

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

B426549077

FACILITY: CADILLAC ASPHALT, LLC, Ann Arbor		SRN / ID: B4265
LOCATION: 857 S WAGNER RD, ANN ARBOR		DISTRICT: Jackson
CITY: ANN ARBOR		COUNTY: WASHTENAW
CONTACT: Susanne Hanf, Environmental Engineer		ACTIVITY DATE: 06/06/2019
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Inspection of an asphalt plant.		
RESOLVED COMPLAINTS:		

Minor Source: Opt-out Source for HAPS, CO, SO2 and NOx. Full Compliance Evaluation (FCE)

Facility Contacts

Jerry Woods-Manager Email: gerald.woods@mipmc.com

Susanne Hanf-Environmental Engineer pH: 734-777-3647 Email: SHanf@mipmc.com

Purpose

On June 6, 2019, I conducted an unannounced compliance inspection of Cadillac Asphalt (Company) located near Ann Arbor, Michigan in Washtenaw County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and Permit to Install (PTI) # 38-79H.

Facility Location

The facility is located in a rural area just outside the City of Ann Arbor with residential homes generally about 1/3 of mile away. Numerous commercial businesses are within 1/3 of a mile. See attached aerial photo.

Facility Background

This facility was last inspected on 10/02/2015 and found to be in compliance.

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.

Regulatory Applicability

PTI 38-79H covers the entire asphalt plant.

40 CFR Subpart I - Standards of Performance for Hot Mix Asphalt Facilities

Arrival & Facility Contact

Some asphalt odors were noted upon my approach to the Company's facility on Wagner road with a light NE wind. I arrived at 9 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Jerry Woods (JW). I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

JW extended his full cooperation and fully addressed my questions.

Pre-Inspection Meeting

JW informed me that they have only been operating since the beginning of May this season due to a late Spring and maintenance issues. They are currently operating 5 to 7 days a week from 6 am to 6 pm and sometimes outside those hours.

The plant's mix drum had shutdown prior to my arrival and wasn't scheduled to restart for a couple more hours. However, the silos were full of product, asphalt truck loading operations were operating, aggregate pile unloading, and a rock crusher owned by Thompson Recycle was operating. The rock crusher was currently processing about 20,000 tons of RAP. JW noted that the RAP pile had grown to estimated 500,000 tons and he explained the difficulties in using up the crushed RAP and or via direct sales of the crushed RAP.

Onsite Inspection

JW gave me a tour of the facility which included the aggregate storage piles, the RAP pile, the asphalt product silos, truck loadout, mixing drum, 2 asphalt cement storage tanks and the control tower.

I observed piles of the various aggregate material used in the process, including piles of crushed and uncrushed RAP. JW indicated that they contract a portable crusher as needed for this job. Thompson Recycle was operating a crusher during the inspection. No dust was observed from this operation or anywhere else at the facility. JW indicated that they use a portable water tank to equip the water spray bars, but this wasn't confirmed. JW noted that all the roads used by the asphalt trucks are paved. The area around the aggregate piles isn't paved and this has created some track out problems. Essentially no track out was noted during this inspection on Wagner road. JW mentioned that they share fugitive dust control duties with an adjacent commercial business that includes the use of a street sweeper and water truck since they share a common road entrance off of Wagner road.

JW showed me the RAP pile. It was by far the largest RAP pile I had seen. JW speculated that the top of the pile is actually the highest elevation in Ann Arbor and nick named it Mt. RAPMORE. We circled the pile and I noted that it encroached on a wet land on one side. There appeared to be a berm in place to prevent storm water from the pile entering the wetland. (A quick literature search shows that typically very little leachates off a RAP pile although some minor amounts of lead have been documented in acidic conditions at other facilities.)

