



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

November 12, 2024

Ron Caldwell
ReConserve of Michigan, Inc.
170 Angell Street
Battle Creek, MI 49037

SRN: N8081, Calhoun County

Dear Ron Caldwell:

VIOLATION NOTICE

On September 17, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of ReConserve of Michigan, Inc. located at 170 Angell Street, Battle Creek, Michigan. The purpose of this investigation was to determine ReConserve of Michigan, Inc. 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; the conditions of Permit to Install (PTI) number 184-08B; Administrative Consent Order (ACO) AQD No. 2024-09; and to investigate recent complaints which we received on September 17, 2024, regarding fallout attributed to ReConserve of Michigan, Inc. operations.

During the investigation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
RTO Filter box attached to EU-DRYING.	R 336.1901 (Rule 901), General Condition 6 of PTI #184-08B, and ACO AQD No. 2024-09	Lab analysis of fallout from the complainant's property, compared with material sampled from the filter box, indicates that the facility is the source. See attached lab results, which show that the fallout material is the same as the material found on the filter box during the complaint investigation.

Air Quality Division (AQD) staff observed fallout on multiple vehicles at a neighboring business parking lot. In order to determine the source of the fallout, AQD staff collected samples. At the complainant's property, two vehicles with confirmed fallout were chosen for sampling, a purple truck, and a maroon SUV. At the ReConserve facility, three samples were taken, two from gravel roadways, and one from the RTO filter box. Merit Laboratories, Inc. was used to conduct the lab analysis of the samples. The results show that the fallout found on the vehicles at the

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complainant's lot are consistent with the particulate material found on the RTO filter box, and not the roadways around the facility.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 3, 2024 (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; whether the violation is ongoing; 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.

Please submit the written response to Jared Edgerton at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or Edgertonj1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If ReConserve of Michigan, Inc. 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 investigation of ReConserve of Michigan, Inc. 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,



Jared Edgerton
Environmental Quality Analyst
Air Quality Division
269-312-1540

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE