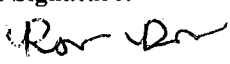


**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Inspection Report
Date: 06/23/2022

Winston-Salem Regional Office
Appalachian Materials LLC - Glendale Asphalt
Plant
NC Facility ID 0500074
County/FIPS: Ashe/009

Facility Data			Permit Data				
Appalachian Materials LLC - Glendale Asphalt Plant 1073 Glendale School Road Glendale Springs, NC 28629 Lat: 36d 20.8422m Long: 81d 23.7702m SIC: 2951 / Paving Mixtures And Blocks NAICS: 324121 / Asphalt Paving Mixture and Block Manufacturing			Permit 10445 / R01 Issued 5/25/2016 Expires 1/31/2024 Class/Status Synthetic Minor Permit Status Active Current Permit Application(s) None				
Contact Data			Program Applicability				
Facility Contact	Authorized Contact	Technical Contact	SIP NSPS: Subpart I				
D.J. Cecile Manager (828) 264-1921	D.J. Cecile Manager (828) 264-1921	D.J. Cecile Manager (828) 264-1921					
Comments: Inspector's Signature:  DMM Date of Signature: 06/27/2022			Compliance Data				
			Inspection Date 06/23/2022 Inspector's Name Ryan Dyson Operating Status Operating Compliance Status Compliance - inspection Action Code FCE Inspection Result Compliance				
Total Actual emissions in TONS/YEAR:							
	TSP	SO2	NOX	VOC	CO	PM10	* HAP
No emissions inventory on record. The emissions inventory is due 11/02/2023. * Highest HAP Emitted (in pounds)							
Five Year Violation History:							
<u>Date</u>	<u>Letter Type</u>	<u>Rule Violated</u>				<u>Violation Resolution Date</u>	
06/25/2020	NOV	2Q .0203 Permit and Application Fees				07/30/2020	
06/20/2019	NOV	2Q .0203 Permit and Application Fees				07/18/2019	
Performed Stack Tests since last FCE: None							
<u>Date</u>	<u>Test Results</u>	<u>Test Method(s)</u>				<u>Source(s) Tested</u>	

Permitted Emission Sources

Emission Source ID	Emission Source Description	Control System ID	Control System Description
CH-1	No. 2 fuel oil-fired asphalt cement heater (1 million Btu/hr. maximum heat input)	N/A	N/A
Drum-mix, hot mix asphalt plant (300 tons per hour rated capacity) capable of processing reclaimed asphalt product (RAP) consisting of:			
HMA-1 (NSPS)	No. 2 fuel oil-fired dryer/mixer (116 million Btu per hour heat input capacity)	CD-1	Bagfilter (8,682 square feet of filter area) with knock-out box
AS-1	Hot mix asphalt storage silo	N/A	N/A
TL-1	Truck load-out	N/A	N/A
Portable RAP plant consisting of:			
RAP-1	RAP crusher (150 tons per hour capacity), screen, and belt conveyor	N/A	N/A

Insignificant/Exempt Activities

Source	Exemption Regulation	Source of TAPs?	Source of Title V Pollutants?
I-AST-1 - Aboveground storage tank containing diesel (15,000 gallons capacity)	2Q .0102 (c)(1)(D)(i)	Yes	Yes
I-ACH-1 - Aboveground storage tank containing liquid asphalt cement (30,000 gallons capacity)	2Q .0102 (c)(1)(L)(xii)	Yes	Yes

Introduction

While performing other field work in the area on June 23, 2022, Mr. Ryan Dyson, Environmental Specialist for the Winston-Salem Regional Office of the North Carolina Division of Air Quality (WSRO-DAQ), visited the site of Appalachian Materials LLC - Glendale Asphalt Plant to conduct a Full Compliance Evaluation (FCE) of the facility. This facility was most recently inspected by Mr. Dyson on December 3, 2020 and appeared to be operating in compliance with all applicable Air Quality standards and regulations at that time, as the facility had yet to be constructed. This facility is a greenfield site for a proposed drum-mix, hot mix asphalt plant (300 tons per hour rated capacity), and it was issued its initial air permit on February 26, 2016. Upon arrival at the site on June 23, 2022, it did not appear evident to Mr. Dyson that an asphalt plant had been constructed on-site.