From there we moved to the material feed conveyors and drum dryers. As we passed by, I also observed the bag house. It wasn't examined closer since it wasn't operating. No visible emissions were seen coming from the mixing of raw materials and we continued on to the liquid asphalt cement tanks. I observed the vapor condensation unit installed at the top of the tanks, which are required by their permit under EUACTANKS. I noted that for each of the 2 tanks, there is a hatch at the top of the tank. JW explained that they used the hatches previously to check liquid levels in the tanks. Now they have level indicators on the side of the tanks, so the hatches are no longer used. Unfortunately, both hatches were heavily corroded and leaking vapor/steam and creating odors. (See attached photos.)

Next, we headed to the loadout area to observe truck loadout operations. The area was enclosed, and no emissions were noted during a truck load out. 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. The fan was operating. The permit allows for the entrance and exit of the loadout operation to be open. It appears that this unit satisfies the requirement in EUSILOS to control truck loadout emissions.

From there we headed to the control tower. See attached screen pics of the control screens. It showed that product was present in the 3 silos. A 4th smaller silo was empty. This silo is used to hold any waste asphalt product that might be generated.

Recordkeeping/Permit Requirements Review

EUHMAPLANT

Limits for this emission unit (EU) are based on 890,000 tons of HMA production annually. The most recent 12-month rolling calendar comes out to 176,809 tons of HMA (see attached records.). 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 records).

This plant has not burned recycled fuel oil (RUO) in several years; 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 records).

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 .375 tons per month which is below both individual and aggregate HAP permitted limits. Individual HAPs are listed per monitoring/recordkeeping requirements.

Post-Inspection Meeting

I held a brief post-inspection meeting with JW. I indicated to him that although not specifically spelled out in their permit, the 2 hatches on the asphalt cement storage tanks would need to be repaired as emissions from the hatches are generating odors and bypassing the vapor control system. JW indicated that he would have it fixed as soon as possible.

I handed him a list of requested records which I requested to be emailed to me by no later than 6/10/2019. JW indicated that he would have environmental engineer Susanne Hanf follow up with me on getting me the records.

I thanked JW for his time and cooperation, and I departed the facility at approximately 10:30 am.

Compliance Summary

The Company is in compliance. Follow-up records were received from the Company on 6/10/2019 in the form of a computer spreadsheet; some of which that are attached to this report. The Company will notify me when the hatches on the asphalt cement tanks are fixed.

