

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

B185158674

FACILITY: RIETH RILEY CONSTRUCTION CO INC		SRN / ID: B1851
LOCATION: 5621 E FIRST STREET, LUDINGTON		DISTRICT: Cadillac
CITY: LUDINGTON		COUNTY: MASON
CONTACT: Randy Misener , Project Manager		ACTIVITY DATE: 06/17/2021
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2021 FCE.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation

I conducted an inspection and records review of the B1851 Rieth-Riley Ludington asphalt plant to determine compliance with PTI 975-91C, 40 CFR 60, Subpart I, and the Air Pollution Control Rules. The requirements of PTI 975-91C include the NSPS requirements and the permit contains "Attachment A" the portable asphalt plant General Permit to Install requirements that limit potential emissions below major source thresholds. The plant is located in the city of Ludington in an industrial park on First Street.

The day I arrived to inspect the plant the weather was sunny, warm and breezy. At the time I arrived the plant was operating but had ceased operation for the day by the time I got to the control room. While operating, there were no visible emissions from the stack and only a small water vapor plume from the storage silos. Asphalt odors were minimal but dust was being raised by vehicle and loader traffic in the plant yard.

Mr. Randy Misener, Project Manager accompanied me on the inspection. He answered my questions about the plant and helped gather the plant recordkeeping. This plant began operating for the 2021 season on 5/5/21. All of the fuel burning process equipment on site uses natural gas. Fuel oil and recycled used oil are no longer used.

Emission Limits

PTI 975-91C and Attachment A contain the following emission limits:

Pollutant	Emission Limit
PM	0.10 lbs/1,000 lbs exhaust gas (dry)

PM10	99 TPY
SO2	99 TPY
NOx	99 TPY
CO	99 TPY
VOC	99 TPY
Lead	99 TPY

Compliance is demonstrated through material limits and annual emission calculations. Annual emissions were reported for 2020 and reviewed in 2021 finding that the report was acceptable. At the time of this report the air emissions reporting system is down due to a cyber attack and specific data is not available.

Production/Process Restrictions

The plant is limited to material throughput of 1,000,000 tons of asphalt paving materials per 12-month rolling time period while burning natural and LP gas.

Compliance is demonstrated through recordkeeping. Records for 2020 (attached) indicate total HMA production was 94,642 tons. 2021 records indicate that around 30,000 tons have been made so far this year.

Proper operation of the baghouse is required for operation of the asphalt plant. This is demonstrated by monitoring the differential pressure and recording the reading daily. At the time of the inspection the differential pressure gauge (manometer) was reading 2.5". Records indicated that the differential pressure ranges between 2.5" and 4". This is an acceptable normal operating range.

A fugitive dust program is required to be implemented and maintained. A fugitive dust plan is attached to the permit. Rieth-Riley has been watering the roadways and yard areas each day according to the daily records but it has been very dry the past week and, as previously mentioned, vehicle traffic was raising dust. Additional daily treatments or the use of an alternate dust suppressant may be necessary. This was discussed with Mr. Misener.

Monitoring/Recordkeeping

PTI 975-91C requires that the following records be maintained:

1. The amount of asphalt paving material produced per 12 mos. Rolling time period.
-These records were provided after the inspection as indicated above.
2. Daily production report including the proportions of virgin aggregate and RAP for all mixtures used each day.
-Daily production records were available at the plant and included all of the required information. A daily permit record log sheet was also maintained that was completed using data from the daily production report.
3. The total hours of operation each day (16 hr. per day and 2,350 hr. per year limits).
-Maintained in the daily production records, 766.84 hours in 2020.
4. The amount of recycled asphalt product (RAP) used on a monthly average.
-Maintained in the daily production records.
5. Records of any significant maintenance activities with respect to air emissions (burner, drum, venture scrubber, etc.).
-R-R had records of black light testing and bag replacement on the baghouse. The baghouse was replaced last year after a gas leak caused the old baghouse to explode. As a result the bags were new and none have needed to be replaced this year. Other maintenance records were provided for 2020 maintenance activities following the inspection.
6. Records of the type of fuel used. Additional requirements apply if fuel oil or recycled used oil are used.
-The only fuel used is natural gas.

Reporting

This source has reported annual emissions to the AQD through MAERS each year.

Stack Parameters

The PTI limits the stack to a minimum height of 60'. When the old baghouse was replaced the stack was retained and still appears to meet this minimum height requirement.

Summary

As a result of this inspection it appears that this source is in compliance with NSPS 40 CFR 60, Subpart I, PTI 975-91C, and the Air Pollution Control Rules.

NAME _____

DATE _____

SUPERVISOR _____