

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

B159735478

FACILITY: Ace-Saginaw Paving Co. Plant 3		SRN / ID: B1597
LOCATION: 4190 JIMBO DR, BURTON		DISTRICT: Lansing
CITY: BURTON		COUNTY: GENESEE
CONTACT: David L. Gohn, Plant Operations Manager		ACTIVITY DATE: 07/11/2016
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Partial Compliance Evaluation (PCE) activities, conducted as part of a Full Compliance Evaluation (FCE): 1.) scheduled inspection, and 2.) review of facility recordkeeping.		
RESOLVED COMPLAINTS:		

On 7/11/2016, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted a scheduled inspection of Ace-Saginaw Paving Company Plant 3 - Burton.

**Environmental contact::**

David L. Gohn, Plant Operations Manager; 810-614-4959; [dgoohn@edwclevy.net](mailto:dgoohn@edwclevy.net)

**Facility description:**

This is a brand new Hot Mix Asphalt (HMA) plant, which was installed this spring, at the site of an existing dual drum HMA plant.

**Emission units:**

Emission Unit ID	Emission Unit Description	Permit to Install (PTI) No.	Federal regulation	Compliance status
EUHMAPLANT	Hot Mix Asphalt (HMA) facility including: aggregate conveyors, 500 ton per hour counterflow drum, knockout box, fabric filter dust collectors	128-73F	40 CFR Part 60, Subpart I	Compliance
EUYARD	Fugitive dust sources including: Plant roadways, plant yard, material storage piles, material handling operations (excluding cold feed aggregate bins)	128-73F	40 CFR Part 60, Subpart I	Compliance
EUACTANKS	Liquid asphalt cement (AC) storage tanks	128-73F	40 CFR Part 60, Subpart I	Compliance
EUSILOS	HMA paving material product storage silos	128-73F	40 CFR Part 60, Subpart I	Pending, re: blue smoke control system for loadout

**Regulatory overview:**

On 1/22/2016, the company received Permit to Install (PTI) No. 128-73F, to install a new HMA plant, equipped with a counterflow drum dryer, knockout box, baghouse, virgin and RAP aggregate handling and feed systems, liquid AC storage tanks with condensers, covered drag slat conveyor, HMA product storage siloes, top of silo control, truck loadout enclosure, and blue smoke control system. This PTI is an opt-out permit, because it limits the facility's Potential to Emit (PTE) to below 100 TPY of each criteria pollutant, to keep it from becoming a major source, opting out of the Title V program..

A major source has the Potential to Emit of 100 TPY of one or more of the criteria pollutants: carbon monoxide (CO), Nitrogen Oxides (NOx), Sulfur Dioxide (SO2), Volatile Organic Compounds (VOC), particulate matter (PM), particulate matter smaller than 10 microns (PM-10), particulate matter smaller than 2.5 microns (PM2.5), and lead. The company chose to limit potential emissions by restricting the annual production allowed by their PTI, while burning specified fuels. The current PTE for this facility is listed in the table below:

Criteria pollutant	Allowable TPY
CO	80.5
NOx	37.1
S02	16.5
VOC	15.3
PM	4.1
PM-10	5.8
PM2.5	1.4

Lead does not have the PTE to reach major source levels for this facility.

#### Fee status:

This facility is considered a Category II fee source, because it is subject to a federal New Source Performance Standard (NSPS), 40 CFR Part 60, Subpart I, *Standards of Performance for Hot Mix Asphalt Facilities*. It is not considered a category I fee source, because it is neither a major source for criteria pollutants, nor for HAPs. It is not considered a category III fee source, because it is not subject to one of the National Standards for Emissions of Hazardous Air Pollutants (NESHAPs).

The facility is required to report air emissions to AQD annually, through the Michigan Air Emissions Reporting System (MAERS).

#### Location:

The facility is located in an industrial park. However, there may be one residential property, combined with a business, about 1,000 feet to the east of the HMA plant. Otherwise, the nearest residences are about 1,600 feet to the south southeast of the plant.

#### Recent history:

The HMA plant which operated at this site for decades has been removed from the site. The brand new plant was installed during the spring. Today was the first time that AQD staff have witnessed this plant operating. Stack testing has been scheduled for 7/20 and 7/21/2016, for CO, particulate matter, and opacity.

