

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

B162065493

FACILITY: CENTRAL ASPHALT INC.		SRN / ID: B1620
LOCATION: 2290 MAY ST, MOUNT PLEASANT		DISTRICT: Bay City
CITY: MOUNT PLEASANT		COUNTY: ISABELLA
CONTACT: Jeff Spagna, Plant Manager		ACTIVITY DATE: 10/10/2022
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Insp, Records, subsequent updates		
RESOLVED COMPLAINTS: C-23-00113, C-23-00114, C-23-00115, C-23-00116, C-23-00118, C-23-00119, C-23-00120, C-23-00121, C-23-00122		

After a meeting with the top company officials, Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) - Air Quality Division (AQD) reviewed records and discussed operations proceeding forward with Plant Manager Jeff Spagna. The facility is covered by air permit 74-86B which was last modified in 2014 to incorporate fuel limits. The facility produces hot mix asphalt (HMA) which is used for roadway paving projects.

The permit has overall limits on carbon monoxide (CO) and sulfur dioxide (SO<sub>2</sub>). The limits are 90 tons per year (tpy) and 85.5 tpy respectively and are based on a 12 month rolling time period. The pollutants would result from the combustion process used to heat aggregates and liquid asphalt. The plant uses natural gas as fuel which results in only small amounts of SO<sub>2</sub>. The amount of SO<sub>2</sub> would be higher if fuel oil was used. Records showed the amount of CO as 24.69 tpy while SO<sub>2</sub> was 0.52 tpy.

There are other requirements in the permit which would apply if fuel oil was used as fuel. However, fuel oil is not used. The amount of recycled asphalt pavement (RAP) used in the production of HMA is limited to 50 percent. The highest monthly amount was 19 percent and was found in April 2022. The plant also has a production limit of 895,000 tons based on a 12 month rolling time period. The plant produced 249,377 tons.

Jeff maintains a log of inspection and maintenance activities for the baghouse as required by the permit. At AQD's suggestion, the inspections will now include other items such as silo tops, venting, connections, load out sides, skirting, exhaust fans etc. to be more encompassing.

Condition III for the silos states the plant shall not operate unless the silos and truck load-out area are enclosed and the captured fumes are transported to the drum burner as combustion air. The deficiencies of such were previously discussed in the meeting with top company officials. Jeff said he would have staff check and fix items which they could address and provide updates. One thing that both parties agreed would take time is the extending of the enclosure on the load-out area, particularly on the west end. When silo 5 is used for the back end of trailers, the front half is sitting outside the enclosure / capture area. Contractors may need to be involved.

As discussed in the prior meeting, the company agreed to have the entire capture system re-evaluated. The basics of capture systems were reiterated by AQD with the recognition by both that contractors would likely be involved. Emphasis on focused capture, using heat rise as an advantage, cuts down on the volume of air needed and makes handling easier and more efficient. Several sketches, ideas, and basics were provided to Jeff to aid his understanding. Jeff said he would explore control systems as an alternative to routing captured fumes back into the drum burner. He wondered if air permitting would be required for such a change. AQD permit section would be consulted but the likely answer is yes.

The current stack height appeared to be over the 40 feet required and a measurement would be provided. The company is under no obligation to increase the stack height at this point but the advantages of doing so were discussed. Such changes would not require an air permit if the stack height was increased and / or the equivalent diameter was the same or smaller. Once again, outside contractors would be involved.

Quite a few of the changes would need outside contractors and would require the plant to be down for work to proceed. As such, the company was encouraged to do as much as possible now and provide updates as necessary. One item to note was that AQD permit exemption 289 2(b) requires the use of

a vapor condensation and recovery system or an equivalent control system. Jeff was informed either controls would be added to meet the exemption or permitting action would be needed. He said he would explore options and welcomed AQD input.

Given the path forward, it was deemed prudent to see what could be accomplished by the company as quickly as possible before a violation notice is sent.

Oct 14, 2022

The company had sealed up many of the areas where leaks occurred on the silo tops. The thought was that when past work was done on the silos not all of the sealed areas were replaced and / or tightened down. The new inspection and maintenance activity logs should prevent a recurrence. Staff members were also checking on best capture points from the silos to better capture fumes. The enclosure encompassing the transfer of HMA from the plant to the silos was also tightened down. Skirting on the ends of the loadout area was also installed.

Oct 19, 2022

AQD met with Aaron White, company VP, and Jeff. Aaron stated they have been in contact with a California based company that specialized in asphalt plants and control of potential odors. The company was currently working on a project in Mexico. The company owner was going to come to Michigan to review Central's existing operations and provide ideas, recommendations, quotes etc. Aaron and Jeff wanted AQD to be present at the time if possible and would provide notice of when it was to occur.

Oct 25, 2022

AQD provided info to Jeff concerning liquid asphalt tank controls in use by others. The same was done with load out controls.

Oct 28, 2022

Jeff provided updates that the final silo gaps were sealed and additional duct work was being installed. He stated that he expected it may be reconfigured by contractors when an overall evaluation was done. He also stated he had a contractor arriving today to examine the existing stack and evaluate potential installation of a new one.

AQD contacted staff in other Districts to check what other HMA plants had as controls and relayed such to Jeff. AQD also went to plants in the district which had newer installations and discussed the pros and cons of controls. The results of discussions were provided to Jeff.

November 21, 2022

Jeff confirmed the plant had shut down and the heat is off. The last HMA was produced November 12. I explained the company would be getting a violation notice for the unfinished work concerning the extension of the loadout area enclosure and condensation controls still being needed on the liquid asphalt tanks.

The facility is considered to be in non compliance.

NAME

B. Z. Stapp

DATE

11-30-22

SUPERVISOR

C. Hall