

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

B173929499

FACILITY: RIETH-RILEY CONSTRUCTION CO., INC.		SRN / ID: B1739
LOCATION: 2020 CHICAGO DRIVE SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Clay Park, Operator		ACTIVITY DATE: 05/21/2015
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro and Kaitlyn DeVries arrived at the facility at approximately 10:00 AM to conduct an unannounced, scheduled and began by conducting site observations from across the street. Visible emissions were seen at an unsatisfactory level being emitted from the EUSILOS load-out bay. We pulled onto the property, exited the vehicle and took video of the load-out area during which time load-out was occurring (see attached CD). As we walked up to the operator tower and looked toward the load-out area, it was noted that the duct work was removed from the load-out area and appeared to have collapsed. As we walked up, we could see emissions escaping the drag conveyor and what appeared to be particulate being emitted from the center of the drum at the recycle chute.

FACILITY DESCRIPTION

This facility is a Hot Mix Asphalt (HMA) plant with a maximum capacity of 500 tph utilizing a counter-flow unified drying/mixing drum. It is controlled at the drum by a fabric filter dust collector (baghouse). The drum, baghouse and burner are brand new. There are 7 silos with a load-out control system. The facility operates pursuant to Opt-out PTI No. 96-96A. The burner is permitted for natural gas and fuel oil, but currently only utilizes natural gas. No Recycled Asphalt Shingles (RAS) are in use at this time and it was confirmed that no more than 50% Recycled Asphalt Product (RAP) is used in any mix.

COMPLIANCE EVALUATION

AQD staff accessed the operator tower and met with Clay Park, and Rick Willison. The DEQ Environmental Inspections: Rights and Responsibilities brochure was presented and briefly discussed. I stated that we were here for a follow-up to the site visit that occurred three weeks ago, and that I had expected a call stating the load-out control had been fixed. (Mr. Park was not present during the site visit)

Mr. Park stated that they had fixed the load-out control, (he was willing to show the receipt for both ducts) but that the problem that had caused the first duct collapse was not fixed, and that the duct collapsed for a second time. I informed him that this was a violation of Rule 910 PTI No. 96-96A and a Violation Notice will be issued. It is unknown at this time, whether or not the system is satisfactorily designed to capture load out emissions. The permit states that the load-out activities occur in an area which is satisfactorily enclosed except for truck entrance and exit points. The design of this system is not enclosed except for the top few feet. The actual effectiveness and compliance of the current design will be evaluated after the unit is properly operating.

AQD staff observed operations, and talked with Mr. Park about the operational parameters of the system and how it correlates with the permit requirements. They made available the log book which contains information on the activities conducted by plant operators to meet the requirements of the permit. The plant start-up CO information was made available. It appeared to show high readings, but a later conversation with John Berscheit proved that we were looking at the wrong numbers and the CO readings were well below the limit of 500 PPMV. (see attached)

The emissions coming from the drag conveyor was pointed out to Mr. Willison who we had discussed it with during the first site visit. He indicated that there is a hinge on the access door there, which seems to be leaking. He stated he would silicone it tonight so it will seal. This maintenance is required by the PTI, Appendix C through the daily observations of inspected items. Also we discussed the fugitive dust being caused by truck traffic and were told that they are in the process of setting up a schedule with Sanisweep. Currently only water is being used, and does not appear to be working satisfactorily.

Mr. Park showed us the displays that he utilizes to operate the plant. The current pressure drop of the baghouse during the inspection was 1.8" H2O. We discussed that the permit requires that it remain above 2.0" H2O. Mr.

Park indicated he has set up the pulse of the air to a more frequent schedule so that he gets a better air flow when he is running a high tonnage of mix. I stated that if this is the proper pressure drop for this plant, the permit will need to be modified in order to operate this way. This decision can be made following stack testing. Mr. Park also showed us the baghouse high temperature alarm which is also required by the PTI. The damper was at a setpoint of 0.16" H₂O. He was in the process of bringing down the speed of the drum which requires a damper change. I showed him how in the permit, the damper is required to be kept between 0.25" and 0.50" H₂O at all times. The low pressure drop of the damper may be correlated with the low pressure drop of the baghouse. If the facility wishes to test at this low damper pressure, and demonstrate compliance that is likely fine, but the permit will need to be modified.

As we waited for Mr. Park to finish the mix and have a few minutes to walk us around the exterior of the plant, it was noted that a significant amount of particulate appeared to be being emitted from the recycle chute. Mr. Willison said they have been working to seal that up and have been experiencing a delay in getting it done. Due to this plant having just started up, it is a work in progress and they work daily on many things that need to be addressed. This is another item that is required by the PTI, Appendix C to be maintained through the daily observations of inspected items.

Mr. Park was able to take us around, and we walked under the drum to the center of the plant. This was likely not a great idea as we were pelted with rocks along with fine particulate that were coming from the recycle chute. This is a problem that needs immediate attention. Also, I asked about a pile of very fine material located near the baghouse. Apparently, it is fines captured by the baghouse that the auger removes and then conveys to the ambient air into a pile. This pile is scooped up and taken to the reject pile. I asked if they had considered placing a tote at the end of the auger to collect this and was told no. This needs to be collected and contained.

As we left, we stopped in the lab and spoke briefly to Deb DeBoer. She will take the records from the log book and enter data electronically. I noted three five gallon buckets outside the door that smelled like solvent and were uncovered just sitting outside. I asked Ms. DeBoer what they were and was told it is her testing solvent and they pour it on the aggregate pile for disposal. I asked her if there was a better place to keep it (meaning, not outside and uncovered) and she said "No". It is recommended that this solvent be kept inside and covered until proper disposal can be conducted.

Later the same day, I called Mr. Berscheit in Goshen, IN to discuss this inspection and to inform him of the Violation Notice that would be sent out for the issue with the silo load out capture system. In this conversation, Mr. Berscheit was able to correct the CO information and sent the data in an e-mail. Each of the above compliance concerns was discussed with Mr. Berscheit, and he was informed that the AQD recognizes that this is a new plant, and some time to get the bugs worked out is acceptable. However, the AQD also requires that identified issues are immediately addressed. Mr. Berscheit was not aware of the list of issues noted by AQD staff during the inspection but he would look into them immediately. I suggested that the plant not conduct stack testing if the recycle chute was not addressed as it may lead to an invalid test. We discussed the requirements of the MAP including the fact that in using a one-size-fits-all approach to permitting asphalt plants, some of the parameters just may not work for all. If the plant continues to operate at the parameters noted during the inspection the permit must be modified to allow for that.

AQD staff did not request any emissions records as this plant has been in operation less than one month. The log book records were on-site and available at the time of the inspection.

Testing of the plant has been delayed and rescheduled twice. The plant has 60 days after achieving the maximum production rate to do the testing. The rate at testing is expected to be 400-450 tph. Production records would need to be reviewed to determine when the maximum production rate was first achieved, and confirm testing takes place within 60 days of that date. It is also recommended that if Rieth-Riley wishes to test the plant with the baghouse and damper below the permit requirements, a new test plan stating those intentions be submitted to the AQD.

COMPLIANCE EVALUATION

This facility was in non-compliance at the time of the inspection.

NAME Paul Langgan

DATE 5-27-15

SUPERVISOR PAB