

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

P130872361

FACILITY: AMERICAN CLASSIC DUMPSTER SERVICE INC		SRN / ID: P1308
LOCATION: 2031 22 MILE ROAD, KENT CITY		DISTRICT: Grand Rapids
CITY: KENT CITY		COUNTY: KENT
CONTACT:		ACTIVITY DATE: 05/29/2024
STAFF: Laura Martin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

On May 29, 2024, Air Quality Department (AQD) staff Laura Martin (LM) conducted an unannounced, scheduled inspection of American Classic Dumpster Service, LLC located at 2031 22 Mile Road, Kent City, Michigan. The purpose of this inspection was to determine compliance with Permit to Install (PTI) Number 146-22 and all other applicable Air Quality Rules and Regulations.

Weather conditions were mostly cloudy, approximately 67 DegF with winds around 10 miles per hour out of the west, per data collected from [www.weatherunderground.com](http://www.weatherunderground.com).

LM arrived at the site at approximately 1:40 PM and noted that the facility cannot be seen from the main road as it is surrounded by trees. LM attempted to drive down a side road, but the facility was still not visible. No visible emissions were observed above the tree line and no odors were detected. LM met with Art Fisk (AF), facility manager, Jacob Thompson (JT) and Nate Thompson (NT), owners. LM discussed the inspection process prior to reviewing PTI No. 146-22 and a facility walk-through. The entire facility is visible from the office building and consists of production equipment and piles of shingles shredded to various sizes. LM left the facility at approximately 3:00 PM.

### Facility Description

American Classic Dumpster Service, LLC (ACDS) is a mobile shingle and concrete crushing facility that is primarily located in Kent City, Michigan. The facility is a recycle asphalt shingle (RAS) recovery process that utilizes equipment to reduce the size of asphalt roofing materials to various sizes ranging from 2-3 inches in size, down to small particles. The pieces and particles are then sold to customers around the state to be used in resealing processes. The RAS recovery process consists of four (4) pieces of equipment, Impaktor Shredder, Beast Grinder, RM Scalper Screen and Model Conveyor, all of which are equipped with diesel-fired engines.

Loads of roofing materials and concrete from construction sites are brought to the facility and sorted accordingly. The crusher and grinder are not used simultaneously as they are both connected to a single screener and stacking conveyor. Particle sizes are sorted through the screener which utilizes vibratory shaking to sift materials onto one of three sorting belts, oversize, mid-size and fine particles. The fine particles are transported to the final storage area, and the oversize and mid-size particles are distributed to piles for re-processing. Water sprayers are utilized to minimize fugitive dust.

### Regulatory Overview

ACDS is considered a true minor source of emissions and is subject to 40 CFR 60 Subpart OOO. The facility is also subject to 40 CFR 61 Subpart M prohibiting the processing of any asbestos containing materials. The permit identifies three (3) emission units (EU), EUPROCESS, EUTRUCKTRAFFIC and EUSTORAGE. The requirements of each EU are described in detail below.

Appendix C requires the testing of incoming roofing materials at least once every 250 tons to confirm no Asbestos Containing Materials (ACM) is being processed in the shredder. ACDS is also required to give prior notification to the AQD District Supervisor if relocating.

### ***Equipment Description***

#### ***EUPROCESS:***

The combination of all process equipment including screens, crusher, feeders, conveyors, grinder and shredder. Control methods include equipment enclosures, water sprayers, drop chutes and/or pant legs for transfer points. Visible emissions (VE) for this emission unit (EU) are limited for each piece of equipment. Opacity limits are stated in the table below.

Equipment	Opacity Limit (%)
All Crushers	15
Screens	10
Conveyor/Transfer Points	10
Wheel Loaders and Truck Traffic	5
Material Storage Piles	5
Any other process equipment which is part of the nonmetallic mineral crushing facility or related processes	10

ACDS is only permitted to process shingle manufacturer by-product shingle waste material (end cuts), clean tear-off asphalt shingle scrap, or asphalt roll roofing material through EUPROCESS and is restricted from processing any asbestos containing materials. EUPROCESS also has a throughput processing limit of

2,000,000 tons of material combined, at all locations, on a 12-month rolling time period.

