



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 8, 2018

Mr. Scott McDowell
MHA Recycling LLC
1972 Miner Avenue
Muskegon, Michigan 49441

SRN: N8267, Muskegon County

Dear Mr. McDowell:

VIOLATION NOTICE

On April 5, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of MHA Recycling LLC (MHA) located at 4365 Evanston Avenue, Muskegon, Michigan. The purpose of this inspection was to determine MHA's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 183-14.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Asphalt Shingle Recycling	PTI No. 183-14, EU-Process, Special Condition (SC) V.1	Failure to conduct visible emissions testing within 180 days of permit issuance.

MHA was required to evaluate visible emissions from EU-Process to show compliance with the 10% opacity limit specified in PTI No. 183-14, EU-Process, SC I.1. In accordance with PTI No. 183-14, EU-Process, SC V.1, MHA was required to conduct visible emissions testing within 60 days of achieving a maximum production rate, but not less than 180 days after permit issuance, which coincides with June 2, 2015.

The inspection conducted on April 5, 2018 found MHA to be in non-compliance with the visible emissions testing requirement specified in PTI No. 183-14, EU-Process, SC V.1, but, due to the operational status of the facility at that time, a Violation Notice was not issued. Rather, MHA was to conduct testing once production resumed, which occurred on July 19, 2018. As of November 5, 2018, testing has not been completed.

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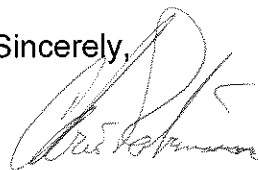
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 29, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If MHA 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 MHA Recycling LLC. 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,



Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-558-0259

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