



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

July 17, 2019

Mr. Scott Allread  
ReConserve of Michigan, Inc.  
170 Angell Street  
Battle Creek, Michigan 49016

SRN: N8081, Calhoun County

Dear Mr. Allread:

### VIOLATION NOTICE

On May 8, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of ReConserve of Michigan, Inc. located at 170 Angell Street, Battle Creek, Michigan. The purpose of this investigation was to evaluate a recent complaint that EGLE, AQD received on May 8, 2019 regarding fallout on vehicles located at Sherriff-Goslin Company located at 10 Avenue C, Battle Creek, Michigan 49037.

On May 8, 2019, staff responded to a complaint made about white powder covering vehicles that had been parked overnight at Sherriff-Goslin Company. A particulate matter sample was taken from two different cars parked on site. These samples were sent to Merit Laboratory for analysis. The night before the Department received the complaint, the wind was out of the east. Based on wind direction, it was most likely the fallout had originated from a facility located to the east of the Sherriff-Goslin Company. The company located about 150 feet directly to east of Sherriff-Goslin is ReConserve of Michigan, Inc. WestRock is located further east of Sherriff-Goslin, about 1,100 feet.

On July 3, 2019, staff from EGLE obtained a sample of the mixing starch used at WestRock. This was also sent to Merit Laboratory to compare to the samples taken from the windshields at Sherriff-Goslin Company. The lab determined that the samples taken from the windshields at Sherriff-Goslin were a mixture including wheat starch, corn starch, and other particles. The sample taken of WestRock starch was determined to have characteristics consistent with corn starch and no non-cornstarch particles were observed in the sample. The samples taken from the windshields of cars parked at Sherriff-Goslin do not match the sample taken from WestRock.

Due to the presence of wheat starch in the sample coupled with the comparison between the samples from the windshield not being consistent with the sample taken from WestRock, the fallout appears to have originated from ReConserve of Michigan, Inc. no. In the professional judgement of AQD staff, based on the evidence collected, the AQD is citing the following violation of Rule 901 of the administrative rules promulgated under Act 451.

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Process Description	Rule/Permit Condition Violated	Comments
EUDRYING	Rule 336.1901(b)	Particulate emissions attributed to ReConserve of Michigan, Inc. covered the vehicles parked at Sherriff-Goslin Company causing an unreasonable interference with the comfortable enjoyment of life and property.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 7, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If ReConserve believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of ReConserve. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Chapel  
Environmental Quality Analyst  
Air Quality Division  
(269)910-2109

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Rex Lane, EGLE