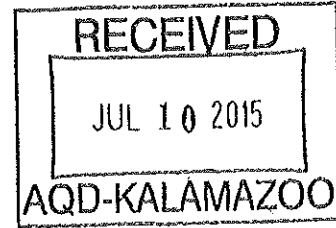


CHEF CONTAINER
WESTSHORE RECYCLING

Allegan County

BT

July 7, 2015



Mr. Dale Turton, P.E.
Environmental Engineer
Kalamazoo District Office
State of Michigan Department of Environmental Quality
Air Quality Division

Dear Dale,

We have received your letter dated June 23, 2015 relating to a violation of Rule 201—installation of equipment without a Permit to Install. The specific equipment you are referring to is a Vermeer HG6000 grinder currently being used to size-reduce waste wood. Most of the material is waste wood generated by local furniture manufacturers.

Our understanding had been that this process was exempt from the provisions of PA 451 and associated promulgated rules, and as authorized in Michigan by the Director of the DNRE in 2006 and amended 2010. As we have subsequently been informed by both you and Fred Sellers, this exemption applies to Solid Waste, but does not apply to Air Quality.

Our intent is to complete an application for a Permit to Install (Rule 201) for this piece of equipment. Below are the action steps we intend to pursue:

Obtain an application form	Completed July 2, 2015
Determine applicability	In process
Complete the initial application	October 15, 2015

During our meeting on July 6, you were helpful in increasing our understanding of general Air Quality rules and the process to be followed in completing an application for a Permit to Install. Thanks for making us aware that many applicants hire 3rd party consultants to complete the application. We are considering this possibility.

The application process appears to allow considerable opportunity for questions from both us and DEQ engineers and administrative personnel. For this reason, it seems difficult to project when the application process will be "complete". We do plan to have the initial application submitted by October 15, 2015.

Also in your letter, you noted an issue with dust fallout stemming from a complaint by Ed Menchen, regarding dust attributed to the grinding operation.

To immediately reduce the intensity, frequency and duration of the fallout, we have taken the following actions:

Processing is now limited to periods when wind speeds are at or below 10 mph. This limit is subject to change in the future as we gain more detailed information on the effect of weather conditions on the movement of the fugitive material. To date, it seems to be effective. We will not be grinding on days when the material will likely move beyond our site.

We are keeping a log of each day's grinding activities. It contains start time, end time, wind conditions, and a short video of the process in operation. This will help us track our work and tie activity to results.

We have initiated a daily sweeping of our asphalt lot with a street sweeper to gather settled fugitive dust.

We believe spraying water during the processing will mitigate much of the emission. We are currently pursuing the following:

Getting water to the processing area. Our first attempt will be running a hose from our transfer station, underneath the asphalt surface, to the processing area. As of this writing, a small culvert is in place underneath the asphalt, and we will be feeding a hose through it this week.

Designing and fabricating mechanisms to spray the water in a manner which knocks down the fugitive dust. We have been in contact with the manufacturer of the process equipment and they indicate the water should not have serious negative impact on the equipment. It will require modifications to operating procedures. It is also likely we will go through several iterations before settling on a permanent design.

We will continue to assure each trailer is covered after it is filled with wood chips.

We will undoubtedly gain new learnings as we seek remedies pursuant to your notice and will keep you posted as to changes and progress in our efforts. We appreciate any ideas or feedback you may have.

Regards,



Kim Buckley
Westshore Recycling/Chef Container