B4280
manual

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

B428041623

FACILITY: CADILLAC ASPHALT LLC, Rawsonville		**SRN / ID:** B4280
LOCATION: 1785 RAWSONVILLE RD, BELLEVILLE		**DISTRICT:** Detroit
CITY: BELLEVILLE		**COUNTY:** WAYNE
CONTACT: Brad Hillard , Division Manager		**ACTIVITY DATE:** 08/11/2017
STAFF: Jonathan Lamb	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled Inspection, FY 2017		
RESOLVED COMPLAINTS:		

DATES OF INSPECTION: August 1, 2017, and August 11, 2017
INSPECTED BY: Jonathan Lamb, MDEQ/AQD
PERSONNEL PRESENT: Brad Hillard, General Manager; Sue Hanf, Environmental Engineer; Randy Emerick, Plant Operator
CONTACT PHONE NUMBER: (734) 485-3095
FACILITY FAX NUMBER: (734) 485-3228

FACILITY BACKGROUND:

Cadillac Asphalt, LLC is a joint venture between the Edward C. Levy Company and Old Castle Materials with Michigan Paving and Materials as the managing partner for the operations. The facility produces road-grade asphalt for various contracts including MDOT, City of Detroit, and Wayne County, as well as their own paving operations. The site is located at the northeast corner of Rawsonville Rd. and I-94. The nearest residential area is located across I-94, directly south of the plant.

Cadillac Asphalt – Rawsonville is a synthetic minor source for hazardous air pollutants (HAPs), carbon monoxide (CO). Operations at the facility are seasonal based on a spring through fall paving season, usually starting production in late April/early May and ending late November/early December; production started on May 8 in 2017. The facility is currently running production Monday through Saturday, occasionally on Sunday. Typical hours of operation are from 6 a.m. to 6 p.m., but the facility may operate 24 hours per day when demand is high. There are approximately 12 daily employees at the site, including 3-4 plant operators.

COMPLAINT/COMPLIANCE HISTORY:

There are no outstanding Violation Notices or Consent Orders. AQD has not received any complaints regarding this facility since 2013.

This facility was once a source of frequent odor complaints until the facility took steps to abate off-site odors, including the installation of a "blue smoke" filtration system and enclosure for load-out controls in 2004 and raising the stack height and replacing the parallel flow drum with a counterflow drum prior to the start of the 2007 paving season.

PROCESS DESCRIPTION/EQUIPMENT:

Cadillac Asphalt produces various mixes of hot mix asphalt (HMA) to customer specifications. The facility also has the ability to produce warm mix asphalt (WMA) but has not produced any WMA the past two paving seasons.

HMA production is done on a continuous basis during operating hours. To produce each mix of asphalt, various formulations of aggregate, recycled asphalt product (RAP), and liquid asphalt cement

are mixed at a ratio as specified by the customer. Formulations vary depending on the intended use of the asphalt; a base mix uses a courser aggregate, while a surface mix will contain more fines to produce a smoother driving surface.

Various sizes of virgin aggregate are moved from stockpiles to cold-feed bins via a front-end loader. This facility uses about 12 types of aggregate, including sand, gravel, limestone, plus 3 grades of RAP. There are 15 cold-feed bins for the various aggregates and RAP. The aggregate and RAP is fed from the feed bins to a belt conveyor which sends the aggregate through a scalping screen and across a weighbridge. The uniformly sized and weighed cold aggregate is then fed into the front end of an inclined counter-flow drum. The counter-flow drum uses a dual barrel system. The cold aggregate is fed into the inner drum and flows towards the flame end of the drum. The burner is located inside the inner drum. The aggregate dries as it approaches the flame and is then discharged to the outer drum. RAP and liquid asphalt are then fed into the outer drum, where it mixes with the aggregate to produce hot mix asphalt. Since neither the RAP nor the liquid asphalt come in direct contact with the flame, emissions and odors tend to be less than those found with parallel-flow drums. The finished hot mix asphalt product is discharged from the mixer onto a slat conveyor. This conveyor elevates the hot mix asphalt to feed into the top of one of eight 300-ton storage silos, where the mix is stored for no more than 24-hours before truck loading and transport to the job site.

