

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

N559773708

FACILITY: Ace-Saginaw Paving Co. - Plant 4		SRN / ID: N5597
LOCATION: 2747 Priemer Road, UBLY		DISTRICT: Bay City
CITY: UBLY		COUNTY: HURON
CONTACT:		ACTIVITY DATE: 09/03/2024
STAFF: Rachel Benaway	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site inspection to verify compliance with PTI 156-95N and all state and federal air use regulations. The facility appears to be in compliance at this time.		
RESOLVED COMPLAINTS:		

Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) staff, Rachel Benaway and Emily Crimmins, conducted an unannounced air quality inspection of Ace- Saginaw Paving Company (N5597) on 9/3/2024. Ace- Saginaw Paving Company is a hot mix asphalt plant located in Uby, MI (Huron County). The purpose of this inspection was to verify Ace- Saginaw Paving Company is in compliance with their Permit to Install (PTI) #156-95N and all applicable requirements of the Federal Clean Air Act, the Michigan Air Pollution Control Rules, and the Michigan Natural Resources and Environmental Protection Act (Act 451 of 1994). Ace- Saginaw Paving Company is considered a synthetic minor source of hazardous air pollutants (HAPs) and particulate matter (PM). The facility is subject to New Source Performance Standard (NSPS) for Hot Mix Asphalt Facilities promulgated in 40 CFR Part 60, Subpart I. The last inspection was completed at the facility on 8/21/2019. Kelly Guertin, an Environmental Engineer with Edw. C. Levy Co. Environmental, is responsible for submitting the requested records. Nick Pavlichek, Plant Operator, was present for the on-site inspection. Personal protection equipment includes a hard hat, safety glasses, high visibility vest, and safety shoes.

At the time of this inspection, the facility had three employees on site and was operating. The typical paving season runs from May to November. There are three standard hot mix asphalt mixes but the mix most commonly used is referred to as their "County Mix." The aggregate used at the facility comes from various sources such as Wallace Stone Quarry for limestone or the facility's own sand and gravel pits located across the street.

Equipment at Facility
EU001 -Hot Mix Asphalt (HMA) equipment: Aggregate conveyors, 425 tph rotary drum-dryer, 135 MMBtu/hr recycled used oil (RUO) fired burner with preheater system, 20,000-gallon storage tank, baghouse
EUYARD - Plant roadways, yard, storage piles, material handling operations
EUTANKS - liquid asphalt cement storage tanks
EUSILOS - 2 HMA paving material product storage silos

The facility installed a portable generator to power the conveyor. The generator is stored in Saginaw when not in use at this facility and is reported to never be in the same location for more than 12 consecutive months. The unit appears to be exempt under Rule 285(2)(g).

The following is a summary of information obtained from the on-site inspection and the submittal of requested records. Where applicable, compliance determinations are indicated for each special condition established in the PTI, organized by emission unit or flexible group. All records submitted to demonstrate compliance with permit requirements and emissions limits are included with this report.

EU001

The hot mix asphalt (HMA) equipment consists of aggregate conveyors, a 425 tph rotary drum-dryer, a 135 MMBtu/hr recycled used oil (RUO) fired burner with preheater system, a 20,000-gallon storage tank, and a baghouse for particulate matter control.

Emission Limits and Recordkeeping:

SC	Pollutant	Limit	COMPLIANT?
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1.1c and 1.23	PM10	19.1 tpy -12-month rolling time • The highest 12-month rolling PM emissions over the past two paving seasons was recorded in June of 2023 at 8.23 tpy, well below the 19.1 tpy limit.	Yes
1.1d and 1.24	CO	0.201 lb/ton of HMA paving material produced • The highest CO reading recorded during the last season and this year so far was 13 lb/hr and 0.049 lbs/ton recorded on 7/31/23, well below the permit limit of 0.201 lbs/ton.	Yes
1.1e and 1.24	CO	75.4 tpy- 12-month rolling time • The highest 12-month rolling CO emissions over the past two paving seasons was recorded in June of 2023 at 3.57 tpy, well below the 75.4 tpy limit.	Yes

