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

B159764187

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:** 08/24/2022
STAFF: Daniel McGeen	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: PCE activities, conducted as part of a FCE: 1. unannounced, scheduled inspection, and 2. review of facility recordkeeping.		
RESOLVED COMPLAINTS:		

On 8/24/2022, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Ace-Saginaw Paving Company Plant 3, in Burton. A review was subsequently conducted of recordkeeping and facility logs. These were Partial Compliance Evaluation (PCE) activities, done as part of a Full Compliance Evaluation (FCE).

Environmental contact::

- David Gohn, Plant Operations Manager; 810-614-4959; dgohn@acesaginawpaving.com
- Alicia Ramsdell, Environmental Engineer; 313-402-5823; aramsdell@edwclevy.net

AQD contact:

Dan McGeen (myself), Environmental Quality Analyst; 517-648-7547; mcgeend@michigan.gov

Facility description:

This Hot Mix Asphalt (HMA) plant was installed during early 2017, replacing an existing dual drum HMA plant. Edward C. Levy Company, which is the parent company for Ace-Saginaw Paving Company.

Emission units:

Emission Unit* ID	Emission Unit Description	Permit to Install (PTI) or Michigan Air Pollution Control Rule No.	Federal Regulations	Compliance Status
EUHMAPLANT	Hot Mix Asphalt (HMA) facility including aggregate conveyors, 500 ton per hour counterflow drum, knockout box, fabric filter dust collector	128-73F	40 CFR Part 60, Subpart I	Compliance

EUYARD	Fugitive dust sources including: Plant roadways, 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 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	Compliance
Two new storage silos	Two new HMA paving material storage silos, controlled by truck loadout and silo control system	MAPC Rule 289(2)(c)	40 CFR Part 60, Subpart I	Compliance

***An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.**

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 PTE	Allowable TPY under PTI 128-73F
CO	80.5
NOx	37.1
SO2	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.

This facility is considered a true minor source for emissions of hazardous air pollutants (HAPs). A facility is considered major for HAPs if it has a PTE of 10 TPY or more for a single HAP, or 25 TPY or more for aggregate HAPs.

Fee status:

This facility is classified as a Category D 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*. 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:

In early 2016, the current plant was installed as brand new, replacing a dual drum plant which had operated there for decades. No complaints have ever been received about the current plant.
The most recent complaint which was potentially related to the previous plant was a fallout complaint in the 1990s, and may possibly have been related to a nearby asphalt plant, which once stood about 1,500 feet away to the northwest. It was never confirmed which asphalt plant, if either, may have contributed to the alleged fallout.

Past violations:

There are no violations for this facility gping back at least as far as 1994 in the plant file, and possibly earlier.

Stack testing:

Stack testing for the new plant was done for CO, NSPS particulate matter, and opacity on 7/20-21/2016, while burning natural gas and RUO. The facility was in compliance with permitted limits. The

CO results, which averaged 0.13 lb/ton while firing RUO, complied with the permitted limit for CO while firing RUO of 0.201 lb/ton. The particulate results were 0.006 grains/dscf, and 0.004 lb/ton, below the NSPS limit of 0.04 grains/dcsf, and below the permitted limit of 0.03 lb/ton, respectively. Opacity readings were all 0%, complying with the limit in the NSPS of 20% and with the 20% except for one 6-minute average per hour not to exceed 27% opacity limit of Michigan Air Pollution Control Rule 301.

Safety equipment:

Safety glasses with side shields,, steel toed boots, a hard hat, and a high visibility safety vest are required. It is not known to me if hearing protection is required, but I would recommend AQD staff bring it, as a standard safety measure.

Note: During the current COVID-19 pandemic, I wore a disposable paper mask, out of personal preference.

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Odor evaluation:

At 9:30 AM, I began an odor evaluation downwind, prior to my arrival onsite. Weather conditions were sunny and 75 degrees F, with winds out of the west at 0-5 miles per hour (mph). Please see attached odor evaluation form, map of offsite odors detceted, and summary of weather conditions for 8/24/2022.

Odors were detected as follows:

- 9:32 AM, level 2 asphalt odor on Center Road, just south of the intersection of Center Road and Scottwood Avenue. The odor continued intermittently for several hundred feet.
- 9:34 AM, level 2 asphalt odor on Center Road, approx. 1,000 feet south of the intersection with Scottwood Avenue.
- 9:36: level 1 diesel exhaust odor at the dead end of ScottwoodAvenue. It should be noted that there are other busineses besides the Ace-Saginaw Plant 3 in the surrounding industrial park which utilize diesel-fueled trucks.
- 9:42 AM: Level 2 skunk odor on Flint Asphalt Drive. Suspectd to be natural in origin..

