

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

B148545394

|  |                               |                           |
|--|-------------------------------|---------------------------|
| 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: 07/31/2018 |
| STAFF: Gina McCann   | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: Inspection of PTI 185-17 and compliance with ACO 2018-07. |                               |                           |
| RESOLVED COMPLAINTS:   |                               |                           |

I (gjm) performed an unannounced, self-initiated inspection of Pyramid Paving. The facility was performing a stack test to comply with the NSPS I for Hot Mix Asphalt Plants. The standard requires compliance with a particulate matter (PM) limit and an opacity limit of 20% using Method 9 verification. Mr. Chad Weiss and Mr. Bruce Weiss were the main contacts during the inspection. The facility was in compliance at the time of the inspection.

The facility has been a source of complaints since at least 2008, with complaints increasing during the 2015 season. Violation notices were sent in 2016 through 2017 for non-compliance with R901 and R910. The facility entered into an Administrative Consent Order (ACO) in an effort to return to compliance. For purposes of complying with the ACO, the following items are part of their compliance plan schedule.

- On and after the effective date of this ACO, the Company shall comply with Rule 901.
  - o Provided the Company timely completes all installation schedules and achieves compliance with R 336.1910 requirements as specified in the ACO, the AQD will not seek stipulated fines for R 336.1901 until 30 days after initial start-up of the facility in 2018.
- The Company shall have completed the installation of the Counter-Flow Revolution "D" Dryer before initiating operation in 2018.
  - o Within 30 days of initiating operation in 2018, the Company shall maintain and operate the Counter-Flow Revolution "D" Dryer in accordance with Rules 901 and 910.
- The Company shall have completed the installation of any load out control specified in Permit 185-17 and any revisions or modifications to this Permit before initiating operation in 2019.
  - o Within 30 days of initiating operation in 2019, the Company shall maintain and operate any load out control system in accordance Rules 901 and 910.
- The Company will notify the AQD Saginaw Bay District Supervisor in writing of the date of initiation of operation in 2019 within 10 days of startup.

The facility completed installation of the counter flow drum prior to paving season startup in 2018. Subsequent performance testing for that PTI (185-17) was taking place during this inspection.

#### EUHMAPLANT

The facility is restricted to a maximum of 35 percent RAP material based on a monthly average in their asphalt mixture. They shall not process more than 864,000 tons of HMA per 12-month rolling time period and shall not process more than 400 tons of HMA paving material per hours based on a daily average.

I viewed records for the 2018 paving season, which initiated on May 7<sup>th</sup>, 2018. The facility has processed 95,000 tons of HMA. The facility reported 221,913 tons of HMA produced in MAERs for the 2017 reporting season. RAP percent was averaging around 28% for their mixtures, while average daily HMA production was around 190 ton per hour (tph).

The facility complies with PM limits with the installation of a baghouse. They monitor pressure drop daily and perform routine maintenance on the control device. Prior to startup for the 2018 season the facility installed all new bags and power washed the inside of the baghouse. At the time of the inspection the pressure differential was between 2.8 inches of water column ("W.C.) and 3.0 "W.C.

CO emissions shall be monitored and be less than 500 ppmv to ensure EUHMAPLANT is operating properly. The facility is required to record one data set, which consists of (8) eight readings, for each of the following occurrences:

- 1) Upon start-up of each paving season.
- 2) Upon a malfunction of the drum dryer or it's associated burner.
- 3) After every 500 operating hours.

CO readings were taken August 2nd, 2018 and not at the beginning of start-up. Readings were below the allowed 500 ppm.

**EUYARD**

To comply with fugitive dust control plan the facility has paved most of the yard. Truck traffic is routed to the northern driveway to exist the yard and speed limit signs are posted. The facility owns a street sweeper and maintains the yard with it.

**EUACTANKS**

The facility installed a vapor condensation and recovery system on the AC tanks. During enforcement negotiations, the facility expressed that the plant receives up to (6) six deliveries of AC a day. The plant thought that the venting of the empty tanks was a source of odors and installed the system to mitigate the odors.

Mr. Chad Weiss showed me the vapor recovery system and the associated pressure gauge for the filters. The gauge 0-10 Pascals (Pa) with the optimum operating range between 0-2 Pa. At the time of the inspection the gauge was within the appropriate range.

**EUSILOS**

The permit requires the facility to install an emission capture system for the top of each storage silo by April 31, 2019. The plant has already begun this installation. The top of the silo control will be routed to a cartridge system to control emissions. Emissions collected from the truck load-out area will be vented to this cartridge system as well. This installation is to occur after the 2018 paving season ends, but before the 2019 season begins.

**FGFACILITY**

The facility has CO, SO2, NOx and VOC limits. It is also a HAPs opt-out source with individual HAPs limited to 9.0 tpy and aggregate HAPs limited to 22.5 tpy.

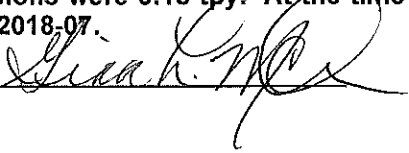
The facility is required to maintain monthly and 12-month rolling time period emission calculation records of all criteria pollutants and HAPs listed in the Emission Limit Table for EUHMAPLANT. For the 12-month rolling time period ending July 2018 the following emissions were recorded:

| Pollutant        | Emission Factor | Lbs of Pollutant | TPY of Pollutant |
|------------------|-----------------|------------------|------------------|
| PM10-FLT         | 0.023           | 2,188.29         | 1.09             |
| PM 2.5-FLT       | 0.0029          | 275.91           | 0.14             |
| CO               | 0.13            | 12,368.59        | 6.18             |
| SO2              | 0.0034          | 323.49           | 0.16             |
| Nox              | 0.026           | 2,473.72         | 1.24             |
| HAP-Lead         | 0.000175        | 16.65            | 0.01             |
| HAP-Benzene      | 0.00039         | 37.11            | 0.02             |
| Toluene          | 0.00015         | 14.27            | 0.01             |
| Ethylbenzene     | 0.00024         | 22.83            | 0.01             |
| Xylene           | 0.0002          | 19.03            | 0.01             |
| Naphthalene      | 0.00009         | 8.56             | 0.00             |
| HAP-Formaldehyde | 0.0031          | 294.94           | 0.15             |
| HAP-Acrolein     | 0.001           | 95.14            | 0.05             |

|           |            |      |      |
|-----------|------------|------|------|
| Arsenic   | 0.00000056 | 0.05 | 0.00 |
| Nickel    | 0.000063   | 5.99 | 0.00 |
| Manganese | 0.0000077  | 0.73 | 0.00 |

The PTII limits CO emissions to 85.58 ton per year (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 July 2018, CO emissions were 6.18 tpy. At the time of the inspection the facility was in compliance with PTI 185-17 and ACO 2018-07.

NAME



DATE

8/6/18

SUPERVISOR