#### Arrival:

This was not an unannounced inspection. Two DEQ student interns with the Office of Environmental Assistance, Ms. Misty Womer, and Mr. Joseph Smith, were accompanying me, for training purposes. I had obtained the company's permission in advance, to bring them to the site for the inspection of the HMA plant.

At 9:30 AM, we drove east on Bristol Road, and south on Jimbo Drive. We were downwind of the HMA plant, as winds were out of the south southeast (SSE). I did not detect any asphalt odors, nor see any visible emissions, except for a steam plume. Weather conditions were 75 degrees F, cloudy, and humid, with winds out of the SSE at 0-5 miles per hour. We drove through the industrial park and returned to Jimbo Drive. Again, I detected no odors.

We arrived at 9:35 AM, and met with Mr. David Gohn, Plant Operations Manager. Mr. Matt Hugo was the plant operator. I provided Mr. Gohn with the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, per AQD procedures.

They do not have a boiler onsite, but rather a small, on demand hot water heater, so a copy of the DEQ boiler NESHAP card was not provided, in this instance. Mr. Gohn showed me the heater, which appeared to be much smaller than 120 gallons in capacity, and does not appear to be subject to the boiler NESHAP for area sources, 40 CFR Part 63, Subpart JJJJJ.

Stack testing for CO, NSPS particulate matter, and opacity is planned for 7/20-21/2016, while burning natural gas and RUO.

Inspection:

Operating data was collected, as follows:

Parameter	12:57 PM
Product	Commercial topcoat
Grade liquid AC	PG 64-22
Production rate tons per hour (TPH)	263
Virgin aggregate TPH	158.4
RAP TPH	97.2
RAP % of total mix	36.96%
Liquid AC TPH	11.6
Liquid AC temperature deg. F	290
Mix temperature deg. F	357.5
Draft through drum dryer " w.c.	2.5
Baghouse temperature deg. F	251
Baghouse pressure drop " w.c.	2.7
Stack temperature deg. F	222

We were informed that Ace-Saginaw does not use any shingle material in their paving mixtures.

A knockout box is used as a gravity collector, to remove coarse particulates from the exhaust stream, prior to the baghouse. I checked for visible emissions from the baghouse exhaust stack periodically during the inspection, but there were none, other than steam. We were informed that the baghouse has 1,300 bags, of a style called "two pocket" bags, and the draft through the drum dryer is 1,700 cfm. It is my understanding that a reverse air cleaning mechanisms is used to clean the bag, to remove collected dust, and that the collected dust is reinjected as fines back into the product mix, in the drum dryer.

Fugitive emissions check

Potential emission source	Fugitive emissions?
Drum dryer	No
Burner end of drum	No
Virgin aggregate conveyor	No
RAP conveyor	No
Ductwork	No
Baghouse	No
Dust reinjection system	No
Liquid AC tanks	No
RUO tank	No
"Tack" tank	No
Drag slat conveyor (enclosed)	No
Storage silos	No
Truck loadout	Yes, discussed under section of this report relating to EUSILOS

I noticed that there was a RAP crusher onsite, today. Mr. Gohn indicated that a relocation notice had been submitted to AQD for the crusher, and I recalled receiving a relocation notice for one coming to this site. There were no visible emissions from the RAP crushing process, at this time.

A compliance check with the Special Conditions of PTI No. 128-73F follows.

Special Conditions for EUHMAPLANT:

I. EMISSION LIMITS

Emission limits are specified in a table for PM, PM10, CO, SO<sub>2</sub>, NO<sub>x</sub>, lead, formaldehyde, 2-Methyl-1-Pentene, and hydrogen chloride. The facility will undergo stack testing on 7/20 and 7/21/2016, for CO, PM, and opacity, while burning Recycled Used Oil and natural gas.

## II. MATERIAL LIMITS

1. The facility is prohibited from burning any fuel other than natural gas, liquid petroleum gas, ultra low sulfur diesel, or recycled used oil (RUO) in EUHAMPLANT. We were informed that the facility was burning RUO, at this time. Upcoming stack testing 7/20 and 21 will be done with both RUO and natural gas, we were informed.

2. The permittee is prohibited from burning in EUHAMPLANT any hazardous waste, blended fuel oil or RUO containing any any contaminant that exceeds the following concentrations or for which the flash point, or ash content, vary from the standards in the following table.