The AQD 0 to 5 odor scale is as follows:

0 - Non-Detect
1 - Just barely detectable
2 - Distinct and definite odor
3 - Distinct and definite objectionable odor
4 - Odor strong enough to cause a person to attempt to avoid it completely
5 - Odor so strong as to be overpowering and intolerable for any length of time

The odors detected above were insufficient to constitute a violation of MAPC Rule 901(b), which prohibits unreasonable interference with the comfortable enjoyment of life and property. I ended the odor evaluation, and drove to the plant at this time.

Arrival:

This was an unannounced inspection.

I arrived at 9:44 AM, and the plant was running. There was no steam plume, and no opacity from the exhaust stack. I drove on the truck entrance route through the site, which is one way. It is my understanding that this is the path all visiting vehicles should take through the site. The posted speed limit is 10 mph. The paved roads were swept, and I saw what appeared to be a fresh application

of calcium chloride in the unpaved roadways and aggregate storage area. There was some water at the base of an aggregate storage pile.

I parked adjacent to the control tower. I went to the base of the stairs, where there is now a gate with a sign posted, due to the ongoing COVID-19 pandemic. Company policy is now for visitors to the tower to use the onsite dispenser of hand sanitizer, and to contact the operator via an intercom. I did both, and I was wearing a disposable paper mask, out of personal preference. The operator, Mr. Wes Guigar, invited me up to the control room.

In the pre-inspection meeting, I explained that I had detetced some intermittent asphltic odors downwind, on Center Road, but not at a evel which would be consideres to cause a nuisance violation. W. Guigar explained that they had been receiving a load of liquid AC from a truck this morning, which could potentially contributed to asphaltic odors I detected. The faint odor of diesel exhaust I detceted on Scottswood Avenue I could not attribute to Ace-Saginaw Paving Co., as numerous industries in the industrial park are sevred by diesel trucks.

Inspection:

The plant was running, while I was onsite. I checked for visible emissions from the baghouse exhaust stack periodically during the inspection, but there were none. Weather conditions were 74 degrees F, sunny, and winds were out of the west at 5 mph.

Plant operating data was collected during the inspection, please see below:

Time	**10:02 AM**	**10:58 AM**
Mix	**3C**	**COM TOP**
Grade liquid AC	**PG 64-22**	**PG 58-28**
% mix AC	**4.8**	**5.6**
Production rate TPH	**282**	**282**
Virgin aggregate TPH	**195.8**	**179.6**
Virgin agg. % moisture	**3.5**	**4.4**
RAP TPH	**76.4**	**83.7**
RAP % moisture	**3.0**	**3.0**
RAP % of total mix	**27.1**	**29.7**

Liquid AC TPH	**10.1**	**11.8**
Liquid AC temp. deg. F	**325.5**	**325.2**
Mix temp. deg. F*	**329.2**	**338**
Draft through drum " w.c.	**0.0 to -0.1**	**0.0**
Baghouse inlet temp. deg. F	**256**	**263**
Baghouse pressure drop " w.c.	**3.3**	**2.8**
Stack temperature deg. F	**235**	**240**

***Sensor is said to read about 10 degrees F higher than actual.**

I checked for visible emissions while onsite. Please see checklist below:

No.	Potential Visible Emission Source	Visible Emissions?
1	Drum dryer	No
2	Burner end of drum	No
3	Virgin aggregate conveyor (partially covered)	No
4	Virgin aggregate screen	No
5	RAP conveyor (partially covered)	No

6	RAP collar	No
7	Ductwork	No
8	Knock out box	No
9	Baghouse	No
10	Baghouse exhaust stack	No
11	Dust reinjection system	No
12	Liquid AC tanks	No
13	RUO tank	No
14	”Tack” tank	No
15	Drag slat conveyor (enclosed)	No
16	Storage silos	No
17	Truck loadout tunnel	Yes
18	Blue smoke control system exhaust stack	No
19	Paved roadways	No
20	Unpaved roadways	No

***See discussion later in this report, under the check of permit special conditions for EUSILOS.**

The baghouse appeared to be working properly. A knockout box is used as a gravity collector, to remove coarse particulates from the exhaust stream, prior to the baghouse. It is my understanding 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 dust was well controlled. I was informed that they had calcium chloride applied last week. I noted that the facility has a motorized sweeper with a water tank onsite, for paved roadways.

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, SO2, NOx, lead, formaldehyde, 2-Methyl-1-Pentene, and hydrogen chloride.

INSPECTION RESULTS: COMPLIANCE. The facility underwent stack testing on 7/20 and 7/21/2016, for CO, particulates, and opacity, while burning Recycled Used Oil and natural gas. The results were well within permitted limits for CO, particulates, and opacity.

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 EUHMAPLANT.

INSPECTION RESULTS: COMPLIANCE. The facility was burning natural gas, at this time, but RUO was onsite and was available for use as fuel, I was informed.