RAP, which is produced from asphalt removed during road construction, is crushed on-site for use as aggregate. Presently, Thompson Recycle is contracted to crush the RAP several times per year.

There are five 35,000-gallon tanks for storing liquid asphalt cement, all equipped with a vapor recovery system, though only four of the five tanks are currently in use. Four of the tanks were installed within the past couple years to replace three 40,000-gallon horizontal tanks. Note: Facility did not obtain a permit to install modification prior to installing the new tanks, although the tanks are covered in Permit to Install No. 216-06 under EUACTANKS.

There are various tanks which are exempt from permitting requirements:

- One 20,000-gallon vertical recycled used oil (RUO) tank: This tank is currently empty since the facility has not used RUO as fuel for several years. This tank is exempt per Rule 284(2)(d).
- One 15,000-gallon diesel tank: This tank holds diesel fuel to be used for fueling off-road vehicles and machinery for on-site operations. This tank is exempt per Rule 284(2)(d).
- One 12,000-gallon vertical tack asphalt tank: Tack is an asphalt by-product used during road resurfacing to improve bonding. This tank is exempt per Rule 284(2)(i).

PROCESS CONTROLS:

Emissions from the drum are sent through a baghouse to control particulate emissions before being discharged to the ambient air. The baghouse contains 966 bags. Dust collected from the baghouse is conveyed via a screw auger back into the mixing process.

In 2004, the facility installed a filter system for the silos and load-out area to control "blue smoke" as well as enclosing the load-out area. The system uses a pleated mesh filter to capture any fine particulates and aerosols from the silos and load-out. Filtered air is then exhausted through a short stack attached to the filter system.

Fugitive dust emissions are controlled by spraying stock piles and roadways as needed and sweeping paved roads on a daily basis.

INSPECTION NOTES:

During my site visit on August 1, 2017, I observed plant operations and performed a walk-through of the yard. Environmental staff was not on site at this time, so I did not perform record review. I spoke with Randy Emerick, Plant Operator, regarding the nature of my visit. The facility was producing HMA during this time, and I recorded the following mix parameters while in the control room:

Current Mix: 4E3
Production Rate: 359 tph
Liquid Asphalt Cement: 19.9 tph
RAP: 20%
Drum Mix Temperature: 320°F
Baghouse Inlet Temperature: 256°F
Baghouse Exhaust Temperature: 239°F
Aggregate Moisture: 4.3%
Baghouse Pressure Drop: 4" wg.
Burner Position: 26% open
Exhaust Fan Damper Position: 28% open

I walked around the aggregate piles and RAP crushing area. Thompson Recycling was on site performing RAP crushing during the inspection. I observed the RAP crushing operation for about 15 minutes. The RAP crusher was using water sprays and I did not observe any issues with fugitive dust emissions. I did not notice any fugitive dust emissions from the storage piles or roadways during this time. Conveyor spillage was minimal. I did not observe any emissions from the blue smoke filtration system, top of silos, or truck load-out area during truck loading.

I returned to the facility on August 11, 2017, and met with Brad Hillard, General Manager, and Sue Hanf, Environmental Engineer, to go over production and emission records and discuss other aspects of operations. I confirmed with Mr. Hillard that the facility is not using recycled asphalt shingles as RAP and is not using rejuvenating agent for the RAP. During this visit, I did not observe any issues with fugitive dust.

APPLICABLE RULES/PERMIT CONDITIONS:

Cadillac Asphalt - Rawsonville operates under PTI No. 216-06, issued on November 28, 2006. This permit set limits on CO and HAPs below major source thresholds, allowing the facility to opt out of Title V permitting requirements.

Production, emission, and maintenance/inspection records from January 2016 through July 2017 were reviewed to determine compliance status for this inspection.

