

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

B426532383

<b>FACILITY:</b> CADILLAC ASPHALT, LLC		<b>SRN / ID:</b> B4265
<b>LOCATION:</b> 857 S WAGNER RD, ANN ARBOR		<b>DISTRICT:</b> Jackson
<b>CITY:</b> ANN ARBOR		<b>COUNTY:</b> WASHTENAW
<b>CONTACT:</b> Susanne Hanf, Environmental Engineer		<b>ACTIVITY DATE:</b> 10/02/2015
<b>STAFF:</b> Zachary Durham	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT ✓
<b>SUBJECT:</b> Inspection of PTI 38-79H.		
<b>RESOLVED COMPLAINTS:</b>		

### Purpose

I arrived at the Cadillac Asphalt plant (previously Barrett Paving) on the morning of October 2, 2015 to observe operations of their equipment as outlined in permit to install (PTI) 38-79H. Michael Gabor accompanied me on my inspection to determine compliance with applicable State and Federal air requirements, including Act 451, Part 55, Air Pollution Control regulations. We met with Jerry Woods, who led us on the tour and showed us the pieces of equipment and facility operations we were interested in observing.

### Background

This facility was acquired by Cadillac Asphalt in the spring of 2015 and was formerly operating under the name Barret Paving. The hot mix asphalt (HMA) process conducted on this property can be a cause for fugitive emissions, which is why certain control devices and plans are included in their PTI. Control equipment includes dust collectors, vapor recovery system, and a load-out enclosure with emission capture. They also have a fugitive dust plan and preventative maintenance plan in place to control dust coming from the site and from the bag houses.

The operations occurring on this site are seasonal and commence based on when road construction and other paving projects can be performed. The plant is usually closed during the winter months, being any time from November to April based on the weather conditions. The HMA product is a blend of various aggregates and liquid asphalt cement. Aggregates include crushed recycled asphalt pavement (RAP) and various virgin feedstocks from fine sands to coarse stone. Based on the preferences of the customer, these components are mixed at different ratios to deliver the desired asphalt consistency. The final product is hauled out by the truck load.

### Compliance Evaluation

#### EUHMAPLANT

Limits for this emission unit (EU) are based on 890,000 tons of HMA production annually. The most recent 12-month rolling calendar (combining production from Barrett and Cadillac) comes out to 244,360 tons of HMA with an average of 215.75 tons/hr of operation (see attached production log sheets). The emission limits for criteria and hazardous air pollutants (HAPs) show compliance with all permitted levels for both the tons per year (tpy) and pounds per tons (lb/ton) metrics (see attached Monthly TAC Emission Calculations).

This plant has not burned recycled fuel oil (RUO) in the last 12 months; though the compliance monitoring plan (CMP) is still being maintained should this change. Preventative maintenance procedures were provided and a recent maintenance log has been attached, which includes recent inspections of the baghouse. The Emission Abatement Plan in Appendix C of the permit is still being maintained.

Requirements for monitoring carbon monoxide (CO) during startup and every 500 hours of operation have been recorded and show compliance by not exceeding 500ppm. Additionally, the Monthly Summaries report indicates the amounts of virgin aggregate and RAP used in the mix on 12-month rolling time scales and average RAP content, which is below the 50% limit (see attached).

#### EUYARD

The fugitive dust plan currently in their permit was observed on site and doesn't require any changes.

#### EUACTANKS

The vapor condensation units on the liquid asphalt cement tanks appeared to be installed and operating properly, as no odors or emissions were observed.

#### EUSILOS

The emissions from loadout activities from the HMA storage silos is contained by an enclosure which is under vacuum and exhausted through a conditioning unit to control odor and particulate. This appears to meet the conditions for required pollution control equipment.

#### FGFACILITY

The Monthly TAC Emission Calculation shows that the aggregate HAPs for the last 12-month rolling calendar were 3.09 tons, which is below both individual and aggregate HAP permitted limits. Individual HAPs are listed per monitoring/recordkeeping requirements.

#### Summary

The plant was operational and appeared to be controlling fugitive emissions like dust and odors as none were present. Upon arriving, Michael and I made our way to the office area and were directed to head to the control tower where Jerry Woods was operating the plant from. He then led us on a tour of the property, which included the aggregate storage piles, liquid asphalt silos, truck loadout, mixing drum and the control tower.

We observed piles of the various aggregate material used in the process, including piles of crushed and uncrushed RAP. Jerry indicated that they contract a portable crusher as needed for this job. From there we moved to the material feed conveyors and drum dryers. As we passed we also observed the bag house. No visible emissions were seen coming from the mixing of raw materials and we continued to the liquid asphalt tank. This is the area most associated with odors, which is why they use the product "Ecosorb" to mitigate any potentially objectionable odors. The product is mixed with the liquid asphalt in a separate tank to mask odors. We also observed the vapor condensation units installed at the top of the silos, which are required by their permit under EUACTANKS.

Next, we headed to the loadout area to observe truck loadout operations. The area was enclosed and only a very small amount of emissions, which appeared to be steam, were able to escape the loadout area from the trunk entrance. I observed that the HMA storage silos and loadout operations were connected to an emission capture system. These areas are under vacuum where steam, odors and other constituents potentially off-gassing from the final product were sent through a unit equipped with a series of filters. It appears that this unit satisfies the requirement in EUSILOS to control truck loadout emissions.

From there we headed back to the control tower and I requested that the records for the facility be sent to me via email and we proceeded to leave.

#### Compliance Status and Recommendations

After review of the records and documents provided to me, I have determined that this facility is in compliance with the requirements of PTI 38-79H.

I recommend that the company review its recordkeeping to ensure that they continue to maintain compliance while completing the transition to new ownership. In particular, there was an issue with the fuel use log formula and subsequent calculations. The issue was discussed with Sue Hanf over the phone and has been resolved, though it might be helpful to be proactive to catch future problems.

NAME Jack Durham

DATE 12/4/15

SUPERVISOR [Signature]