

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B660163182

FACILITY: RON BROWN & SONS INC		SRN / ID: B6601
LOCATION: 17443 PLEASANTON HWY, BEAR LAKE		DISTRICT: Cadillac
CITY: BEAR LAKE		COUNTY: MANISTEE
CONTACT: Lisa Hobart , Vice President		ACTIVITY DATE: 06/01/2022
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On site Inspection and Records Review		
RESOLVED COMPLAINTS:		

On Wednesday June 1, 2022, 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. AQD 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 partly cloudy, wind speeds about 5 to 10 miles per hour out of the north-northeast, and approximately 60 degrees Fahrenheit. The facility was operating during the inspection, The facility is a small hot mix asphalt (HMA) batch plant that is capable of producing 80 to 100 tons of asphalt per hour. The plant is used to produce asphalt to pave driveways, patching jobs, and smaller road projects. The equipment consisted of a rotary dryer, an asphalt heater, a rotoclone wet scrubber system for control of particulate matter, and a storage silo for the asphalt material. The wet scrubber discharges into a pond system. The pond was cloudy during the inspection from the discharge of the wet scrubber. 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. The plant began operating this year on May 16, 2022, which is later than typical due to the spring weather conditions and frost laws. During the inspection, AQD could see minimal visible emissions while loading the trucks from the silo, but the visible emissions quickly dissipated. Additionally, a large steam plume is visible from the wet scrubber and from the exit point into the pond when the plant is operating. The steam plume quickly dissipated. The plant is not in operation all year long and shuts down during the winter months. The plant is able to shut down intermittently during the spring, summer, and fall months if the demand is low. According to Ms. Hobart, fuel oil and recycled asphalt shingles (RAS) are not used at the facility. During the inspection, AQD observed the wet scrubber pressure drop was at 4.5 inches of water column and the water supply was at of 40 pounds per square inch pressure. The facility has the pond cleaned 2 to 3 times per month, and cleans out approximately 500-700 tons of slurry which is pumped into a pit to dry out and then emptied to a recycle pile that is then crushed and recycled into the gravel mix . During the inspection, the plant was producing approximately 183 tons that day.

PTI Records Review

- **Emission Limits:** The facility shall not have visible emissions with an average of 20 percent opacity over a 6-minute average. Minimal visible emissions were observed during the inspection while loading trucks, however the visible emissions quickly dissipated, and did not appear to be greater than 20 percent opacity.

The facility also shall not exceed carbon monoxide (CO), sulfur dioxides (SO₂), volatile organic compounds (VOCs), nitrogen oxides (NO_x), particulate matter (PM), and lead annual emission from the HMA 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 2021, CO emissions were 2.6 tons per 12-month rolling time period, 0.6 tons of NOx per 12-month rolling time period, and 3.7 tons of PM per 12-month rolling time period. The emissions reported for lead, SO₂, and VOCs were negligible amounts (0.06 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 63,350 gallons of propane in 2021. This facility does not burn any recycled used oil in or RAS in the processes at the facility.
- **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 at 4.5 inches of water column and a water supply pressure of 40 pounds per square inch.

All necessary maintenance conducted at the facility is typically logged into a computer system once it's performed. The new controller of the plant has not been including the maintenance in the system, but Ms. Hobart indicated she is going to him start adding the maintenance activities. Ms. Hobart has all the maintenance activities logged as work orders in her office, so she was able to show me the activities since the beginning of the year. Based on the maintenance records, the pond system for the wet scrubber is cleaned approximately two to three times a month, and most recently changed May 21, 2022. 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. 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 Condition 21 in Attachment A, and facility reports annual and fugitive emissions to the AQD. Based on the most recent Michigan Air Emissions Reporting System (MAERS), the facility was in compliance.
- **Stack/Vent Restrictions:** There are no permitted stack/vent restrictions associated with the HMA plant.
- **Other Requirements:** There are no other requirements applicable for the HMA plant.

NAME 

DATE _____

SUPERVISOR _____