2. The permittee is prohibited from burning in EUHMAPLANT any hazardous waste, blended fuel oil or RUO containing 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 %**

INSPECTION RESULT: UNKNOWN. The plant was burning natural gas today, but is permitted to also burn RUO. In 2017, RUO samples were taken when RUO was onsite, and the results complied with the permitted limits. The next inspection of this facility will focus on sampling of RUO. .

3. The permittee is prohibited from using any asbestos tailings or waste materials containing asbestos.

INSPECTION RESULT: COMPLIANCE. It is my understanding that they do not use any asbestos tailings or any waste materials containing asbestos.

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

INSPECTION RESULT: COMPLIANCE. As seen instantaneously today, the RAP content was no higher than 29.7%, while running a commercial paving mix. The attached Burton Production Data.xslx *spreadseet shows that the highest monthly average was 32.91%, in June, 2022.*

5. Production is limited to no more than 800,000 tons of HMA in EUHMAPLANT per 12-month rolling time period, as determined at the end of each calendar month.

INSPECTION RESULT: COMPLIANCE. I had not requested records showing the 12-month rolling value. However, the attached Burton Production Data.xslx *spreadseet shows that the total production for the 2022 year to date (YTD) has been 243,306.50 tons. This would not likely exced 800,000 tons if production from October 2021 through the end of the 2021 paving season was added in. As an additional check, I reviewed the MAERS data for the 2021 calendar year, which showed that production for the 2021 paving season was 287,273 tons.*

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.

INSPECTION RESULT:COMPLIANCE . 2021 production while burning RUO as fuel was only 51,537 tons tons, as reported to MAERS. 2020 production while burning RUO was 0.0 tons. RUO use in late 2020 or in 2022 would not be expected to result in a 12-month rolling value over 550,000 tons, when 550,000 is more than total production in the individual years 2020, 2021, or 2022, YTD.

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.

INSPECTION RESULT: COMPLIANCE. As seen instantaneotusly today, the production rate did not go higher than 282 TPH, well within the permitted range.

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.

INSPECTION RESULT: COMPLIANCE. 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.

INSPECTION RESULT: COMPLIANCE. Attached to this inspection activity report are daily records from Plant Operations Manager David Gohn, showing baghouse maintenance, including;

- *A record of replacing seals, and fine tuning the burner, on 3/22/2022.*
- *A black light inspection of the baghouse, and replacement of 4 bags, on 4/20/2022.*
- *Monitoring of CO emissions from the drum dryer, and replacing 3 more bags, on 4/26/2022.*

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.

INSPECTION RESULT: COMPLIANCE. The company submitted an emission abatement plan on 8/23/2016.

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.

INSPECTION RESULT: COMPLIANCE. it is my understanding that they follow this.

5. The permittee is require to maintain the efficiency of the EUHMAPLANT 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.

INSPECTION RESULT: COMPLIANCE. On 9/30/2022, I received an example of CO monitoring data from D. Gohn, in response to a request I made a couple hours previously. The data was collected with a handheld CO monitor, as I understand it. Please see table below.

CO monitoring recordkeeping from 4/26/2022, from 7:45 to 8:05 AM:

CO reading #	Co reading, in ppm
1	190
2	202
3	193
4	205
5	*
6	*
7	*

8	*

***There was reported to be too little production to obtain a full 8 readings.**

***There was reported to be too little production to obtain a full 8 readings.**

Mix code: 1667

TPH: 270

CO monitoring recordkeeping from 4/29/2022, from 7:00 to 7:40 AM:

CO reading #	Co reading, in ppm
1	203
2	196
3	196
4	199
5	208
6	204
7	200
8	203

Mix Code: 184

TPH: 255

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.

INSPECTION RESULT: COMPLIANCE. The attached daily records identify any maintenance performed on the baghouse, including the annual black light inspection and the subsequent replacement of 4 bags, on 4/20/2022.

During the 8/24/2022 AQD inspection, there were no visible emissions from the baghouse exhaust stack. I observed baghouse pressure drop range from a high of 3.3 inches, w.c., to a low of 2.8 inches, w.c. This is within the allowed range of 2 to 10 inches, w.c.

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.

INSPECTION RESULT: NONAPPLICABLE. this HMA plant has never 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.

INSPECTION RESULT: COMPLIANCE. Stack testing for CO took place from 7/20 to 7/21/2016. The CO results, which averaged 0.13 lb/ton while firing RUO, complied with the permitted limit for CO while firing RUO of 0.201 lb/ton.

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*. Additionally, the company is required to notify the AQD District Supervisor in writing, within 15 days of the date of commencement of trial operations.

INSPECTION RESULT: COMPLIANCE. Stack testing for NSPS particulate rates took place from 7/20 to 7/21/2016. The particulate results were 0.006 grains/dscf, and 0.004 lb/ton, below the NSPS limit of 0.04 grains/dcsf, and below the permitted limit of 0.03 lb/ton, respectively.