Contaminant	Limit	Units
Arsenic	5.0	ppmw
Cadmium	2.0	ppmw
Chromium	10.0	ppmw
Lead	100.0	ppmw
PCBs	1.0	ppmw
Total Halogens	4000.0	ppmw
Sulfur	1.5	Weight %
Minimum Flash Point	100.0	Deg. F
Maximum Ash Content	1.0	Weight %

RUO analysis data from the RUO supplier had been observed by me during a previous visit here, on 4/26/2016. The supplier analysis showed the following results.

Parameters	Lab analysis	Permitted limits	Compliance?
PCBs	< 1.00 ppm	1.0 ppmw (maximum)	Yes
Arsenic	< 1.00 ppm	5.0 ppmw (maximum)	Yes
Cadmium	< 0.100 ppm	2.0 ppmw(maximum)	Yes
Chromium	< 0.400 ppm	10.0 ppmw (maximum)	Yes
Lead	< 7.00 ppm	100.0 ppmw (maximum)	Yes
Silicon	34.0 ppm	NA	NA

Additionally, Attachment A to this report contains the results from lab analyses of three RUO samples which the company collected on 8/11/2016, one month after this inspection. The lab results for all three samples show compliance with the permitted limits for arsenic, cadmium, chromium, lead, PCBs, total halogens, % sulfur, minimum flash point, and maximum ash content.

3. The permittee is prohibited from using any asbestos tailings or waste materials containing asbestos. It is my understanding, that they do not use any asbestos tailings or any waste materials containing asbestos, from an 8/22/2016 e-mail from Mr. Gohn ( please see Attachment A to this report)

4. The RAP content of the asphalt mixture is limited to a maximum of 50% RAP, based on a monthly average. The RAP content today was 36.96%, instantaneously.

5. Production is limited to no more than 800,000 tons of HMA in EUHAMPLANT per 12-month rolling time period, as determined at the end of each calendar month. Total production so far for the new plant is 139, 374.03, per Mr. Gohn's 8/22/2016 e-mail (please see Attachment A).

6. While combusting diesel fuel (ultra low sulfur diesel fuel) or RUO, the facility is limited to no more than 550,000 tons of HMA production per 12-month rolling time period, as determined at the end of each calendar month. Per Mr. Gohn's 8/22/2016 e-mail, production with RUO is 74,354.28 tons estimated (please see Attachment A).

7. The plant is prohibited from a production rate of more than 500 tons per hour (TPH) of HMA, based on a daily average, to be determined by dividing the daily HMA production by the daily operating hours. The instantaneous production rate I recorded during the inspection was 263 TPH, below the permitted maximum.

### III. PROCESS/OPERATIONAL RESTRICTIONS

1. The facility is required to implement and maintain the Fugitive Dust Control Plan for EUYARD, specified in Appendix A of the PTI. It appeared that the facility was following their fugitive dust plan appropriately.
2. The permittee is required to implement and maintain the Preventative Maintenance Program specified in Appendix B of the PTI. It is my understanding that they are implementing and maintaining this. Please refer to Attachment B of this report for an example of the baghouse inspection log.
3. The permittee is required within 60 days of permit issuance to submit an emission abatement plan for startup, shutdown, and malfunctions of equipment contained in EUHMAPLANT. The company submitted an emission abatement plan on 8/23/2016; please see Attachment D of this report.
4. The permittee is required to implement and maintain the Compliance Monitoring Plan (CMP) for RUO specified in Appendix C of the PTI, or an alternate approved plan. Mr. Gohn explained that they have received two RUO deliveries from their supplier this year, which are from the same batch. On 4/26/2016, I had viewed the lab analysis which their supplier provided them for this particular batch of RUO. The RUO analysis is discussed earlier in this activity report. I indicated that I would be collecting samples of RUO to split with Ace-Saginaw during the upcoming stack testing, which is scheduled for 7/20-21/2016.
5. The permittee is required to maintain the efficiency of the EUHAMPLANT drum mix burner(s), to control CO emissions, by fine tuning the burners. This is to be done at the start of the paving season, or upon a malfunction of EUHMAPLANT as shown by the CO emission monitoring data. Please see Attachments C and F to this report, for burner tuning and CO readings.