Safety Equipment

When the facility is placed into service, the protective equipment required on-site will include safety shoes, safety glasses, hearing protection, hard hat, and a safety reflector vest.

Applicable Regulations

Permit Condition A.1 states that the facility is subject to the following regulations: Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0202, 2D .0503, 2D .0506, 2D .0510, 2D .0516, 2D .0521, 2D .0524 (40 CFR 60, Subpart I), 2D .0535, 2D .0540, 2D .0605, 2D .0611, 2D .1100, 2D .1806, 2Q .0304, 2Q .0309, 2Q .0315 and 2Q .0711. This facility is not subject to the Risk Management Plan (RMP) requirements of the 112(r) Program, as it does not purchase, produce, utilize, or store any of the regulated substances in quantities above their associated threshold limits. The facility is still subject to the General Duty clause in this rule.

Discussion

The facility is a proposed asphalt plant that does not yet appear to have been constructed as of the time of this inspection. Mr. Dyson attempted to contact Dr. D.J. Cecile, Manager, to inquire about the status of the facility, but did not receive a response. In the most recent correspondence with Dr. Cecile on January 30, 2022, Dr. Cecile stated, "Currently, there is still ongoing litigation regarding the local permits required for our asphalt plant. Thus, the plant has not yet been constructed." This statement was from the facility's most

recent report, which is required to be submitted on an annual basis, and convey the facility's SO₂ emissions, CO emissions and tonnage of asphalt produced.

NSPS/NESHAP

The facility's No. 2 fuel oil-fired dryer/mixer (HMA-1) will be subject to 40 CFR 60, Subpart I, including Subpart A "General Provisions" upon start-up. To comply, the facility shall not discharge or cause the discharge into the atmosphere of any gases that contain particulate matter in excess of 90 mg/dscm (0.04 gr/dscf), or exhibit 20 percent opacity, or greater. The facility will be required, under the provisions of North Carolina General Statute 143-215.108 and in accordance with 15A NCAC 2D .0605, to demonstrate compliance with these emission limits by testing the emission source. Compliance is indicated at this time since the facility is not currently in operation.

Facility-Wide Emissions

The following table, borrowed from Permit Review R00 (written by Mr. Jalal Adouli, Former Permits Coordinator for the WSRO-DAQ, and dated February 26, 2016), conveys the facility's projected potential and actual emissions.

Pollutant	Projected Actual Emissions [tons/yr.]	Potential Emissions (after controls/limits) [tons/yr.]	Potential Emissions (before controls/limits) [tons/yr.]
PM	6.84	6.89	78.39
PM ₁₀	4.28	4.33	40.78
SO ₂	18.63	<100	155.71
NO _x	8.56	8.88	72.90
CO	19.96	<100	174.30
VOC	7.22	7.23	63.21
HAP _{Total}		1.35	11.79
HAP _{Highest} (formaldehyde)		0.48	4.19

Permit Issues/Considerations

No permit issues or considerations were encountered at the time of this inspection, and no permit issues appear to be documented by the facility's recent inspectors.

Stack Testing

No stack testing appears to have been conducted at the facility.

5 Year Compliance History

On June 25, 2020, the facility was issued a Notice of Violation (NOV) for non-payment of the facility's required annual air quality permit fee. This violation was resolved on July 30, 2020, when the payment of the fee was received.

On June 20, 2019, the facility was issued a Notice of Violation (NOV) for non-payment of the facility's required annual air quality permit fee. This violation was resolved on July 18, 2019, when the payment of the fee was received.

Conclusion

Based on visual observations and the fact that the facility is not currently in operation, the facility appeared to be in compliance with all applicable Air Quality standards and regulations at the time of this inspection.