

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

N218435055

FACILITY: RIETH RILEY CONSTRUCTION CO INC		SRN / ID: N2184
LOCATION: 3401 LANDFILL RD, ROSCOMMON		DISTRICT: Cadillac
CITY: ROSCOMMON		COUNTY: ROSCOMMON
CONTACT: Don LeForce , Plant Operator		ACTIVITY DATE: 06/01/2016
STAFF: Shane Nixon	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site inspection and records review		
RESOLVED COMPLAINTS:		

AQD staff traveled to the Rieth-Riley hot mix asphalt (HMA) plant in Roscommon County to perform an inspection. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 466-89G. Mr. Don LeForce, Plant Operator, was present at the time of the inspection.

A. EUHMAPLANT - 345 ton per hour drum mix asphalt plant.

1. **Emission Limits** - Based on a spreadsheet completed by the company, emissions from the facility are well below the emission limits listed in the PTI. Attached are spreadsheets which show the calculated emissions for the 12 month rolling time period ending May 2016.

2. **Material Limits** - The HMA plant is currently restricted to burning only #2 through #6 fuel oil, recycled used oil (RUO), propane, or natural gas. Currently, the facility is burning RUO in the HMA plant. An analysis for the most recent shipment of RUO (attached) provided by the supplier demonstrates that it is not hazardous waste.

The percent recycled asphalt pavement (RAP) contained in the HMA is limited to 30% based on a monthly average. Records provided by the company indicates that monthly averages were less than 30%. For the previous 12 months, the highest RAP percentage monthly average was 26% and occurred in October 2015. The RAP content of the HMA being produced during the inspection was approximately 16% based upon AQD calculations.

HMA production is limited to 895,000 tons per 12 month rolling time period. Records maintained by the facility indicate the production rate has never come close to the limit. The highest production for the 12 month rolling time period of June 2015 through May 2016 occurred in October 2015 and 142,675 tons of HMA was produced. The HMA production rate is also limited to 345 tons per hour (the rated capacity of the HMA plant). Records indicate that the hourly production limit has not been exceeded. The production rate at the time of the inspection was approximately 253 tons per hour.

3. **Process/Operational Restrictions** - The permittee is not allowed to operate the HMA plant unless the fugitive dust control plan, preventative maintenance plan, and compliance monitoring plan for RUO are implemented and maintained. These plans are discussed later in the report.

The burner(s) for the drum mixer are required to be maintained to control CO emissions. Based upon records of the CO testing and burner tuning, the facility appears to be adequately maintaining the efficiency of the burners.

4. **Design/Equipment Parameters** - The baghouse is required to be maintained and operated in a satisfactory manner. Satisfactory manner means maintaining a differential pressure between 2 and 8 inches water column across the baghouse. At the time of the inspection, the differential pressure was 3.5 inches water column.

5. **Testing/Sampling** - There are no specific testing/sampling requirements for the HMA plant at this time; therefore, this section is not applicable.

6. **Monitoring/Recordkeeping** - In accordance with the PTI, the virgin aggregate feed rate and RAP feed rate are monitored on a continuous basis.

CO emissions are monitored at the startup of every paving season and every 500 hours of operation. Records maintained at the facility's office indicate CO emissions were monitored and the burner was tuned on June 2016.

A log of maintenance activities performed on the plant is required to be maintained at the facility. AQD review of the records determined them to be adequate.

Records of the type of fuel combusted, physical and chemical properties of the fuel, and production records of RAP containing HMA produced were available for each calendar month. Spreadsheets containing this information are attached.

Daily records of the virgin aggregate feed rate, RAP feed rate, HMA temperature, and information to identify the

components of the HMA were available upon request. This information is automatically printed every five minutes. A HMA mixture called low volume superpave was being produced at the time of the inspection. The information staff recorded at the time of the inspection follows:

Production Rate	253 tons per hour
Aggregate moisture	2.4%
RAP moisture	3.5%
asphalt cement content of HMA	5.5%
AC content of RAP	4.7%
AC temperature	300 deg. F.

All records, including 12 month rolling and monthly emission calculations, CO emission monitoring, and average daily, monthly and 12 month rolling production records were available upon request. AQD review of the records indicates the facility is in compliance with the recordkeeping requirements of the PTI for EUHMAPLANT.

7. Reporting - The facility is required to provide notice to the AQD within 30 days after commencing use of RUO containing greater than 1,000 ppm halogens. RUO with a halogen content greater than 1,000 ppm has not yet been used.

B. EUSILOS - HMA paving material product storage silo.

1. Process/Operational Restrictions - The permittee is not allowed to operate the silos unless the emission capture system for the top of each silo is maintained and operated in a satisfactory manner. During the inspection, AQD staff noted that there were no visible emissions from the top of each silo. AQD staff considers the emission capture system to be operating properly based on those observations.

C. FGFACILITY - All process equipment sourcewide including equipment covered by other permits, grandfathered equipment and exempt equipment.

1. Emission Limits - Each individual HAP is limited to 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. The highest aggregate HAP emissions from the facility for the preceding 12 months was 1.28 tons.

2. Monitoring/Recordkeeping - Records of HAP emissions are required to be maintained and made available to AQD staff upon request. Records (attached) were made available upon request.

D. Fugitive Dust Control Plan

Brine or water is usually applied to areas subject to vehicular traffic. AQD staff observed in records that the non paved areas were brined on May 3, 2016 and frequent rainfall was claimed as dust suppression in 2015. Areas in which the HMA haul vehicles travel appeared to be paved. Out-going trucks tarped their loads prior to exiting the facility. A sign was posted on the silo supports in a conspicuous location to remind drivers to tarp their loads.

No fugitive dust was observed from any of the storage piles at the time of the inspection and no stock piling was performed to determine if the freefall drop distance was minimized.

Records of all fugitive dust control activities are logged and were made available to AQD staff.

Fugitive emissions from any transfer system, storage bin, mixer, hopper, or baghouse are required to be immediately corrected. At the time of the inspection, AQD staff did not observe any fugitive emissions from any of the process equipment.

E. Preventative Maintenance Program for the Fabric Filter Dust Collector

The differential pressure across the baghouse is maintained within the acceptable range of 2 to 8 inches water column as evidenced by the on-site inspection and records review. Records indicate that the differential pressure is recorded at least once per day. Dust captured by the baghouse is reinjected into the HMA, therefore, disposal of a collected air contaminant is not an issue. A black light inspection was performed in April 2016 which resulted in the need to replace four bags.

CONCLUSION - Based upon the on-site inspection and records review, AQD staff has determined the facility to be in compliance with PTI No. 466-89G.

NAME Shane Nelson

DATE 7/22/16

SUPERVISOR 