

**Cadillac
Asphalt** LLC
7555 Whiteford Rd
Ottawa Lake, MI 49267
(734)854-2265
Fax (734) 856-7996



December 7, 2017

Mr. Jonathan Lamb
MDEQ
Air Quality Division
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202-6058

Re: *Revision-* Cadillac Asphalt, Rawsonville Plant, SRN B4280
AC Tank Installation

Dear Mr. Lamb:

Cadillac Asphalt replaced the existing AC tanks with five new 35,000 gallon AC tanks, installation was completed in March 2017. Liquid Asphalt Cement (AC) has a vapor pressure of 0.053 psia (0.365kPa). In accordance with NSPS Subpart Kb, **60.110b**, Applicability and designation of affected facility, these tanks are not subject to NSPS.

NSPS Subpart Kb, 60.110(b): This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ (nineteen thousand eight hundred fifteen gallons) but less than 151 m³ (thirty-nine thousand eight hundred ninety-four gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

Cadillac asphalt has calculated potential to emit calculations using AP-72 Ch 7.1, Organic Liquid Storage Tanks. These calculations are attached. The total emissions are estimated to be 740 lbs VOC/yr from all 6 tanks and 123 lbs VOC /yr from each tank. These emissions are based on no control, and the permitted maximum Asphalt Production.

Cadillac believes these tanks to be exempt from permitting in accordance with Rule 284(2)(i) as the tanks are less than 40,000 gallons and asphalt cement has a true vapor pressure of not more than 1.5 psia at the actual storage conditions.

R 336.1284 Permit to install exemptions; containers.

Rule 284(2)(i) Storage, mixing, blending, or transfer operations of volatile organic compounds or noncarcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions.

Please let me know if you need further information or have any questions, I can be reached at 734-777-3647.

Sincerely,

A handwritten signature in black ink, appearing to read 'S Hanf', with a long horizontal line extending to the right.

Susanne Hanf
Environmental Engineer