

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

B148548825

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: 05/07/2019
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Inspection of PTI 185-17 and ACO 2018-07.		
RESOLVED COMPLAINTS:		

I (glm) performed an announced inspection of Pyramid Paving. I was accompanied by Mr. Chris Hare, Bay City District Supervisor and Dana Brandt, PEAS/EGLE Safety Coordinator. Mr. Bruce Weiss and Oscar the Operator 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. Since the ACO has been in place the facility has been in compliance with R901.
- The Company shall have completed the installation of the Counter-Flow Revolution "D" Dryer before initiating operation in 2018. The facility installed the counter-flow drum prior to initiating operation in 2018.
- 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 facility has been in compliance with R901 and R910 since initiating operation in 2018.
- 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. Mr. Hare and I visited the site on May 2, 2019 to discuss the load out control equipment with Pyramid's vendor from Meeker. The Meeker representative noted three items with regard to the cartridge filter on the loadout.
 1. The pressure differential is measured across the 5th,6th,7th stage (ie the Cartridge, Wrap and Insert only). The entire filter unit is replaced when the pressure differential reaches 8" WC via the installed Gauges. The stage 4 Filter is disposable and is usually replaced every 90 to 120 days of production. It must be visually checked for saturation. Stages 1-3 are visually checked for particulate and cleaned as necessary. Usually once a year. It is up to the plant to observe and maintain the unit based on the loading that it sees.
 2. There is no Production Limit on filter replacement. The life of the filters varies drastically based on how the unit is operated and the amount of ambient particulate and oil content of the fumes. Rubberized oils, Polymer Blends, Anti Strip all effect the filter life.
 3. Due to the fact that all operations are different, Pyramid must maintain the unit based on the above advice and develop a procedure. The only hard and fast rule is that the final filters are replaced when the pressure differential reaches 8" WC based on the installed gauges.

Control was installed and operating during the inspection and the facility was in compliance with this condition of the ACO.

- 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. Control was installed and operating during the inspection and the facility was in compliance with this condition of the ACO.

- 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. Notice was received within 10 days prior of startup.

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 hour based on a daily average.

HMP per the 12-month rolling time period ending November 2018 was 245,302. RAP percent was averaging below 35 percent RAP for their mixtures, while average daily HMA production was around 229 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 2.8 inches of water column ("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 its associated burner.
- 3) After every 500 operating hours.

CO readings were taken May 4, 2019 in accordance to Special Condition VI.3. of PTI 185-17. 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 exit the yard and speed limit signs are posted. The facility owns a street sweeper and maintains the yard with it. During the inspection the yard was saturated due to recent rain events.

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.

I did not view the vapor recovery system during the inspection. However, on May 2, 2019 Mr. Hare and I discussed the unit with Pyramid's supplier, Meeker. There are three indicator lights that show operation of the filter as "green" or good, "yellow" or starting to see use, and "red" attention needed. During the May 2, 2019 visit the visual alarm indicated the filters were in acceptable condition to operate.

EUSILOS

The permit requires the facility to install an emission capture system for the top of each storage silo by April 31, 2019. The top of the silo control was routed to a cartridge system to control emissions. Emissions collected from the truck load-out area were vented to this cartridge system as well. See discussion above for proper operating values.

FGFACILITY

The facility has CO, SO₂, NO_x 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. I reviewed records ending November 2018 and the facility was in compliance with all emission limits.

At the time of the inspection the facility was in compliance with PTI 185-17 and ACO 2018-07.

NAME *Wanda L. Mc* DATE *5/14/19* SUPERVISOR *C. Hoo*