

ReConserve of Michigan, Inc. EGLE Violation Notice 08/16/2024

August 16, 2024

Ron Caldwell
ReConserve of Michigan, Inc.
170 Angell Street
Battle Creek, Michigan 49037

SRN: N8081, Calhoun County

Dear Ron Caldwell:

VIOLATION NOTICE

On August 7, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of ReConserve of Michigan, Inc. located at 170 Angell Street, Battle Creek, Michigan. The purpose of this investigation was to determine ReConserve of Michigan, Inc. compliance with the requirements of the federal Clean Air Act, Part 56, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1964 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 184-08B; Administrative Consent Order (ACO) AQD No. 2024-09; and to investigate recent complaints which we received on July 26, 2024, and August 7, 2024, regarding fugitive dust attributed to ReConserve of Michigan, Inc. operations.

During the investigation, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---|--|--|
| EU-DRYING. PTI Filter box attached to EU-DRYING. | R 336, 1901 (Rule 901), General Condition 6 of PTI #184-08B, and ACO AQD No. 2024-09 | Excessive amount of particulate matter accumulation on and around filter box, which is located outside. Material appears to be the same as what was found on the complainant's vehicles. |
| EU-DRYING. | Special Condition III.2 of PTI #184-08B | Dusty waste filter material was observed near the filter box in an open container, which was exposed to the outside ambient air. |

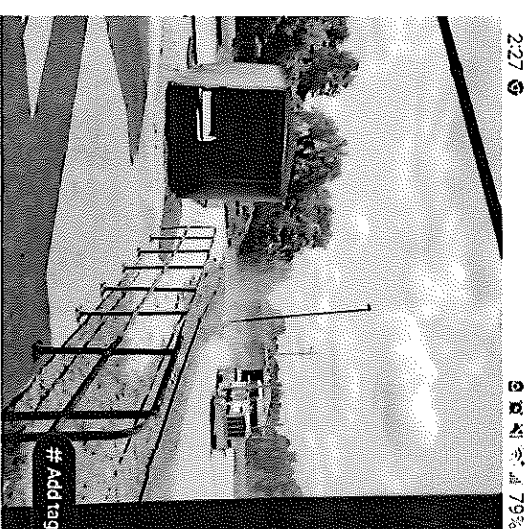
In the professional judgment of AQD staff, the dust fallout that was observed was of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 and PTI number 184-08B.

The AQD staff observed fallout accumulation on multiple vehicles at a neighboring business parking lot.

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- ▶ July 26, 2024 Jared Edgerton's review of ReConserve of Michigan we did not see particulates coming from filter box stack. Yes we saw particulates on the box, but no emissions. We did see truck traffic at the 5 mph speed limit kicking up dust since it had been dry. See attached pics. See dust cloud moving from East to West with the wind direction over to our neighbors.



July 26, 2024 3:17 PM

Edit

Add tag

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- ▶ August 07, 2024 Jared Edgerton's review of ReConserve of Michigan we did not see particulates coming from filter box stack. We saw some particulates on the box, but no emissions. Earlier in the day I had my employee sweeping (with a skid steer sweeping attachment) the concrete slab, which is North east of our neighbors. There was a strong east to west wind that was picking up the dust from the sweeping attachment carrying it over to our neighbors. I was walking to our Finish Feed bay to look at inventory as I saw the dust being blown from this sweeper attachment over to our neighbors. I stopped my employee as soon as I saw this occurring. She was sweeping the same concrete slab that the tractor trailer is on in the picture in slide 2.

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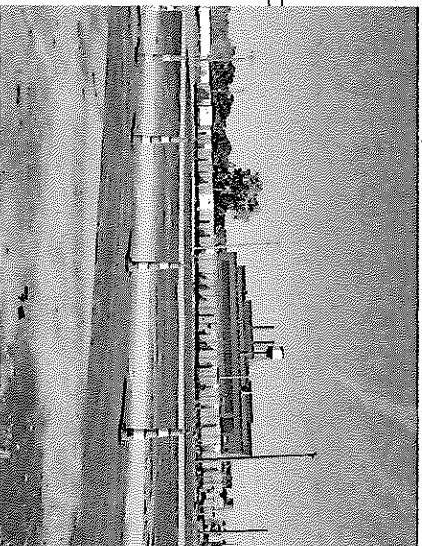
- ▶ Violation Notice comments: Excessive amount of particulate matter accumulation on and around filter box, which is located outside. Material appears to be the same as what was found on the complainant's vehicles.
 - ▶ ReConserve of Michigan review: We reviewed roof section, west of filter box, and found no sediment.
 - ▶ ReConserve of Michigan review: I challenge that the dust on complainants vehicles, if it came from ReConserve, didn't come from filter box area.
- ▶ Violation Notice comments: Dusty waste filter material was observed near the filter box in an open container, which was exposed to the outside ambient air.
 - ▶ ReConserve of Michigan review: We store used filters in a grey container. When the container fills then we empty out into trash receptacle.
 - ▶ ReConserve of Michigan review: I saw no fugitive emissions or fugitive dust escape from used filter media that was sitting in open container either on July 26, 2024 or August 07, 2024.
 - ▶ ReConserve of Michigan review: I challenge that the dust on complainants vehicles, if it came from ReConserve, didn't come from filter box area.

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- ▶ Countermeasure activity
 - ▶ Filter box improvements. Done.
 - ▶ No sweeping concrete slab Northwest of Load out building or Northeast of neighbors before 7 p.m. at night. To prevent dust from being blown over onto neighbors, but adhering to our malfunction abatement plan of daily sweeping. Done.
 - ▶ Dumping used filter media daily into trash receptacle. Done.
 - ▶ Campus undergoing massive asphalt / concrete paving project. \$740,000 expense. Target completion date: 10/04/2024.

09/04/2024 PICS.

Area between Office and Garage
Asphalt and concrete daily peak complete.



North of Load Out Building

Concrete slab for computer house, complete. Excavators working on grating / sweeping for asphalt.

