DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY	REPORT:	Scheduled	Inspection

3148537622			
FACILITY: PYRAMID PAVING & CONTRACTING CO		SRN / ID: B1485	
LOCATION: 1503 PINE ST, ESSEXVILLE		DISTRICT: Saginaw Bay	
CITY: ESSEXVILLE		COUNTY: BAY	
CONTACT: Bruce Weiss , President		ACTIVITY DATE: 11/01/2016	
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT	
SUBJECT:			
RESOLVED COMPLAINTS:			

I (glm) completed a scheduled inspection of Pyramid Paving and Contracting Company (Pyramid). The facility is a permitted Hot Mix Asphalt (HMA) plant operating under Permit To Install (PTI) #260-81B. Pyramid is a synthetic minor opt out facility located at 1503 Pine Street, Essexville, Michigan. The purpose of the inspection was to verify compliance with PTI #260-81B, NSPS I, and applicable air quality state regulations.

Facility Description

Pyramid is a parallel flow, 300 tons per hour, HMA plant located in a small band of industrial/commercial facilities along the Saginaw River, surrounded by a mix of mostly residential properties. The plant consists of a single, parallel-flow drum system (installed in April 1997), control house, primary pollution control device (knock out pot), bag house, three HMA silos with truck load-outs, asphaltic concrete storage tanks, aggregate feeders and associated conveyors, and assorted storage buildings/trailers. The bag house was reported to contain approximately 742 fabric filter bags, with spares kept onsite for unscheduled repairs.

Note that the facility had sent in notification of their intent to install warm mix water injection equipment, and produce warm mix asphalt at this facility. However, the operator reported that the results of trial operations were not to the company's satisfaction, and that the equipment was not being used.

Compliance Evaluation

The facility received 22 complaints regarding odor and opacity at ground level from April to November 2016. The facility was cited three times, May 23, October 21 and November 14, 2016 in violation of general condition 8 as follow up to complaint investigations.

Special condition 15 states they shall not operate the asphalt plant unless the fabric filter collector is installed and operating properly. The facility tracks maintenance records and provided receipts for bags purchased in 2011, 2012 and 2014. The facility was cited in violation of R910 due to excess opacity on October 21, 2016 and November 14, 2016. There appears to be a problem with the engineering of the load out blue smoke recovery, possibly overloading the baghouse or introducing cooled air to the gas stream which does not allow the emissions to get proper lift and dispersion.

Special condition 16 requires continuous measure and display of the pressure drop across the collector. During the inspection, the plant was in operation and I viewed a pressure differential readout.

Special condition 18 requires the stack height to be greater than 23 feet. Using an inclinometer, the stack was measured to be approximately 65 feet.

Special condition 19 limits plant operation to no more than 12 hours a day nor 2,160 hours per year. According to the 2015 MAERS submittal, the plant operated 153 days. A spot check of onsite records for 2016 confirmed the plant operated less than 12 hours per day. Records are attached for November 1st, October 25th, 18th, and 11th, June 29th and 8th, 2016.

At the time of the inspection, loads were observed to be tarped/covered after pulling out of the load out area. (SC 20, dust plan, Appendix A). Though during routine visits for complaint investigations the facility was routinely out of compliance with this portion of the dust plan.

Recordkeeping and Recording

Under PTI #260-81B requirements for recordkeeping and reporting include:

- A written log of the hours of operation to be kept on file for a period of at least two years (SC 19)
- Baghouse inspection and repair records (SC 20, Appendix A), and
- Documentation of chloride or brine applications (SC 20, Appendix A)
- The operator reported that written logs for the hours of operation are stored onsite for the season, with

copies and additional year's records available for review at the main office. Records regarding bag house inspection and repair as well as chloride or brine applications are kept as part of the daily logs, which are ultimately maintained at the main office. Attached are the most recent copies of receipts for brine application.

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The facility is currently in non-compliance with the items listed above and a response to the most recent violation

SUPERVISOR