

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

B581735667

FACILITY: RIETH-RILEY CONSTRUCTION CO., INC.		SRN / ID: B5817
LOCATION: 2325 KIPP RD, MASON		DISTRICT: Lansing
CITY: MASON		COUNTY: INGHAM
CONTACT: Mike Erbisch , Plant Manager		ACTIVITY DATE: 07/22/2016
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, unannounced, initial contact (as inspector) inspection as part of an FCE.		
RESOLVED COMPLAINTS:		

Inspection Report

B5817- Rieth Riley, Mason
2325 Kipp Road
Mason, MI 48854

Inspection Date:

7/20/16 and 7/22/16

Facility Contacts:Mike Erbisch, 517-676-9644, merbisch@rieth-riley.com**MDEQ AQD Personnel:**Nathan Hude – huden@michigan.gov, 517-284-6779**Facility Description:**

The Reith-Riley Construction Asphalt Plant manufactures road paving asphalt. The plant is seasonal and operates from late March to mid-November depending on the weather.

The plant employs 4 individuals and operates 6-7 days per week dependent on workload and the weather. Rieth Riley also has paving crews that operate under the same schedule.

Reith Riley is located in an industrial area on the south east side of the city of Mason. Jewett airfield is directly to the east, Mason High School is about ½ mile north east, to the west is a factory called Gestamp and a Meijer.

Site specific required protective equipment includes eyewear, high visibility vests, and steel toed boots.

Applicable Regulations:

PTI 1343-91C for a hot mix asphalt plant using recycled used oil (RUO)

PTI 435-74A replacement of multiclone & venturi scrubber w/a bag house

PTI 435-74 complete asphalt plant new

40CFR60 subpart I Standards of Performance for Hot Mix Asphalt Plants, the required stack test was performed July 8-9, 2003

R336.1285(b) for warm mix asphalt

40CFR63 AAAAAAA does not apply to this facility per paragraph 63.11559(c) This subpart does not apply to hot mix asphalt plant operations that are used in the paving of roads or hardstand, or operations where asphalt may be used in the fabrication of a built-up roof.

Voided Permits:

PTI 435-74 appears to be issued for the old portable asphalt plant that has since been removed and replaced with the hot mix asphalt plant covered under 1343-91C. PTI 435-74 will be voided for removal of equipment.

PTI 435-74A appears to be issued for replacing a dual cyclone wet collector for a 10,656 s/f baghouse on the old portable asphalt plant. This equipment has since been removed and replaced with the hot mix asphalt plant covered under 1343-91C. PTI 435-74A will be voided for removal of equipment.

Previous Inspections (within 5 years):

7/11/13, Brian Culham, no issues noted

Previous Violations:

none

Violations Found During this Inspection including reoccurring:

Recent Complaints (within 2 years):

none

MAERS Reporting

Facility is a Category II source due to being subject to an NSPA, 40CFR60 subpart I

MAERS Emission Unit List

EUASPHPLANT1- asphalt drum mixer, 120 MMBtu/hr, controlled by fabric filter bag house

Inspection Summary

7/20/16- I attempted to inspect the facility on this date, yet Mike was unavailable. I left my business card and a copy of PTI's 435-74 and 435-74A for Mike to research (when he returned) to determine if they were needed or redundant with PTI 1343-91C. The skies were mostly sunny and wind out of the south east. I did not detect any odors on my approach of the facility, yet did notice considerable fugitive dust from vehicle traffic. The dust was from a front end loader operating in the aggregate storage area on the north side of the facility and from trucks entering and exiting the facility to be or after being loaded. This dust was in excess of 20% and will be addressed when I go to the facility next. A Fugitive Dust Plan is included under PTI 1343-91C as Appendix A. I did observe numerous vehicles exiting the business covered with tarps as required by PTI 1343-91C Appendix A 3.b.

7/22/16- I arrived at Rieth-Riley around 7:30am for a scheduled, unannounced, initial contact (as inspector) inspection. It was sunny skies with 5-10mph winds out of the south West; upon entering the parking lot and the building, I could detect an asphalt odor yet did not see any visible emissions.

