

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

B760929596

FACILITY: Shinglecycle, LLC		SRN / ID: B7609
LOCATION: 2127 WILLOW ST, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Aaron Perrault, Owner		ACTIVITY DATE: 03/30/2015
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled joint inspection, by AQD Lansing District Office, and Technical Programs Unit.		
RESOLVED COMPLAINTS:		

On 3/30/2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced inspection of Shinglecycle, LLC, at its Willow Street shingle yard/processing facility. AQD was represented by asbestos inspector Jessica Allotta of the Technical Programs Unit (TPU), and by myself.

Environmental contact:

Aaron Perrault; owner, 517-643-4948; rockbuilt.inc@gmail.com

Facility description:

The facility is a shingle processing site. They process used residential tear-off shingles, into a finer grade, and a coarser grade.

Emission units:

EU- Process; PTI No. 148-08: shingle grinder removed from site by Crutchall Resource Recycling Company.

EU-Truck Traffic; PTI No. 148-08; Compliance

EU-Storage; PTI No. 148-08; Compliance

Regulatory overview:

This facility is considered to be a true minor source for particulate emissions. A facility is considered to be a minor source if it has a potential to emit (PTE) of 100 TPY or less of criteria air pollutants. Criteria pollutants are those for which a National Ambient Air Quality Standards (NAAQS) exists: carbon monoxide, nitrogen oxides, sulfur dioxides, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns. It is considered to be a minor, or area source, for Hazardous Air Pollutants (HAPs), because it does not have the potential to emit 10TPY or more of a single HAP, or 25 TPY or more of aggregate HAPs.

There appear to be two State Registration Numbers (SRNs) related to this facility. The SRN for Permit to Install (PTI) No. 148-08 for the shingle recycling process is B7609. This was also the SRN for the former operators of the site, Bodycote and Lindberg Heat Treating. A new SRN, P0101, was created by the Emissions Reporting & Assessment (ERA) Unit in 2010, after 7/1/2008 issuance of the PTI. This was done in an attempt to reflect the change in the nature of the industrial operation since the closure of Bodycote, and was intended to avoid confusion, but has actually created some. The most appropriate SRN for activity reports in MACES appears to be the original one, B7609, which is associated with the PTI.

Fee status:

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for

Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III. The facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

Location:

The facility is located at an industrial site which was formerly home to Bodycote, and to Lindberg Heat Treating before that. To the north is a small apartment complex. To the northeast is a restaurant, Padnos Summit Steel, and an Alro steel facility. To the east is an office furniture business, and a residential area. To the south is a residential area.

Recent history:

On 7/1/2008, the Crutchall Resource Recycling Company, L.L.C., received PTI No. 148-08 for the shingle recycling process. This business operated on the site of what was once Bodycote, and before that, Lindberg Heat Treating. The AQD did not conduct any inspections of the Crutchall operation. On 10/3/2014, the AQD received an anonymous odor complaint from a nearby resident, who attributed foul odors to the shingle processing facility, especially in hot weather. They also reported hearing that "asbestos shingles" were being handled at the site. On 10/7/2014, AQD drove by the site, and through nearby neighborhoods. The only odor that could be noticed was a barely detectable, oily odor. In order to follow up on the complainant's concern over asbestos containing materials (ACM), at a later date, I contacted asbestos inspector Jessica Allotta, from TPU. She suggested that a joint inspection of the facility would be an appropriate way to address the ACM concern.

Arrival:

I arrived at 8:58 AM, and found J. Allotta to be waiting in the parking lot, which is north of the shingle yard. There no odors detectable from the facility, and no signs of fugitive dust. Weather conditions were sunny, clear, and 35 degrees F, with winds out of the west southwest at 10 miles per hour.

We entered a building to the west of the parking lot, looking for an office for Crutchall. We were told that Crutchall has sold the site to Shinglecycle, and that Shinglecycle's main office is elsewhere in Lansing. We were informed that we would find their employees, if we entered the shingle recycling yard, immediately south of the parking lot.

We met with two operators, Jordan and Seth. They explained the owner, Mr. Aaron Perrault, was offsite at this time, delivering or picking up containers for his dumpster business. We provided our identification/credentials, per AQD procedures. I provided a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, also per AQD procedures. We explained that a complaint of odors and an allegation of ACM at the site had prompted this inspection. Facility staff suggested that the odor complaint received in 2014 may have been actually related to the Lansing Wastewater Treatment Plant (WWTP), which it was pointed out, is north of Shinglecycle, and just to the northwest of a small apartment complex. Because I was not able to experience the odor at the time the complainant was smelling it, I cannot say if the WWTP was the actual source of the odor.

Inspection:

We were informed that dumpsters of roofing waste are brought in from offsite, and are checked for the presence of asbestos. Impurities such as metal, plastic, and wood are sorted out. Steel and aluminum are recycled, we were told. We observed some small piles of non-shingle materials that had been removed. If they even suspect the presence of ACM, that load is rejected, and not allowed onsite. Seth explained that he was previously an asbestos removal/renovation contractor, and so has been trained on identification and proper handling of ACM, and use of protective equipment.

We were informed that they do not accept rolled roofing or flat roofing materials, as these can contain ACM. Plus, they cannot physically process these materials. We were also informed that they do not accept roofing materials from commercial roofs. This is in keeping with Special Condition No. 1.3 of

PTI No. 148-08, which prohibits such materials. Additionally, this condition specifies that the permittee process only shingle manufacturer by-product shingle waste material (end cuts) or clean tear-off asphalt shingle scrap and other incidental roofing waste from private, residential homes only, no larger than four units per structure.

