



Central

ASPHALT, INC.

900 S. BRADLEY • BOX 389 • MT. PLEASANT, MI 48858
PHONE (989) 772-0720 • FAX (989)773-7640



"AN EQUAL OPPORTUNITY EMPLOYER"

December 14, 2022

Mr. Ben Witkopp
Environmental Engineer
EGLE
Air Quality Division
Bay City District
401 Ketchum St.
Suite B
Bay City, MI 48708

**RE: Response to Violation Notice Dated November 29, 2022
Central Asphalt, Inc. Mt. Pleasant Plant, Isabella County
SRN B1620**

Dear Mr. Witkopp:

Central Asphalt, Inc. is writing this letter to respond to a written Violation Notice dated November 29, 2022 regarding the site visit you conducted on October 10, 2022 at Central Asphalt's Hot Mix Asphalt Plant located at 2290 May St. Mount Pleasant, MI. The purpose of the inspection was to determine compliance with PTI No. 74-86B. The following is a description of actions that have been taken to improve the emission capture systems per our PTI and to modify the liquid asphalt storage tanks to be in compliance with Rule 201.

Top of Silo Emission Controls:

On October 10, 2022 Central Asphalt plant personnel performed a thorough review of the mechanical equipment on top of the silos. As a result of this evaluation, improvements were made to seal areas where fugitive emissions could be released. The improvements included sealing gaps, ductwork maintenance, and re-installing clamping mechanisms on transfer and main slat conveyor covers.



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Under Silo Loadout Controls:

On October 10, 2022 Central Asphalt plant personnel performed a thorough review of the mechanical equipment associated with the under-silo loadout controls. Personnel reviewed the condition of the enclosure. It was found that there were numerous areas that had been damaged including a window that had been removed and not replaced. It was also determined that the enclosure exit points needed to be better enclosed. As a result of this evaluation, improvements were made to seal areas where fugitive emissions could be released. The improvements included sealing gaps, installing additional skirting material on the enclosure exit points, and "boarding up" the window opening.

These repairs did lessen the fugitive emissions occurring at the top of silos and loadout area and we feel that the violations are not ongoing. In addition to the repairs described above, Central Asphalt is proposing to upgrade the entire capture system to what we believe is BACT for the asphalt industry. We are currently in the process of requesting quotes from equipment manufacturers and installers to purchase and implement a new filtering system that will replace the current process of transporting captured fumes to the drum burner as combustion air. This system will be similar to equipment currently permitted and in use by multiple asphalt plants both in Michigan and other states and countries. Our goal is to have this project started as soon as control equipment can be acquired and installed and completed by the time of initial plant startup for the 2023 paving season (date is weather dependent).

Liquid Asphalt Storage Tanks:

On October 10, 2022 Central Asphalt maintenance personnel performed a thorough review of the liquid asphalt storage tanks. As there are no current controls associated with this equipment, no corrective action could be taken at the time of violation.

Central Asphalt is currently in the process of requesting quotes from equipment manufacturers and installers to modify the existing tanks with vapor condensation and recovery units. Our goal is to have this project started as soon as control equipment can be acquired and installed and completed by the time of initial plant startup for the 2023 paving season (date is weather dependent).



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Central Asphalt, Inc. is committed to complying with local, State and Federal laws and regulations. We appreciate you meeting with us personally to discuss these issues in detail on the date of the violation. We will continue to keep you updated on the status of the repairs and upgrades being performed to bring our facility into compliance.

If you have any questions or concerns regarding this correspondence, please do not hesitate to contact me. For technical questions, please continue to contact Jeff Spagna (Plant Manager) as he will be the lead on these projects.

Respectfully,

Central Asphalt, Inc.

Aaron White
Vice President

CC: Jeffrey Spagna, Central Asphalt, Inc.
Jenine Camilleri, EGLE