I entered the office and spoke with the receptionist who stated that Mike was in the mix house. I went to the mix house and introduced myself and informed him on the reason for my visit while providing him with a copy of our inspection brochure and my business card. I showed Mike the older permits which we discussed for some time. He stated that the older plant had been removed and is no longer applicable, thus the permits were no longer valid. We also discussed 40CFR60 I, the required compliance with this regulation was completed via stack test which was conducted on July 8-9, 2003. Mike and I then went through PTI 1343-91C as detailed below.

The plant is permitted to, but currently does not use URO or used recycled oil as a fuel, thus paragraphs 1.3, 1.8, 1.13, nor does all of Appendix C apply. The plant burns natural gas as a fuel thus satisfying 1.2; when walking the yard, I did not observe any asbestos suspect material discussed in 1.4; 1.5, 1.6, 1.7 will be checked via records which were requested with a due date of 7/26/16; 1.9 is in reference to the fugitive dust plan which is in Appendix A, Mike and I discussed my observations from Wednesday 7/20 but it appears they are otherwise following this plan; 1.10 will be checked via records which were requested with a due date of 7/26/16; 1.12 requires the use of the fabric filter baghouse with a pressure drop of 3-7 inches, a check of the gauge indicated 5 inches; 1.14 is recorded by the plant operator throughout the day; 1.15 will be checked via records which were requested with a due date of 7/26/16; 1.16 is met by the 2003 stack test; 1.17 is met by the pressure drop of 5 inches as referenced for 1.12; 1.18 is being met by daily recording; 1.19 through 4.2 will be checked via records which were requested with a due date of 7/26/16.

Records were received from John Berscheit on 7/26/16 via email.

1.5 limits the use of RAP to 50%; records indicate that RAP usage was 31.4%

1.6 limits total HMA processed to 850,000 tons per 12 month rolling; the resultant was 227,711 tons

1.7 limits the hourly HMA to 350 tons; records check on site indicated an average of 250 tons per hour.

1.10 requires the facility to maintain the efficiency of the plant through maintenance and CO monitoring; this has been satisfied as detailed in following paragraphs.

1.15 requires the monitoring of CO via a handled monitor. The records provided includes an hour count to indicate when a new test is required based on the hours the plant operates; the following dates were when the most recent six tests occurred: 5/16/16, 9/24/15, 6/3/16, 10/17/14, 9/8/14, and 5/27/14.

1.19 requires records to be kept to ensure compliance with 40CFR60 subparts A and I; the records provided satisfy this requirement.

- 1.20 is in reference to maintenance; information regarding the baghouse black light checks was provided.
- 1.21 requires the plant to record daily information; this is being conducted by the plant operator throughout the day and a copy of this record was provided on site.
- 1.22 requires recordkeeping of virgin aggregate feed rate, RAP feed rate, asphalt product temperature and asphalt composition records; this information was satisfied in the records provided in person and via email.
- 1.23 requires a 12 month rolling emission calculation of all criteria pollutants and HAPS listed in the emission limit table; this is being completed and the 12 month aggregate HAP emissions from the facility are 2 tons or less and each individual HAP is computed monthly. All of the criteria pollutants are calculated on a monthly and 12 month rolling average as well.
- 1.24 requires CO emission records; this is completed via the CO monitoring and computed in lbs per ton of HMA produced; this is not a limit in the limit table and it is not in the records but is easily attained by using HMA produced and CO Emissions that are recorded, using the 12 month information the calculation is 19.49 tons (38980lbs) CO / 227711 tons HMA = 0.17 lbs CO per ton HMA.
- 1.25 requires HMA paving material records; this was satisfied by records review on site and by the records received.
- 1.26 requires record keeping of fuel used to produce HMA material; the plant only uses natural gas and the usage amount for the 12 month rolling was 68354000 scf.
- 4.1a and 4.1b are the facility HAP limits; these limits are being met and emissions are well under the limits.
- 4.2 requires HAP emission calculations and recording; this is met as cited in previous paragraphs.

It appears that this facility is in compliance with all requirements of the applicable permit and 40CFR60 subpart I based on my inspection and records check. This report will be used to void permits 435-74 and 435-74A in accordance with MDEQ memo Procedure for Voiding Permits to Install, dated June 7, 1999.

NAME  DATE 7/28/16 SUPERVISOR 

