

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

N075837353

FACILITY: MICHIGAN PAVING & MATERIALS CO.		SRN / ID: N0758
LOCATION: 1100 MARKET SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Ben Schmittling , Area Manager- Grand Region		ACTIVITY DATE: 10/14/2016
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Ben Schmittling, Area Manager- Grand Region. Mr. Schmittling escorted me to the operator tower where we met with Jake Dietz, Plant Operator. There we commenced discussions on plant operations and recordkeeping which Mr. Dietz was very familiar with and had everything up-to-date and immediately available.

FACILITY DESCRIPTION

Michigan Paving & Materials Co. is a hot mix asphalt (HMA) facility that is permitted pursuant to Opt-out Permit to Install No. 66-84E, which also covers the aggregate conveyors, a maximum rated 650 ton per hour parallel flow HMA drum dryer/mixer with fabric filter dust collector for control of particulate matter. The permit contains synthetic minor limits for Hazardous Air Pollutants (HAPs). This permit also contains conditions for the yard, the liquid asphalt cement storage tanks and the HMA storage silos. This HMA plant is also subject to New Source Performance Standard as identified in 40 CFR Part 60 Subparts A and I. All original stack testing requirements have been met.

COMPLIANCE EVALUATION

EUHMAPLANT

Emission Limits

The emission limits in the permit have various methods of compliance, including stack testing, monitoring through a hand held CO monitoring device and recordkeeping. The PM stack testing has been completed and demonstrated compliance. The CO stack testing has been conducted, and the hand held monitoring is being done in accordance to the permit requirements. (data attached) Additional pollutant recordkeeping is being maintained in the attached acceptable format, which includes data on daily emissions for each pollutant. The permit indicates that the emission limits are based on 895,000 tons HMA paving material production. This plant currently operates at less than half that production limit.

Material Limits

The material usage limits apply to burning any fuel that has a sulfur content of less than 0.6% by weight, and limits for metals in recycled used oil. No liquid fuel is in use at the facility at this time. Additionally, the HMA plant is limited to a maximum 50% RAP material on a monthly average. The maximum RAP used at this plant is 45% which is atypical, and generally in the 33% range. The current 12-month rolling HMA produced is 388,763 tons.

Process/Operational Limits

The process operational limits include specific plans as detailed in Appendix A, B and C. These cover fugitive dust, preventative maintenance of equipment and a compliance monitoring plan for recycled used oil. It lists the appropriate range for the fabric filter pressure drop as being between 2 and 10" H₂O. The pressure drop at the time of the inspection was 3.6" H₂O and Mr. Dietz indicated the typical range based on the production rate is 3.5-4.5" H₂O. The pressure drop and lack of visible emissions indicate compliance. Attached is a maintenance log that includes the fabric filters.

Testing

The testing requirements included complete stack sampling and odor threshold analysis that was completed June of 2008 and indicated compliance.

Monitoring

The monitoring requirements are being conducted and recorded in a satisfactory manner. The feed rates are monitored and recorded by the systems control programs in the operator tower, which was upgraded in 2016. Mr. Dietz had all information available to view. The permit requires CO monitoring at the start-up of the season and every 500 hours of operation. Mr. Dietz indicated that while they don't operate 500 hours in a month, it is monitored every month to ensure compliance. The CO readings must be below 500 ppm, and since the 2016 burner replacement, the readings are at 20 ppm. At the time of the inspection, the drum mix and drum exhaust temperatures were being monitored and were 320°F and 305°F respectively.

Recordkeeping/Reporting/Notification

All required recordkeeping is being maintained, and Sue Hanf, Environmental Engineer with Michigan Paving who provided me with access to the spread sheets to evaluate for accuracy. The spreadsheet is attached via data CD.

Attached is a chronological log of baghouse maintenance activities, and no visible emissions or other issues were identified during the inspection. The HMA loadout stations are not controlled.

I asked if the company was still producing warm mix asphalt, which was the "new" thing in paving a few years ago. Apparently, not a lot of customers liked the consistency of it as it was harder to work with so it really never took off.

EUYARD

The facility maintains a program for fugitive emissions control, and the documentation is included on the Daily Production Log tab in the attached spreadsheet. No excessive fugitive emissions were observed the day of the inspection.

EUACTANKS

No visible emissions were observed from the liquid storage tanks.

FGFACILITY

The emission limit for each individual HAP is less than 8.9 tons per 12-month rolling time period, and aggregate HAPs are limited to less than 22.4 tons per 12-month rolling time period. Current highest HAP is formaldehyde at 0.8 tons. Aggregate HAP emissions are 1.14 tons. All calculations are attached.

Compliance activities appear to be in place for each of the Appendices A, B and C.

EVALUATION SUMMARY

Michigan Paving and Materials- Grand Rapids was in compliance at the time of the inspection.

NAME



DATE

10-28-16

SUPERVISOR

