

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

N362673102

FACILITY: WYOMING ASPHALT PAVING INC		SRN / ID: N3626
LOCATION: PLOPPER S PIT 46TH ST N OF 64TH, LAWRENCE		DISTRICT: Kalamazoo
CITY: LAWRENCE		COUNTY: VAN BUREN
CONTACT: John Rachac , Operations Manager		ACTIVITY DATE: 07/29/2024
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On July 29, 2024 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 62820 46th Street, Lawrence Michigan at 2:00 PM to conduct an unannounced air quality inspection of Wyoming Asphalt Paving Co., Inc. (hereafter WAPC) SRN (N3262). Staff made initial contact with the office receptionist and stated the purpose of the visit. John Rachac, WAPC, Operations Manager, is the site contact and arrived shortly thereafter for further discussions.

WAPC is a hot mix asphalt facility that only uses 100% virgin materials to produce asphalt. The Lawrence facility is a satellite plant for the main company that is based in Plainwell. Due to the facility being a satellite facility most of the records are kept in Plainwell. The facility produces 10 different mixes of asphalt. The facility operates seasonally typically starting up operation in the last week of April and shutting down in November. WAPC currently has around 3 employees and production hours during the week vary based on orders.

WAPC was last inspected by the AQD on August 5, 2020 and appeared to be in Non-compliance at that time with PTI No. 301-88A. Staff asked, and Mr. Rachac stated that the facility does not have any emergency generators, boilers, or cold cleaners.

Mr. Rachac gave staff a tour of the facility. Required personal protective equipment are safety glasses, steel toe boots, hearing protection, and a hard hat. Staff observations and review of records provided during and following the inspection are summarized below:

EUHMAPLANT:

This emission unit includes the aggregate conveyors and the Batch Mix Drum. The facility loads the raw aggregate materials on to the conveyer which transport the materials to the Batch Mix Drum. The Batch Mix Drum is a dryer that is permitted to be fueled by both natural gas and fuel oil. The dryer is controlled by a cyclone and wet venturi scrubbers.

Special Condition II.3 restricts WAPC from using any asbestos tailings or waste materials containing asbestos. Special Condition II.4 does not allow the facility to use any Reclaimed Asphalt Pavement (RAP) unless the facility has submitted prior notification and received approval by the AQD. During the inspection Mr. Rachac stated that the facility does not use any of the materials listed above.

The facility is permitted to operate with fuel oil however, it was stated by Mr. Rachac during the inspection that the facility has not used fuel oil in over 30 years. Since the facility has not used fuel oil in EUHMAPLANT Staff did not request the record of the sulfur content and higher heating value of fuel oil combusted in EUHMAPLANT.

WAPC is required to maintain and operate the equipped cyclone and wet venturi scrubber in a satisfactory manner but does not have specific requirements on pressure drop readings or visible emissions readings. When asked about maintenance Mr. Rachac stated that the facility does weekly greasing of the augers. It was also stated that Summer of 2023 the facility replaced gaskets in the system which improved seals and helped with fugitive emissions. There is no pressure drop meter on the cyclone and the only pressure meter on the wet venture scrubber is for the water flow pressure. The facility was shutting down when Staff arrived, but Staff was able to observe both the cyclone and wet venturi scrubber in operation during the inspection.

The facility maintains a list of types of asphalt mixtures and the materials that goes into each onsite. The production information is recorded onsite then sent off to Plainwell for recordkeeping. The facility was able to provide records for these mixtures.

EUYARD:

This emission unit is fugitive dust sources at the facility including plant roadways, plant yard, material storage piles, and material handling operations (excluding cold feed aggregate bins). This emission unit has only Special Condition associated with it and is a process/operational restriction. The facility is required to wet the plant yards and roads as needed while the equipment is operating. When Staff arrived to conduct the inspection, there was no visible fugitive dust from truck traffic. It was indicated to Staff that there is a pond located at the back of the property that is used to wet the roads daily unless there is rain.

FGFACILITY:

This flexible group includes all source wide equipment including grandfathered and exempt equipment. As a part of this flexible group the facility has a material limit which restricts the amount of HMA that the facility can produce per 12-month rolling time period. The facility is also required to comply with emissions limits for CO, PM10, Individual HAPs, and Aggregate HAPs.

The facility tracks daily the amount of HMA that is produced at the facility. This is then able to be used to calculate the monthly amount of HMA produced. WAP provided records that showed the facility has been well under the 440,000 TPY limit. Staff Reviewed Records for the period of January 2022 through July 2024 and the maximum 12-month rolling tons of HMA produced 22,218 Tons which occurred in June 2022.

The facility uses the monthly HMA production data to calculate CO, PM10, and HAPs that are associated HMA production. CO and PM10 both use emission factors that are noted in the Permit Evaluation document. Certain ancillary equipment emissions are calculated on a worst case basis and that is used for emissions. These include operations like the hot oil heaters, loadout, and yard emissions. HAP emissions appear to use a combination of AP-42 emissions and a safety factor. From the spreadsheet provided all the emission factors used were higher values than one cited specifically in AP-42 tables 11.1-10 and 11.1-11. Since the emission factors used would appear to give an overestimation of emissions likely due to the safety factor they appear to be appropriate.

Since January 2022 the facility recorded the maximum amount of total CO emissions to be 5.0 TPY in June 2022 and September 2022. Total CO emission are well below the 90.0 TPY CO emission limit. In this same time period the maximum amount of total PM10 emissions are

calculated to be 0.77 TPY in June 2022. Total NOx emissions are well below the 60.0 TPY PM10 emission limit.

HAPs emissions for HMA production equipment are calculated based on the amount of HMA produced at the facility. Facility is required to maintain records for individual HAPs and aggregate HAPs. The largest HAP that is emitted from HMA production equipment is calculated to be Ethylbenzene and Xylene. The largest amount of Xylene that was emitted since January 2022 was 0.07 TPY from the HMA production equipment. The largest amount of Ethylbenzene that was emitted since January 2022 was 0.05 TPY from the HMA production equipment. The maximum total aggregate HAP emissions from HMA production equipment were calculated to be 0.21 TPY.

HAPs are also calculated for the ancillary equipment. HAP emissions from these emission units are minimal but still should be included as a part of the FGFACILITY emission limits. These emissions are calculated based on the maximum permitted 440,000 HMA production rate or operation time hours of 8,760 where appropriate. The additional aggregate HAP emissions are calculated to be 0.1972 TPY at the identified production rate. With the facility being at about 5.05% of the production rate these emissions are an overestimation. The total aggregate HAP emissions are 0.4072 TPY including the ancillary equipment and HAPs calculated from HMA production. This is well below the permit limit of 22.5 of aggregate HAP emissions.

Conclusion:

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with PTI No. 301-88A. Staff stated to Mr. Rachac that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 2:45 PM.-CJY

NAME

Cody Yungis

DATE

8/14/24

SUPERVISOR

Morris