



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 9, 2022

Scott Allread
ReConserve of Michigan, Inc.
PO Box 1413
Battle Creek, Michigan 49016

SRN: N8081, Calhoun County

Dear Scott Allread:

VIOLATION NOTICE

On May 4, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation at Sherriff Goslin Roofing located 10 Ave C, Springfield, Michigan. The purpose of this inquiry was to investigate a recent complaint which we received on May 4, 2022, regarding fugitive dust and fallout attributed to ReConserve of Michigan's operations located at 170 Angell Street, Battle Creek.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-SIZING	R 336.1901 (Rule 901)	Recurring fallout was observed offsite, on a neighboring business employee's cars.
EU-SIZING	R 336.1910	Cyclone is not being maintained and operated in a satisfactory manner.

In the professional judgment of AQD staff, the dust fallout that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451. The AQD staff observed dust fallout covering Sherriff Goslin employee and company vehicles on the following dates: 11/12/21, 2/24/22, 3/16/22, 4/12/22, and 5/4/22.

It appears the dust is originating from the stack of a cyclone in the finished feed bay, installed under exemption R 336.1285(2)(f). The cyclone was installed on 6/24/2016 to abate indoor fugitive dust. After the start-up of the facility, it was discovered that a fan used in EU-SIZING at the finish mill operations was creating excess fugitive emissions within EU-FINISHED FEED as the material was transferred from the mill to the finished feed bay. The facility now ducts the fan into the cyclone, so the fines drop out through a rotary valve located closer to the fines pile. When the feed entering the cyclone is too wet, the feed clogs the bottom of the cyclone, leading to dust fallout exiting the stack. This finished material is then blown onto neighboring cars, creating a nuisance.

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On March 16, 2022, the AQD staff was informed, by the facility, about the cyclone malfunctioning the previous day.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 31, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If ReConserve 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 violations cited above and for the cooperation that was extended to me during my complaint investigation. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Chapel
Senior Environmental Quality Analyst
Air Quality Division
269-910-2109

cc: Mary Ann Dolehanty, EGLE
Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE