......

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

013240159771072			
FACILITY: Reclaim Synergy, LLC		SRN / ID: U132401597	
LOCATION: 101 Bishop Drive, Battle Creek		DISTRICT: Kalamazoo	
CITY: Battle Creek		COUNTY: CALHOUN	
CONTACT: Rich Ottrock , Manager		ACTIVITY DATE: 03/12/2024	
STAFF: Michael Cox	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:	
SUBJECT: Self-Initiated inspection in response to PEAS complaint			
RESOLVED COMPLAINTS: C-24-00819			

Air Quality Division (AQD) staff Michael (MTC) and Mariah Scott (MS) arrived at the Reclaim Synergy, LLC (RS) facility located at 101 Bishop Drive, Battle Creek, MI at approximately 1:15 pm on March 12, 2024, to complete a self-initiated inspection in response to a Pollution Emergency Alert System (PEAS) complaint. Prior to entering the facility, offsite odors and emission observations were completed. No odors or visible emissions were observed.

Facility Description

Reclaim Synergy, LLC (RS) SRN: U132401597 is an unpermitted scrap plastic recycling facility that primarily grinds and pelletizes recycled plastics for resale. The facility utilizes post-industrial scrap plastic from the automotive, flexible packaging, and injection molding industries. The scrap plastics (primarily in the form of 55gallon drums) go through a shredder that is located on the outside of the building and is then conveyed into the facility where it goes through the grinding process. From there the now plastic pieces are conveyed through a water bath for cooling via rotating arms to a large pump that vacuums the water and plastic pieces up. The water and plastic pieces then go through a process cyclone that drops the material out into an enclosed screw auger that separates the plastic from the water. The plastic is then dropped out into a large plastic sheet lined cardboard tote, while the water goes to an underground storage tank. The water from the storage tank is then pumped back into the water bath for reuse. Two grinders are located in the back of the building that are primarily used for sizing of plastic pieces. Two plastic extruders are also on site that are used to produce small plastic pellets. The facility also has another building (Building 2) on site where recycled cardboard and other materials are bailed. One grinder and an approximately 350-gallon offroad diesel tank are located at this building as well.

Compliance Evaluation:

Upon arrival, AQD staff MTC and MS met with Mr. Rich Ottrock, Manager, who provided a walk-through of the facility and answered site specific questions.

RS utilizes a shredder that is located on the outside of the building to process plastic containers which are then conveyed into the facility where it goes through the grinding process. It was noted that some of the containers are dry and some of the containers still contain liquids before going through the process line. Only one grinder is located on this process line that is used to grind the now shredded plastic containers into small pieces. The small plastic pieces are then conveyed through a water bath for cooling and move along the water bath via rotating arms to a large pump that vacuums the water and plastic pieces up. The water and plastic pieces

then go through a process cyclone that drops the material out into an enclosed screw auger that separates the plastic from the water. The plastic is then dropped out into a large plastic sheet lined cardboard tote, while the water goes to an underground storage tank. The water from the storage tank is then pumped back into the water bath for reuse. Two grinders are located in the back of the building that are primarily used for sizing of plastic pieces. Mr. Ottrock stated that they were rarely used. Two plastic extruders are also on site that are used to produce small plastic pellets. The extruders were stated to be used infrequently. One extruder was noted to have duct work venting outside the building. Emissions from all the process except for the one extruder and the shredder located outside emit to the general in-plant environment, however large roll top doors are kept open and vent fans were stated to be pulling air from inside the building outward. Due to the roll top doors being open and the shredder located outside of the building some of these processes do not appear to be exempt from Rule 201 permitting. A Rule 201 violation will be sent to the facility.

Additional Observations:

The facility also has another building (Building 2) on site where recycled cardboard and other materials are bailed. One grinder is located in Building 2. The grinder appears to vent inside the building as well and was not in use during the inspection. An approximately 350-gallon offroad diesel tank is located at this building as well. The diesel tank appears to be exempt from Rule 201 permitting per Rule 284(2)(d).

Located around both buildings are a large amount of collected plastic containers. The containers were noted to be stored in the open environment and had "hazardous waste" labels on them. Some of the containers were noted to still have liquids in them. Some spillage was noted on the ground. Due to the large amounts of "hazardous waste" labeled containers and the spillage noted during the inspection, AQD Staff notified the Material Management Division (MMD) as well as the Water Resources Division (WRD) to follow up.

Summary:

Based on the facility walk-through and observations made, Reclaim Synergy, LLC appears to be out of compliance with state air quality rules and regulations. A violation notice for the above referenced violation will be sent to the facility.

NAME Michael T. Cox

DATE <u>3/26/2024</u> SUPERVISOR Monica Brothers