

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

P044345766

FACILITY: YEAGER PAVING MATERIALS LLC		SRN / ID: P0443
LOCATION: 3666 CARROLLTON ROAD, CARROLLTON		DISTRICT: Saginaw Bay
CITY: CARROLLTON		COUNTY: SAGINAW
CONTACT: Trevor Lewinski, Operator		ACTIVITY DATE: 08/23/2018
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection to verify compliance with PTIs 75-13, and 95-13 on 10/20/2015		
RESOLVED COMPLAINTS:		

I (GLM) conducted an unannounced inspection at the Yeager Paving Materials, LLC, dba U.S. Paving & Stone facility. I was accompanied by Mr. Matthew Karl, MDEQ-AQD, Yeager Paving Materials, LLC operators Mr. Trevor Lewinski and Mr. Justin Ross. 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. 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 August 29, 2018 requesting a compliance response by September 19, 2018

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.

EUHMAPLANT: Non-Compliant

Construction for the HMA plant began on January 1, 2015, 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 the facility was not in operation. The plant had produced all the asphalt it planned to make for the day and was idling down for shutdown. Feed rates and operational parameters are monitored continuously on the control screen, with summary printouts printed out in 15 minutes intervals. On August 17, the plant produced 359 tons in the three hours that it operated or 120 ton per hour. At the time of the inspection the average percentage of total combined RAP/RAS per ton of hot 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.

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 collected upon start-up for the paving season. However, the data was greater than 500 ppmv stated in the PTI. The facility did not monitor CO emissions after 500 hours of operation. A violation notice was sent for the facility to correct.

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, not much maintenance has been needed yet. The plant has points that are greased daily. The facility has not done a black light evaluation on the baghouse as required annually, upon start-up. There are a large

number of new bags on hand in the event they are needed. I suggested using a notebook to track maintenance performed. The plant is required to operate the collector's pressure drop between 2 and 10 " H₂O. According to records reviewed for the last paving year, the pressure drop is within this range. According to the PMP the pressure drop across the fabric filter should be recorded at least once per day and the facility maintains these records.

The facility is required to maintain 12-month rolling, CO emissions, data. Records are attached and below the 40 tpy allowed.

EUYARD: Compliant

The trucking yard is currently paved. 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.

EUSILOS: Compliant

An emission capture system is required for the top of each storage silo. The facility maintains a separate collector for this activity. Liquid AC that is drawn out of the gas stream is gathered in a 55-gallon drum. Once the drum is full the facility reuses it in their process.

FGFACILITY: Compliant

The facility has HAPs opt-out limits in their PTI, which require less than 9.0 tpy of an individual HAP and less than 22.5 tpy of aggregated HAPs based on a 12-month rolling time period. At the time of the inspection the facility was in compliance with this requirement. Formaldehyde make up the bulk of the HAPs emissions. I reviewed records from 2015 through current. For the 12-month rolling time period ending May 2018, formaldehyde emissions were 0.57 tpy and the aggregate HAPs emissions were 0.77 tpy.

At the time of the inspection the facility was not in compliance with its PTI. A violation notice was sent to have CO emissions monitoring corrected.

NAME

Ulina R. McPhee

DATE

8/29/18

SUPERVISOR

C. Hare