



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

March 28, 2024

Scott Sherman, Managing Director
Reclaim Synergy, LLC
101 Bishop Drive
Battle Creek, MI 49037

SRN: U132401597, Calhoun County

Dear Scott Sherman:

VIOLATION NOTICE

On March 14, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Reclaim Synergy, LLC located at 101 Bishop Drive, Battle Creek, Michigan. The purpose of this inspection was to determine Reclaim Synergy, LLC'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 to investigate a recent complaint which we received on March 7, 2024, regarding black smoke and burning plastic odors attributed to Reclaim Synergy, LLC's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Recycled Plastic Process, including shredding and grinding	R 336.1201 (Rule 201)	Failure to obtain an Air Use Permit for process equipment.

During this inspection, it was noted that Reclaim Synergy, LLC had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Reclaim Synergy, LLC on March 14, 2024, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the recycled plastic process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

EGLE, AQD also requests that the facility submit a malfunction abatement plan (MAP) as described in Rule 911(2), within 60 days of the date of this letter. The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the recycled plastic operation and shall specify the following:

- a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
- d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 18, 2024 (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 Michael Cox at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or Coxm9@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Reclaim Synergy, LLC 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.

Scott Sherman, Managing Director
Reclaim Synergy, LLC
Page 3
March 28, 2024

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Reclaim Synergy, 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,

Michael T. Cox

Michael Cox
Environmental Quality
Analyst Air Quality Division
616-240-3607

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE