

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: Complaint Investigation**

N808170017

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| <b>FACILITY:</b> ReConserve of Michigan, Inc.   |  | <b>SRN / ID:</b> N8081           |
| <b>LOCATION:</b> 170 ANGELL STREET, BATTLE CREEK  |  | <b>DISTRICT:</b> Kalamazoo       |
| <b>CITY:</b> BATTLE CREEK   |  | <b>COUNTY:</b> CALHOUN           |
| <b>CONTACT:</b> Ron Caldwell , General Manager  |  | <b>ACTIVITY DATE:</b> 11/20/2023 |
| <b>STAFF:</b> Rachel Benaway  | <b>COMPLIANCE STATUS:</b> Non Compliance | <b>SOURCE CLASS:</b> SM OPT OUT  |
| <b>SUBJECT:</b> On-site complaint investigation initiated by two complaints for fugitive dust in neighboring parking lot. A Rule 901 violation notice will be issued. |  |                                  |
| <b>RESOLVED COMPLAINTS:</b>   |  |                                  |

AQD received complaints about fallout on vehicles parked in the Sheriff Goslin Roofing Company lot, next door to the ReConserve plant, on 11/8/23 and 11/20/23. Both complaints were supported with photographs. AQD Staff, Rachel Benaway, was on another inspection and unavailable to investigate the first complaint but did an on-site investigation of the second on 11/20/23.

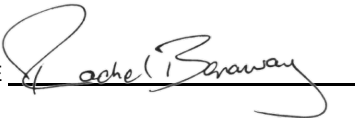
Staff confirmed that there was dust covering cars in the lot where the complaints originated. The ReConserve facility is located to the east of the Sheriff Goslin Roofing Company. Winds at the time of the investigation were out of the E at approximately 15 mph. From this parking lot, Staff observed a considerable amount of fallout sitting on top of the silo.

Staff was accompanied around the ReConserve facility by the General Manager, Ron Caldwell. Permit to Install (PTI) 184-08B requires the facility to maintain records of visible emissions (VE) for the storage silos and for the baghouse stacks from roto chopping and packaging material removal operations. Staff requested the facility submit these records for the most recent two-year period. As a result of previous fallout complaints and VNs issued for failure to close the loading bay doors during loading operations, last May the facility offered to begin a visible emissions monitoring program for the loading bay operators. Staff requested the submittal of these records from May to November of this year. The submitted records indicated that most days the raw material bay is swept twice for debris, but no visible emissions are noted from any process. Occasionally, a comment is offered about sweeping up rice hulls or needing a new clamp on an auger lid. No comments were ever made about fugitive dust accumulation on the silo or building rooftop, but Staff has made these observations during the last two complaint investigations.

Staff observed that the batch hopper area, externally located between the finished feed bay and the loading bay, had significantly less debris accumulation on the ground and far less active product flurries than the last time on site. Since the last violation notice (VN) was issued on 10/4/23, the facility has reinforced the batch hopper tower by adding panels in multiple places and replaced a missing panel, which has created a more contained environment than before. The auger lids on the conveyors appeared to be intact and Mr. Caldwell explained that a portion of the conveyor had been reinforced by welding where the auger was boring through and creating fallout.

The facility loads around 65 trucks a week which equates to approximately one truck every 45 minutes. Staff observed a train on the tracks by the loading bay and both loading bay doors were closed. No other loading operations were observed during this investigation. Mr. Caldwell reported that the loading bay doors have been repaired and are now in complete working order.

A violation notice will be issued for a violation of Rule 901 for nuisance fugitive dust. Last year, five complaints were documented, and two violation notices were issued. This year, complaints have been received on 1/11, 6/20, 8/22, 9/19, 9/25, 11/8 and 11/20/23. This will be the third violation notice issued in 2023. Due to the ongoing nature of complaints received and the amount of time required for Staff to attend to them, District Staff is recommending a referral for further enforcement procedures to find necessary and overarching solutions. Staff requested the facility submit their current Malfunction Abatement Plan for the storage silos and the drying and roto-chopping operations as well as their current Fugitive Dust Plan for the raw material handling, storage silos, and finished feed operations. Enforcement discussions will likely include a request for these documents to be updated to include all modifications made at the facility due to malfunctions and the standard operating procedures for handling future malfunctions. The fugitive dust plan must be updated to include all monitoring procedures for the purpose of preventing future fallout occurrences, give a comprehensive accounting of where and how fugitive dust originates from facility operations, and detail proactive maintenance activities at each exhaust point that reduce fugitive dust emissions.

NAME 

DATE 12/4/2023

SUPERVISOR Monica Brothers