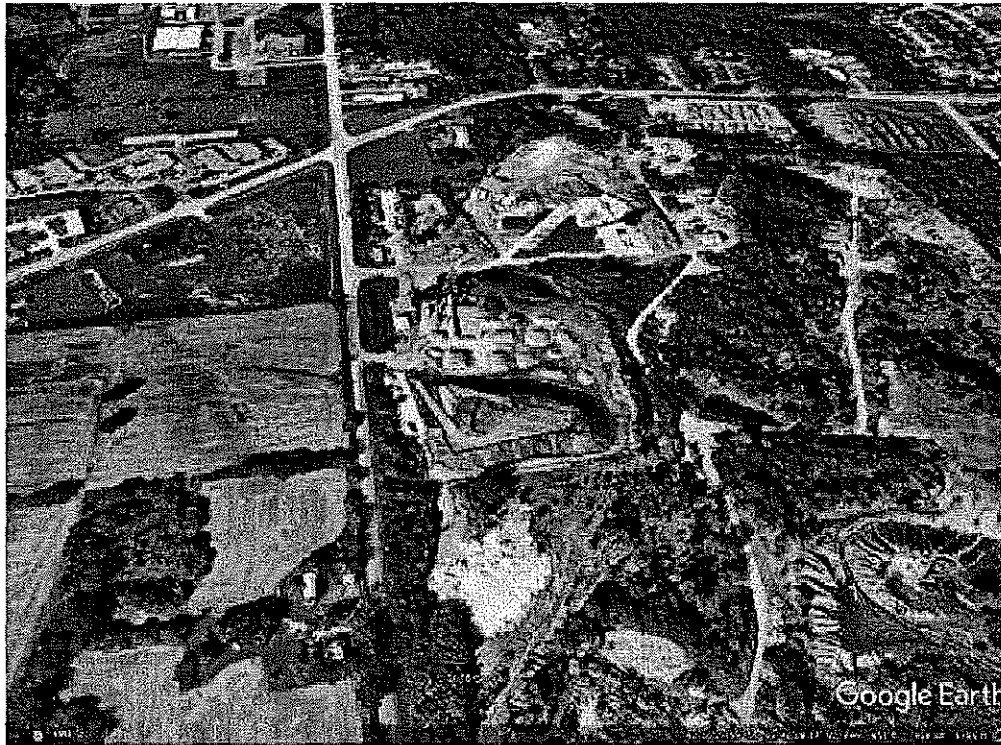


Image 1(Aerial View) : Aerial view.



Image 2(Asphalt Loading) : Asphalt loading.

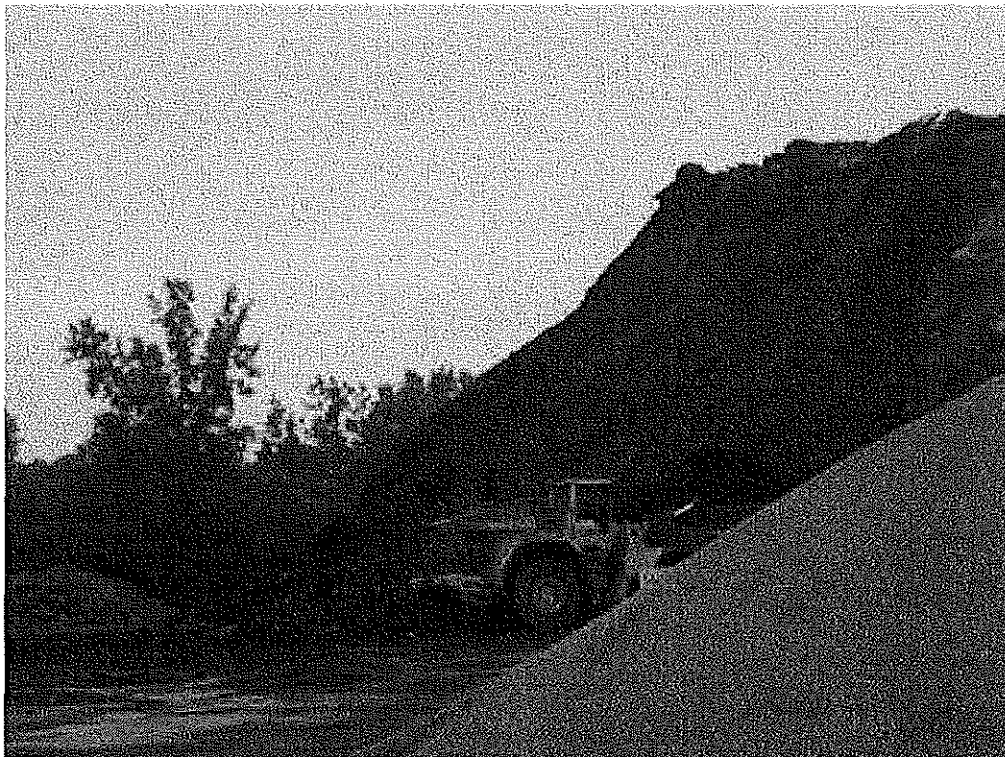


Image 4(RAP Pile) : Large RAP pile estimated to contain 500,000 tons.



Image 5(Asphalt Cement Tanks) : Asphalt Cement Tanks



Image 6(Tank Hatch 1) : Asphalt cement tank showing leaking hatch.



Image 7(Tank 2 Hatch) : Another leaking hatch on an asphalt cement tank.

