

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

P044358173

<b>FACILITY:</b> YEAGER PAVING MATERIALS LLC		<b>SRN / ID:</b> P0443
<b>LOCATION:</b> 3666 CARROLLTON ROAD, CARROLLTON		<b>DISTRICT:</b> Bay City
<b>CITY:</b> CARROLLTON		<b>COUNTY:</b> SAGINAW
<b>CONTACT:</b> Trevor Lewinski , Operator		<b>ACTIVITY DATE:</b> 05/20/2021
<b>STAFF:</b> Gina McCann	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Inspection of PTI 95-13.		
<b>RESOLVED COMPLAINTS:</b>		

I (GLM) conducted an unannounced inspection at the Yeager Paving Materials, LLC, dba U.S. Paving & Stone facility. I was accompanied by Mr. Nathanael Gentle, EGLE-AQD and Yeager Paving Materials, LLC operator 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, SO<sub>2</sub>, NO<sub>x</sub>, and Hazardous Air Pollutants (HAPs). The facility was in compliance with PTI #95-13 at the time of the inspection.

### 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 has a crusher that is permitted under PTI #95-13. The crusher did not operate this last year and was not a part of this inspection. The facility subcontracts the RAP (recycle used asphalt) crushing out to larger companies to save time and effort. The on-site crusher expends more in labor than what it costs to hire out.

### EUHMAPLANT:

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.

Special condition (SC) II.1. restricts operation of the plant to burning only natural gas. The plant has a natural gas line to EUHMAPLANT, and at the time of the inspection, there were no other signs that an alternative fuel was being utilized.

SC II.2. prohibits the use of any asbestos tailings or waste materials containing asbestos. This condition appears to be a part of the permit, because of the option to use RAS (recycled asphalt

shingles). EUHMAPLANT does not utilize this option and therefore it does not seem apparent that asbestos tailings are of concern. We discussed this condition while I was on-site and that the RAP used in the plant is from what is being tore off the road prior to paving.

SC II.3. limits the asphalt mixture processed in EUHMAPLANT to a maximum total of 50 percent combined RAP/RAS materials by weight based on a monthly average. SC VI. 6.b. is the associated monitoring and recordkeeping requirement that requires the plant to records for each calendar month that EUHMAPLANT operates the tons of hot mix asphalt containing RAP/RAS produced, including the average percent of total combined RAP/RAS per ton of hot mix asphalt produced containing RAP/RAS. The plant hand writes this percent on the daily production sheets that are filed by day of the month. I reviewed these records while on-site. For May 20, 2021 the asphalt mixture processed was 25%.

SC II.4. restricts the plant from processing more than 500,000 tons of HMA paving materials per 12-month rolling time period as determined at the end of each calendar month. SC VI.10 is the associated monitoring and recordkeeping requirement to record the average daily, monthly and 12-month rolling time period records of the amount of HMA paving materials produced from EUHMAPLANT. For the 12-month rolling time period ending December 2020 the plant produced 72,235 tons of HMA

SC II.5. limits the amount of HMA paving materials in EUHMAPLANT to 160 tons per hour based on a daily average. SC VI.10 is the associated monitoring and recordkeeping requirement that requires the plan to keep records, in a satisfactory manner, average daily, monthly and 12-month rolling time period records of the amount of HMA paving materials produced from EUHMAPLANT. I reviewed records from 2015 through current. The plant had a couple of dates during this time where the daily average for HMA produced exceeded the 160 tph limit. During stack testing to comply with permit limits and the NSPS Subpart I requirements, the facility operated equipment at 190 tph. The plant was under permitted emission limits for the testing and had assumed that they could operate at a higher ton per hour because of the testing. The permit still has the 160 tph restriction and the facility needs to request a revision of the permit.

SC III.1. requires the plant to implement and maintain a Fugitive Dust Control Plan for EUYARD. The plant owns two sweepers. One with a water tank and one that is a sweep up model. The sweep up model, sweeps the particles up into a collector on the machine. During NSPS Subpart I testing, the plant paved the entire parking lot. Additionally, the plant has enclosed all aggregate piles and the tops of the hoppers where aggregate is added into the process stream.

