

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

B660149209

FACILITY: RON BROWN & SONS INC		SRN / ID: B6601
LOCATION: 17443 PLEASANTON HWY, BEAR LAKE		DISTRICT: Cadillac
CITY: BEAR LAKE		COUNTY: MANISTEE
CONTACT:		ACTIVITY DATE: 05/01/2019
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection and Records Review		
RESOLVED COMPLAINTS:		

On May 1, 2019, Caryn Owens of the Department of Environment, Great Lakes, and Energy (EGLE) – Air Quality Division (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.

#### **Summary:**

The activities covered during the field inspection and records review for the facility indicate the facility is in compliance with PTI 164-70D. Specific permit conditions that were reviewed are discussed below.

#### **On-site Inspection:**

During the field inspection the weather conditions were overcast, wet with on and off rain, and wind speeds about 5 to 10 miles per hour out of the northeast, and approximately 45 degrees Fahrenheit. The facility was not operating during the inspection, and according to Ms. Hobart, during the colder weather in the spring they haven't started up yet this season. 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 rotoclone wet scrubber system for control of particulate matter, and storage silos for the asphalt material. The wet scrubber discharges into a pond system. The pond appeared clean during the inspection. 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. No visible emissions were observed however, it was previously raining and no truck traffic was present during the inspection to observe fugitive emissions.

#### **PTI Records Review**

- Emission Limits:** The facility shall not have visible emissions with an average of 20 percent opacity over a 6-minute average. The facility was not operating during the inspection, so no visible emissions were observed. The facility also shall not exceed carbon monoxide (CO), sulfur dioxides (SO<sub>2</sub>), volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), 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 2018, CO emissions were 2.9 tons per 12-month rolling time period, 0.6 tons of NO<sub>x</sub> per 12-month rolling time period, and 4 tons of PM per 12-month rolling time period. The emissions reported for lead, SO<sub>2</sub>, 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 66,400 gallons of propane in 2018. According to Attachment A - Conditions: 10 through 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, but does not use recycled asphalt material.

- Process/Operational Parameters:** The facility uses a rotoclone wet scrubber 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 wet scrubber was not operating and therefore there was no pressure drop or water supply pressure.

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 Attachment A, Conditions: 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 22,100 gallons of propane a month. The facility calculates NO<sub>x</sub>, SO<sub>2</sub>, 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 Condition 21 in Attachment A, and facility reports annual emissions to the DEQ. Based on the most recent Michigan Air Emissions Reporting System (MAERS), the facility was in compliance.

NAME Camp Owens

DATE 5/1/19

SUPERVISOR SN