA paving product last year and 11,217 tons so far this year. Based on their records they are averaging approximately 110 tons/hr of HMA being produced this year.

They are required to implement and maintain a fugitive dust plan, preventative maintenance plan, emission abatement plan for startup, shutdown and malfunction, and a compliance monitoring plan for the RUO (S.C. III.1 - 4). Mr. Fraley said that they were following those plans. Mr. Fraley said that the adjacent sand and gravel operation (owned by Gerken) will water the roadways as necessary. If necessary, Mr. Fraley said that he can get a water truck from the main office to come down and water the roadways. However, they are not keeping a record of any fugitive dust control that is done at the facility. I have requested that they start recording their dust control activities. He showed me the list of all preventative maintenance he did before starting up the plant (SC VI.5). I asked him to also note

the date each maintenance item was completed. Mr. Fraley stated that he is following the emission abatement plan for startup, shutdown and malfunctions. They are following the compliance monitoring plan for the RUO. As noted previously, Mr. Fraley was able to provide me with an analysis of the RUO showing it met all the requirements of specified in SC II.2. He is also the one that does the upkeep on the baghouse that is installed, and he shown me what maintenance was done on the baghouse and the supplies that he has on hand as required by emission abatement plan. Mr. Fraley monitors the pressure drop across the baghouse and he said it usually runs at 2.5" H<sub>2</sub>O (S.C. IV.1).

AQD has not required this facility to conduct a verification and quantification of odor emissions at this plant (SC V.1).

Per S.C. IV.2 and VI.2, they are monitoring the virgin aggregate feed rate and the RAP feed rate. Mr. Fraley told me that the scales were calibrated this spring. Mr. Fraley did not have the results of CO monitoring that should have been done this spring with the facility startup and after each malfunction event (SC VI.3 and VI.9). I will contact the main office for the CO monitoring results for this year. I then asked to see the records required fuel combusted (identification, type, amount in gallons, and composition) and tons of HMA containing RAP produced and the average percentage of RAP in HMA containing RAP (SC VI.6). Mr. Fraley said that the main office of Tackett & Sons Materials would have that information. I then asked for the records for the production information (virgin aggregate and RAP feed rate, asphalt paving product temperature, and information sufficient to identify all the components of the asphalt paving mixture) as required by SC VI.7. Mr. Fraley showed me an example of one of their mixes and told me that they have four mixes that they produce. I will contact the main office for each of the mix designs. I then asked for the monthly and 12-month rolling time period emission calculations for all criteria pollutants and toxic air contaminants (SC VI.8). Mr. Fraley said that the main office of Tackett & Sons Materials would have that information. I then asked for the average daily, monthly, and 12-month rolling time period of the amount of HMA produced (SC VI.10). Mr. Fraley said that the main office of Tackett & Sons Materials would have that information.

#### EUYARD

As stated in Process and Operational limits section above, they are implementing the fugitive dust plan (SC III.1). As previously noted, they need to start recording what activity is done to minimize the dust and when it is done. They also did not provide me the calculated annual fugitive dust emissions. They are not in compliance with this table.

#### EUACTANKS

The vapor condensation and recovery system is installed and is operating on the liquid asphalt cement storage tanks (SC III.1). They are complying with this table.

#### EUSILOS

The storage silos have an emission capture system located on the top of each silo that are being maintained (SC III.1). They are complying with this table.

#### FGFACILITY

They did not provide the calculated actual emissions of HAPs from the facility based on the emission rate limits in the Emission Limit Table. They are not in compliance with this table.

Before I left the facility, I went over the information that I needed from Tackett & Sons Materials to complete my inspection. I requested the following information:

#### EUHMAPLANT

1. Fuels combusted for the time period of August 2017 through July 2018
  - a. Identification, type, and amounts (in gallons)
  - b. Sulfur content (percent by weight), specific gravity, flash point, and higher heating value (Btu/lb) of all fuel oils being combusted, which shall be provided by the supplier.
2. Tons of hot mix asphalt (HMA) containing recycled asphalt product (RAP) produced, including the average percent of RAP per ton of HMA produced containing RAP for the time period of August 2017

through July 2018.

3. Information of the four mixes of HMA that is produced at this facility that includes the virgin aggregate feed rate, RAP feed rate, product temperature, and identification of the components of the asphalt paving material mixture.

4. Monthly and 12-month rolling time period emission calculation records of all criteria pollutants and toxic air contaminants listed in the Emission Limit Table for EUHMAPLANT for the time period of August 2017 through July 2018.

5. CO emissions data and the associated production data for the startup of the 2018 season, each malfunction, and after every 500 hours of operation for this calendar year.

6. Average daily, monthly, and 12-month rolling time period records of the amount of HMA paving materials produced for the time period of August 2017 through July 2018.

**EUYARD**

1. The annual fugitive dust emissions for calendar year 2017.

**FGFACILITY**

1. Monthly and 12-month rolling time period emission calculation records of individual and aggregate HAP emission calculations for the time period of August 2017 through July 2018.

After the inspection on that same day, I was contacted by Ms. Lucinda Stone of Tackett & Sons Materials to go over the information that I had requested during my inspection. I asked to have the information by August 31, 2018. The information that was provided to me by Tackett & Sons Materials was not what I had requested. I sent Ms. Stone an email on September 6, 2018 detailing the information that I specifically wanted requested that they provide it to me by September 14, 2018. I did not receive any information that I requested on by the due date.

**Compliance Determination**

Based on the information gathered during this inspection and MAERS non-submittal, I determined that they are not in compliance with the conditions of PTI #369-06.

NAME Brian Carley

DATE 9/18/18

SUPERVISOR [Signature]