

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

B198636751

FACILITY: RIETH-RILEY CONSTRUCTION CO., INC.		SRN / ID: B1986
LOCATION: 724 EAST WASHINGTON, ZEELAND		DISTRICT: Grand Rapids
CITY: ZEELAND		COUNTY: OTTAWA
CONTACT: Zach Steensma , Plant Operator		ACTIVITY DATE: 08/30/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro and Chris Robinson arrived at the facility to conduct an unannounced, scheduled inspection and met with Zach Steensma, Plant Operator. This facility operates pursuant to Permit to Install (PTI) 772-93 and Opt-out PTI No. 772-93A. PTI No. 772-93A was issued on December 18, 2014 and is a result of the AQD moving forward with plans to rescind Rule 208a. Rule 208a had been used by the facility as a means of limiting the potential to emit of carbon monoxide (CO) and hazardous air pollutants (HAPs) to synthetic minor levels.

#### FACILITY DESCRIPTION

Rieth-Riley Construction Company, Inc. is an asphalt production plant with a counter-flow drum and baghouse, top of silo emission capture system and load out control which consists of an electrostatic precipitator.

#### COMPLIANCE EVALUATION

Mr. Steensma maintains daily records of material, maintenance and pressure drop information. Also kept is a log of all fugitive dust abatement information.

Zero cutback asphalt is stored or used at this site, not even cold patch. The average recycled asphalt product (RAP) content of the mixes made is 30% or less. The permit RAP limitation is 50%.

The baghouse is black lighted twice a year and Mr. Steensma indicated that at that time any issues are corrected immediately

In addition to regular water application, the site has chloride applied and they pay a company to come and clean up any trackout. While there, the facility has them sweep the commercial property to the east also.

Staff observed the baghouse pressure drop, and discussed normal operations with Mr. Steensma. The observed and discussed normal pressure drop is between 3.5-4.0" H<sub>2</sub>O, and that depends on the ton per hour the drum is producing. This value is slightly higher than previously discussed with the former plant operator. This value should be monitored during the next compliance inspection to evaluate any additional increases. The current range is still within the appropriate range for the baghouse.

The smog hog truck load out control (ESP) is serviced 2-3 times per season.

#### PTI No. 772-93

This permit limits particulate emissions to 15.6 lb/hr as required in New Source Performance Standard 40 CFR 40.60 i. Stack testing was done in the past as required which demonstrated compliance with this limit. Visible emissions from the baghouse is limited to 5% opacity, which has not been observed.

NO<sub>x</sub> is limited to 82 tons per year. Reported NO<sub>x</sub> emissions for 2015 are 16.76 tons.

As indicated above the facility maintains a program for continuous fugitive emissions control for plant

roadways and the ESP for odor control at load out.

This facility currently utilizes natural gas, however it is equipped to burn fuel oil as well.

Opt-Out PTI No. 772-93A

This permit contains synthetic minor limitations on CO and HAP. CO is limited to 89.9 tons per 12-month rolling time period. Reported CO emissions through June 2016 are 22.22 tons. Individual HAP emissions are limited to less than 9.0 tons per 12-month rolling time period. The highest reported individual HAP is formaldehyde at 0.16 tons. Aggregate HAP emissions are limited to less than 22.5 tons per 12-month rolling time period. Reported aggregate HAP emissions are 3.21 tons.

Recordkeeping was requested and received timely from John Berscheid out of the facility's Goshen, IN headquarters. A modification to the CO and HAP emissions are recommended that they be totaled.

The facility was in compliance at the time of the inspection.

NAME John Berscheid

DATE 9-23-16 SUPERVISOR [Signature]