

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

B660129797

FACILITY: RON BROWN & SONS INC		SRN / ID: B6601
LOCATION: 17443 PLEASANTON HWY, BEAR LAKE		DISTRICT: Cadillac
CITY: BEAR LAKE		COUNTY: MANISTEE
CONTACT:		ACTIVITY DATE: 06/10/2015
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Field Inspection and Records Review		
RESOLVED COMPLAINTS:		

On June 10, 2015, Caryn Owens of the DEQ-AQD conducted a scheduled field inspection and records review of Ron Brown and Sons, Inc. (SRN: B6601) located at 17443 Pleasanton Highway in Pleasanton Township, Manistee County, Michigan. The field inspection and records review were conducted to determine compliance with permit to install (PTI) No. 164-70D. The facility has opted out of major source applicability by limiting operational and production limits potential to emit (PTE) below major source thresholds. The facility is not subject to New Source Performance Standards (NSPS) of Performance for Hot Mix Asphalt Facilities under 40 CFR, Part 60, Subpart I because the facility was constructed prior to June 11, 1973. DEQ was accompanied by Lisa Hobart, of Ron Brown & Sons, Inc. during the inspection. An inspection brochure was handed to Ms. Hobart at the beginning of the field inspection.

During the field inspection the weather conditions were approximately 70 degrees Fahrenheit, with clear skies, and winds approximately 10 miles per hour from the north-northwest. The facility is a small, hot mix asphalt (HMA) batch plant capable of producing 60 tons of asphalt per hour. The facility produces asphalt for patching jobs, and smaller road projects. The facility is not in operation all year long, and shuts down during the winter months. It is able to shut down intermittently during the spring, summer, and fall if the demand is low. The equipment consisted of a rotary dryer, an asphalt heater, a wet scrubber system and cyclone for control of particulate matter, and storage silos for the asphalt material. The wet scrubber discharges into a pond system. No visible emissions were observed from the wet scrubber stack. The facility uses propane as its fuel source, and an approximately 10,000 gallon bullet tank is located in the central portion of the site. A maintenance building was located on the eastern portion of the property for repairing equipment and vehicles. DEQ observed a heat shimmer from the dryer at the facility. No other visible emissions were observed, however, no truck traffic was present during the inspection to observe fugitive emissions. DEQ recommends applying dust suppressant to the yard to keep fugitive dust emissions down during dry weather conditions.

PTI Records Review

Emission Limits: In reference to Special Conditions (SC): 2 and 3, carbon monoxide (CO), sulfur dioxides (SO₂), volatile organic compounds (VOCs) nitrogen oxides (NO_x), particulate matter (PM), and lead annual emission from the hot mix asphalt (HMA) manufacturing plant is limited to no more than 99 tons per year based on a 12-month rolling time period. Additionally, emissions of hazardous air pollutants (HAPs) are limited below 10 tons per 12-month rolling time period for individual HAPs, and 25 tons per 12-month rolling time period for all HAPs combined.

Based on the records reviewed for 2014, CO emissions were 2 tons per 12-month rolling time period, 0.5 tons of NO_x per 12-month rolling time period, and 3 tons of PM per 12-month rolling time period. The emissions reported for lead, SO₂, and VOCs were negligible amounts (0.05 tons or less per 12-month rolling time period). The facility was within the permitted emission limits.

Materials/Fuels: The facility burns propane at a maximum rate of 6 gallons per minute. Based on the records reviewed, the facility burned 52,000 gallons of propane in 2014. According to SC: 10 through SC: 14, the facility is allowed to use approved recycled used oil, however, this facility does not burn any recycled used oil in the processes at the facility. Additionally, the facility is allowed to use recycled asphalt material. However, the facility does not use recycled asphalt material.

Process/Operational Parameters: In reference to SC: 4 through SC: 8, the facility uses a wet scrubber and cyclone for control of the production equipment. The wet scrubber uses pressure drop and water supply pressure to determine whether the control equipment is operating properly. During the field inspection, the pressure drop was 7 inches water column, and the water supply pressure was 32 pounds

per square inch (psi). According to Mr. Allen Mattison, the Plant Operator, when the water pressure is close to 60 psi the control equipment needs to be cleaned. During the field inspection the control equipment was operating properly.

All necessary maintenance conducted at the facility is logged into a computer system once it's performed. Based on the maintenance records, the pond system for the wet scrubber is cleaned approximately once a month. No maintenance concerns were observed during the field inspection, and the maintenance records are properly maintained.

- **Testing Sampling Equipment:** Performance testing has not been completed at this facility.
- **Monitoring/Recordkeeping:** In reference to SC: 14-A through C, the facility monitors the monthly fuel consumption of propane. No other fuel is used for the processes at the facility. Based on the records reviewed, the facility uses an average of approximately 9,000 gallons of propane a month. The facility calculates NOx, SO2, and CO emissions compiled on a monthly basis, using the specified emission factors in the PTI. The emissions are already discussed above. Fugitive dust emissions are calculated using EPA emission factors, and are included in the PM emissions already discussed above.
- **Reporting:** In reference to SC: 21, and facility reports annual emissions to the DEQ. Based on the most recent Michigan Air Emissions Reporting System (MAERS), the facility was in compliance.

Evaluation Summary: Based on the field inspection and records review, the facility is in compliance with PTI 164-70D, and no further actions are necessary at this time.

NAME Caryn Owens

DATE 6/15/15

SUPERVISOR [Signature]