### IV. DESIGN/EQUIPMENT PARAMETERS

1. The fabric filter dust collector, or baghouse, is required to be installed, maintained, and operated in a satisfactory manner. Satisfactory operation is said to require a pressure drop range between 2 and 10 inches of water column (w.c.), and the minimum pressure drop is prohibited from being less than 2 inches w.c., except when a large number of bags have been replaced or other reason acceptable to AQD.

During the inspection, there were no visible emissions (other than steam) from the baghouse exhaust stack. The instantaneous reading obtained from the control room computer monitors was 2.7 inches, w.c.. The baghouse appeared to be operating properly, at this time. Additionally, please refer to Attachment B of this report for an example of the baghouse inspection log. It shows that black light testing was conducted on 4/28/2016, and that all the fabric filter bags were newly installed.

### V. TESTING/SAMPLING

1. This condition states that verification of odor rates from this plant may be required, upon notification from the AQD District Supervisor. Neither this HMA plant nor its predecessor at this site have ever been the subject of an odor complaint to the AQD, and therefore testing for odor rates is not being required at this time.
2. EUHMAPLANT is required to undergo stack testing for CO emission rates within 60 days after achieving maximum production rate of HMA, but not later than 180 days after commencing trial operation. Stack testing for CO was scheduled to take place from 7/20 to 7/21/2016.
3. EUHMAPLANT is required to undergo stack testing for particulate emission rates within 60

days after achieving maximum production rate of HMA, but not later than 180 days after commencing trial operation, pursuant to 40 CFR Part 60, Subpart I, *Standards of Performance for Hot Mix Asphalt Facilities*. Stack testing for NSPS particulate rates was scheduled to take place from 7/20 to 7/21/2016.

The company is required to notify the AQD District Supervisor in writing, within 15 days of the date of commencement of trial operations. On 5/23/2016, AQD received a 5/19/2016 letter from Mr. Benjamin J. Kroeger, Environmental Engineer for Edward C. Levy Co., advising AQD that construction of the HMA plant was completed on 5/3/2016. No later than 45 days prior to testing, a complete test plan, including a testing schedule, is required to be submitted to AQD. On 5/23/2016, AQD's Technical Programs Unit (TPU) received a 5/19 stack test protocol from Derenzo Environmental Services (DES), so this condition appears to have been met.

## VI. MONITORING/RECORDKEEPING

1. All required calculations are required to be completed in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month.
2. Virgin aggregate feed rate and RAP feed rate is required to be monitored on a continuous basis. This was verified during the inspection.
3. The permittee is required to monitor, with a hand held CO monitor, CO emissions from EUHMAPLANT and associated production data from the time of the emissions readings upon startup of each paving season, upon a malfunction of the drum dryer or its associated burner, and once per calendar month in which EUHMAPLANT operates. Please see Attachments C and F, for examples of data from burner tune ups. The examples were done on 6/13 through 6/15/2016, and 6/27 through 28/2016.
4. The permittee is required to monitor emissions and operating information in accordance with 40 CFR Part 60 Subparts A and I. The proposed stack test dates of 7/20-21/2016 were within 180 days of commencing operation.
5. The permittee is required to conduct all necessary maintenance and make all necessary attempts to keep all drum mixer/burner and fabric filter dust collector components of EUHMAPLANT maintained and operating in a satisfactory manner at all times. They are required to maintain a log of all significant maintenance activities conducted and all significant repairs made to EUHAMPLANT. Maintenance for the baghouse or fabric filter dust collector is required to be consistent with the Preventative Maintenance Program specified in Appendix B of the PTI. Please refer to Attachment B of this report for an example of the baghouse inspection log.

During the inspection, the components of EUHAMPLANT appeared to be operating properly. There were no fugitive visible emissions from the virgin aggregate conveyors, RAP conveyors or RAP collar, the drum dryer, the burner housing, the knockout box, baghouse, dust reinjection system, or drag slat conveyor.

6. The permittee is required to keep the following records for each calendar month of operation:
  - a. Identification, type and amounts (in gallons) of all fuel oils combined. This is being done, as demonstrated by the recordkeeping in Attachment A of this report.
  - b. Sulfur content (percent by weight), specific gravity, flash point, and higher heating value (Btu/lb) of all fuel oils being combusted. They have data showing the above parameters for the RUO in their RUO tank; please see Attachment A.
  - c. Tons of HMA containing RAP produced, including the average % of RAP per ton of HMA produced containing RAP. This is being done, as demonstrated by the recordkeeping in Attachment A.
  - d. Tons of HMA produced while burning each fuel type. It is my understanding that they keep this data.

e. Tons of total HMA produced. This is being done, as demonstrated by the recordkeeping in Attachment A.

