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

P010151759

FACILITY: Shinglecycle, LLC		SRN / ID: P0101
LOCATION: 2127 Willow St, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Aaron Perrault, Owner		ACTIVITY DATE: 12/19/2019
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <i>Minor</i>
SUBJECT: Scheduled, unannounced compliance inspection to determine compliance with PTI 148-08A		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow (author), Jeremy Brown (AQD Technical Programs Unit, Asbestos)
Personnel Present: Jordan Crandall, shingle yard operator

Other Personnel: Aaron Perrault, Owner (ondemanddumpster@gmail.com)

Purpose

Conduct an unannounced, scheduled compliance inspection by determining compliance with Shingle Cycle's Permit to Install (PTI) No. 148-08A for a shingle grinding and recycling process. This facility was last inspected in April 2015. I asked Jeremy Brown, AQD Technical Programs Unit asbestos inspector, to accompany me on this inspection for his evaluation of the materials onsite, and whether the materials onsite resemble any of the materials that are prohibited under the PTI.

Facility Background/Regulatory Overview

Inspection

This was an unannounced compliance inspection. At approximately 9:45 a.m. on December 19, 2019 Jeremy Brown, AQD Asbestos inspector, and I met with Jordan Crandall, the operator for the Shingle Cycle yard. He explained that Aaron Perrault, owner, was on vacation until the week of January 6, 2020.

We provided J. Crandall with our business cards. J. Brown and I explained to him that we were there to inspect the shingles pile in order to identify any suspect (asbestos-containing) materials within the shingle pile, to take samples and test for asbestos, as well as obtain recordkeeping items required by the permit.

J. Crandall said that Shingle Cycle is no longer processing the shingles but they are still receiving them. The shingles that are received are then shipped out to a landfill for disposal. There is a small accumulation pile where the shingles they currently receive are kept until they can be sent out for disposal. The pile that was historically being processed (grinded and sorted) under PTI148-08A still remains. Shingle Cycle is currently working with the Materials Management Division (MMD) to resolve a violation pertaining to speculative accumulation of the historic shingles pile because little to none of the shingles appear to have been reused or recycled in some time (see attached violation notice from MMD). Shingle Cycle is required to respond to this violation notice by January 31, 2020 with a comprehensive workplan on how to address the violation.

Table 1 contains a list of all equipment permitted under PTI 148-08A. According to J. Crandall, all equipment listed in Table 1 has been removed. See the "Status" column in Table 1 for specifics. I will have a discussion with Aaron Perrault about voiding PTI 148-08A – the permit must be voided because the equipment has been removed. The only piece of equipment that is left is one large conveyor that Shingle Cycle once used for oversized shingles that did not get process or that were leftover from the shingles grinder. This conveyor was not operating during the inspection. J. Crandall said they have not processed any shingles since the end of 2018.

J. Crandall said they receive a maximum of 2 loads (120 yards per load) of shingles per day during the winter months (when less construction/demolition occurs). He said all shingles are either sent to Republic in Marshall or Waste Management in Lennon.

Table 1. PTI 148-08A: Asphalt Shingle Recycling Process equipment

EU	Description	Status
EU-Process	2004 Extec Trommel Screen 830, 110 HP, diesel-powered, 75 tons/hr Portable grinder with a max of 700 HP (diesel)	The Extec Trommel screen was sold and no longer located at this site. J. Crandall said it has been gone for ~ 3 years.