PTI No. 216-06, Special Conditions:

To determine compliance with emission rates, the results of the emissions testing performed on September 12-14, 2007, were used, except for 1.1d, 1.1e, and 1.1f. These values were taken from production and emission records reviewed from January 2016 through July 2017.

EUHMAPLANT – This emission unit consists of an HMA facility, including aggregate conveyors, 650-ton per hour counterflow drum dryer/mixer, and fabric filter dust collector.

Emission Limits:

Condition	Pollutant	Permit Limit	Highest Reported Emissions	Compliance Status
1.1a	PM	0.04 gr/dscf	0.016 gr/dscf	COMPLIANCE
1.1b	PM	0.04 lb/ton	0.012 lb/ton	COMPLIANCE
1.1c	CO	0.201 lb/ton	0.040 lb/ton	COMPLIANCE
1.1d	CO	89.8 tons per 12-month rolling time period	33.9 tons (12-month rolling time period ending March 2016)	COMPLIANCE
1.1e	SO_2	0.14 lb/ton	0.03 lb/ton (July 2017)	COMPLIANCE
1.1f	NOx	0.12 lb/ton	0.06 lb/ton (Sept. 2016)	COMPLIANCE
1.1g	Lead	1.5×10^{-5} lb/ton	2.21×10^{-6} lb/ton	COMPLIANCE
1.1h	Benzene	0.001 lb/ton	0.00029 lb/ton	COMPLIANCE
1.1i	Toluene	0.006 lb/ton	2.75×10^{-6} lb/ton*	COMPLIANCE
1.1j	Ethylbenzene	0.005 lb/ton	2.18×10^{-6} lb/ton*	COMPLIANCE
1.1k	Xylene	0.001 lb/ton	4.37×10^{-6} lb/ton*	COMPLIANCE
1.1l	Napthalene	0.001 lb/ton	0.000037 lb/ton	COMPLIANCE
1.1m	Formaldehyde	0.01 lb/ton	0.00122 lb/ton	COMPLIANCE
1.1n	Acrolein	0.0008 lb/ton	0.00014 lb/ton	COMPLIANCE
1.1o	Arsenic	1.5×10^{-6} lb/ton	6.78×10^{-7} lb/ton	COMPLIANCE
1.1p	Nickel	1.5×10^{-4} lb/ton	3.39×10^{-6} lb/ton	COMPLIANCE
1.1q	H_2SO_4	0.015 lb/ton	< 0.00005 lb/ton	COMPLIANCE
1.1r	Manganese	5.0×10^{-5} lb/ton	2.77×10^{-5} lb/ton	COMPLIANCE
1.1s	Hydrogen Chloride	0.006 lb/ton	< 0.00003 lb/ton	COMPLIANCE

* Note: In the stack test report, these values were reported as Non-Detected but no minimum detection level was given. In evaluating compliance with the permit limits, Tom Maza (AQD-TPU) estimated the actual emissions for these compounds.

Material Usage Limits:
1.2: IN COMPLIANCE. Currently, this facility only burns natural gas. The facility has not used RUO in the past several years.
1.3 and 1.4: NOT EVALUATED. Since the facility is not currently using RUO or keeping RUO on site, no sample was obtained.
1.5: IN COMPLIANCE. The facility does not use any asbestos-containing materials in EUHMAPLANT.
1.6: IN COMPLIANCE. The facility limits their asphalt mix to a maximum of 50% RAP based on a monthly average. The highest percentage of RAP used, based on monthly average, was 34.7% in April 2016. The average RAP % for July 2017 was 23.8%.
1.7: IN COMPLIANCE. Total asphalt production is below permitted limit of 895,000 tons of HMA per 12-month rolling time period. Highest 12-month rolling total during the compliance period was 513,864 tons in for the 12-month rolling time period ending January 2016. The 12-month rolling total through July 2017 was 449,006 tons.
1.8: IN COMPLIANCE. The facility did not exceed the permit limit of 650 tons of HMA per hour, based on daily average of operating hours. The highest hourly HMA production rate was 494 tons per hour on August 11, 2016.

