



REGION 1

BOSTON, MA 02109

Clean Air Act Inspection Report

Report Date: April 15, 2025

I. Background

Inspection Date: April 9, 2025

Inspection Type: Partial Compliance Evaluation

EPA Inspector: Dana Donovan, Enforcement and Compliance Assurance Division, Air Compliance Section

DANA DONOVAN

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DONOVAN

Date: 2025.04.15 08:39:18 -04'00'

EPA Reviewer: John Melcher, Senior Enforcement Coordinator, Air Compliance Section

JOHN MELCHER

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Date: 2025.04.15 11:23:38 -04'00'

Facility Name: O&G Bridgeport Concrete and Asphalt Plant

ICIS Air ID#: CT0000000900100031

Facility Location: 260 Bostwick Ave, Bridgeport, CT 06605

Mailing Address: 112 Wall Street, Torrington, CT 06790

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Small Business Resources Information Sheet:

Without making a determination that the subject business or organization is a small business, EPA is providing this Small Business Resource Information Sheet regarding information that may assist small businesses in identifying and complying with environmental requirements:

<https://www.epa.gov/sites/default/files/2017-06/documents/smallbusinessinfo.pdf>

Inspection Attendees:

Name	Title	Organization
Dana Donovan	Life Scientist	US EPA
Grace Perry	Environmental Engineer	US EPA
Matthew Dmyterko	Director of Environmental Compliance	O&G Industries
Richard Warren	Assistant VP of Facilities	O&G Industries
Greg Nadeau	Environmental Compliance Specialist	O&G Industries

Facility/Process Description:

This facility produces, mixes, and supplies concrete and asphalt.

A detailed facility compliance report can be found in EPA's "Enforcement and Compliance History Online" database at the following link:

<https://echo.epa.gov/detailed-facility-report?fid=110012809979>

Potentially Applicable Federal Air Regulations:

The following federal air regulations may be applicable to the Facility:

- 40 CFR Part 60, Subpart I - Standards of Performance for Hot Mix Asphalt Facilities
- 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants

State Air Permits:

The Facility currently has three active New Source Review operating permits issued by the State for the two Redimix concrete plants and the hot mix asphalt batch plant. The State has also issued a pre-construction permit for the new asphalt plant that will be installed later this year.

Previous Enforcement Actions:

On March 27, 2020, the Connecticut Department of Energy and Environmental Protection (CT DEEP) issued a Notice of Violation (NOV) for violations of permits 015-0083 and 015-0271, which authorize the operation of the two Redimix concrete plants. The NOV alleged that the dry Redimix concrete plant exceeded hourly and annual emissions limits for particulate matter (PM) in permit 015-0271 and that the wet Redimix concrete plant exceeded the daily production limit in permit 015-0083. After reviewing the violations, CT DEEP determined that the allegations were made in error. O&G did not

exceed emission limits as written in permit 015-0271 and permit 015-0083 was not active at the time of inspection. The NOV was closed on October 13, 2022.

On April 10, 2018, CT DEEP issued an NOV for violations of 40 CFR Part 60 Subpart OOO. The NOV alleged that the Facility did not conduct the required initial performance test within 180 days of startup and did not send the final test report within 60 days of completing the test. The NOV issued as part of a series of NOVs issued to multiple O&G-owned facilities for violations of Subpart OOO. The NOV was closed upon review of the opacity tests.

II. Inspection

A. Opening Conference:

On March 31, 2025, Dana Donovan, of the EPA, contacted Matthew Dmyterko, of O&G Industries, to inform him that the EPA would be conducting a Clean Air Act inspection at the Facility on April 9.

On April 9, 2025, Ms. Donovan and Grace Perry arrived at the Facility at 10:20 a.m. Mr. Dmyterko, Richard Warren, and Greg Nadeau met the EPA representatives in a conference room to conduct an opening conference. Ms. Donovan and Ms. Perry presented their credentials. Ms. Donovan asked if any information could be considered confidential business information (CBI). Facility representatives said they did not anticipate any CBI being shared.

Facility representatives provided the following basic information about the Facility history and operations:

- O&G Industries bought the Facility in the mid-1980s. The hot mix asphalt plant was already installed and operating when O&G acquired the Facility. Leverty and Hurley Co. was the original owner of the Facility.
- O&G employs about 25 people who work at the Bridgeport facility, excluding drivers.
- The Facility operates from 6:00 a.m. to 4:00 p.m., Monday through Friday. The asphalt plants and milling screener operate from mid-March to early-December each year. The concrete plants operate year-round.

Ms. Donovan asked about the asphalt and concrete plants at the Facility. Facility representatives provided the following information:

- Currently, there are two Redimix concrete plants and one hot mix batch asphalt plant operating on site. One concrete plant is a dry mix plant, and the other is a wet mix plant.
- The Facility previously operated a drum mix asphalt plant as well, but this plant was recently torn down.
- The Facility plans on installing and operating a new asphalt plant that will include a hot mix batch plant, and a drum mix plant combined in one plant. The Facility has already acquired a pre-construction permit for the new asphalt plant.
- The current hot mix asphalt plant on site will be phased out and torn down once the new asphalt plant starts operation.

- Emissions from all of the asphalt and concrete plants are controlled by baghouses. Each fabric filter is changed out annually.
- The Facility operates a portable milling screener with a capacity of 150 tons per hour. The milling screener crushes old asphalt which can be reused as reclaimed asphalt pavement (RAP) mixed into the asphalt produced in the asphalt plant.
- The Facility uses wet suppression to control dust from the screener; however, the crushed material is very oily, so they often do not need to spray down the material with water.
- During the operating season, maintenance is performed on the plants on an as needed basis. During the off season, the Facility completely deconstructs the asphalt plant and performs preventative maintenance.

Ms. Donovan said the EPA received an initial startup notification for a boiler in September 2011. Facility representatives said that there used to be a boiler on site that was used for the concrete plant, but it was removed in approximately 2012.

Facility representatives provided the following information regarding the Facility's stack testing history:

- An initial Method 9 opacity test was conducted for the milling screener on November 16, 2017. A second opacity test was conducted on August 8, 2022. The Facility passed both tests.
- The most recent test conducted on the hot mix batch asphalt plant was on June 1, 2020. The Facility tested for NOx emissions according to the permit issued by CT DEEP.
- The Facility is already coordinating with Gammie Air to conduct the initial performance test for the anticipated new asphalt plant, according to Subpart I.

Ms. Donovan asked for clarifications on the operations at other O&G Industries-owned property in Bridgeport, CT. According to ECHO, O&G owns and operates at four other properties in Bridgeport. Facility representatives provided the following information about the other locations:

- The property at 1121-1125 Seaview Ave is a "laydown yard." There used to be a rock crushing plant at the site, but it was removed. The site is primarily used for stockpiling raw materials.
- The property at 325 Hancock Ave is a mason yard. The site is primarily used as a showroom for sales of O&G product.
- The property at 471 Hancock Ave used to have a stone splitter on site. The property was sold and is no longer owned by O&G Industries.
- Facility representatives were not aware of any O&G operations at 290 North Ave. They do not believe it was ever an O&G-owned property.

Ms. Donovan asked if the Facility ever receives complaints from nearby residents. Facility representatives said that they do not often receive complaints and that they try to be proactive by street sweeping and sending out a water truck every day to minimize dust and drag out.

B. Facility Tour

The group proceeded on a tour of the Facility at 11:00 a.m. Ms. Perry took photos during the tour that are located in the inspection file.

1. Prep Garage

The group began the tour in the garage. Mr. Dmyterko explained that the area is used for prepping and repairing equipment. Ms. Donovan asked if there were any solvents-based parts washers. Facility representatives said there were parts washers on site, but all parts washers are water-based. The group walked to the back of the garage to look at the water-based parts washer.

2. Milling Screener

The group proceeded outdoors and stopped by the milling screener, which was operating during the inspection. EPA inspectors observed a hopper, a conveyor that led to a screener, and another conveyor which deposited the crushed asphalt into stockpiles. Ms. Donovan observed the oily quality to the crushed asphalt and noted that there were no visible emissions even though the wet suppression system was not operating.

3. Hot Mix Batch Asphalt Plant

Mr. Dmyterko led the group to the hot mix batch asphalt plant, which was also operating during the inspection. Mr. Dmyterko explained that different types of aggregate are stored in bins, which are then conveyed over to a drum. In the drum, the material is heated up and mixed together. From the drum, the asphalt is transported to silos where it is stored until it is loaded onto trucks. The group observed asphalt being loaded onto two trucks. Ms. Donovan detected a slight malodor standing next to the asphalt plant.

Mr. Dmyterko also pointed out the plot of land where the drum mix asphalt plant was located before being torn down.

The group walked around to the other side of the asphalt plant to observe the dust collection system. Mr. Dmyterko said the filters are changed out at the beginning of every season and that they check for leaks in the baghouses by monitoring the pressure differential. Mr. Dmyterko said the new system will have a baghouse leak detection system with an alarm if the baghouse breaks.

Ms. Donovan noticed a tank with No. 2 fuel oil next to the asphalt plant. Mr. Dmyterko said that the plant runs using natural gas with No. 2 fuel oil as a backup fuel source.

4. Redimix Concrete Plants

The group then proceeded to the concrete plants. The concrete plants are located together in the same building. Both concrete plants were operating at the time of the inspection. Mr. Dmyterko said that the loading process for the concrete plants is similar to the asphalt plant – different aggregate materials are conveyed from bins to the plants. Mr. Dmyterko explained that wet concrete is mixed on site in the plant, whereas dry concrete is mixed in the truck. The group observed the baghouses for each plant and also saw trucks being loaded with concrete.

The group entered the building to look at the plants from the inside.

5. Loading Barge

The group proceeded to observe the barges which supply the material used on site. Facility representatives said that all materials are delivered by barge. The material is off loaded into stockpiles and then brought to the bins to be used in the asphalt and concrete plants as needed.

C. Records Review

Facility representatives provided a binder of records for EPA inspectors to review. Ms. Donovan and Ms. Perry reviewed the binder records and made the following observations:

- The Facility conducts baghouse inspections for the asphalt plants on an annual basis. The Facility provided inspection logs from 2020 through 2024.
- The Facility conducts baghouse inspections for the dry Redimix concrete plant on a weekly basis. The Facility provided inspection logs from January 2020 to February 2025.
- The Facility conducts baghouse inspections for the wet Redimix concrete plant on an annual basis. The Facility provided inspection logs from 2020 through 2024.
- The Facility records the pressure drop across each baghouse on a daily basis. The Facility provided daily readings from 2020 to 2025. The pressure differential ranged from 2.0 to 5.0 in. WC.
- The Facility keeps logs for the daily sweeper and water truck rounds. The Facility provided logs for 2020 through 2022.

Facility representatives said that the frequency of baghouse inspections reflects the requirements in their CT DEEP permits.

On April 11, 2025, Mr. Dmyterko provided sweeper and water truck logs for 2023 and 2024 by email.

D. Closing Conference

At 11:30 a.m., the group returned to the conference room for the closing conference. Ms. Donovan thanked the facility representatives for their time.

Ms. Donovan said that EPA inspectors do not make compliance determinations in the field; however, the EPA inspectors had not identified any specific areas of concern during the inspection.

Ms. Donovan and Ms. Perry left the Facility at 11:37 a.m.