

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

N165629791

FACILITY: ALBRECHT SAND AND GRAVEL		SRN / ID: N1656
LOCATION: 3790 W. Sanilac Rd., SNOVER		DISTRICT: Saginaw Bay
CITY: SNOVER		COUNTY: SANILAC
CONTACT: James Albrecht , Plant Manager		ACTIVITY DATE: 06/03/2015
STAFF: Sydney Bruestle	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection to follow up on VN from July 2014.		
RESOLVED COMPLAINTS:		

Sydney Bruestle and Gina McCann of the AQD conducted a scheduled inspection at Albrecht Sand and Gravel on June 3, 2015. We arrived on site (3501 Cat Lake Road in Caro) around 10:00 am and met with Duane Mausolf and Jim Albrecht. This plant is a Bituma-Stor parallel flow plant rated at 250 ton per hour (TPH). The plant is operated under the approved PTI 547-87M.

The Facility is rated at 250 tpy, while onsite the plant production rate fluctuated between 170-185 tpy. At the time of the inspection the facility was producing mix 36A. This mix contains 0% RAP. The plant runs on recycled used oil (RUO).

AQD collected a sample of RUO and sent it to Fibertec Environmental Services for analysis (see attached analysis). Midwest analytical services performed the total halogen analysis, the results showed 2800 mg/kg of total halogens, which is below the 4000 ppm limit for total halogens.

Fibrotec Performed the analysis for the following elements/compounds:

Element/Compound	Result (ppm)	Limit (ppm)
Arsenic	Not detected at a reporting limit of 0.1 ppm	5.0 ppm
Cadmium	Not detected at a reporting limit of 0.05 ppm	2.0 ppm
Chromium	Not detected at a reporting limit of 0.5 ppm	10 ppm
Lead	Not detected at a reporting limit of 1.0 ppm	100 ppm
PCBs	Not detected at a reporting limit of 1.0 ppm	1.0 ppm
Flash Point	Greater than 208 degrees F	Minimum of 100 degrees F
Ash Content	0.39 %	1.0%
Sulfur %	0.33 %	1.5 %

Process/Operational Limits:

Albrecht Sand and Gravel was not implementing and maintaining the Compliance Monitoring Plan (CMP) for Recycled Used Oil as required by permit condition 1.8 and outlined in Appendix C.

The plant did not have a sign informing truck drivers all trucks leaving the site with HMA paving materials is required to be covered prior to leaving the site as stated in the Fugitive dust plan in Appendix A. This plan is required by permit condition 1.9. The plant appears to be implementing and maintaining the remainder of the Fugitive Dust Plan (Appendix A).

The plant did not fine tune the burners for proper burner operation and performance as required by permit condition 1.10.

Permit Condition 1.11 states the plant must submit a start up, shut down, and malfunction plan to the AQD District Supervisor to minimize emissions. This plan has not yet been received by the AQD, however, the company is aware of the requirement and is composing a plan.

Monitoring:

The plant monitors the aggregate feed rate and RAP feed rate on a continuous basis as required by permit condition 1.14.

Albrecht Sand and Gravel started operating May 18, 2015 for the 2015 season. The plant failed to monitor CO emission upon start up of the 2015 paving season as required by Permit Condition 1.15 a. The plant is aware they must also monitor CO emissions upon a malfunction and after every 500 hours of operation as required by permit conditions 1.15 b and c.

The Fabric Filter dust collector has a continuous pressure drop monitor installed, however, Albrecht Sand and Gravel was not recording pressure drop observations daily as required by permit condition 1.17.

The plant monitors fuel usage rate for EUHMAPLANT on a daily basis in gallons per day.

Recordkeeping/ Reporting/ Notification:

The plant was not maintaining a log of all significant maintenance activities conducted and all significant repairs made to EUHMAPLANT consistent with the preventative maintenance plan (Appendix B) as required by permit condition 1.20.

The plant was keeping records of fuel type, amount (gallons) for each fuel combusted (1.21 a). However, they were not keeping records of sulfur content (percent by weight), specific gravity, flash point, and higher heating value (Btu/lb) of all fuels being combusted as required by permit condition 1.21 b. The plant was also not maintaining records required by the CMP (Appendix C) as required by permit condition 1.21 e.

The plant continuously monitors virgin aggregate feed rate and RAP feed rate, they intermittently monitor product temp. While on site the virgin aggregate feed rate was approximately 172 tons per hour, the RAP feed rate was 0 tons per hour, and the asphalt paving material product temperature was around 298 degrees F.

AQD requested the following records on June 15, 2015:

Permit Condition	Records needed
1.15/1.24	CO emissions recorded
1.18	Fuel Usage rate for 2014 and 2015
1.20	Maintenance Log (dust collector maintenance activities listed in appendix B)
1.21	Daily Records of the following for 2015 season: <ul style="list-style-type: none"> - Fuel oil ID, type, amount (gallons) - Sulfur Content (percent by weight)

	<ul style="list-style-type: none"> - Specific Gravity - Flash Point - Higher heating Value (BTU/lb) - Tons of hot mix asphalt produced containing RAP - Determination of SO2 emissions in lb/MMBTU (based on worse case specification of fuel oil used) - Records Required in Appendix C: <ul style="list-style-type: none"> ~Copies of Supplier certificates of analysis ~analytical results from onsite (2015 season) ~Quarterly summaries (described in appendix C)
1.23	Monthly and 12 month rolling time period records for criteria pollutants and HAPs listed in emission limit table
1.25	Hourly, Monthly, and 12 month rolling time period records of the amount of HMA paving materials produced (2014 and 2015 seasons)
1.26	Hourly, Monthly, and 12 month rolling time period records of the amount of fuel used for all fuels combusted (gallon of fuel per ton of HMA)

Records were received June 23, 2015. (See Attached)

The facility was not in compliance with PTI 574-87M and a violation notice was sent on June 25, 2015 for the following:

Process Description	Rule/Permit Condition Violated	Comments
Hot mix asphalt (HMA) Facility	1.15 a,b and c	Monitor CO emissions upon start up, malfunction, and every 500 hours
Hot mix asphalt (HMA) Facility	1.21 b,d, and e	Daily SO2 Records
Hot mix asphalt (HMA) Facility	1.80	Compliance Monitoring Plan (CMP) for RUO- Characterization program in Appendix C- Sampling
Hot mix asphalt (HMA) facility	1.17	Daily pressure drop recordings and annual pressure drop gauge calibration
Hot mix asphalt (HMA) facility	1.20	Maintenance Records kept in accordance to Appendix B-

		preventative maintenance program, Black light test not conducted prior to operation
Hot mix asphalt (HMA) facility	2.1	Do not have speed limit and covered truck signs posted as outlined in Appendix A

NAME Sgt. B. M.

DATE 06/29/15

SUPERVISOR C. Chase