Additionally, 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 was 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.

INSPECTION RESULT: COMPLIANCE. The records are in an acceptable format. The production log I received (attached) from D. Gohn showed throughput for the year, including RAP and RAP %, and was completed before the 30th day of the clanedar month, for the previous calendar month.

2. Virgin aggregate feed rate and RAP feed rate is required to be monitored on a continuous basis.

INSPECTION RESULT: COMPLIANCE. This is documented in the attached spreadsheet Burton Production Data.xlsx, *from D. Gohn* The company documented the amount of RAP aggregates used YTD. The amount of virgin aggregate mixes and RAP is tracked daily in the operators logs.

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.

INSPECTION RESULT: COMPLIANCE. On 9/30/2022, I received an example of CO monitoring data from D. Gohn, in response to a request I made a couple hours previously. The data was collected with a handheld CO monitor, as I understand it. Please see table below.

CO monitoring recordkeeping from 4/26/2022, from 7:45 to 8:05 AM:

CO reading #	Co reading, in ppm
1	190
2	202
3	193
4	205
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***There was reported to be too little production to obtain a full 8 readings.**

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TPH: 270

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CO reading #	Co reading, in ppm
1	203
2	196
3	196

4	**199**
5	**208**
6	**204**
7	**200**
8	**203**

Mix Code: 184

TPH: 255

4. The permittee is required to monitor emissions and operating information in accordance with 40 CFR Part 60 Subparts A and I.

INSPECTION RESULT: COMPLIANCE. The stack testing of 7/20-21/2016 was 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 EUHMAPLANT. 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.

INSPECTION RESULT: COMPLIANCE. Attached to this inspection activity report are daily records from D. Gohn, showing baghouse maintenance, including;

- *A record of replacing seals, and fine tuning the burner, on 3/22/2022.*
- *A black light inspection of the baghouse, and replacement of 4 bags, on 4/20/2022.*
- *Monitoring of CO emissions from the drum dryer, and replacing 3 more bags, on 4/26/2022.*

During the inspection, the components of EUHMAPLANT 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. *INSPECTION RESULT: It s my understanding that the facility does this.*

b. Sulfur content (percent by weight), specific gravity, flash point, and higher heating value (Btu/lb) of all fuel oils being combusted. *INSPECTION RESULT: It s my understanding that the facility does this.*

c. Tons of HMA containing RAP produced, including the average % of RAP per ton of HMA produced containing RAP. *INSPECTION RESULT: It s my understanding that the facility does this.*

d. Tons of HMA produced while burning each fuel type. *INSPECTION RESULT: This is being done, and one of the locations it is documented is in the yearly MAERS report.*

e. Tons of total HMA produced. INSPECTION RESULT: This is being done, as demonstrated by the attached spreadsheet* Burton Production Data.xslx*.

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

a. The virgin aggregate feed rate. *INSPECTION RESULT: COMPLIANCE. This is being done, as shown in the attached spreadsheet for 4/29/2022..*

b. The RAP feed rate. *INSPECTION RESULT: COMPLIANCE. This is being done, as shown in the attached spreadsheet for 4/29/2022.*

c. The asphalt paving material product temperature. *INSPECTION RESULT: COMPLIANCE. This is being done, as shown in the attached spreadsheet for 4/29/2022, which shows an average mix temperature of 335 degrees F.*

d. Information sufficient to identify all components of the asphalt paving material mixture. *INSPECTION RESULT: COMPLIANCE. This data is kept on a daily basis and is shown in their recordkeeping, please see attached spreadsheet* Burton Production Data.xslx*.*

e. Tons of HMA produced while burning each fuel type. *INSPECTION RESULT.* This data is kept in the daily operator logs.

f. Tons of total HMA produced. *INSPECTION RESULT: This is being done, as demonstrated by the attached spreadsheet* Burton Production Data.xslx*.*

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. *INSPECTION RESULT: COMPLIANCE*. 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.

INSPECTION RESULT: COMPLIANCE. It is my understanding that this is being done.

9. The permittee is to keep records of all CO emissions and related production data (at the time CO data was collected).

INSPECTION RESULT: COMPLIANCE. This is being done, as shown in the attached daily spreadsheets for 4/26 and 4/29/2022.

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.

INSPECTION RESULT: COMPLIANCE. This is being done, per my review of recordkeeping in previous years. The annual MAERS report for the 2021 calendar year also shows the amount of HMA product produced while burning each fuel type.

11. Monitoring is required of fuel usage rate for EUHMAPLANT, on a daily basis.

INSPECTION RESULT: COMPLIANCE. 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.

INSPECTION RESULT: COMPLIANCE. 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.

