

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

N159435666

FACILITY: RIETH RILEY CONSTRUCTION CO, INC.		SRN / ID: N1594
LOCATION: Kings Highway, SAINT JAMES		DISTRICT: Cadillac
CITY: SAINT JAMES		COUNTY: CHARLEVOIX
CONTACT:		ACTIVITY DATE: 07/07/2016
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Compliance inspection PTI 93-01A.		
RESOLVED COMPLAINTS:		

On 7/07/2016 I conducted an inspection of the Rieth-Riley portable asphalt plant N1594 to determine compliance with PTI 93-01A, 40 CFR 60, Subpart I, and the Air Pollution Control Rules. The requirements of PTI 93-01A include the NSPS requirements. The plant currently is in storage at the Bay Shore pit in Charlevoix. This plant previously operated on South Fox Island and on Beaver Island. The last date of operation was in July and August of 2014 when it was used to produce asphalt for a paving project on 4 miles of Kings Highway on Beaver Island. This is the only year the plant operated in the last five year period. After that project concluded around 8/25/2014 the plant was broken down and removed from the island.

I met with Mr. Brad Shearer at the Bay Shore pit to observe the equipment and get additional information. The plant was stored in separate pieces in an area of the pit where stockpiles of processed material and RAP were stored. The plant was broken down into its individual components which I inventoried as follows:

Company ID	Description	Model	Serial Number
1700	Generator and Feeder	NA	NA
93-01A	Asphalt Drum Mixers, Inc. (ADM) Drum Mixer and venturi scrubber.	SPL5424-S	150-87
NA	6,000 gal. Fuel Tank Trailer	5-6109/T4-32-12	271010002230
3020	Generator Trailer	NA	NA
42760	Asphalt Cement Tank Trailer	NA	NA
NA	Self-Erecting Load-out Silo	NA	NA

PTI contains requirements for emission limits, material use limits, testing, monitoring and recordkeeping, and stack restrictions.

Emission Limits

PTI 93-01A contains the following emission limits:

Pollutant	Tons/Year
PM	1
SO2	8
NOx	6
CO	10.1
VOC	2.9
Lead	8.0E-04

Compliance is demonstrated through testing and annual emission calculations. Annual emissions as reported for 2014 were as follows:

Pollutant	Emissions
PM	< 1 Ton
SO2	< 1 Ton
NOx	1 Ton
CO	< 1 Ton
VOC	< 1 Ton
Lead	0.06 lbs.

Production/Process Restrictions

The plant is limited to material throughput of 100,000 tons of asphalt paving materials per 12-month rolling time period.

Compliance is demonstrated through recordkeeping. Records for 2014 indicate total HMA production was 11,072 tons

Records of significant maintenance activities are also required. R-R provided a response indicating that no significant maintenance has been required.

Proper operation of the venturi scrubber is required for operation of the asphalt plant. This is demonstrated by monitoring the differential pressure and flow rate to the scrubber. Recording of these operating parameters is not required.

Testing

Testing to demonstrate compliance with NSPS PM limits was required. PM testing was conducted by the previous owner of the plant in 1988 and a copy of the test provided to the following owners (H&D Paving, now Reith-Riley) is on file. No further testing has been done.

HAPs testing is required within 90 days of reaching 90,000 tons of HMA production. This production level has not been met yet.

Monitoring/Recordkeeping

PTI 93-01A requires that the following records are maintained for five years:

1. The amount of asphalt paving material produced per 12 mos. Rolling time period.
2. The asphalt paving material ton per hour production rate.
3. The total hours of operation per season.
4. The amount of recycled asphalt product (RAP) used on a monthly average.
5. Burner efficiency monitoring records (Carbon Monoxide emissions monitoring) required at start up and every 500 hrs. of operation.
6. Records of any significant maintenance activities with respect to air emissions (burner, drum, venture scrubber, etc.)
7. Records of the type of fuel used. If recycled used oil is used records of the analysis for each shipment of RUO and on-site characterization.

Following the inspection records were requested and provided by R-R. These records demonstrate:

1. Total HMA produced, 11,072 tons/12-mos. rolling was less than the 100,000 ton/12-mos rolling limit.
2. The average asphalt paving material ton per hour production rate was 59.86 tph which is slightly less than the 60 tph limit.
3. The total hours of operation per season were 184.99.
4. No RAP was used.
5. Records are attached, one data set required each 500 hours. The records provided meet this requirement.

- 6. There were no significant maintenance activities during the limited use of the plant.
- 7. Recycled used oil (#400 fuel oil) was used during operation of the plant. An analysis of the RUO used is attached.

Reporting

This source has reported annual emissions to the AQD through MAERS each year. However, the plant only operated during EI year 2014. The 2014 MAERS emissions report is attached.

Stack Parameters

The PTI limits stack diameter to 38" and a minimum height of 21'. At the time of the inspection the stack was disassembled and mounted on the Drum Mixer trailer. It appeared that the diameter was compliant with the limit and that the assembled stack would reach the minimum height.

Summary

As a result of this inspection it appears that this source is in compliance with NSPS PTI 93-01A, 40 CFR 60, Subpart I, and the Air Pollution Control Rules.

NAME 

DATE 7-25-16

SUPERVISOR 