7. The permittee is required to keep intermittent daily records of the following production information for EUHAMPLANT:

a. The virgin aggregate feed rate. It is my understanding that this data is kept in their daily production reports.

b. The RAP feed rate. It is my understanding that this data is kept in their daily production reports.

c. The asphalt paving material product temperature. It is my understanding that this data is kept in their daily production reports.

d. Information sufficient to identify all components of the asphalt paving material mixture. It is my understanding that this data is kept in their daily production reports.

e. Tons of HMA produced while burning each fuel type. It is my understanding that this data is kept in their daily production reports.

f. Tons of total HMA produced. It is my understanding that this data is kept in their daily production reports.

The permittee is to record the initial mix design and time, upon startup. When a new mix design (i.e. a different mix design) is activated, the time and new mix design are to be recorded. It is my understanding that this data is kept.

8. This requires monthly and 12-month rolling time period emission calculation records of all criteria pollutants and TACs listed in the emission limit table at the start of the Special Conditions in the PTI for EUHMAPLANT. Please note that stack test results may be used to estimate emissions, with AQD approval. It is my understanding that 12-month emission calculation records are being kept and will be submitted in early 2017 for calendar year 2016, via MAERS.

9. The permittee is to keep records of all CO emissions and related production data (at the time CO data was collected). They are keeping production data from the time the CO emissions are monitored; please see Attachments C and F.

10. The permittee is to record average daily, monthly, and 12-month rolling time period records of the amount of HMA product produced while burning each fuel type, and of the total amount of HMA product produced. The facility appears to be keeping daily, monthly, and yearly records on fuel use, based on Attachment A for the daily and monthly recordkeeping, and also based on previous MAERS reports for the Ace-Saginaw HMA plant which operated here last year, for the yearly recordkeeping.

11. Monitoring is required of fuel usage rate for EUHMAPLANT, on a daily basis. It is my understanding that this data is kept on a daily basis.

#### VII. REPORTING

1. Within 30 days after installation, construction, reconstruction, relocation or modification, the permittee is to notify the AQD in writing, of completion of this activity. The company sent AQD a letter notifying us of the 5/3/2016 date of completion of construction.

#### VIII. STACK/VENT RESTRICTIONS

1. The exhaust gases from the baghouse exhaust stack are required to be exhausted unobstructed vertically upwards from a stack (SVHMAPLANT) with a maximum diameter of 68 inches, and a minimum height of 50 feet. The stack appears to comply with this requirement.

**IX. OTHER REQUIREMENTS**

NA

**Special Conditions applicable to EUYARD:**

**I. EMISSION LIMITS**

NA

**II. MATERIAL LIMITS**

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The fugitive dust control plant in Appendix B of the PTI is required to be implemented and maintained. The facility appeared to be taking the necessary steps to control fugitive dust onsite.

**IV. DESIGN/EQUIPMENT PARAMETERS**

NA

**V. TESTING/SAMPLING**

NA

**VI. MONITORING/RECORDKEEPING**

1. All required calculations are to be completed by the 30th day of the calendar month, for the previous calendar month.

2. The permittee is required to calculate the annual fugitive dust emissions for EUYARD,, using emission factors from the U.S> Environmental Protection Agency (EPA) document AP-42, or other emission factors approved by the DEQ. This newly permitted plant has only just started running, However, the company submitted in early 2016 the 2015 fugitive dust emission calculation in their MAERS report for the previous HMA plant they operated here. The emissions are shown in the table of 2015 fugitive dust emissions, below.

**VII. REPORTING**

1. The permittee is required to report the actual emission levels from EUYARD to the AQD through the annual MAERS report. This plant started operating in spring of 2016, but the company submitted the 2015 annual fugitive dust emissions for the previously operated plant here in early 2016, via their MAERS report. Please see table below.