INSPECTION RESULT: COMPLIANCE. I had brought along the AQD laser rangefinder tool, with which to measure stack height. However, the geometry of the stack at this site was such that I could not obtain an acurate reading with the laser range finder.

W. Guigar offered to measure the stack, because they have a manlift onsite, as well a a long measuring tape. I indicated if this could be done without any danger to plant employees, it would be very helpful. The following day, 8/25/2022, at 2:42 PM, he texted me to say that the stack was measured and came out to be 50 feet and 1 inch in height. This complies with the minimum height requirement of 50 feet.

IX. OTHER REQUIREMENTS

NA.

Special Conditions applicable to EUYARD:

1. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The fugitive dust control plan in Appendix B of the PTI is required to be implemented and maintained.

INSPECTION RESULT: COMPLIANCE. The facility appeared to be taking the necessary steps to control fugitive dust onsite. Sweeping and application of dust suppressants appeared to be done to a high standard, for things like spilled materials.

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.

INSPECTION RESULT: COMPLIANCE. This is being done, as shown in the Burton Data Spreadsheet.xslx.

2. The permittee is required to calculate the annual fugitive dust emissions for EUYARD,, using emission factor s from the U.S. Environmental Protection Agency (EPA) document AP-42, or other emission factors approved by the DEQ.

INSPECTION RESULT: COMPLIANCE. The company submitted the 2021 annual fugitive dust emissions, via their MAERS report. Please see table below.

2021 fugitive dust emissions:

Process	Lbs	Tons
Haul roads – paved & unpaved	4,473.92	2.24
Aggregate storage	6,515.35	3.26

VII. REPORTING

1. The permittee is required to report the actual emission levels from EUYARD to the AQD through the annual MAERS report.

INSPECTION RESULT: COMPLIANCE. The company submitted the 2021 annual fugitive dust emissions, via their MAERS report. Please see table below.

2021 fugitive dust emissions:

Process	Lbs	Tons
Haul roads – paved & unpaved	4,473.92	2.24
Aggregate storage	6,515.35	3.26

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.

INSPECTION RESULT: COMPLIANCE: 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. The three new tanks are vertical, while the two existing ones are horizontal. 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.

INSPECTION RESULT: compliance. Emissions from the top of each silo 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.

INSPECTION RESULT: COMPLIANCE. 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 silos, 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.

Starting around 10:15 AM, I observed at least several trucks go through the loadout process, from the control room. I noticed blue smoke or steam escaping the east end of the north loadout tunnel, even with light winds of 0-5 miles per hour out of the west. I asked if there was a way to increase the draft on the system, so that those emissions would be drawn into an intake point, instead of escaping.

W. Guigar informed me that the blue smoke control system has a timer which shuts the exhaust fan down, if there is no loadout activity for 20 minutes, and the fan must be turned on again manually. While we had been talking, the system had not been manually activiated again. I immediatey requested that it be restarted, and this was done promptly. This made a noticebale reduction in the blue smoke or steam being emitted from the loadout tunnels. Winds were now 5-10 mph out of the west.

However, there were still some blue smoke emissions escaping from the east end of the north loadout tunnel. The cylinder which opens the east intake point for the north loadout lane was not working, and fugitive emissions of blue smoke were escaping the east end of the north loadout tunnel. W. Guigar indicated they had already contacted an electrician, and he hiself would work on the cylinder this afternoon. At 3:48 PM the same day, he texted me, to advise me that the issue was now fixed, because it had been wired backwards.

Outside, at ground level, when truck loadout emissions were being routed to the loadout baghouse, I saw no emissions from the baghouse exhaust stack. It appeared to be working properly.

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

(End of check of PTI special conditions.)

Two new HMA product storage silos:

I was informed that over the past winter, they have added two new HMA product storage silos to the plant. These are located at the east end of the original bank of storage silos, and are served by the existing truck loadout and silo control system. One was added to the north lane, and the other to the south lane.

MAPC Rule 289(2)(c) exempts the following from the requirement of MAPC Rule 201 to obtain a permit to install:

(c) An asphalt concrete storage silo that has all its emissions vented back into the burning zone of the kiln or that has an equivalent control system

Miscellaneous:

They do not have a boiler onsite, but rather a small, on demand hot water heater. The heater is 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 JJJJJJ.

Post-inspection meeting:

At the end of the inspection, we discussed how the cylinder which opens the east intake point for the north loadout lane was not working, and fugitive emissions of blue smoke were escaping the east end of the north loadout tunnel. W. Guigar indicated they had already contacted an electrician, and he himself would work on the cylinder this afternoon.

At 3:48 PM the same day, he texted me, to advise me that the issue was now fixed, because it had been wired backwards. Since this was corrected the same day it was observed by AQD, it is not being cited as a violation.