Material Usage Limits and Recordkeeping:

SC	Condition	COMPLIANT?
1.5 and 1.21	Limit the asphalt mixture process in EU001 to a maximum of 50% RAP material based on a monthly average • Facility is tracking the tons of HMA containing RAP produced, including the average % of RAP per ton of HMA. In 2023, the highest RAP% average in a month was 26.02% in October. So far in 2024, May had the highest monthly average at 23.99%.	Yes
1.6 and 1.25	Shall not process more than 750,000 tons of HMA per 12-month rolling time period • The highest amount of HMA produced in a 12-month rolling time period between the 2023 and 2024 paving seasons so far was 187,657 tons, recorded in June of 2023.	Yes
1.7 and 1.25	Shall not process more than 425 tons of HMA per hour based on daily average (divide daily HMA production by daily operating hours) • The facility is tracking the daily HMA production and operating hours on the daily maintenance files.	Yes
1.8 and Appendix (App) C	Shall not operate unless Compliance Monitoring Plan for RUO in Appendix C is implemented and maintained • Submitted records included supplier documentation and laboratory reports from each delivery with oil specifications and constituent properties listed.	Yes
1.10	Shall fine tune drum mix burners at the start of each paving season and after every 500 hours of operation, or upon malfunction as shown by CO monitoring data • Maintenance sheets were submitted indicating all work done on drum mixer burners. Fine tuning of the burner is specifically noted on daily sheets. A third party burner specialist inspects the burner every season.	Yes
1.12 and App B.51	Shall not operate unless fabric filter duct collector is installed, maintained, and properly operated- Acceptable pressure drop range: between 2 and 10 in of water column • See notes in next section	Yes

1.20 and App B	<p>1a. Pressure drop across baghouse shall be continuously monitored</p> <p>2. Baghouse shall be equipped with high temp sensor/alarm system</p> <ul style="list-style-type: none"> • High temperature set-point is 380 degF <p>3. Baghouse particulate shall be stored/disposed of properly</p> <ul style="list-style-type: none"> • Dumpster on site is used for disposal <p>6. Perform black light test once per year.</p> <ul style="list-style-type: none"> • Tests are done in the Spring and the Fall of every season. Test were completed on 5/7/2023, 9/12/2023, and 3/28/2024. <p>7. Maintain at least 15 filter bags on site and keep inventory of bags and other necessary parts</p> <ul style="list-style-type: none"> • Facility reports that approximately 50 bags are stored on site 	Yes
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Monitoring and Recordkeeping:

SC	Condition	COMPLIANT?
1.16	<p>Monitor the virgin aggregate feed rate and RAP feed rate on a continuous basis</p> <ul style="list-style-type: none"> • Control room panel monitors these rates continuously and the daily rates are recorded on the daily sheets. 	Yes
1.17 and 1.24	<p>Use handheld CO monitor for CO emission rate and record associated production data</p> <ul style="list-style-type: none"> • CO readings are completed at least once every month, sometimes more often, during each paving season. Records were submitted with required production data. 	Yes
1.18 and 1.24	<p>Monitor emissions and operating information in accordance with NSPS 40 CFR Part 60 Subparts A and I</p>	Yes

Recordkeeping:

SC	Condition	COMPLIANT?
1.22	<p>Daily records:</p> <p>a) Virgin aggregate feed rate</p> <p>b) RAP feed rate</p> <p>c) Asphalt paving material product temperature</p> <p>d) Information sufficient to identify all components of the asphalt paving material mixture</p> <p>-Record mix design and time of start-up for each mix design</p> <ul style="list-style-type: none"> • Verification of daily recordkeeping was confirmed during inspection. Daily log sheets were submitted with all above information included. 	Yes
App B.5.2	<p>Records of baghouse pressure drop recorded once per day (verify on site)</p>	
App B.8	<p>Records of: (date, time, condition)</p> <p>-Baghouse visual inspections and black light inspections</p> <p>-# of bags installed at each inspection</p> <p>-Visible emission observations at stack discharge point</p> <p>-Significant maintenance performed on baghouse</p> <ul style="list-style-type: none"> • Maintenance logs were submitted with all above information included. Facility often completes baghouse maintenance on days when plant is not operating. 	Yes

EU001 appears to be in compliance with all applicable permit conditions and requirements at this time.

