

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

P044331822

FACILITY: YEAGER PAVING MATERIALS LLC		SRN / ID: P0443
LOCATION: 3666 CARROLLTON ROAD, CARROLLTON		DISTRICT: Saginaw Bay
CITY: CARROLLTON		COUNTY: SAGINAW
CONTACT: Brad Lewinski		ACTIVITY DATE: 10/12/2015
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection to verify compliance with PTIs 75-13		
RESOLVED COMPLAINTS:		

I (GLM) conducted an unannounced inspection at the Yeager Paving Materials, LLC, dba U.S. Paving & Stone facility. I was accompanied by Yeager Paving Materials, LLC operators Blake Birnbaum and Treavor Lewinski. Yeager Paving Material, LLC was issue PTI #95-13 on July 24, 2013 for a 60 ton per hour (tph) non-metallic mineral crusher and PTI #75-13 on August 19, 2013 for a hot mix asphalt plant (HMA) facility including aggregate conveyors, 160 tph two-stage horizontal duo-drum mixer/dryer rotary drum (counterflow) and fabric filter dust collector. This inspection covers PTI #75-13. Emissions of concern are CO, PM, SO₂, NO_x, and Hazardous Air Pollutants (HAPs).

Violations were discovered of air permit PTI #75-13 during the inspection. A violation notice was sent on October 14, 2015 requesting a compliance response by November 4, 2015.

Description

Yeager Paving Materials, LLC facility is located at 3666 Carrollton road in Carrollton, Saginaw County, along the Saginaw River on a brownfield redevelopment site. This facility anticipates using the shipping channel one day. The continuous drum mix facility has a design capacity of 160 tph and is fueled exclusively with natural gas. Air emissions are controlled using a baghouse installed the mix drum and a blue smoke control system on the asphalt loading area and storage silos. Currently, the finished product is mainly used by Yeager Paving for parking lots and driveways.

The facility crushes recycled used asphalt (RAP) with the crusher that is permitted under PTI #95-13. The crusher was inspection on October 20, 2015 and is not part of this inspection.

FGFACILITY: Non-Compliant

Construction for the HMA plant began on January 1, 2105, within 18 months of permit approval. Within 30 days after completion of the installation/construction the facility shall notify the AQD District Supervisor, in writing, of the completion of the activity. Construction was completed by August 19, 2015 and notification of completed construction was received on September 10, 2015.

At the time of the inspection Mr. Lewinski reported that they were operating at 120 tph. Feed rates and operational parameters are monitored continuously on the control screen, with summary printouts printed out in 15 minutes intervals. On October 7, 2015 the virgin feed rate was 40.81 tons, RAP feed rate was 22.85 ton, and the asphalt paving material product temperature was 347°F. I suggested the facility change the summary printouts to 60 minute intervals, which will help them in recording hourly, daily, and 12-month rolling tons of HMA paving material produced. At the time of the inspection the average percentage of total combined RAP/RAS per ton of hat mix asphalt produced containing RAP/RAS was less than 50%.

NO_x, CO and SO₂ are controlled through only burning natural gas and the plant records natural gas usage.

Records are not available in an acceptable format. The tons of HMA processed per hour based on a daily average (573.42 tons per day), determined by dividing the daily HMA production by the daily operating hours (4.28 hours), for October 7, 2015 was 133.98 tph. The facility was cited for not maintaining monthly/12-month rolling time period records of the amount of HMA paving materials produced (S.C. VI.10).

To control CO emissions the facility shall maintain the efficiency of the drum mix burners, by fine tuning the burners for proper burner operation and performance. This shall be done at the start of each paving season or upon a malfunction of the plant as indicated by the CO emission monitoring data collected with a handheld CO monitor. Houck Asphalt Maintenance performed the initial CO emissions and fine-tuned the burner upon start-up of the facility. This emissions data was not available at the time of the inspection. The facility needs to purchase a CO monitor and was cited for lack of recording monitored CO emissions (S.C. VI.3).

Emissions are also controlled by implementing a Preventative Maintenance Program (PMP) and Emission Abatement Plan for Startup, Shutdown and Malfunctions. Since the plant is so new, maintenance has not been needed yet. At the time of the inspection the pressure drop on the main baghouse was 1.8 inches of H₂O (" H₂O). The plant is required to operate the collector's pressure drop between 2 and 10 " H₂O. The bags are relatively new and have likely not built up the filter cake required to efficiently operate within the required range. According to the PMP the pressure drop across the fabric filter should be recorded at least once per day. The facility was made aware that a daily operations log book should be maintained and was cited for not having pressure differential records (S.C. III.2).

EUYARD: Compliant

The trucking yard is currently half paved and is being finished as the plant has extra material to use. At the time of the inspection fugitive dust was not an issue.

The bulk of the emissions are controlled through material usage limits and maintaining emission records for criteria pollutants, TACs and HAPs. At the time of the inspection these records were not being maintained. Emission calculations will utilize emission factors from the HMA fact sheet and from the permit until stack test results are received.

The facility has not reached maximum production and has not yet performed stack testing. Stack testing is required within 180 days after the commencement of trial operations, which is February 15, 2016. The plant will shut down for the season by November 15th, 2015. Due to the seasonal operation of the industry, the short operation time available this season (2015) and that the plant will not reach maximum production rate this season the facility has requested testing to commence early 2016 operating season. The facility is currently gathering testing bids and will follow up with AQD staff with a proposed time frame.

NAME

Maria R. McLam

DATE

10/22/2015

SUPERVISOR

C. More