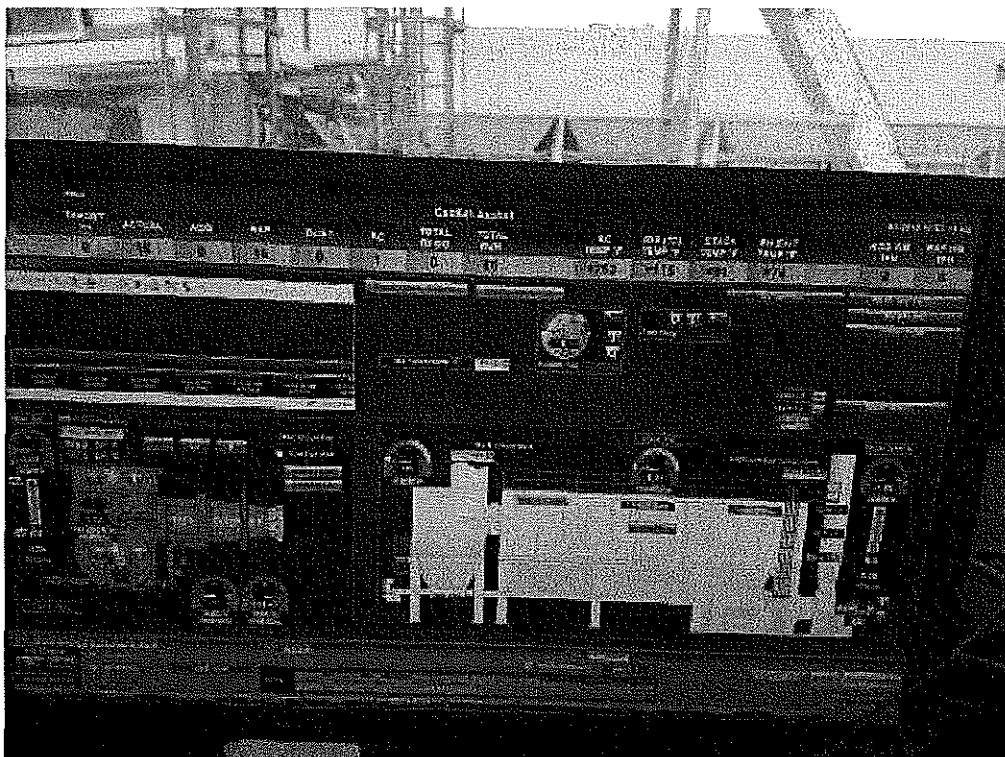


Image 8(Control Screen) : Control screen showing operating parameters.