	<p>Portable screening (vibrating screen deck & trammel screen) with a max of 250 HP engine (diesel)</p> <p>Control includes: enclosures, water sprays, drop chutes and/or pant legs for transfer points and work practices to minimize fugitive dust</p>	<p>The portable 700 HP grinder has not been onsite for ~ 2 years.</p> <p>The portable vibrating screen deck and trammel screen have been gone in 2018</p>
EU-Truck Traffic	<p>Truck traffic for transfer of material to and from the facility and loader traffic associated with processing equipment, storage pile handling, and loading delivery trucks</p>	<p>Not present during the inspection</p>
EU-Storage	<p>Protected area stock piles of unprocessed shingles and ground shingle product material</p>	<p>Present, both the historical shingles pile (speculative accumulation, according to MMD) and the temporary storage pile (piles sent to landfill)</p>

EU-PROCESS

EU-PROCESS consists of portable grinders used to grind the shingles for sale. As previously stated, all EU-PROCESS equipment has been removed from the site and it has been at least a year since Shingle Cycle has processed any shingles for reuse. I was told by J. Crandall that Shingle Cycle still plans to process the large shingles pile that has accumulated over the years once the price of oil is up again. This will create a demand for oil-containing products like shingles and therefore the shingles can be processed and sold again. Because the shingles pile is still present, verifying compliance with the asbestos requirements contained in PTI 148-08A is still applicable. The Emission Limits (10% opacity from drop and transfer points); Process/Operational Restrictions (tons of shingles processed per week, Fugitive Dust Control Plan, and portable grinder presence at the site); Design/Equipment Parameters (maintaining the engine associated with the Extec Trommel screen); and several Monitoring/Recordkeeping requirements associated with the processing of shingles are not applicable at this time and will not be addressed because the equipment has been sold and/or removed.

Material Limits

Shingle Cycle shall not process any regulated asbestos tailing or asbestos containing waste materials in EU-PROCESS. Shingle Cycle shall also not process these types of materials:

1. Cementitious shingles, shake shingles, and transite siding that may be suspect to asbestos-containing material
2. Roll roofing, built-up roofing tile cedar shake shingles, coal tar, rubber, slate or metal roofing or roofing from commercial buildings
3. Any type of hazardous waste (e.g. mercury-containing devices such as thermostats, paint, solvents, other volatile liquids).
4. Significant amounts (more than 2% by weight of other debris that is not asphalt shingles (plastic, paper, glass, metal, trash). These materials shall be separated from the shingles to the extent acceptable by the AQD district supervisor.

The waste must not come from any place other than roofing waste from private, residential homes, no larger than four units per structure. J. Crandall said that they take shingles in obtained by local construction companies, including Palmer Construction, Cats roofing, Home Pro roofing, and Hanson contractors. He said that these shingles only come from homes.

While onsite, J. Brown and I walked across a portion of the shingles pile. J. Brown said that he did not see anything suspect within the portions of the pile we walked on and indicated several times that the shingle waste on the pile appeared to be tear-off asphalt shingle scrap. J. Brown did not believe there to be any roll shingles, shake shingles, cementitious shingles or transite within the area we were observing, based on J. Brown's professional judgment. J. Brown noted that there were nails, paper, and plastic sheeting which is normally found with new shingles packaging. It was present, but by our estimates, much less than 2% by weight. J. Crandall said that they did and currently do remove any metal from the shingles coming in for recycling. He said that they used to own a magnet that would be used to pull the nails out of the shingles piles, but they no longer have this.

We saw that Shingle Cycle also has waste materials being stored onsite (see attached photo), the pile of which abuts the large accumulated shingle pile. J. Brown took these photos. J. Crandall explained that this is waste brought in from Aaron Perrault's other business, On Demand Dumpster, and that they are currently seeking to obtain a permit for a transfer station from EGLE. I have forwarded the waste pile photos to Evin Maguire, MMD, Lansing District Office, to provide MMD with AQD's findings. MMD is already aware of the waste accumulation. The AQD does not consider this waste pile to be waste that was incorporated into the shingles pile, nor believe that the waste was delivered to the site with the shingles and therefore the waste pile does not impact compliance with PTI 148-08A.