Process/Operational Limits:
1.9: IN COMPLIANCE. Facility maintains and implements the Fugitive Dust Plan as outlined in

Appendix A of PTI No. 216-06. See Fugitive Dust compliance status below for more details.
1.10: IN COMPLIANCE. Facility maintains and implements the Preventative Maintenance Program as outlined in Appendix B of PTI No. 216-06. The baghouse is equipped with an alarm and production is automatically shutdown if the temperature exceeds 400 °F. Replacement bags are kept on site. The bags are rated for 7 years of use, and were last replaced in 2013. A black light inspection of the baghouse is performed at the start of each paving season; this year, the inspection was performed on May 10, 2017, and no problems were found. Records of all inspections and maintenance activities involving the baghouse are maintained, as required.
1.11: IN COMPLIANCE. Facility maintains a Compliance Monitoring Plan for RUO as outlined in Appendix C of PTI No. 216-06, though the facility has not used RUO in several years.
1.12: IN COMPLIANCE. Facility maintains and implements the Startup, Shutdown, and Malfunction Plan as outlined in Appendix D of PTI No. 216-06.
1.13: NOT IN COMPLIANCE. Facility did not perform burner tune-ups at the start of the paving season in 2016 or 2017. Burner tune-up was first performed on June 28, 2016, for the 2016 paving season and July 18, 2017, for the 2017 paving season. At the time of inspection, the facility had not yet operated for 500 hours this paving season.
1.14: IN COMPLIANCE. The baghouse appears to be installed, maintained, and operated in a satisfactory manner. Baghouse pressure drop is monitored continuously and recorded at least once per day. A review of records shows the pressure drop is usually maintained in the range of 4-5" wg, within the permit range of 2" to 10" wg. During the inspection, the baghouse pressure drop was 4" wg.

Testing:
1.15: IN COMPLIANCE. Testing for odor emissions was performed on September 12-14, 2007 and the results were submitted on November 9, 2007. There are no permit limits associated with odor emissions, only the requirement to perform testing per Special Condition 1.18.
1.16: IN COMPLIANCE. Testing for TAC emission rates was performed on September 12-14, 2007 and the results were submitted on November 9, 2007.
1.17: IN COMPLIANCE. Testing for CO emission rates was performed on September 12-14, 2007 and the results were submitted on November 9, 2007.
1.18: IN COMPLIANCE. Testing for PM emission rates was performed on September 12-14, 2007 and the results were submitted on November 9, 2007.

Monitoring:
1.19: IN COMPLIANCE. Virgin aggregate feed rates and RAP feed rates are monitored on a continuous basis.
1.20: NOT IN COMPLIANCE. CO monitoring was not performed at startup of the paving season in 2016 and 2017, as required. CO monitoring was first performed on June 28, 2016, for the 2016 paving season and July 18, 2017, for the 2017 paving season. Readings showed average CO ppm of 114 during the June 28, 2016 monitoring and 191 ppm during the July 18, 2017 monitoring. At the time of inspection, the facility had not yet operated for 500 hours this paving season.
1.21: IN COMPLIANCE. Facility monitors and records emission rates and operating parameters as required per 40 CFR Part 60, Subpart A and I.

Recordkeeping/Reporting/Notification:
1.22: IN COMPLIANCE. All required calculations are maintained in an acceptable format and provided to AQD during the inspection.
1.23: IN COMPLIANCE. Emission and operating records are maintained as required per 40 CFR Part 60, Subpart A and I.
1.24: IN COMPLIANCE. The drum burners and baghouse are maintained and operated as required. Records of burner and baghouse inspections and maintenance are maintained. These records include date of inspection/malfunction, findings, and corrective actions (if any).