Conclusion:

There were no instances of noncompliance, and fugitive dust control at the plant was very well done. The ony area of concern was a cylinder which controlled the east intake point for the north loadout tunnel was not working. This was fixed by 3:48 PM the same day, and the operator, W. Guigar, explained that the problem had been caused by the wiring. Because this was resolved the same day,it is not being considered a violation of MAPC Rule 910, which requires that an air-cleaning device be installed, maintained, and operated in a satisfactory manner.

NAME _____ DATE 1/26/2023 SUPERVISOR RB

Ace-Saginaw Paving Co. Plant 3, Burton

B1597

Map of offsite odors detected on 8/24/2022

Key to Map:

Locations:	Findings
• 3	Level 2 asphalt odor
• 5	Level 2 asphalt odor
• 6	Level 1 diesel exhaust odor
• 10	Level 2 skunk odor

The 0-5 odor scale used by AQD is as follows:

0 - Non-Detect

1 - Just barely detectable

2 - Distinct and definite odor

3 - Distinct and definite objectionable odor

4 - Odor strong enough to cause a person to attempt to avoid it completely

5 - Odor so strong as to be overpowering and intolerable for any length of time

EGLE

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
ODOR SURVEY FORM

Rev. 04/23/22

Source Name: Ace-Saginaw Paving Co. Plant 3				Inspector: McGeen, Dan
Source Address: 4190 Jimbo Drive Burton, 48529				Date:
Sky Conditions:				Temperature:
Wind Speed:		Wind Direction:		Source of Meteorological Data: Car thermometer
Location (attach map, if available)	Time	Odor Scale (See below)	Characteristic (See below)	Comments: (Observations that will aid in the determination of the source & properties of the odor)
1. Center & Atherton Rds.	9:30 AM	0		Southbound.
2. Center & Bristol Rds.	9:32 AM	0		
3. Center,S of Scottwood	9:32 AM	2	Asphalt	Just south of intersection with Scottwood Ave.
4. Center Rd.,N. of Maple	9:33 AM	0		I turned around just north of Maple Rd.
5. Center,S of Scottwood	9:34 AM	2	Asphalt	1,000 feet south of Scottwood Ave., as I drove northbound.
6. End of Scottwood	9:36 AM	1	Diesel exhaust	West end of Scottwood Ave.
7. Bristol & Jimbo Dr.	9:39 AM	0		Eastbound.
8. Jimbo Dr.	9:40 AM	0		Southbound, towards site.
9. Card Dr.	9:40 AM, est.	0		Eastbound, east of site.
10. Flint Asphalt Dr.	9:42 AM	2	Skunk	Driving northbound.

Odor Scale	Odor characteristic examples:
0 - Non-Detect	Paint-like
1 - Just barely detectable	Musty, moldy
2 - Distinct and definite odor	Burnt, smoky
3 - Distinct and definite objectionable odor	Tar-like, asphalt
4 - Odor strong enough to cause a person to attempt to avoid it completely	Cut grass
5 - Odor so strong as to be overpowering and intolerable for any length of time	Citrus fruit

Search Locations

Log in (/log…

Recent Cities

Burton, MI (48519) (/weather/us/mi/burton/42.99,-83.63) Flint, MI (48504) (/weather/us/mi/flint/43.04,-83.72) Brighton, MI (48114) (/weath

