

DEPARTMENT OF ENVIRONMENTAL QUALITY  
 AIR QUALITY DIVISION  
 ACTIVITY REPORT: Self Initiated Inspection

N791525154

FACILITY: CRUTCHALL RESOURCE RECYCLING CO LLC		SRN / ID: N7915
LOCATION: 631 CHESTNUT ST SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Bryan Hall ,		ACTIVITY DATE: 05/16/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, unscheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, unscheduled inspection. I introduced myself to the men cleaning off a conveyor and indicated that the site manager, Brian Hall would be back from an errand in approximately five minutes.

Mr. Hall arrived, and staff informed him that an air quality inspection was taking place with regard to the unpermitted shingle processing equipment on-site. Mr. Hall indicated that they sold the old equipment (Bandit Beast) some time ago. The current equipment on site consists of a McCloskey 724 RE 4X4 rotary power screener that generates one size product. The other unit is a Stone Products vibratory screen with three size products. Both units are diesel fired.

We discussed the different areas of shingle storage, and the different sizes that the equipment screens for. The main pile (pile #1) is all residential shingles that have been lab tested for asbestos by Mr. Hall himself. He stated that he is trained in asbestos identification and no tested shingles have had asbestos. The shingles originate from a residential roof company named Mr. Roof and an occasional random person who stops by and asks to dump a load. Mr. Hall indicated the Yard Manager Jim Gray is the contact for any required records.

Pile #2 is called shingle flake fuel or 1" minus product. This has been screened to the 1" size that is preferred by the purchaser and used for fuel, at a cement kiln located in northern lower Michigan.

Pile #3 is the ¼" minus product. This is utilized by one paving company as an additive to the asphalt product.

Pile #4 is the 3" minus, which also is sent to the cement kiln for fuel.

Also discussed was the permitting status of the screening equipment. At the time of the inspection, I thought that there was a permit exemption for screening that would apply to this equipment. However, upon closer evaluation the exemption is only for screening of uncrushed sand, gravel, soil and other inorganic soil-like materials. None of those product options applies to shingles.

We discussed voiding Permit to Install No. 373-07 and Mr. Hall indicated that he would like to discuss that with the Administrator at Crutchall, Ms. Ellie Kane. After further thought, and discussion with Cindy Smith, Permit Supervisor in Lansing, the best way to go about this is modify the existing permit to update the equipment being used. This is also probably the fastest way to get a permit on the screens. PTI No. 373-07 has special conditions for three separate emission units; EU-Process, EU-Truck Traffic and EU-Storage. At the time of the inspection only EU-Truck Traffic and EU-Storage were evaluated for compliance. That is because EU-Process does not exist and therefore until permit modification cannot be evaluated. No compliance issues were noted with regard to truck traffic and storage. Due to spring rains, the facility was generally damp. Further evaluation will be conducted as needed during drier weather. We also discussed that permits are equipment specific, which means that another shingle crusher cannot come in and operate under the Crutchall permit.

Since the equipment was down for maintenance on Friday, staff and Mr. Hall planned to talk on Monday to set up a time to see the equipment in operation. This is to help staff determine how the equipment looks with regard to particle generation and permitting. At the closing, staff and Mr. Hall discussed the DEQ Environmental Inspections: Rights and Responsibilities brochure, and staff indicated that I would provide him with one during the follow-up visit.

On Monday, May 19<sup>th</sup> staff called Mr. Hall and informed him that the equipment needs a permit and is in

violation. A Rule 201 violation notice will be issued. We also set up a time on Tuesday May 20<sup>th</sup> at 9:00 am to observe the screens in operation. Mr. Hall asked why he needs a permit, and was told that the screens do generate air pollution in the form of particulate and that since there is no applicable exemption the only other option is to get a permit. Mr. Hall indicated that Crutchall will do whatever it takes to be in compliance.

The facility was in violation at the time of the inspection.

Update 5/20/14

Staff met with Bryan Hall and Ellie Kane to observe the screens in operation and to discuss the equipment permitting process. Both indicated a willingness to comply and get the permit application in as soon as possible. AQD will work with Crutchall to get the permitting accomplished.



Image 1(McCloskey screen) : 724 RE 4X4



Image 2(Screen) : Brushes on drum for continuous cleaning.

NAME Paul Lagan

DATE 5-20-14 SUPERVISOR PAZ