

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

B730042222

|   |                               |                           |
|---|-------------------------------|---------------------------|
| FACILITY: RIETH RILEY CONSTRUCTION CO., INC.          |                               | SRN / ID: B7300           |
| LOCATION: 11101 Levering Rd, MUNRO TWP                |                               | DISTRICT: Cadillac        |
| CITY: MUNRO TWP                                       |                               | COUNTY: CHEBOYGAN         |
| CONTACT: John Berscheit , Technical Services Manager  |                               | ACTIVITY DATE: 10/19/2017 |
| STAFF: Kurt Childs                                    | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: 2018 FCE. Site inspection and records review |                               |                           |
| RESOLVED COMPLAINTS:                                  |                               |                           |

**2018 Full Compliance Evaluation**

I conducted an FCE inspection and responded to an odor complaint regarding this facility on 10/19/2017. The Rieth-Riley Levering plant is an ROP opt-out source operating under PTI 369-81Z. The plant began operation for the 2017 season on May 10, 2017. The PTI covers emission units for the hot mix asphalt plant (EUHMAPLANT), plant yard (EUYARD), asphalt cement tanks (EUACTANKS), and storage silos (EUSILOS) as well as a flexible group for the entire facility (FGFACILITY). During the inspection, I met with Rieth-Riley asphalt plant supervisor Stuart Wright and plant operator Mr. Tyler Socolovitch. John Berscheit is the MAERS contact as well as the contact for any air permit issues and records that are not maintained at the plant.

A complaint regarding odors and water impacts was received on October 13, 2017. It was not possible to assess odors since the plant was not operating and an additional site inspection may be necessary. Review of records will indicate any maintenance or operational problems. Mr. Wright stated the plant has been down on occasion for maintenance issues but has been running more than normal this year due to two large nearby paving projects.

At the time of the inspection the skies were scattered and winds were around 15 mph from the west. The air temperature was 60 degrees F.

**EUHMAPLANT**

The asphalt plant includes the following equipment:

1. Raw material feed for aggregate and RAP each including bins a screen and conveyors.
2. Asphalt tank trailers (2).
3. Used oil tank.
4. Asphalt tank heaters.
5. Drum dryer.
6. Baghouse.
7. Propane tank.

At the time of the inspection the asphalt plant was not operating though it had operated earlier in the day. Despite the wind, I did not observe any visible emissions from the plant yard and storage piles This plant is rated for 250 tons per hour and can reach that capacity according to the operator. PTI 369-81Z limits hourly production to 300 TPH HMA. Three shipments of recycled used oil were received and used at the beginning of the season. RUO use has ceased and the plant is burning propane for the rest of the season. Records indicate the three shipments of RUO met the permit specifications for the quality of the fuel and each shipment was screened at the plant for PCBs.

The asphalt plant is equipped with a baghouse as indicated above that is equipped with a differential pressure gauge. The differential pressure reading is also available on the plant control panel. Plant records indicate the differential pressure when operating ranged from 2.7 to 4.9 inches WC. The PTI requires a minimum differential pressure of 2" WC unless a large number of bags have been changed or other acceptable conditions exist and indicates the proper operating range is 2-8" WC. An extension has been added to the baghouse stack and it much higher than the 40' minimum specified in the permit, probably closer to 70'. Maintenance records indicate the baghouse has been checked regularly and one bag replaced this season.

PTI 369-81Z limits RAP usage to 40% of the asphalt mixture. Plant records indicate the average RAP usage for 2017 was 20% of RAP in mixes. The plant is limited to 895,000 tons of HMA production per year. Records indicate 100,065 tons were produced so far during 2017. Monthly records show the plant emissions for CO, SO<sub>2</sub>, and NO<sub>x</sub> are below the permitted limit of 89.9, 89, and 89 tpy respectively. The records appear to indicate that PM lb./ton

(HMA) emission rates exceeded the permit limits some months but the records are monthly averages and the limits are based on stack testing with averaging periods specified by the test method. As of the date of this evaluation the AQD has not requested testing to demonstrate compliance for emission limits in lb/ton. Based on the lack of previous testing, the emission records, and past experience with asphalt plants, I would recommend requesting an emission test of this facility to demonstrate compliance with the air pollutant emission limits in PTI 369-81Z.

Portable CO detector test results for 2017 were available at the plant, the printouts of those tests indicated 8 readings over at least 30 minutes were conducted as required. Limited plant records were available at the time of the inspection. The plant operator had his daily plant foreman reports but the data had only been added to the computerized weekly plant summary sheets through July 29, 2017. Those records indicated that all of the recordkeeping required by the PTI is being maintained and the material throughput and operating parameters were in compliance with the permit requirements. Monthly records are maintained by Mr. Berscheit and were provided upon request.

#### **EUYARD**

R-R has an approved fugitive dust plan (attached as Appendix A to the PTI) and appeared to be in compliance with all aspects. At the time of the inspection, the location of EUHMAPLANT was paved as was the road used by haul vehicles. Working areas of the gravel pit that the vehicles must travel through are not paved but are treated with water or dust suppressant as needed. Plant records included dates of watering, rain or treatment. The gravel roads used by non-haul vehicles as well as other areas of the yard were either wet or treated with dust suppressant and there was minimal fugitive dust from the yard. Speed limit signs were posted and there did not appear to be any fugitive dust from storage piles. Drop heights from conveyors and from the loader appeared to be minimized.

#### **EUACTANKS**

The tanks were equipped with a vapor condensation and recovery system that was operating properly. There were no visible emissions or odors. The asphalt tank heater is not subject to either the Major or Area source boiler and process heater NESHAPs because process heaters are not subject to Subpart JJJJJ and Natural gas fired process heaters are not subject to Subpart DDDDD.


#### **EUSILOS**

The silos do not appear to be equipped with an emissions capture system that routes emissions back to the burner of the drum mixer. This is not required by PTI 396-81Z but could be a source of odors and smoke. The truck loadout area beneath the silo is not enclosed, this is not required but can contribute to odors. I observed two trucks being loaded and the visible emissions were minimal.

#### **FGFACILITY**

Monitoring and recordkeeping for FGFACILITY is maintained and records were provided and up to date (copy attached). Monthly HAPs emission records demonstrate individual and combined HAP emissions are below the 8.9 TPY and 22.4 TPY limits respectively.

As a result of the inspection, records review and MAERS review the facility appeared to be in compliance with PTI 75-03C. The complaint response is being addressed through a separate activity report (CA B730042242).

NAME  DATE 11-8-17 SUPERVISOR 