

ALLAN MYERS VA, Inc. d/b/a
ALLAN MYERS MATERIALS
638 Lancaster Avenue
Malvern, PA 19355

ODOR CONTROL PLAN

CAPITAL ASPHALT
4901 Shepherd Parkway, SW
Washington, DC 20032

October 2023

The Department of Energy and Environment (DOEE) issued a final rule that requires stationary sources such as asphalt processing plants located in Washington, DC to adopt a DOEE approved Odor Control Plan (OCP). This document has been created to maintain compliance with 20 DCMR § 903, Odorous or Other Nuisance Air Pollutants.

The regulation states that an OCP shall include the following information:

(a) Source information:

(1) Name of Source;

Allan Myers VA, Inc. Capital Asphalt Plant

(2) Name, phone number, and email address (if available) of source's owner or operator and point of contact;

Ben Alexander
(610) 389-5044
ben.alexander@allanmyers.com

(3) Source physical address;

Allan Myers VA, Inc.
4901 Shepherd Parkway
Washington, DC 20032

(4) Source mailing address;

Allan Myers VA, Inc.
638 Lancaster Avenue
Malvern, PA 19355

(5) Source type

Hot mix asphalt plant.

(6) Source hours of operation

The source can operate at any time every day of the week; however, the air permit limits the total amount of hot mix asphalt production in any twelve-month rolling period. Please note that the plant typically shuts down completely for approximately two months in winter for annual maintenance.

(7) Description of source operations; and

The facility produces hot mix asphalt, used primarily for road paving. Associated with that is the stockpiling of aggregate materials used in the production process.

(8) Emergency contact information:

Ben Alexander
(610) 389-5044
ben.alexander@allanmyers.com

(b) The following information about any odor generated by the source:

(1) Floor plan, specifying the locations of odor-emitting activity and emissions;

The odor-emitting activity at the asphalt plant is the production of hot mix asphalt that involves heating asphalt cement and coating sand and aggregate with the asphalt. Since the activity is a plant and not a building, a floor plan is not applicable. Attachment 1 contains an aerial photograph of the facility that shows the asphalt plant.

(2) Specific odor-emitting activity; and

The specific odor-emitting activity is the hot mix asphalt manufacturing process that involves adding asphalt cement to sand and aggregate that has been heated in a drum. Please note that exhaust from the hot mix asphalt drum is directed to a baghouse prior to emission to the atmosphere.

(3) Phases (timing, length, etc.) of odor-emitting activity;

The timing and length of odor-emitting activity depends on the weather and the production schedule. Hot mix asphalt is generally not manufactured during precipitation events. Furthermore, the air permit limits the total amount of hot mix asphalt production in any twelve-month rolling period. Please note that the plant typically shuts down completely for approximately two months in winter for annual maintenance.

(c) A description of the proposed odor mitigation procedures and practices, which must either be based on industry-specific best control technologies and best management practices or be otherwise sufficient to effectively prevent nuisance odors for all odor sources, and which must include the following:

(1) Administrative controls:

(A) Maintenance, testing, and audit procedures to ensure that control equipment is functioning properly and the OCP is being adhered to;

In order to limit odor-emitting activity, Myers conducts the following activities:

- Baghouse inspections including fluorescent dust leak tests.
- Baghouse performance testing conducted by an outside contractor.
- Baghouse stack outlet observations.
- Maintain the baghouse pressure drop within manufacturers specifications.
- Visual inspections of asphalt cement storage tanks and associated piping.
- Limit the temperature of hot mix asphalt to prevent vaporization of asphalt cement.
- Submit annual emissions report to DOEE which includes an audit of the facility's records.
- Annual shutdown for maintenance.

(B) Staff training;

Myers employees are trained on the proper operation of the plant and its associated equipment. Procedures for asphalt cement delivery are written and available for quick reference. Employees are expected to observe the plant and stop production whenever a failure occurs that causes excessive emissions or may pose a danger to personnel or the environment.

(C) Recordkeeping procedures and forms; and

Many records are kept electronically, such as the baghouse pressure drop, fluorescent dust leak tests, temperature of the hot mix asphalt, and annual shutdown maintenance activities. Reports from outside contractors who conduct performance testing, tuning, and process adjustments are also typically filed electronically.

(D) Any other work practices necessary to prevent nuisance odors;

An additional work practice to prevent nuisance odors is limiting the time trucks idle when waiting to be loaded with hot mix asphalt.

(2) A proposal concerning engineering controls, reviewed by a professional engineer licensed with the Department of Licensing and Consumer Protection and certified by the professional engineer to be sufficient to effectively mitigate odors for all odor sources, to address the following:

(A) Engineering controls shall include each of the following components:

- (i) System design;
- (ii) Operational processes; and
- (iii) Maintenance plan; or

(B) If the owner or operator of a source determines that engineering controls are not necessary to effectively mitigate odors for all or specific odor sources, the owner or operator shall submit that determination to the Department as part of its OCP;

Hot mix asphalt plants have been in operation for over 100 years and are designed to comply with Clean Air Act and local regulations without additional engineering controls. Typical industry specific best practices include burner tuning, operation of the plant in accordance with manufacturer's specifications, and equipment maintenance. Myers conducts stack tests to determine emissions as required by its air permit, typically every five (5) years.

(d) A timeline for implementation of odor mitigation practices that takes into account the compliance time needed for the design, ordering, contracting, installation, and start-up of control equipment or process changes, commencing upon notice from the Department that it has approved the OCP; and

N/A – Hot mix asphalt plants are designed to comply with federal and local regulations.

(e) A description of the source's procedures for receiving, responding to, and tracking complaints.

If a complaint is received, the Myers employee will listen to the complaint and let the caller know that someone from our company will return the call, typically within 24 hours. Once the caller's contact information and reason for the complaint has been obtained, the information will be forwarded to the Allan Myers Malvern, PA office so that it may be distributed to the appropriate personnel who will return the call. Personnel in the Malvern office, typically the office manager maintains a log of complaints.

Attachment 1

Asphalt Plant Photograph



Allan Myers -
Capital Asphalt Plant



**ALLAN
MYERS**

Asphalt Plant

Capital Asphalt

4901 Shepherd Parkway, SW
Washington, DC 20032