2015 fugitive dust emissions for the previous HMA plant which operated at this site:

Process	Lbs	Tons
Haul roads – paved & unpaved	3,479.91	1.74
Aggregate storage	5,067.28	2.53



**VIII. STACK/VENT RESTRICTIONS**

NA

**IX. OTHER REQUIREMENTS**

NA

**Special Conditions applicable to EUACTANKS****I. EMISSION LIMITS**

NA

**II. MATERIAL LIMITS**

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

The permittee is required to install, maintain, and operate in a satisfactory manner a vapor condensation and recovery system. The three new liquid AC tanks and the two existing liquid AC tanks which remain from the previous plant at this site are all equipped with condensers. No visible emissions could be seen from the tanks, or their condensers.

**IV. DESIGN/EQUIPMENT PARAMETERS**

NA

**V. TESTING/SAMPLING**

NA

**VI. MONITORING/RECORDKEEPING**

NA

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTIONS**

NA

**IX. OTHER REQUIREMENTS**

NA

**Special Conditions applicable to EUSILOS****I. EMISSION LIMITS**

NA

## II. MATERIAL LIMITS

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee is required to have an emission control system from the top of each storage silo which is installed, maintained, and operated in a satisfactory manner. Emissions from the top of each silo, it was explained, are drawn downwards, through the enclosed drag slat conveyor, and ducted to the burning zone of the drum dryer for combustion. When the drum dryer is not running, silo emissions pass through the dryer, and exit the plant after traveling through the main baghouse and the 50 foot exhaust stack. No visible emissions could be seen from the top of the storage silos, or from the drag slat conveyor.

2. The permittee is required to have the load out activities take place in an area which is enclosed except for entrance and exit points, with emissions vented into the burning zone of the drum dryer or controlled by equivalent means. The company chose as an equivalent means a blue smoke control system. They are required to install, maintain, and operate the system in a satisfactory manner.

There are four storage silos for HMA product, and two loadout lanes which pass underneath them. The loadout lanes are not totally enclosed. Rather, the sides of the lanes are somewhat open, with wall panels which extend down from the ceiling of the loadout area, stopping at about the roofline of a typical truck. It is my understanding that the purpose of this design is to allow for a truck driver to safely exit their vehicle and the loadout lane itself, in the event of an accident.

An air handling system has been installed for the loadout lanes under the siloes, with the intent to capture emissions of blue smoke from the loadout process. The captured emissions are then routed to a baghouse for control. It is my understanding that the baghouse contains dry plastic pellets, which are moved in a swirling motion, followed by a series of fabric bags. The controlled emissions are then exhausted unobstructed vertically upwards, through a single exhaust stack.

We observed the loadout process over time, as several trucks were loaded in the north truck loadout lane. Emissions of blue smoke within the loadout lane were partially captured by the air handling system. I estimated that about 2/3 of the blue smoke was captured, and routed to the baghouse, while roughly 1/3 was blown out the east end of this loadout lane, by the wind. The loadout lanes each run from west to east, and winds were currently out of the southwest.

I discussed with Mr. Gohn AQD's concerns about the amount of blue smoke being captured by the air handling system. The permit to install does not specify a set percentage of emissions to be collected, but I felt the actual percentage collected should be well above the 2/3 mark. Mr. Gohn acknowledged that there is some room for improvement, and indicated that this may be possible.

Rule 910 of the Michigan Air Pollution Control Rules requires that a control device be installed, maintained, and operated in a satisfactory manner. It is my understanding that when any facility installs a new piece of air pollution control equipment, it may take a period of time, and some adjustments, for the operator to maximize the efficiency of the control system. With this in mind, AQD is waiting to make a determination on compliance with Rule 910 until the facility has had a reasonable opportunity to optimize the performance of the new system.

When loadout emissions were being routed to the baghouse, I saw emissions from the baghouse exhaust stack. Mr. Gohn believed the emissions to be steam. From our location, on a catwalk by the virgin aggregate bins, I was not able to tell if the emissions were steam or blue smoke. In the future, a closer look, from a ground level perspective, may make it easier to distinguish.

## IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS


NA

IX. OTHER REQUIREMENTS

NA

Conclusion:

No instances of noncompliance were observed. However, AQD will monitor the progress which is made with the blue smoke control system for the truck loadout enclosure. The efficiency of the unit is not yet where AQD would like it to be, yet. The company is trying to work with the original equipment manufacturer on this issue.

NAME 

DATE 8/9/16 SUPERVISOR 