SC III.2. restricts operation of the plant unless the Preventative Maintenance Program specified in Appendix B has been implemented and is maintained. Yeager was able to produce maintenance records related to specific components of EU-HMAPLANT. The baghouse had various inspection and maintenance performed and the baghouse associated with the silos were all replaced prior to starting the 2021 paving season.

SC III.4 requires the plant to maintain the efficiency of the EUHMAPLANT drum mix burners, to control CO emissions, by fine tuning the burners for proper burner operation and performance. SC VI.3. is the monitoring and recordkeeping requirement to monitor, with a handheld CO monitor, the CO emissions from EUHMAPLANT and the production data associated with the time

the emissions data were collected. I reviewed the CO monitoring data for the start-up of the paving season. CO emissions for the data set were below the required 500 ppmv.

SC IV.1 restricts operation of EUHMAPLANT unless the fabric filter dust collector is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the fabric filter dust collector requires a pressure drop range between 2 and 10 inches of water column ("W.C.). At the time of the inspection the pressure drop was 2.6 "W.C.

SC IV.2. requires the plant to install, calibrate, maintain and operate in a satisfactory manner a device to monitor the virgin aggregate, RAP and RAS feed rate to the EUHMAPLANT on a continuous basis. The cold feeds, recycle belts and liquids devices were calibrated on April 7, 2021.

SC I.4 restricts CO emissions to 40.0 ton per year (tpy) based on a 12-month rolling time period as determined at the end of each calendar month. SC VI.8 is the associated monitoring and recordkeeping requirement that requires the plant to keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records of all criteria pollutants and TACs listed in the Emission Limit Table for EUHMAPLANT. For the 12-month rolling time period ending May 2021 CO emissions were 5.75 tpy. I reviewed TAC emissions and all were below permitted values.

#### EUYARD

Fugitive dust sources including: Plant roadways, Plant yard, Material storage piles, Material handling operations (excluding cold feed aggregate bins).

The plant owns two sweepers. One with a water tank and one that is a sweep up model. The sweep up model, sweeps the particles up into a collector on the machine. During NSPS Subpart I testing, the plant paved the entire parking lot. Additionally, the plant has enclosed all aggregate piles and the tops of the hoppers where aggregate is added into the process stream, in an effort to reduce areas of potential fugitive dust.

The yard was clear at the time of inspection and no concerns of fugitive dust were noted.

#### EUACTANKS

Liquid asphalt cement storage tanks.

SC III.1. restricts operation of EUACTANKS unless the vapor condensation and recovery system is installed, maintained, and operated in a satisfactory manner.

#### EUSILOS

Hot Mix Asphalt (HMA) paving material product storage silo controlled by a fabric filter baghouse.

SC III.1. restricts operation of EUSILOS unless the emission capture system for the top of each storage silo is installed, maintained, and operated in a satisfactory manner.

The baghouse associated with the silos were all replaced prior to starting the 2021 paving season.

SC III.2. restricts operation of the silos unless all the silo load-out activities occur in an area, which is permanently enclosed except for truck entrance and exit points. Emissions collected from the truck load-out area shall be vented into the burning zone of EUHMAPLANT. During the inspection I viewed several trucks receive loads from the silos. I was able to verify during each load out that the emissions were being captured via the load out control.

This facility has HAP opt-out limits in the permit. Individual HAPs are limited to less than 9.0 tpy based on a 12-month rolling time period as determined at the end of each calendar month. For the 12-month rolling time period ending May 2021, formaldehyde had the most emissions for an individual HAP at 0.64 tpy. Aggregate HAPs are limited to less than 22.5 tpy based on a 12-month rolling time period as determined at the end of each calendar month. The aggregate HAP emissions for the 12-month rolling time period ending May 2021 was 1.21 tpy.

During the inspection we discussed the installation of a diesel generator for emergency backup. The name plate on the engine rated it at 416 KW, which converts to 3.86 MMBtu/hr. It appears this generator can meet the exemption requirements of R285(g), which is for a 10,000,000 Btu/hour maximum heat input engine. However, it would be subject to the NSPS Subpart I for compression ignition engines.

NAME 

DATE 6/19/2021

SUPERVISOR 