1.25: IN COMPLIANCE. Facility maintains monthly records of a) fuel usage, b) sulfur content of fuels (when applicable), and c) tons of HMA produced (including RAP usage).
1.26: IN COMPLIANCE. The facility maintains daily production records for a) virgin aggregate feed rate, b) RAP feed rate, c) asphalt pavement material product temperature, and d) formulation mixes for the asphalt pavement material produced, including start time of each mix produced.
1.27: IN COMPLIANCE. The facility maintains monthly and 12-month rolling time period emission calculation records of criteria pollutants and the TACs listed in the emission table associated with Special Conditions 1.1a through 1.1s.
1.28: IN COMPLIANCE. The facility maintains records of all CO emissions and related production data, including dates and times emissions were monitored.
1.29: IN COMPLIANCE. The facility maintains average daily, monthly and 12-month rolling time period records of the amount of HMA paving materials produced and number of operating hours for EUHMAPLANT.

Stack/Vent Restrictions:
1.30: IN COMPLIANCE. The baghouse stack appears to meet the permit requirements of 68-inch maximum diameter and 110-foot minimum height.

EUYARD – This emission unit consists of fugitive dust sources, plant roadways, plant yard, material storage piles, and material handling operations (excluding cold feed aggregate bins)

Process/Operational Restrictions:
2.1: IN COMPLIANCE. The Fugitive Dust Plan as outlined in Appendix A is implemented and maintained. During my inspection, I did not observe any issues with fugitive dust and sweeping/spraying records were reviewed on site.

Recordkeeping/Reporting/Notification:
2.2: IN COMPLIANCE. Fugitive dust emissions are calculated and reported in MAERS, as required.

EUACTANKS – This emission unit consists of liquid asphalt storage tanks.

Process/Operational Limits:
3.1: IN COMPLIANCE. EUACTANKS which are currently installed are equipped with a vapor condensation and recovery system.

EUSILOS – This emission unit consists of the HMA paving material product storage silos.

Process/Operational Limits:
4.1: IN COMPLIANCE. The emission capture system for EUSILOS appears to be installed and operating properly. No visible emissions were observed from the tops of the silos during the inspection.
4.2: IN COMPLIANCE. Load-out controls for EUSILOS are installed and operated, as required. No emissions were observed coming from the truck loading area under the silos or from the stack of the blue smoke filtration system during truck loading.

FGFACILITY - All process equipment at the stationary source including equipment covered by other permits, grand-fathered equipment and exempt equipment.

Emission Limits:
5.1a: IN COMPLIANCE. No individual HAP exceeded 8.9 tons per year based on a 12-month rolling time period. The maximum 12-month rolling emissions are reported in the table below:

HAP	Highest 12-month rolling total	12-month rolling total for July 2017	Compliance Status
Lead	$3.2x10^{-4}$ tons (March 2017)	$3.0x10^{-4}$ tons	IN COMPLIANCE
Benzene	$1.0x10^{-1}$ tons (September 2016)	$9.4x10^{-2}$ tons	IN COMPLIANCE
Toluene	$1.0x10^{-1}$ tons (June 2017)	$9.8x10^{-2}$ tons	IN COMPLIANCE
Ethylbenzene	$1.1x10^{-1}$ tons (July 2017)	$1.1x10^{-1}$ tons	IN COMPLIANCE
Xylene	$5.7x10^{-2}$ tons (September 2016)	$5.4x10^{-2}$ tons	IN COMPLIANCE
Napthalene	$3.2x10^{-2}$ tons (June 2017)	$3.0x10^{-2}$ tons	IN COMPLIANCE
Formaldehyde	$8.4x10^{-1}$ tons (August 2016)	$7.7x10^{-1}$ tons	IN COMPLIANCE
Acrolein	$9.5x10^{-3}$ tons (June 2017)	$8.7x10^{-3}$ tons	IN COMPLIANCE
Arsenic	$1.5x10^{-4}$ tons (September 2016)	$1.4x10^{-4}$ tons	IN COMPLIANCE
Nickel	$1.7x10^{-2}$ tons (August 2016)	$1.5x10^{-2}$ tons	IN COMPLIANCE
Manganese	$2.3x10^{-3}$ tons (June 2017)	$2.2x10^{-3}$ tons	IN COMPLIANCE
HCl	0.0 pounds HCl reported every month	0.0 pounds reported	IN COMPLIANCE

5.1b: IN COMPLIANCE. Total HAP emissions did not exceed 22.4 tons per year based on a 12-month rolling time period. During the past two years, the maximum 12-month rolling HAP emissions was 1.3 tons in September 2016. The 12-month rolling total HAP emissions as of July 2017 was 1.2 tons.
5.2: IN COMPLIANCE. HAP emissions are calculated and recorded on a monthly basis and 12-month rolling time period basis, as required.
5.3: IN COMPLIANCE. AQD was notified that the installation and startup of the equipment was completed prior to the start of the 2007 paving season.

