

## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

LIESL EICHLER CLARK DIRECTOR

SRN: B7609, Ingham County

LANSING DISTRICT OFFICE

February 3, 2020

Mr. Aaron Perrault, Owner Shingle Cycle, LLC 506 South Charles Street Lansing, Michigan 48912

Dear Mr. Perrault:

## VIOLATION NOTICE

On December 19, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Shingle Cycle, LLC located at 2127 West Willow Street, Lansing, Michigan. The purpose of this inspection was to determine Shingle Cycle 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; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 148-08A.

During the inspection's records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Process	PTI 148-08A, SC II.2	Asphalt shingles waste was taken from a non-residential building

PTI 148-08A, Special Condition II.2, Material Limits provides a list of "Acceptable Material" that Shingle Cycle LLC is allowed to process in EU-Process. Specifically, Shingle Cycle is only allowed to process tear-off asphalt shingle scrap and other incidental roofing waste from "private, residential homes only." During records review for the December 19, 2019 inspection, a Shingle Cycle's invoice record showed that on October 27, 2017, Shingle Cycle LLC received asphalt shingle materials from 4990 Zimmer Road, Williamston, MI, which is the address for the Williamston Township office, a non-private, non-residential entity. This is a violation of PTI 148-08A, Special Condition II.2.

The AQD acknowledges that Shingle Cycle, LLC is currently not processing shingles and that PTI 148-08A was voided after the inspection because the shingle processing equipment under EU-Process has been removed. Nonetheless, during the inspection AQD staff were informed that Shingle Cycle was still processing shingles in 2017 when the shingles from the Williamston Township office were received, and at which

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time, PTI 148-08A was still active. The AQD also acknowledges that Shingle Cycle LLC still maintains a shingles pile onsite that may be processed again in the future under new AQD permitting.

Please describe the actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 24, 2020 (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; 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 if Shingle Cycle begins to process shingles again in the future.

Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, First Floor South, 525 West Allegan St, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Shingle Cycle, 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.

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

Michelle Luplow

**Environmental Quality Analyst** 

Muun Lydo

Air Quality Division

517-284-6636

cc: Ms. Mary Ann Dolehanty, EGLE

Dr. Eduardo Olaguer, EGLE

Ms. Jenine Camilleri, EGLE

Mr. Christopher Ethridge, EGLE

Mr. Brad Myott, EGLE

Mr. Jeremy Brown, EGLE