42.98 °N, **83.69** °W

Flint, MI Weather History

53° BISHOP INTERNATIONAL AIRPORT STATION (/DASHBOARD/PWS/KMIFLINT16?CM_VEN=LOCALWX_PWSDASH) | CHANGE

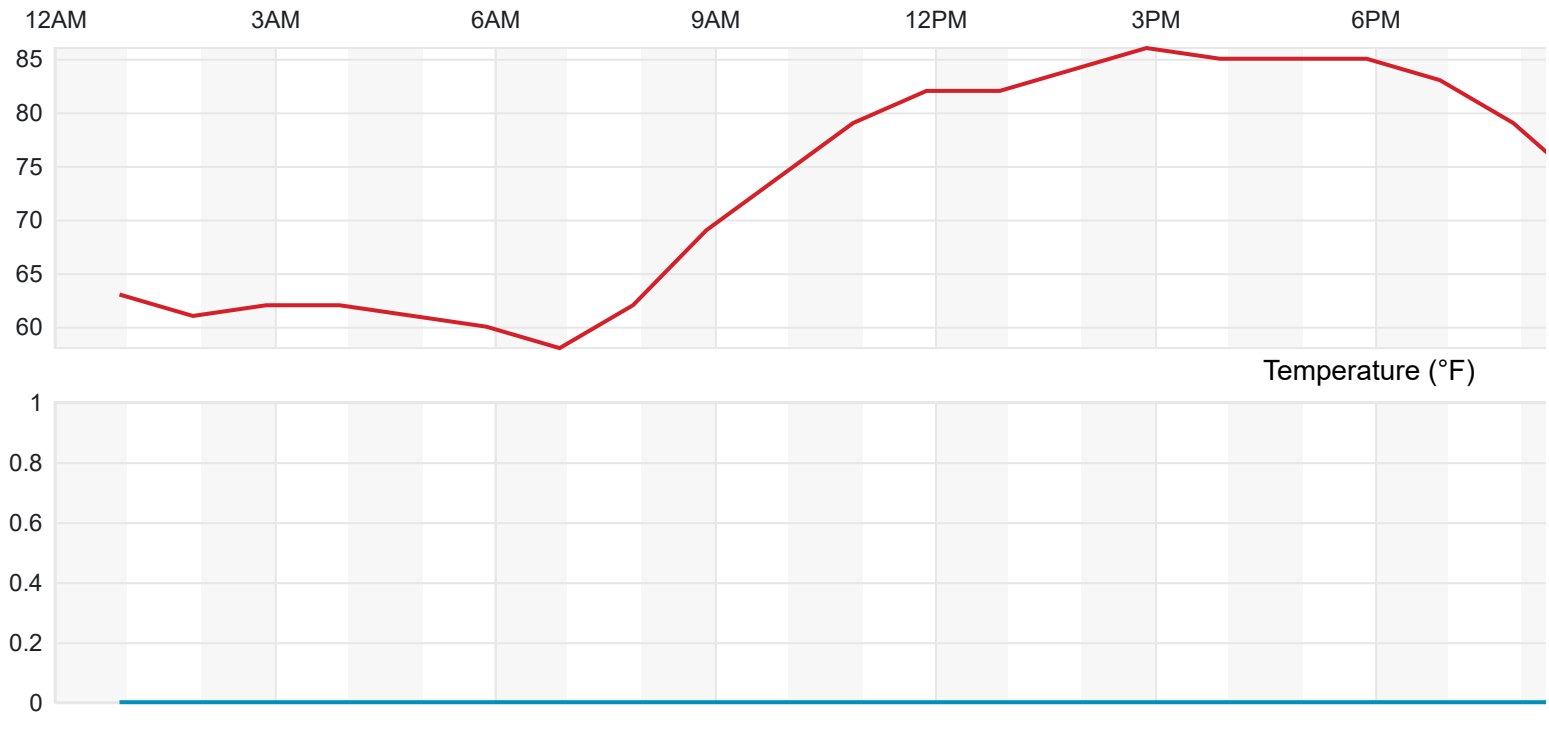
HISTORY (/HISTORY/DAILY/US/MI/FLINT/KFNT)

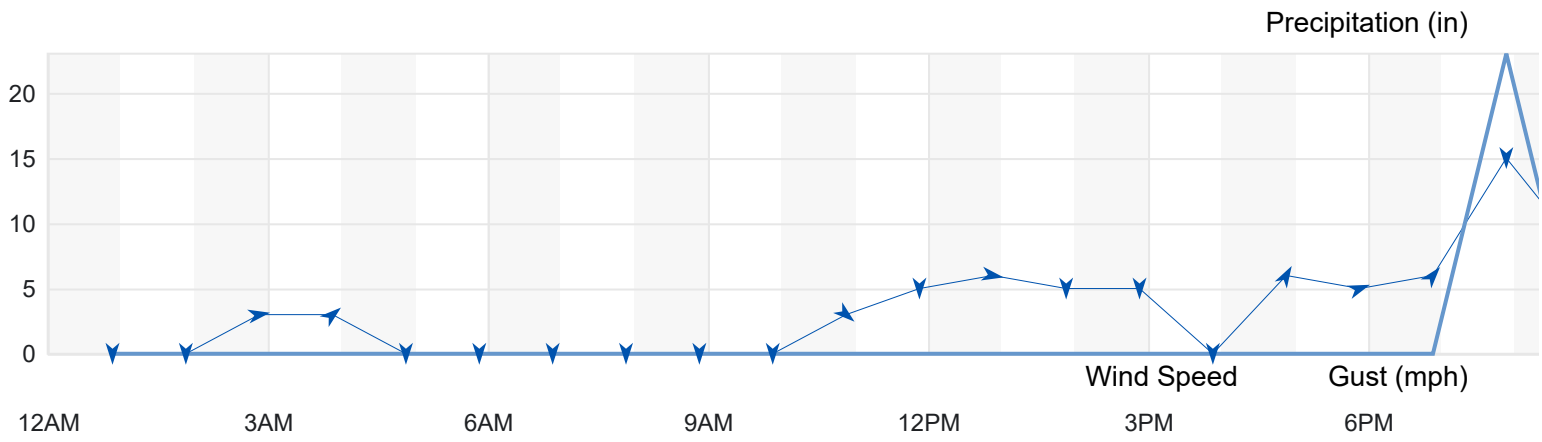
- TODAY (/WEATHER/KFNT)
- HOURLY (/HOURLY/KFNT)
- 10-DAY (/FORECAST/KFNT)
- CALENDAR (/CALENDAR/US/MI/FLINT/KFNT)
- HISTORY (/HISTORY/DAILY/US/MI/FLINT/KFNT)
- WUNDERMAP (/WUNDERMAP?LAT=42.984&LON=-83.69)