Appendix A of PTI No. 216-06 - Fugitive Dust Control Plan

IN COMPLIANCE: Cadillac Asphalt – Rawsonville is in compliance with conditions of the fugitive dust plan listed below. Records were reviewed on-site during the inspection.

1. Site Maintenance:
a. Sweeping is performed with a vacuum sweeper on a daily basis on paved areas, including part of the I-94 West Service Drive to Rawsonville Road. Unpaved areas are sprayed with calcium chloride every few weeks or as needed. A review of records show calcium chloride was applied on June 16, June 30, July 18, and August 2 in 2017.
b. 10 mph speed limit signs are posted.
c. Drop distance of aggregate storage piles appears to be minimized as much as possible.
d. Aggregate storage piles are maintained to reduce fugitive dust emissions.

2. Management of On-Site Roadways:
a. All roadways for HMA hauler traffic are paved.
b. Paved roadways are swept on a daily basis.
c. Unpaved areas are sprayed with calcium chloride every few weeks, or as needed.
d. Any aggregate on roads is cleaned up immediately, if any spillage occurs. There were no signs of aggregate spillage on the I-94 Service Drive or road leading into the facility.

3. On-Site Management of Haul Vehicles:

a. Incoming trucks are covered upon arrival.
b. Outgoing trucks, including HMA haulers, are covered prior to leaving the site. Signs are posted to remind drivers.

4. Management of Front-End Loader Operations:
During my inspection, front-end loaders appeared to operate in a manner to reduce spillage and drop heights during transfer of materials.

5. Recordkeeping:
All records of dust control activities, including time and dates of sweeping and calcium chloride spraying, are maintained on site.

6. Fugitive Emissions from Process Equipment and Baghouse Dust Collector:
Equipment and baghouse are checked daily for leaks or emissions and repairs are made, if necessary.

Appendix B of PTI No. 216-06 – Preventative Maintenance Program for the Fabric Filter Dust Collector

IN COMPLIANCE. Facility is in compliance with the following conditions of Appendix B:

1. Fabric Filter Dust Collector Operating Pressure Drop:
a. Pressure drop across baghouse is greater than 2" wg. Pressure drop is generally maintained between 4"-6" wg.
b. Pressure drop is recorded once per day.

2. Fabric Filter Dust Collector/Plant Alarm System:
- Baghouse is equipped with a high temperature sensor and alarm, which shuts down the process if temperatures hit the setpoint.

3. Handling and Storage of Fabric Filter Dust:
- Dust collected by the baghouse is conveyed back into the drum as aggregate in production.

4. Piping and Seals Maintenance:
- Piping and seals are inspected daily and repaired or replaced, if necessary. Any repairs are recorded in the maintenance log.

5. Visible Emissions and Actions to be Taken:
- Facility follows the procedures listed in this condition if visible emissions are observed. The facility has not had any instances where an excess emission report needed to be submitted to AQD during the past five years. There is not a certified Method 9 reader on site, but Cadillac Asphalt has two certified readers, Sue Hanf and Mike Yeager, who cover the metro Detroit area and could be on site within 60 minutes, if needed.

6. Black Light Inspections:
- Black light inspections are performed at the start of paving season, when bags are replaced, or if any issues are noted with the baghouse. A black light inspection was most recently performed on May 10, 2017.

7. Inventory of Filter Bags:
- Facility maintains an inventory of filter bags available within four hours, if needed. In addition, the facility keeps 24 bags on site for small emergency bag replacement.

