

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

A253464106

<b>FACILITY:</b> Michigan Paving and Materials- Woodland	<b>SRN / ID:</b> A2534	
<b>LOCATION:</b> 3566 Millcreek Ave., COMSTOCK PARK	<b>DISTRICT:</b> Grand Rapids	
<b>CITY:</b> COMSTOCK PARK	<b>COUNTY:</b> KENT	
<b>CONTACT:</b> Josh Nellis , Plant Superintendent	<b>ACTIVITY DATE:</b> 08/02/2022	
<b>STAFF:</b> April Lazzaro	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Unannounced, scheduled inspection.		
<b>RESOLVED COMPLAINTS:</b>		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Josh Nellis, Plant Superintendent and Jason Feliciano, Back up Operator. No odors or visible emissions were identified during an off-site investigation of the facility and surrounding area, which included the neighborhood where the complainants reside or upon arrival at the facility.

### Facility Description

Michigan Paving is a hot mix asphalt (HMA) facility operating pursuant to Opt-out Permit to Install No. 990-90B. The facility is also subject to the New Source Performance Standards Subpart I – Standards of Performance for Hot Mix Asphalt Facilities. This facility has a history of recent odor complaints, most recently from the neighborhood to the east adjacent to the Grand River. Three formal odor complaints have been received during the 2022 season, which is lower than years past. In 2021 by comparison, 16 odor complaints were received. The AQD has not verified that the odors experienced by residents violate Rule 901 for nuisance odors at this time.

### Compliance Evaluation

Upon arrival at the facility, I contacted Josh Nellis who was on site operating the plant for the day. He sent Mr. Feliciano to escort me to the operator tower for a pre-inspection meeting where we discussed the purpose of the inspection. Following that discussion, Mr. Feliciano provided me with an escort around the plant and provided information on the facility's daily operations.

### Opt Out PTI No. 990-90B

#### **EUHMAPLANT**

This emission unit consists of one hot mix asphalt (HMA) facility including the aggregate conveyors, a 650 ton per hour (tph) parallel flow drum dryer/mixer, and a fabric filter dust collector. While the facility is rated for 650 tph, it typically operates under 350 tph. The initial records showed that the highest tph achieved for the 2022 season was on July 27, 2022, at 838 tph, which is above the maximum rated capacity of the plant. I requested additional information from the company and was told that the hours of operation for the day had been entered incorrectly into the spreadsheet. Instead of the original hours of 6.5, the correct operating hours for that day were 13.6. I also received the daily production sheet which corroborated this information. With the correct hours entered, the data indicates the production rate on July 27 was 400.81 tons per hour which is within the rated capacity of the plant.

The facility is permitted to burn a variety of fuels; however, it currently only burns natural gas to heat the HMA to the appropriate temperature and consistency.

Stack testing was conducted in 2008, and for pollutants where test data is available, those values are used to demonstrate compliance with the applicable emission limits. Recognized and appropriate emission factors are used to calculate emissions for all other pollutants. A complete spreadsheet was received that meets all recordkeeping requirements of the permit.

Michigan Paving continuously monitors a variety of parameters, including baghouse pressure drop, HMA temperature as well as other process information. This monitoring is done both to fulfill permit requirements, and for internal reasons. Each plant operator is experienced in running the plant and constantly monitors appropriate parameters for product consistency and permitting requirements. Additionally, the facility is required to keep daily logs of information sufficient to identify all components of the asphalt paving material mixture as well as times and mix designs made. As indicated above, the facility spreadsheet contains all information required by the permit and is acceptable.

The HMA plant is limited to 50% recycled asphalt product (RAP), and the highest RAP content used in the 2022 season was 38.76%.

The HMA plant is limited to 750,000 tons of paving materials per 12-month rolling time period. The reported throughput for the 12-month time period ending in July 2022 is 298,786 tons which indicates compliance with the limit.

Monitoring of carbon monoxide (CO) is required to ensure that the asphalt burner is properly tuned to minimize combustion emissions. This monitoring was discussed with the company, and records of the monitoring was requested. During the last inspection, it was noted that the facility went slightly over the 500 hour timeframe required by the permit. The CO value at startup was an average of 19 ppm and the 500 hour check value was an average of 18 ppm. The facility action level is 500 ppm.

The loadout bay is where the HMA is dispensed from the silos into the delivery truck. This loadout bay is enclosed on three sides, with openings where the trucks enter and exit. Loadout was observed and appeared appropriately controlled. Emissions generated during loadout are ducted into the burn zone of the HMA dryer.

## **EUYARD**

This emission unit applies to fugitive dust sources including plant roadways, plant yard, material storage piles, and material handling operations (excluding cold feed aggregate bins).

Observations made during the inspection indicated that the yard is being appropriately maintained, and Mr. Feliciano indicated he was in the process of filling the water truck when I arrived. All in plant roadways that are paved as required. The facility operates a 3,000-gallon watering truck with a front-end sprayer. Brine is also applied as needed.

Michigan Paving utilizes an outside contractor to sweep the paved plant areas, as well as the roadways leaving the plant. This occurs once a week. Following the inspection, they are now scheduled for twice a week.

Stockpiles of materials were observed during the inspection and no fugitive dust was noted the operators records daily whether there was rain and whether dust control was applied.

A thorough inspection of all equipment was conducted, and no concerns with the transfer system, storage bins, mixer, hopper, or fabric filter dust collector were observed.

#### **EUACTANKS**

This emission unit applies to the liquid asphalt tanks. Between the end of the 2017 and start of the 2018 paving season the former liquid asphalt cement (AC) tank farm was replaced. The new tank farm consists of five new 35,000-gallon AC tanks, one 15,000-gallon asphalt emulsion tank a diesel fuel tank and an old recycled RUO tank. A review conducted during a previous AQD inspection found that this replacement was exempt from permitting however, that determination has not been reviewed further for accuracy at this time.

#### **EUSILOS**

This emission unit includes six HMA storage silos. The emissions generated in the silos are removed at the top of the silo and are ducted back into the burn zone of the HMA dryer. The silos were observed during the inspection and maintenance activities were discussed. Visual inspection of the silos is conducted daily, and corrective action is taken as needed to maintain the units. The silos appeared to be appropriately controlled during the inspection.

#### **FGFACILITY**

This flexible group is for all process equipment at the stationary source including equipment covered by other permits, grand-fathered equipment and exempt equipment.

Emissions of Hazardous Air Pollutants (HAP) are limited to less than 8.9 tons per year for each individual HAP and less than 22.4 tons per year for aggregate HAPs. The highest HAP emissions are from formaldehyde at 139.5 lbs for the month of July 2022 and 0.46 tons for the 12-month time period ending in July 2022. This data indicates compliance with the individual HAP limit. Aggregate HAP emissions for the 12-month rolling time period ending in July 2022 are 0.63 tons. This data indicates compliance with the aggregate HAP limit.

#### **Appendix B – Preventative Maintenance Program For the Fabric Filter Dust Collector**

A visual inspection of the exterior of the baghouse and associated components was conducted. The unit appeared sound and in good condition. We discussed some areas of paint wear, and potential hotspots in the metal. Michigan Paving utilizes a device to measure/monitor metal thickness so any repairs can be made as appropriate. The pressure drop of the baghouse was 2.3” H<sub>2</sub>O, which is in the acceptable range. Based on the records provided, the pressure drop ranges between 2.0 (season start-up) and 3.0” H<sub>2</sub>O.

#### **Conclusion**

Michigan Paving was in compliance with PTI No. 990-90B at the time of the inspection.

NAME April Lazzaro

DATE 08/18/2022

SUPERVISOR HH