

5/26/2022

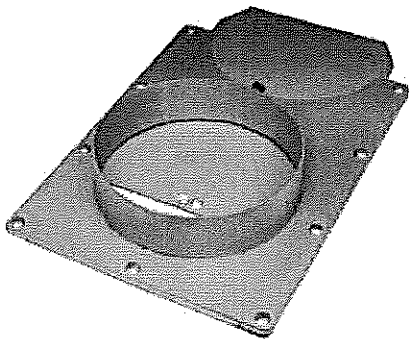
EGLE, AQD, Kalamazoo District
7953 Adobe Road
Kalamazoo, Michigan 49009

Jenine Camilleri,
Enforcement Unit Supervisor at EGLE, AQD
P.O. Box 30260
Lansing, Michigan 48909-7760

Dear Amanda,

The violations on 4/12/22 and 5/4/22 were not caused by improper maintenance but by process improvements earlier in the process allowing for more tons per hour (TPH) for our lower sales volume product. Unfortunately the aspiration system, the fan, cyclone and air lock, are at the limit of capacity when running the improved TPH. The failure mode was the rotary air lock stops flow of the material during its rotation and the material builds momentarily at the bottom of the cyclone, this normally drops out when the airlock opens. However, the higher volume can create a bridge at the bottom of the cyclone on top of the airlock over time. This blocks normal flow and the material blows out the top of the cyclone.

In the short term, we shut off the fan when this product was running. Unfortunately, the mill acts as a large fan and blows product into the aspiration fan and into the ductwork. This by itself does not blow out the stack but accumulates material in the system. This has the potential to blow out the stack when the fan is started when running our primary product. To avoid this potential we are installing a mechanical gate valve to prevent material from entering the aspiration system when the low volume product is run. This unit was installed 5/20. Since 5/12 we have been inserting a steel plate between the drop out duct and the aspiration intake blocking the system when running the low volume product. This is the same process as the gate valve but considerably more cumbersome. We are also limiting the TPH through the system negating the improvement in TPH.



AMERICAN BLOWER SUPPLY

Manual Blastgate: 10 in Duct Size, 17 in Lg, 23 in Wd

Item # 54GZ18

Mfr. Model # BGSS10C

UNSPSC # 40161503

Catalog Page # N/A

Country of Origin Taiwan. Country of Origin is subject to change.

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Battle Creek, MI 49016
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In the long term, we will be investigating improving the capacity of the aspiration system to take advantage of the improved TPH through the rest of the system. This will include evaluating removal of the air lock entirely as well as adding an auger at the bottom of the cyclone and before the airlock to allow material to continuously drop out of the cyclone rather than momentarily stopping the material.

Amanda and I discussed ducting the top of the cyclone back into the raw bay, which Amanda said is allowed via the permit. This is not a feasible solution when better options are available.

Sincerely,

Scott Allread
General Manager
ReConserve of Michigan
Sallread@ReConserve.com