EUYARD

Control techniques and operational procedures regarding fugitive dust from plant roadways, yard, storage piles, and material handling operations.

Process/Operational Limits per Special Condition 2.1 and Appendix A:

- The facility contracts a third party, Kleenway, to deliver and apply calcium chloride to EUYARD. The facility submitted delivery/application documentation indicating four delivery/applications in 2023 from 3,500 to 6,000 gallons each. So far in 2024, five delivery/applications have been made at 6,000 gallons each. The deliveries are made as needed, but the facility can also use truck and front-end loader bucket applications of water from the surrounding ponds between applications if necessary.
- 10 mph speed limit signs are posted at the facility entrances.
- No track out was observed at the time of this inspection. No visible emissions were observed from roadways, piles or the plant yard.
- An aggregate delivery was observed during this inspection. The delivery truck was covered upon arrival.

Monitoring/Recordkeeping:

SC	Condition	COMPLIANT?
2.2	Calculate annual fugitive dust emissions of PM and report to MiEnviro <ul style="list-style-type: none"> • The facility reported 2.76 tons of annual fugitive dust emissions on their 2023 Emissions Inventory Report. 	Yes

EUYARD appears to be in compliance with all applicable permit conditions and requirements at this time.

EUACTANKS

The facility has three horizontal and one vertical liquid asphalt cement storage tanks.

Process/Operational Limits:

SC	Condition	COMPLIANT?
3.1	Shall not operate unless vapor condensation and recovery system is installed, maintained, and operated properly <ul style="list-style-type: none"> • Tank inspections are tracked on the daily maintenance logs. The tanks are equipped with sonar overflow systems. 	Yes

EUACTANKS appears to be in compliance with all applicable permit conditions and requirements at this time.

EUSILOS

The facility has two HMA paving material product storage silos. Per SC 4.1, the silos are equipped with a draft system for vapor control that consists of an exhaust fan that captures and directs exhaust from the silos into the baghouse.

EUSILOS appears to be in compliance with all applicable permit conditions and requirements at this time.

FGFACILITY

All process equipment at the source, including equipment covered by other permits, grandfathered and exempt equipment is subject to the listed HAP limits.

- The facility submitted monthly and 12-month rolling emissions calculations for the 2022 through the 2024 paving seasons so far. The facility is tracking emissions of the following HAPs:

Acrolein	Ethylbenzene	Manganese	Sulfuric Acid Mist
Arsenic	Formaldehyde	Napthalene	Toluene
Benzene	Hydrogen Chloride	Nickel	Xylene

Emission Limits and Recordkeeping:

SC	Pollutant	Limit	COMPLIANT?
5.1a and 5.2	Each individual HAP	Less than 8.9 tpy per 12-month rolling time period • The individual HAP with the highest emissions is hydrogen chloride. The highest 12-month rolling time emissions over the past two paving seasons was 0.56 tpy in June of 2023.	Yes
5.1b and 5.2	Aggregate HAPs	Less than 22.4 tpy per 12-month rolling time period • The highest 12-month rolling time emissions of all HAPs over the past two paving seasons was 1.33 tpy in June of 2023.	Yes

FGFACILITY appears to be in compliance with all applicable permit conditions and requirements at this time.

NAME Rachel Benaway

DATE 9/23/2024

SUPERVISOR Wina L. McLean