Daily Weekly Monthly

(/history/daily/KFNT/date/2022-8-24) (/history/daily/KFNT/date/2022-8-24) (/history/daily/KFNT/date/2022-8)

August 24 2022 View





Summary

Temperature (°F)	Actual	Historic Avg.	Record
High Temp	86	79.1	101
Low Temp	58	57.4	40
Day Average Temp	72.42	68.2	-
Precipitation (in)	Actual	Historic Avg.	Record
Precipitation (past 24 hours from 04:53:00)	0.00	3.90	-
Dew Point (°F)	Actual	Historic Avg.	Record
Dew Point	61.75	-	-
High	64	-	-
Low	57	-	-
Average	61.75	-	-
Wind (mph)	Actual	Historic Avg.	Record
Max Wind Speed	15	-	-
Visibility	10	-	-
Sea Level Pressure (in)	Actual	Historic Avg.	Record
Sea Level Pressure	29.24	-	-
Astronomy	Day Length	Rise	Set

Temperature (°F)	Actual	Historic Avg.	Record
Actual Time	13h 33m	6:51 AM	8:25 PM
Civil Twilight		6:22 AM	8:55 PM
Nautical Twilight		5:46 AM	9:31 PM
Astronomical Twilight		5:07 AM	10:09 PM
Moon: waning crescent		3:42 AM	7:33 PM

Daily Observations

Time	Temperature	Dew Point	Humidity	Wind	Wind Speed	Wind Gust	Pressure	Precip.
12:53 AM	63 °F	59 °F	87 %	CALM	0 mph	0 mph	29.16 in	0.0 in
1:53 AM	61 °F	59 °F	93 %	CALM	0 mph	0 mph	29.17 in	0.0 in
2:53 AM	62 °F	60 °F	93 %	W	3 mph	0 mph	29.17 in	0.0 in
3:53 AM	62 °F	60 °F	93 %	SW	3 mph	0 mph	29.18 in	0.0 in
4:53 AM	61 °F	60 °F	97 %	CALM	0 mph	0 mph	29.19 in	0.0 in
5:53 AM	60 °F	60 °F	100 %	CALM	0 mph	0 mph	29.19 in	0.0 in
6:53 AM	58 °F	57 °F	97 %	CALM	0 mph	0 mph	29.20 in	0.0 in
7:53 AM	62 °F	62 °F	100 %	CALM	0 mph	0 mph	29.22 in	0.0 in
8:53 AM	69 °F	64 °F	84 %	CALM	0 mph	0 mph	29.23 in	0.0 in
9:53 AM	74 °F	63 °F	68 %	CALM	0 mph	0 mph	29.24 in	0.0 in
10:53 AM	79 °F	62 °F	56 %	NW	3 mph	0 mph	29.24 in	0.0 in
11:53 AM	82 °F	63 °F	52 %	VAR	5 mph	0 mph	29.24 in	0.0 in
12:53 PM	82 °F	64 °F	54 %	W	6 mph	0 mph	29.23 in	0.0 in
1:53 PM	84 °F	63 °F	49 %	VAR	5 mph	0 mph	29.23 in	0.0 in
2:53 PM	86 °F	64 °F	48 %	VAR	5 mph	0 mph	29.21 in	0.0 in
3:53 PM	85 °F	62 °F	46 %	CALM	0 mph	0 mph	29.20 in	0.0 in
4:53 PM	85 °F	62 °F	46 %	SSW	6 mph	0 mph	29.19 in	0.0 in
5:53 PM	85 °F	62 °F	46 %	WSW	5 mph	0 mph	29.19 in	0.0 in
6:53 PM	83 °F	63 °F	51 %	SW	6 mph	0 mph	29.19 in	0.0 in
7:53 PM	79 °F	63 °F	58 %	N	15 mph	23 mph	29.20 in	0.0 in
8:53 PM	73 °F	63 °F	71 %	N	8 mph	0 mph	29.21 in	0.0 in

Time	Temperature	Dew Point	Humidity	Wind	Wind Speed	Wind Gust	Pressure	Precip.
9:53 PM	70 °F	62 °F	76 %	N	3 mph	0 mph	29.23 in	0.0 in
10:53 PM	66 °F	62 °F	87 %	CALM	0 mph	0 mph	29.23 in	0.0 in
11:53 PM	67 °F	63 °F	87 %	NE	3 mph	0 mph	29.23 in	0.0 in