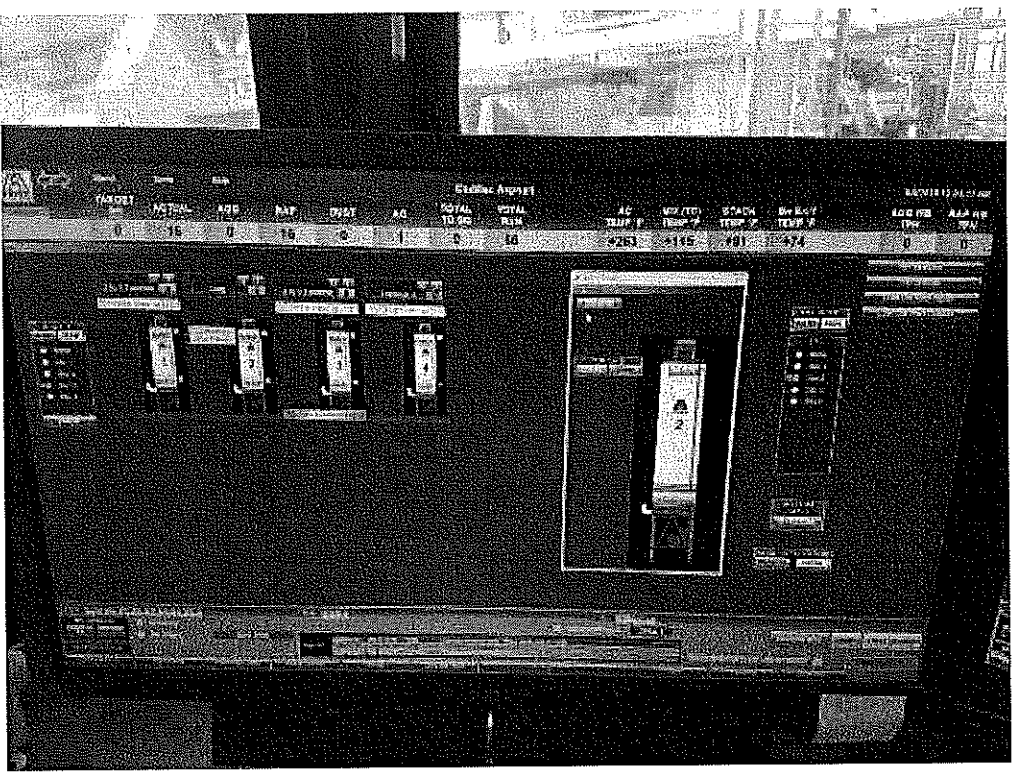


Image 9(Control Screen 2) : Screen shot from control room.

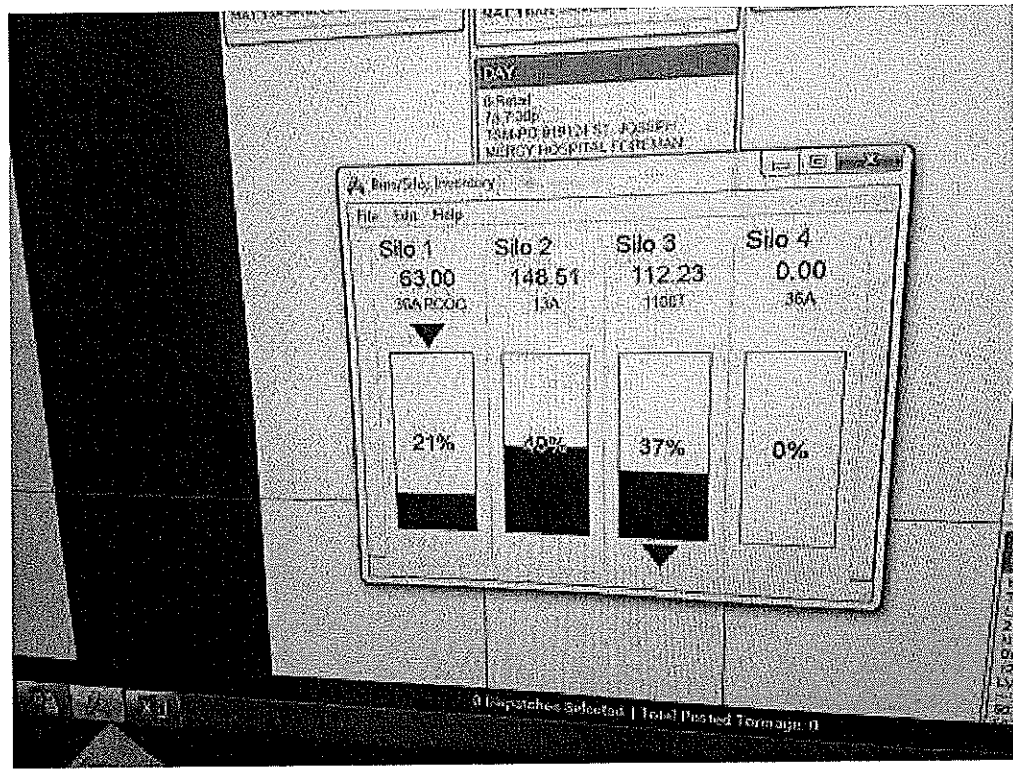


Image 10(Control Room) : Screen shot showing levels of asphalt in the storage silos.

NAME M. Kovalchik

DATE 6/10/2019

SUPERVISOR 