

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

B189358379

FACILITY: ASPHALT PAVING, INC		SRN / ID: B1893
LOCATION: 1000 E SHERMAN BLVD, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Ryan Johnson , Plant manager		ACTIVITY DATE: 04/30/2021
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: An on site air quality compliance evaluation.		
RESOLVED COMPLAINTS:		

Introduction

On April 30, 2021, State of Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) staff member Scott Evans (SE) conducted an announced, on-site air quality inspection of the Asphalt Paving Company facility located at 1000 E Sherman Blvd. in Muskegon Michigan to assess compliance with Air Permit to Install (PTI) No. 12-96 and all other applicable air quality regulations. This inspection was announced in order to ensure proper staff presence at the facility as well as coordinate safety precautions during the ongoing COVID-19 pandemic.

Asphalt Paving Company is an asphalt hot mix plant. It operates on a modified continuous production model using a dual drum system. Various materials including recycled asphalt paving (RAP), sand, and aggregate are dispensed from seven hoppers and weighed before moving to the dryer. Aggregate is sifted through a screen and brought to temperature before being added to a drum with RAP and liquid asphalt. Three 150-ton storage silos are on site for storage of the asphalt product until it is dispensed to vehicles for transport. One baghouse is on site to control particulate matter.

Evaluation

Upon arrival at the facility, there were noticeable odors of fresh asphalt on site and in the near vicinity. These odors did not extend unreasonably far from the facility property, nor did they appear to be offensive or intolerable even when on site. Some steam could be seen exiting the facility stack (discussed further below) as well as some minor dust from routine facility activity such as moving trucks on dirt driveways, loading of material into trucks, and removing material from piles. None of the dust appeared to be leaving the facility in excess amounts. SE was greeted by Ryan Johnson (RJ) and a walking visual inspection commenced.

The facility currently has one active permit: PTI No. 12-96.

PTI No. 12-96

This permit was issued in 1996 with eight outlined special conditions. It is an opt-out permit that outlines limits on production to no more than 585,000 tons per year of asphalt produced on a twelve-month rolling schedule. This limit allows the facility to opt-out of the Renewable Operating Permit (Title V) program.

The permit requires that only 0.10 lbs. of particulate matter per 1000 lbs. of dry exhaust may be emitted from the plant. The facility is also subject to the New Source Performance Standard (NSPS) 40 CFR Part 60 subpart I for Hot Mix Asphalt plants. A particulate emissions test was conducted in

1989 that demonstrated compliance with the particulate limit of the PTI. At this time, the on-site control measures appear to be working as intended to maintain compliance with the PTI and the NSPS particulate limits. As mentioned, steam could be seen leaving the baghouse stack at the facility. However, this steam appeared to contain no visible particulate matter at the time of the inspection.

The permit outlines that visible emissions may not exceed 20% opacity over a 6-minute average time period. As discussed above, there appeared to be ~0% opacity at the facility during the inspection coming from the baghouse stack. Dust coming from material during operations such as moving trucks on dirt driveways, loading of material into trucks, and removing material from piles did not appear to surpass 5% opacity at any time and averaged to 0% opacity over a 6-minute average.

Particulate emission rates are required to be verified through appropriate testing methods as outlined in air permitting rules or in any other method approved by the AQD. Testing was conducted during the original permitting process in 1989 with passing results. At this time, it does not appear to be necessary to re-test.

As required by the permit, the baghouse operates at all times that the facility is in operation. While on site, SE was able to visually confirm the use of daily logs that included verifying proper baghouse operation. At the time of the inspection, the baghouse gauge was displaying a flow rate of 3 in H₂O.

SE did not measure the height or diameter of the stack, however, it appeared to be unaltered from the required height of 50 feet above ground level.

The facility is required to limit the use of RAP to no more than 40% of any production mix. The facility provided SE with appropriate documentation that demonstrated compliance with this requirement. During the 2020 and 2021 production years, the monthly RAP% did not exceed 20% at any time.

The facility is prohibited from using asbestos containing products in the mixes. This was discussed and the facility expressed that no asbestos material is used in the mixes. Records confirmed this.

Other Items

During the last inspection, the facility was required to develop and implement a fugitive dust plan in order to control potential dust emissions from the site. During the visit, the facility was able to demonstrate possession and use of this plan. The plan outlines control measures such as covering of conveyors and use of brine spray to control excess dust. Conveyor coverings could be seen as installed and in use during the inspection. Use of brine spray for ground dust emissions was not utilized during the visit as rain from the previous night had already tamped down excess dust, however, when asked about it, RJ confirmed use of the method when necessary.

It is worth noting that, during the inspection, RJ expressed that the facility intends to shut down operations at the end of the 2021 operational period. A new facility location has been selected and operations will be moved there. The facility is currently working on obtaining the necessary permits for this move. For the time being, PTI No. 12-96 remains active as this site continues operations.

However, if the plan continues as intended, this PTI will need to be voided when this facility shuts down.

Conclusion

At the conclusion of the inspection, the facility appeared to be in compliance with PTI No. 12-96 as well as all other applicable air quality regulations.

NAME Scott EvansDATE 6/10/2021SUPERVISOR HH