



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

Case ID #: 194466

November 19, 2020

Asphalt Paving & Supply, Inc.
Attention: Chris J. Graff
2425 N Glassford Hill Rd
Prescott Valley, AZ 86314

Subject: Opportunity to Correct Deficiencies
Asphalt Paving & Supply Inc. Dba Arrowhead Materials, Place ID 165561
2400 N Glassford Hill Rd / Prescott Valley, AZ 86314

Dear Mr. Graff:

This Notice of Opportunity to Correct Deficiencies (NOC) is an informal compliance assurance tool used by the Arizona Department of Environmental Quality (ADEQ) to provide a responsible party (such as a facility owner or operator) an opportunity to correct one or more deficiencies of an environmental requirement and describes the facts known to ADEQ at the time of issuance. ADEQ has reason to believe that Asphalt Paving & Supply, Inc. as the owner/operator of equipment located at 165228 Physical Property For Air Portable Location has violated a requirement of Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit, license, or administrative order. The purpose of this letter is to allow you an opportunity to correct these deficiencies without further enforcement by ADEQ. If this NOC is a result of an inspection then the NOC also serves as a monthly status update as required by A.R.S. § 41-1009(J).

COVID-19 (Corona Virus) Note:

If compliance at your facility is affected by COVID-19, please do the following:

1. Minimize effects and duration, and return to compliance as soon as possible.
2. Document the specific nature and dates of noncompliance due to COVID-19.
3. Document how COVID-19 was the cause and the actions taken in response, including best efforts to comply and the steps taken to return to compliance as soon as possible.
4. Send that documentation to ADEQ.

ADEQ will work with you to set reasonable expectations during this time. For more information about how ADEQ will manage compliance during this COVID-19 emergency, please click on the guidance located on ADEQ's webpage banner.

An ADEQ inspection of the facility completed on November 17, 2020 revealed the following:

Main Office

1110 W Washington Street ● Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 W Congress Street ● Suite 433 ● Tucson, AZ 85701
(520) 628-6733

www.azdeq.gov

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1. **Permit 69486 - Attachment D: Concrete Batch Plants, Condition II.A.1**

The Permittee shall not cause to be discharged into the atmosphere from any concrete batch plant processes any plume or effluent which exhibits greater than 20 percent opacity. (A.A.C. R18-2-512.B702.b.3)

The results of the DOCS observations from emissions at the silo were 26.46% and 35% opacity which is above the permitted limits.

2. **Permit 69486 - Attachment D: Concrete Batch Plants, Condition II.B.1.a**

Baghouses, or equivalent, shall be operated in accordance with vendor specifications to control emissions vented by silos during the loading operations.([A.A.C. R18-2-306.A.2 and -331.A.3.e) (This is a material permit condition.)

Visual observations and the results of the DOCS observations confirmed that the facility was not operating the baghouse in a manner to control emissions.

3. **Permit 69486 - Attachment D: Concrete Batch Plants, Condition II.B.1.b**

Loading of storage silos shall be conducted in such a manner that the displaced air does not by-pass the baghouse and is not direct-vented to the atmosphere. (A.A.C. R18-2-306.A.3.c)

Visual observations and photos indicated emissions were from the pressure relief valve, which bypasses the baghouse and emitted directly into the atmosphere.

DOCUMENTING COMPLIANCE:

Within 10 calendar days of receipt of this Notice, please submit documentation that the deficiencies never occurred or comply with the following requirements.

1. Within 10 calendar days of receipt of this letter, please submit specific to this case:
 - A. Provide the Inspector with records that demonstrate compliance with the activities listed in Conditions II.B.1.c.(1) through (5).
 1. This includes: (1) Prior to start-up, visual inspections shall be conducted on all venting ducts or lines, fittings (including dust shroud), and the blower; (2) Following shut-down, all pressurized systems shall be turned 'off'; (3) All pressure and temperature gauges, flow meters, and other related instruments shall be checked daily to ensure proper functioning; any detected problems shall be corrected as soon as possible; (4) All ducts, hoods, framework, and housings shall be checked daily for signs of wear; (5) The fan motor, bearings, shaking device, reverse-jet blow rings, valves, and dampers shall be lubricated regularly and checked for wear
 2. Does the silo have a high pressure alarm, overfill alarm, pinch valves, etc.? What was the status of the equipment at time of violation?
 - B. Provide the Inspector with the last monthly opacity observation per Attachment D, Condition C.1
 - C. Provide the Inspector with logs of recent maintenance activities performed on the baghouse. These logs shall include the type of maintenance activity being performed and the duration of each maintenance activity, including the date, starting time, and ending time of the maintenance activities per Attachment D, Condition C.2

D. If applicable, provide the Inspector with records for each baghouse equipped with a pressure drop measuring device, the Permittee shall monitor and record once per day the pressure drop (in inches of H₂O) across the baghouse. The records shall include the dates and time each reading was taken per Attachment D, Condition C.3

E. Provide the Inspector an explanation of the circumstances that led to the violation of the previously stated permit conditions..

F. Provide the Inspector with documentation showing training, protocols, etc. to eliminate or reduce another violation of the previously stated permit conditions.

Acceptable documentation includes, but is not limited to photographs, receipts, standard operating procedures, and/or relevant logs.

SUBMITTING COMPLIANCE DOCUMENTATION:

Please review the above and submit a written response by email to bryan.casey@azdeq.gov or by mail to the following address:

Arizona Department of Environmental Quality, Attention: Casey Bryan, Air Quality Compliance Unit,
1110 W Washington St, Phoenix, AZ 85007 MC: N/A

OFFER TO MEET:

ADEQ is willing to meet regarding this Notice and can provide information on how to return to compliance. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact Casey Bryan at (602) 771-4370.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, this letter has no such force or effect. ADEQ may verify compliance by on-site inspection or other appropriate means and may escalate enforcement if necessary. Within 30 days of receipt of your response to this letter, ADEQ will notify you whether the facility is in substantial compliance.

Sincerely,



Casey Bryan
Air Quality Compliance Unit