DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

B751930720

FACILITY: CRUTCHALL RESO	SRN / ID: B7519					
LOCATION: 6301 NORTH DOF	DISTRICT: Lansing					
CITY: FLINT	COUNTY: GENESEE					
CONTACT: Ellie Kane , Adminis	ACTIVITY DATE: 08/20/2015					
STAFF: Daniel McGeen	COMPLIANCE STATUS: Pending	SOURCE CLASS: MINOR				
SUBJECT: Attempt to conduct unannounced, scheduled inspection of former Crutchall shingle recycling facility which is currently closed,						
but reportedly in the process of trying to reopen, under new ownership.						
RESOLVED COMPLAINTS:						

On 8/20/2015, the DEQ, AQD attempted to conduct an unannounced, scheduled inspection of the former Crutchall Resource Recovery Flint site, which was closed, at this time.

Facility environmental contact:

For voiding the Permit to Install (PTI) for removed Crutchall equipment: Ellie Kane, Administrator, Crutchall Resource Recovery; 616-443-6019; crr4mi@yahoo.com

The new facility owner's name and contact information are unknown, at this time.

Facility description:

This facility is a shingle recycling facility, which was formerly owned by Crutchall, and is attempting to reopen by late 2015, under a new owner.

Emission units:

Emission unit ID	Description	Permit to Instail No.	Compliance status
EU- Process	Material sorting and separation; grinding with Model 3680 Bandit Chipper (700 HP Caterpillar engine) with liquid spray for dust suppression. Equipment includes areas and methods used to sort usable shingles from scrap material, material handling and transporting of material to storage areas. Control methods may include equipment enclosures, water sprays, drop chutes and/or pant legs for transfer points and work practices to minimize generation of fugitive dust.	293-08	Removed from site; PTI to be voided
EU-Truck Traffic	Truck traffic for the transfer of material to and from the facility and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved yard areas.	293-08	Not operating; PTI to be voided
EU- Storage	Protected area stock piles of unprocessed shingles and ground shingle product material.	293-08	Not operating; PTI to be voided

Regulatory background:

This facility has an air use permit, Permit to Install No. 293-08, which allows for grinding and sorting of shingles. It is considered a true minor source, not having the potential to emit (PTE) to be a major source of criteria pollutants, nor a major source of Hazardous Air Pollutants (HAPs).

Fee status:

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for

criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III. The facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

Location:

The facility is located in a heavily industrialized area of Flint, and is on the west side of Dort Highway. The nearest residences are about 1,000 feet to the northwest, and about 700 feet to the northeast.

Recent history:

The facility was last inspected on 7/30/2009, by AQD's Brad Myott, and found to be in compliance. It is presently under new ownership, rather than being owned/operated by Crutchall, according to a statement made in April, 2015 by Ms. Ellie Kane, Administrator for Crutchall Resource Recovery, LLC. I could not find any record of AQD having ever received any complaints about this facility.

Arrival:

At 1:11 PM, the facility's gate was closed, and shingles and what looked like a piece of portable industrial equipment were glimpsed through it, as I drove by. The equipment was turned at an angle that made it difficult to tell if it was a grinder, or a trommel, or other screening process. There was no sign of activity, from what I could see, nor was there any evidence of fugitive dust. Weather conditions were cloudy and 72 degrees F, with winds out of the west southwest. The ground was still damp from overnight rains.

I then stopped at Environmental Rubber Recycling, which is immediately north of the former Crutchall site. The woman at the customer service window explained that the shingle recycling facility has not operated in quite some time, but is in the process of trying to reopen. She said Environmental Rubber gets calls every day from people who think that the shingle business is theirs, and who want to bring in shingles. She advised I check with the company, RPM, which owns both the property the shingle recycler is leasing, and the property Environmental Rubber Recycling is leasing. She recommended that I speak with an RPM contact, Guy, who is frequently at either RPM's tire business, located in a bright yellow building, or at RPM's auto parts sales building, located in a dark green building. RPM is south of the shingle facility site, on the west side of Dort Highway, at 6025 N. Dort Highway.

Guy was not available at either RPM's auto parts or tire businesses, but I left my business card with a manager, Dave, at the tire shop. I asked if Guy could call me, with contact information for the shingle recycler, so I could determine if they had equipment that was exempt, or if they needed an air use permit, prior to start up. Dave indicated he would ask Guy to contact me.

Follow up discussion:

On 9/10/2015, I called Ms. Ellie Kane, Administrator for Crutchall, to inquire if the existing PTI No. 293-08 could be voided. I was informed that the Model 3680 Bandit Chipper covered by the permit has been removed, and will not be getting reused by the new facility owner. I will therefore submit a permit void request to AQD Permit Section Secretary Sue Thelen, and a permit void letter will be sent to Ms. Kane. Ms. Kane informed me that the new owner hopes to begin operating the Flint site again, before the end of 2015, but it is uncertain if that goal will be met. She indicated that she will contact AQD's Permit Engineer Dave Riddle to begin the process of getting a PTI, when the new owner has decided what equipment they will use in the future.

Conclusion:

The shingle recycling facility was not operating, at the time of the inspection, but the new owner hopes

to reopen it, possibly before the end of 2015. I did not identify any areas of noncompliance, at the time I drove by the site. Ms. Kane will contact AQD's Dave Riddle, when the new owner of the facility has decided what equipment they will go with, so that discussion on submitting a permit application can begin. Meanwhile, I will request that the existing Crutchall PTI, No. 293-08, be voided, and a copy of the void letter sent to Ms. Kane.

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