



GRETCHEN WHITMER  
GOVERNOR

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



AARON B. KEATLEY  
ACTING DIRECTOR

May 12, 2023

Kevin Kowalchuk  
ReConserve Michigan  
170 Angell Street  
Battle Creek, Michigan 49037

SRN: N8081, Calhoun County

Dear Kevin Kowalchuk:

**VIOLATION NOTICE**

On May 9, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation at Sherriff Goslin Roofing located 10 Ave C, Springfield, Michigan. The purpose of this inquiry was to investigate a recent complaint which we received on June 23, 2022, regarding fugitive dust and fallout attributed to ReConserve of Michigan's operations located at 170 Angell Street, Battle Creek.

During the investigation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-FINISHED FEED	Permit to Install (PTI) No. 184-08B Special Condition (SC) III.1	The facility shall not operate EU-FINISHED FEED unless the program for continuous fugitive emissions has been implemented and is maintained.
EU-FINISHED FEED	PTI No. 184-08B SC IV.1	The facility shall not operate EU-FINISHED FEED unless the external conveyors or enclosures are installed, maintained, and operated in a satisfactory manner.
EU-FINISHED FEED	R 336.1901 (Rule 901)	Recurring fallout was observed offsite, on a neighboring business employee's cars.

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In the professional judgment of AQD staff, the dust fallout that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 and Special Condition III.1 and IV.1 under EU-FINISHED FEED of PTI number 184-08B. The AQD staff previously observed dust fallout covering Sherriff Goslin employee and company vehicles on the following dates: 11/12/21, 2/24/22, 3/16/22, 4/12/22, 5/4/22, 6/23/22.

It was originally believed that the dust originated from the stack of a cyclone in the finished feed bay. Since the previously issued violation notices, the facility has rerouted the stack of this cycle back into the building, and complaints have decreased.

In this instance, the wind was coming out of the east for part of the day, with gusts up to 17 mph. Via cameras located in the loading area, staff observed the finished feed being loaded into trucks, inside the loading bay, with the doors left open. Doors left open while loading could facilitate dust fallout on neighboring businesses if the winds are in the correct direction and gusts are high enough.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 2, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 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.

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

Sincerely,

A handwritten signature in black ink that reads "Amanda Cross". The signature is written in a cursive style with a large initial 'A' and 'C'.

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

Enclosure

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Rex Lane, EGLE  
Keith Caudill, ReConserve