Testing/Sampling & Monitoring/Recordkeeping

Shingle Cycle is required to sample and test each type of tear-off shingle material, according to the sampling protocol outlined in Appendix B of the PTI, using polarized light microscopy Method 600 with an accredited laboratory certified to conduct this test. J. Crandall called office assistant, Cathy Baker, to confirm that the last shingle samples were taken and tested in December 2018. I requested that lab analyses records for the last load of shingles processed at the site be provided and Shingle Cycle has yet to provide these records. Aaron Perrault is on vacation and I was told Shingle Cycle won't be able to send the records until he is back. Therefore, compliance with this item is pending. In addition to these records, I also requested that for the last few loads of shingles received, Shingle Cycle provide records that include a statement that the tear-off shingle scrap was generated at private, residential homes only, the addresses where the shingle scrap originated, and a statement that the roofing waste materials consists of asphalt shingles and associated roofing debris only, no hazardous materials.

Each load of shingles received is required to be inspected by personnel trained to visually detect possible asbestos-containing material (ACM). During the 2015 inspection, Seth Knoop, previous yard manager, was identified as the personnel trained to identify possible ACM. During this inspection, J. Crandall said that Seth no longer works at this site, but that he was trained by Seth Knoop to look for rolled roofing and slate shingles (aka transite). In addition to inspecting the loads for these types of materials, J. Crandall said he was also responsible for pulling shingle samples and having them sent to the lab. In the event that he found rolled roofing or transite, J. Crandall said he would send the whole load of shingles directly to a landfill; he said that Shingle Cycle has an empty dumpster available onsite for such occurrences.

J. Brown took a sample of shingle material and delivered it to Fibertech for analysis per Method 600 to determine if asbestos was present. J. Brown provided me with the analysis report which stated that there was no asbestos detected in the sample. See attached report.

J. Brown explained to J. Crandall that from a worker's health and safety standpoint, they should continue to look for asbestos-suspect shingles, and other possible ACM, including transite even though Shingle Cycle is no longer processing shingles; the unloading of shingles onsite could cause shingles to break, and if they contain asbestos, could result in exposures to asbestos dust. Continuing to evaluate the shingle loads for possible ACM is also important in terms of properly manifesting asbestos waste prior to landfill disposal.

EU-Truck Traffic and EU-Storage

EU-Truck Traffic consists of all truck traffic for the transfer of material to and from the facility and all loader traffic associated with the processing equipment, storage pile handling and loading delivery trucks. EU-Storage consists of stock piles of unprocessed and ground shingle product materials. Although the shingle processing equipment is no longer present, Shingle Cycle still receives shingles and therefore EU-Truck Traffic requirements are still applicable for transfer of shingles to and from the facility. During the inspection we did not observe any loads of shingles coming into the site nor leaving the site, thus I was not able to verify compliance with the 5% opacity limit for truck traffic. The shingle storage piles are limited to 5% opacity. During the inspection, temperatures were below freezing and therefore all shingles were encrusted in ice and snow. I did not see any signs of opacity from any of the piles.

The Fugitive Dust Control Plan (attached in Appendix A of the PTI) is required to be implemented for these two emission units. Storage piles need to be controlled so that dust off the pile never exceeds 5% opacity. I observed no dust coming from any of the shingles storage piles during the inspection.

The site roadways and facility yard are required to be controlled with dust suppressant to meet the 5% opacity limit for truck traffic. I saw no opacity being generated from the roads or plant yard during the inspection. J. Crandall said that they use a water truck and a sweeper truck to keep the roads maintained 9 months out of the year (winter months are the exception).

Compliance Statement: Shingle Cycle appears to be in compliance with PTI 148-08A, pending the records review. Upon receiving the requested records from Aaron Perrault, a follow-up report will be created for determining compliance based on the records submitted. I will work with Aaron Perrault to ensure PTI 148-08A is voided and that he understands the reasoning behind the permit being voided.



Image 1(Waste Dumping) : Note glass/windows being dumped from truck



Image 2(Waste Pile) : Note various waste items including a wooden bed frame, ball, and random plastic objects.

NAME Muellem Lyon

DATE 1/3/20

SUPERVISOR B.M.