There are two testing/sampling requirements outlined in the PTI. A visible emissions evaluation shall be performed within 60 days of achieving maximum production rate, or 180 days after the commencement of trial operation, and testing of each type of tear-off shingle material in accordance with the protocol outlined in Appendix C.

Appendix C requires that a sample be tested every 250 tons of shingles received for processing.

Recordkeeping requirements includes tracking the amount of materials processed monthly, in tons, based on a 12-month rolling time period. A list of all personnel trained to visually detect possible asbestos containing material (ACM) should be maintained on file. Information about each load processed, including where the material was generated and re-roofing customer addresses where roofing material originated, shall also be maintained on file.

The permit requires that EUPROCESS not operate unless the nuisance minimization plan for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix B has been implemented and is maintained.

#### ***EUTRUCKTRAFFIC:***

This EU consists of the truck traffic from off-site construction locations to the processing area, from the processing area to delivery of material products to customers, and the loader traffic associated with all processing equipment. Pollution control utilizes water sprayers and the application of calcium chloride or other acceptable materials to control fugitive dust. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUTRUCKTRAFFIC, are limited to a maximum of five (5) percent opacity, based on a six-minute average and shall not be operated without the nuisance minimization plan for fugitive dust.

The nuisance minimization plan for fugitive dust requires that a record of all watering/dust suppressant applications be maintained for site roadways/plant yard and all records are to be kept on file for a period of five (5) years.

#### ***EUSTORAGE:***

An open area of stockpiles of various material sizes and product types. Water spray, calcium chloride or other acceptable materials are used when necessary to control fugitive dust. The process shall not be operated without the nuisance minimization plan. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUTRUCKTRAFFIC, are limited to a maximum of five (5) percent opacity, based on a six-minute average.

The nuisance minimization plan for fugitive dust requires that a record of all watering/dust suppressant applications be maintained for site roadways, the plant yard and storage piles.

#### **Compliance Evaluation**

Records were requested for the time period of June 2023 through May 2024. Records received include shingle testing results dated August 2020 and January 2021, and a spreadsheet containing the addresses of shingle origin and amount received. Testing result confirm no asbestos containing material (ACM) was processed at the facility. Loads of roofing material received from re-roofing projects totaled to 175.28 tpy based on a 12-month rolling time period as determined at the end of each calendar month. New material that was considered manufacturer rejects were processed and shipped out to Geocycle in Muskegon and totaled 549.63 tpy based on a 12-month rolling time period as determined at the end of each calendar month. The combined total weight of shingles processed through EUPROCESS was 724.91tpy based on a 12-month rolling time period as determined at the end of each calendar month, which is under the permitted limit of 2,000,000 tpy.

Based on the throughput amount, testing would be required for any incoming loads, but ACDS stated that they are discontinuing the shingle processing operation due to the lack of market opportunities for the processed roofing material. The last load received for processing was on March 1, 2024.

VE testing was required to be performed no later than 180 days after process start-up, but testing was not conducted. Because no shingles have been accepted since March and the plant is no longer operating, a violation notice will not be issued. However, VE testing will be required if the plant starts operating again. In addition, if the plant resumes operation, the recordkeeping format should be improved.

ACDS was following the requirements of the nuisance minimization plan as outlined in Appendix B. They stated that they continually utilized the processed shingles to control dust per the Beneficial Reuse Petition approved by EGLE. The spreading of material was done on a weekly basis.

No notifications of relocation were received and ACDS confirmed that they did not relocate during their time of operation.

There is no record keeping requirement for visible emissions and when LM was onsite there was no dust or visible emissions. It should be noted that the facility was not operating at the time of the inspection.

#### Compliance Determination

Based on the observations made at the time of the inspection and the subsequent records review, American Classic Dumpster Service, Inc. appears to be in compliance with PTI No. 146-22 and all other applicable Air Quality Rules and Regulations.

NAME Laura Mart

DATE 6/26/24

SUPERVISOR 