



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 26, 2023

Kyle Daneff
Padnos Wyoming Recycling
500 44th Street SW
Grand Rapids, Michigan 49548

SRN: P1410 Kent County

Dear Kyle Daneff:

VIOLATION NOTICE

On October 10, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Padnos Wyoming Recycling located at 500 44th Street SW, Grand Rapids, Michigan. The purpose of this inspection was to determine Padnos Wyoming Recycling'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 October 2, 2023, regarding fugitive dust attributed to Padnos Wyoming Recycling's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Plastic Shredder 1	Rule 370	Failure to properly collect and dispose of air contaminants.
Plastic Shredder 1	Rule 201	Failure to obtain a Permit to Install.
Plastic Shredder 2	Rule 370	Failure to properly collect and dispose of air contaminants.
Plastic Shredder 2	Rule 201	Failure to obtain a Permit to Install.

During the inspection on October 10, 2023, the AQD observed that Plastic Shredder 1 and Plastic Shredder 2 baghouse fines were not being properly collected or disposed of. This is a violation of Rule 370 for failure to properly collect and dispose of air contaminants in a manner so as to minimize the introduction of contaminants to the outer air. Additionally, while this type of process could potentially utilize the Rule 285(2)(l)(vi) exemption, it does not meet the criteria as neither emission unit had

emissions being released only into the general in-plant environment, nor were they utilizing an appropriately designed and operated fabric filter collector. As such, the shredders are also in violation of Rule 201.

Pursuant to Rule 911, the AQD requests that Padnos Wyoming Recycling submit a Malfunction Abatement Plan (MAP) for all baghouses and associated process and collection systems at this facility, including the two shredders noted above and the copper grinding process baghouse.

A Rule 278 exemption demonstration is requested for all emission units at the facility as certain processes and process equipment may be exempt from obtaining a Permit to Install (PTI). Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

Finally, please provide a facility-wide Potential to Emit (PTE) demonstration for all criteria pollutants emitted at the stationary source. Information on calculating PTE can be found at:

<https://www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/potential-to-emit>

Please submit the information regarding the MAP, the Rule 278 exemption demonstration, and the PTE demonstration within 30 days of the date of this letter.

In addition, please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 16, 2023 (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 April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or LazzaroA1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Kyle Daneff
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If Padnos Wyoming Recycling 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 inspection of Padnos Wyoming Recycling. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE