Asheville-Buncombe Air Quality Agency Facility Inspection Report

Facility Inspection Information					
Facility Name:	MTTG, LLC dba Mill Tek Toll Grinders				
Date of Inspection:	June 17, 2025		**Last Inspected:**	January 30, 2024	
Mailing Address:	PO Box 835 Arden, NC 28704		**Physical Location:**	45 Spiral Rd. Arden, NC 28704	
Contact Name:	Reed Buhler		**Phone Number:**	(970)-310-4134 (303)-668-7231 (Mark Morgan, Owner)	
Contact Email:	milltektollgrinders@outlook.com , rack92@msn.com (Reed's Email)				
Permit #:	11-873-17B	**Issued:**	July 10, 2017	**Expires:**	July 31, 2025
Inspector(s):	Alexander (Alex) Latta				
Results:	Appears in compliance		**Inspection Time:**	0950 hours	

Introduction

On the above date, a comprehensive inspection was conducted at MTTG, LLC dba Mill Tek Toll Grinders. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Air Quality Code (AB Air Quality Code). MTTG, LLC dba Mill Tek Toll Grinders, otherwise known as the facility, operates a clay grinding process with the purpose of retrieving the ground clay to use as a raw product in another process. Operation of this facility is granted under permit number 11-873-17B which was issued on July 10, 2017, amended March 9, 2020 and July 12, 2021, and expires on July 31, 2025. The inspection was conducted by Alex Latta. The facility was represented by Reed Buhler. The following is a summary of the inspection results:

Safety Equipment / Special Instructions

Steel-toed shoes, a safety vest, and a hard-hat are required while touring the facility. Hearing protection may be required in certain areas while equipment is operating.

Permitted Equipment:

- One (1) 30 horsepower electrically powered bisque clay crushing system (CS-30), with a maximum design capacity of 2,000 pounds per hour with emissions controlled by one (1) baghouse (EP2). ***This unit was not operating during the inspection.***
- One (1) 40 horsepower electrically powered bisque clay crushing system (CS-40), with a maximum design capacity of 2,000 pounds per hour with emissions controlled by two (2) baghouses (EP3) and (EP4). ***This unit was operating during the inspection. The mill baghouse had a pressure drop of 10 – 12 in W.C. The other baghouse on this process had a pressure drop of 5.0 in W.C.***
- One (1) 40 horsepower electrically powered bisque clay crushing system (CS-40A) with a maximum design capacity of 2,000 pounds per hour with emissions controlled by one (1) baghouse (EP5). ***This unit was operating during the inspection and had a pressure drop reading of 3.6 in W.C.***
- One (1) Screening operation (S-1) with a maximum design capacity of 2,000 pounds per hour with emissions controlled by one (1) baghouse (EP6). ***This unit was operating during the inspection.***
- One (1) 200 horsepower electrically powered bisque clay jet mill crushing system (JM-1) with a maximum design capacity of 500 pounds per hour with emissions controlled by one (1) baghouse (EP7). ***This unit was operational during the inspection and had a pressure drop reading of 0.5 – 0.6 in W.C during pulses.***
- One (1) 20 horsepower electrically powered bisque clay lump breaker crushing system (LB-1) with a maximum design capacity of 1500 pounds per hour with emissions controlled by one (1) baghouse (EP8). ***This unit was not operating during the inspection.***
- One (1) 40 horsepower electrically powered bisque clay crushing system (CS-40B), with a maximum design capacity of 2,000 pounds per hour with emissions controlled by one (1) baghouse (EP9). ***This unit was not operating during the inspection. The unit is used infrequently.***

All of the permitted equipment was observed during the inspection. According to facility representatives, the baghouses EP2, EP8, and EP9 function more as vacuums within the process to minimize dust and do not feature magnehelic gauges. According to the facility, so long as

those units do not emit dust, they are operating correctly. Once dust is noticed, the bags are changed since the presence of dust indicates the bag is full.

Permit Conditions:

The following does not represent all permitted conditions, only the permit conditions that are directly relevant to the inspection. For all the conditions, please review the permit.

- **A.7 – This condition requires that the permittee maintain and operate the facility at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved.** *The facility has developed a maintenance schedule for equipment and is maintaining records of all maintenance. Additionally, the facility is maintaining an inventory of spare parts for equipment. The facility has established standard operating procedures for equipment and is training equipment operators on the procedures.*
- **A.8 – This condition requires that the facility notify the Agency in the event of a malfunction.** *The facility has not experienced any malfunctions during the reporting period.*
- **A.11 – This condition requires that the facility pay their annual permit fee on a timely basis.** *The facility is up-to-date on fee payments. The facility last submitted their fee payment on August 12, 2024.*
- **A.12 – This condition states that the facility is required to submit a permit renewal request no later than ninety (90) days prior to permit expiration.** *The facility's permit expires July 31, 2025 and the renewal request was due no later than May 2, 2025. The facility submitted their permit renewal request on May 15, 2025. A notice of deficiency (NOD) was mailed to the facility on June 12, 2025 to address this issue.*
- **A.14 – This condition requires the facility retain a copy of the permit on the premises.** *The facility had a copy of their current operating permit on-site.*

- **B.2 – This condition states the facility shall be operated to ensure visible emissions do not exceed 20% opacity over a six-minute average.** *At the time of the inspection, the facility was not exhibiting an opacity. The only equipment exhibiting an opacity was the jet mill which would emit small momentary puffs during pulses around 10% opacity. These emissions were all contained to the inside of the building and fugitive emissions were not escaping from the open areas of the building to the outside.*
- **B.3 – This condition establishes the facility's particulate matter emission limit.** *Specific allowable emission rates are listed in the permit review form for this facility. The facility is meeting these limits through proper operation of the baghouses during facility operation. Vendor supplied records show a capture efficiency of 99.7% which was used to determine the facility's potential emissions which meet the requirements of AB Air Quality Code 4.0515.*
- **B.4 – This condition requires the facility to minimize fugitive dust at the facility.** *During the inspection, fugitive dust was not observed outside the manufacturing section of the plant.*
- **B.5 – This condition requires the facility to inspect and maintain the fabric filters to ensure proper operation of the equipment. Inspections are required on at least an annual basis and the results of all inspections and maintenance must be maintained in logs.** *The facility conducts inspections on a monthly basis on average. The last inspection occurred on June 2, 2025. The facility normally conducts inspections on the first operational day of each month. Additionally, the facility constantly monitors the baghouses in order to change bags once full.*
- **B.6 – This condition requires the facility to submit annual reports by February 15th.** *The facility is submitting annual reports as required. The most recent annual report was postmarked February 13, 2025, received on February 18, 2025, and contained all the required information. For 2024, the throughput of crushed clay at the facility was 3,807,283 lbs from January - December.*

Compliance History:

On June 12, 2025, a Notice of Deficiency (NOD) was issued to MTTG dba Mill Tek Toll Grinders for late submittal of the 2025 permit renewal request. The facility's permit expires July 31, 2025 and the renewal request was due no later than May 2, 2025. The facility submitted their permit renewal request on May 15, 2025. No further action was taken by the Agency.

Conclusion:

Based on the above information, MTTG dba Mill Tek Toll Grinders. appears to be in compliance with all applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.

Signature: _____ **Date:** 6/17/2025

Reviewer Signature: _____ **Date:** 7/9/25

Director Signature: _____ **Date:** 7/11/2025