8. Fabric Filter Dust Collector Inspection Record:
- Facility maintains a baghouse inspection and maintenance log in electronic format. Bags were last replaced in 2013. The records maintained were sufficient to demonstrate compliance during this inspection; however, I advised Cadillac Asphalt staff to start including more detail in the inspection and maintenance logs to fulfill all the requirements of this condition.

Appendix C – Compliance Monitoring Plan (CMP) for Facilities Burning Recycled Used Oil (RUO)

NOT EVALUATED. Facility is not currently using RUO as fuel, so Appendix C was not evaluated at this time.

Appendix D – Emission Abatement Plan for Startup, Shutdown, and Malfunctions

IN COMPLIANCE. Facility is in compliance with the following conditions of Appendix D:

1. Normal Startup Procedure:
- Facility follows normal startup procedures to minimize emissions.

2. Normal Shutdown Procedure:
- Facility follows normal shutdown procedure to minimize emissions.

3. Hot Starts-Hot Stops:
- If necessary, facility follows the hot start-hot stop procedures listed in this condition to minimize emissions.

4. Malfunction Stops:
- If necessary, facility follows the malfunction stop procedures listed in this condition to minimize emissions. A water supply is available to control any fugitive emissions, if needed.

A. Identification of Supervisory and Maintenance Personnel:
- The facility maintains a list of supervisory and maintenance personnel. The Plant Operator is responsible for following startup and shutdown procedures.

B. Description of Inspected Items:
- Plant personnel perform daily walk around inspections at the start of each day and during operations to check for fugitive emissions from the baghouse and processing equipment, as listed in this condition. Any equipment malfunctions and repairs are recorded in the maintenance and inspection log.

C. Frequency of Inspections:
- Plant personnel perform daily walk around inspections are the start of each day and during operations, as noted above. A more thorough inspection and maintenance program is implemented at the end of the paving season during winter shutdown.

D. Replacement Parts:
- Facility keeps replacements bags, black light powder, and caulk on site, as required.

E. Baghouse Variables and Monitoring:
- Baghouse pressure drop is monitored constantly and recorded daily. Baghouse pressure drop is usually maintained between 4"-6" wg. Baghouse is equipped with high temperature sensors and alarms which shut down the process if the baghouse exhaust temperature exceeds the set point.

F. Corrective Procedures and Responsible Persons:
- Facility follows the corrective action procedures, per the starup and shutdown plan. Facility has not had to submit a R.912 report in the past five years.

G. Drum Mix and Batch Normal Startup Procedures:
- Facility follows normal start up procedures and monitoring, as required.

NSPS, Subpart I: Standards of Performance for Hot Mix Asphalt Facilities: This federal regulation sets a PM emission limit of 0.04 grains/dscf and an opacity limit of below 20%, and requires stack testing to determine compliance. The facility is in compliance with this regulation.

Note: Copies of some of the records reviewed during this inspection can be found in the orange facility file. This includes daily/monthly production logs, emission records, baghouse inspections, fuel analysis/daily fuel logs, and CO monitoring from 2007 through 2009.

FINAL COMPLIANCE DETERMINATION:

At the time of inspection, Cadillac Asphalt – Rawsonville was determined to in noncompliance with the following Special Conditions of Permit to Install No. 216-06:

- 1.13: NOT IN COMPLIANCE. Facility did not perform burner tune-ups at the start of the paving season in 2016 or 2017.
- 1.20: NOT IN COMPLIANCE. CO monitoring was not performed at startup of the paving season in 2016 and 2017, as required. CO monitoring was first performed on June 28 for the 2016 paving season and July 18 for the 2017 paving season.

As a result, a Violation Notice will be issued to the facility for these violations. In addition, the facility will be asked to provide a demonstration to determine NSPS Subpart Kb and permit exemption applicability for the installation of the four 35,000-gallon liquid asphalt tanks to determine if the facility was required to obtain a Permit to Install prior to installing the tanks. Once this information is received, AQD will reevaluate the compliance status of EUACTANKS.

NAME _____ DATE 10-13-17 SUPERVISOR JK