We were told that the shingle grinding unit is no longer at the site, having been removed by Crutchall when they sold the site to Shinglecycle. The shingle grinder did not undergo visible emissions testing at this site, to the best available knowledge of the AQD. As the shingle grinder does not belong to Shinglecycle, this is not a compliance issue they are responsible for.

Without the shingle grinder, they use their bulldozer and excavator to run over the shingles multiple times, breaking them down into smaller pieces. The excavator has to perform additional work to reduce the pieces in size, but the bulldozer does well just by running over the materials, they have found. They explained that these pieces are then run through their Extec 830 trommel, a rotating screening system. The trommel appears to fall under the emission unit EU-Process in PTI 148-08. The trommel was not running at the time of the inspection, but I took photos of it (please see attached). We were informed that two head magnets are used to remove nails from the materials being processed.

Two grades of processed shingles are made. One is 1/4" minus, and goes to Hot Mix Asphalt plants, to be used in paving materials. The coarser grade, referred to as "chips," is sent to Lafarge Corporation in Alpena, for use as fuel in their cement kilns.

J. Allotta collected 4 samples of materials from their chip piles, and from their layered pile. These will be checked for the presence of asbestos. She did not visually detect the presence of any ACM while onsite.

We were informed that Lafarge is their largest customer. We were told that the reason the shingle pile is currently so high is because Lafarge would not accept shingles over the winter. The operators expect that once their customer is ready to receive shipments of shingles, the height of the pile should go down accordingly.

I called the owner, Mr. Aaron Perrault, via cell phone. He was on the road at the time, but was agreeable to meeting with AQD in the near future, at his office in Lansing, to review the recordkeeping required by PTI No. 148-08. J. Allotta and I left the site at this time.

While onsite, I observed that the shingle pile appeared to be at least 15 feet tall. After the inspection, I reviewed Appendix B, the Site Management Plan (SMP). It states that the height of the material in the shingle staging and storage areas "will not exceed 14 feet in height as dictated by the City of Grand Rapids." This SMP had been an appendix to Crutchall's permit for their Grand Rapids site. It is not known if Lansing's city government has any restrictions on storage pile height. Because AQD does not limit the height of storage piles, it would not be appropriate to use a City of Grand Rapids requirement as a basis for a Violation Notice.

Conclusion:

Facility staff were very cooperative. The facility appeared to be in compliance with their PTI, at this time. The 4 samples of shingle material which J. Allotta collected all turned out to be negative for the presence of ACM.

Note: J. Allotta and I met with Mr. Perrault at a subsequent date, 4/21, along with AQD Permit Engineer Dave Riddle, and shingle recycling consultant Ms. Ellie Kaine, to review recordkeeping, and to discuss Shinglecycle's 4/21 permit application to update their PTI. That meeting is documented in a separate activity report.



Image 1(Photo 1) : Trommel, with pile of unprocessed shingles in background.

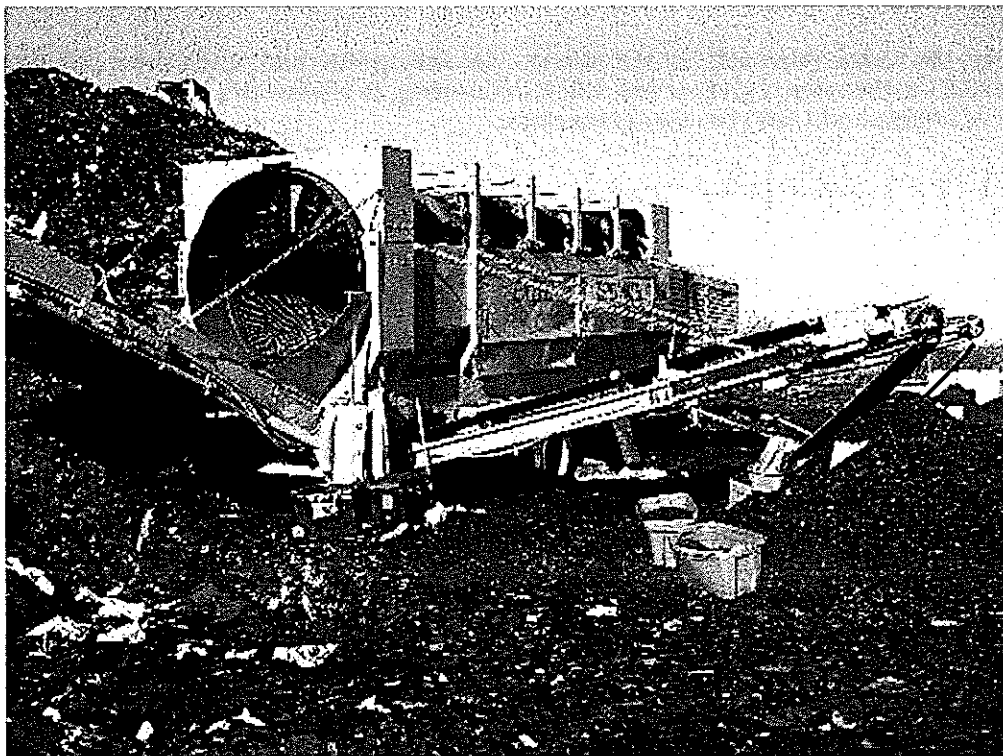


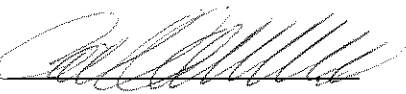
Image 2(Photo 2) : Trommel.



Image 3(Photo 3) : Processed chips, the larger of the two sizes they make.



Image 4(Photo 4) : Pile of 1/4" minus material, which is used by the Hot Mix Asphalt industry.

NAME 

DATE 6/3/2015

SUPERVISOR _____