

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

B581755363

<b>FACILITY:</b> RIETH-RILEY CONSTRUCTION CO., INC.		<b>SRN / ID:</b> B5817
<b>LOCATION:</b> 2325 KIPP RD, MASON		<b>DISTRICT:</b> Lansing
<b>CITY:</b> MASON		<b>COUNTY:</b> INGHAM
<b>CONTACT:</b> John Berscheit , Environment Compliance Specialist		<b>ACTIVITY DATE:</b> 08/20/2020
<b>STAFF:</b> Samantha Davis	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b>		
<b>RESOLVED COMPLAINTS:</b>		

**Facility Contacts:**

John Berscheit, Environmental Compliance Specialist,  
574-532-0032  
JBERSCHEIT@rieth-riley.com

**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.

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.

PTI) No. 1343-91C for a hot mix asphalt plant using recycled used oil (RUO).

**Inspection Summary**

8/20/20- This was a routine scheduled inspection for compliance with PTI 1343-91C. This inspection was coordinated with Dave, Plant Operator due to COVID-19.

I arrived at Rieth-Riley around 9:30am. Upon entering the parking lot and the building, I could not detect any odors and did not see any visible emissions. The plant yard appeared well-kept and water was being applied to road-ways upon my arrival.

I entered the office and spoke with the receptionist and was greeted by John Berscheit and Dan Larson. We had introductions and I explained the purpose of my visit and we proceeded to go out to the plant where Dave, Plant Operator, was working.

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. Dan assured me that they are aware of the material coming in and where it's from, and that they typically only receive recycled roadway material not material from demolition sites which might contain asbestos. Condition 1.9 is in reference to the fugitive dust plan which is in Appendix A, we discussed the Fugitive Dust Plan and it appears they are following this plan; 1.10 requires CO emission monitoring and I was given the printed out reports from this seasons monitoring upon my arrival; 1.12 requires the use of the fabric filter baghouse with a pressure drop of 3-7 inches, the run for the day was already wrapping up and the equipment was being shut down but based on the baghouse maintenance check records I am inclined to think that this is operating properly; 1.14 is recorded by the plant operator throughout the day; 1.15 CO monitor reading was given to me on site for the most recent probing dated 7/31/20; 1.16 is met by the 2003 stack test; 1.17 is met by the pressure drop referenced in 1.12; 1.18 is being met by daily recording; 1.19 through 4.2 will be checked via records received on 8/28/20.

Records were received from John Berscheit on 8/28/20 via email.

1.5 limits the use of RAP to 50%; records indicate that highest RAP usage was 35.86%

1.6 limits total HMA processed to 850,000 tons per 12 month rolling; the resultant was 199,518 tons

1.7 limits the hourly HMA to 350 tons; records check on site indicated the average production rate was 235.56 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 handheld monitor. The records provided included the most recent test was 7/31/20.

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. The most recent check was 5/11/20.

1.21 requires the plant to record daily information; this is being conducted by the plant operator throughout the day and was reviewed 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 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 4.5 tons, well below the limit of 22.4 tpy 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.

1.25 requires HMA paving material records; this was satisfied 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 65,512 K.

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.

NAME *Samantha Davis*

DATE 9/24/20

SUPERVISOR *B.M.*