DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

P020667697		
FACILITY: Molon Asphalt Inc.		SRN / ID: P0206
LOCATION: 18695 HONOR HWY, INTERLOCHEN		DISTRICT: Cadillac
CITY: INTERLOCHEN		COUNTY: BENZIE
CONTACT: Scott Porter , President		ACTIVITY DATE: 06/08/2023
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Follow-up to update that were made to plant due to violation notice from 11/22/22		
RESOLVED COMPLAINTS:		

On Thursday, June 8, 2023 Caryn Owens of the Department of Environment, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted a follow-up, on-site field inspection of Molon Asphalt (SRN: P0206) located at 18695 Honor Highway, Interlochen, Benzie County, Michigan. This is in response to the violation notice sent to Molon Asphalt last November, since the violation was sent at the end of the 2022 asphalt season. This field inspection was to observe the changes made to become in compliance with permit to install (PTI) No. 19-11B.

Summary:

The activities covered during the field inspection for the facility indicate the facility has corrected the areas found in violation from November 2022 and is in **Compliance** with PTI 19-11B and no further action is necessary at this time.

On-site Inspection:

During the field inspection the weather conditions were sunny, with variable winds from the north about 5-10 miles per hour, and approximately 64 degrees Fahrenheit. The facility was issued a violation notice on November 22, 2022 for EUHMAPLANT due to failure to conduct carbon monoxide (CO) monitoring for proper burner operation at the start-up of the paving season and after 500 hours of operation, as well as EUSILOS due to operating the storage silos without top control emission capture for each silo to control fugitive emissions.

AQD received a response to the violation notice from Molon Asphalt on November 28, 2022, indicating that Company will have the plant changes updated by mid-April to correct the violations noted in the October 21, 2022 inspection.

On April 20, 2023, AQD received an email from Scott Porter, President of Molon Asphalt, indicating they purchased the equipment to monitor the CO for proper burner operation, and they completely rebuilt the top of the silos and outfitted them with top control, and they indicated several other systems were made to improve safety, quality, and compliance. The email indicated they were planning to fire up the plant on April 26, 2023.

When I arrived on site, the plant was active, but the asphalt drum was not operating because the northern silo was full for the most recent job orders. I met with Mr. Ben Brown, the Plant Manager, who showed me around the site. The site had produced about 190 tons so far this day. The site typically operates 6:30 to 9:30 in the morning until the silos are full or they have enough product available for the work scheduled. And they operate five days a week. There was currently 30 tons of material in the northern silo and no asphalt stored in the southern silo. The mix is kept between 325 to 350 degrees Fahrenheit in the silos. The facility is currently using 15 percent reclaimed asphalt pavement (RAP). The facility is capable of producing approximately 600 tons per day, but this is based on customer demand. The site also uses two mix designs at this time, and typically they only use one of the two mix designs. According to Mr. Brown, and the records he showed me, the baghouse typically is around 4.0 inches water column (wc). I observed a tanker truck filling the asphalt cement storage tanks when I was onsite. Slight petroleum-asphalt odors were present onsite, but the odors were not considered offensive, or strong. Additional odors were **not** present from filling the asphalt storage tanks. Although the asphalt drum was not operating, Mr. Brown has been taking videos of the plant operating and texting them to Mr. Porter. Watching Mr. Brown's videos, no visible emissions or steam plumes were observed from the plant operations and I could see the drum rotating. The videos appeared very different from the photos I took during my last inspection from October 21, 2022, which showed steam plumes from a few different areas of EUHMAPLANT.

Mr. Brown records the Total HMA produced, Total virgin aggregate used, RAP used, Asphalt cement, hours of operation, HMA product temperature, baghouse pressure drop, if there was precipitation at the site, if dust control was applied, and the natural gas usage on a daily basis. Additionally, Mr. Brown collects daily operational information on the AC tanks, output of HMA from the drum, and how much material is added to the silos.

I received the CO emissions from Mr. Porter to show that the burner was operating properly. According to the results completed May 6, 2023, CO was at 290 ppm, which was less than the 500 ppm permitted limit to show that EUHMAPLANT was operating properly.

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DATE 11-14-23 SUPERVISOR Thank Mixon