



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

June 1, 2016

Mr. Don Sturch
ReConserve of Michigan, Inc.
170 Angell Street
Battle Creek, Michigan 49016

SRN: N8081, Calhoun County

Dear Mr. Sturch:

VIOLATION NOTICE

On May 18, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of ReConserve of Michigan (formerly known as Endres Michigan, Inc.), located at 170 Angell Street, Battle Creek, Michigan. The purpose of this inspection was to determine ReConserve of Michigan's 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 administrative rules; and the conditions of Permit to Install (PTI) No. 184-08A.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-RAW MATERIAL	PTI No. 184-08A, Special Condition (SC) III.1 and VII.1	Permittee has not prepared, implemented, or maintained a fugitive dust plan (FDP) for all plant roadways, the plant yard, all material storage piles, and all material handling operations. Written notification to the AQD District Supervisor was not submitted following completion of equipment installation.
EU-DRYING	Rule 201	Permittee has installed a bypass stack prior to the regenerative thermal oxidizer (RTO) controls. Bypass operation use is not authorized under PTI No. 184-08A.
EU-DRYING	PTI No. 184-08A, SC III.1	Permittee has not prepared or submitted a Malfunction Abatement Plan (MAP) that is required for process operation.
EU-DRYING	PTI No. 184-08A, SC VI.3	Permittee is not recording RTO combustion temperatures at 10-15 second intervals and recording 3-hour block averages.

EU-DRYING	PTI No. 184-08A, SC VI.2 and VII.1	Permittee is not recording the tons of food byproducts dried on a calendar month or 12-month rolling time period basis. Written notification was not submitted to the AQD following completion of equipment installation.
EU-STORAGE SILOS	PTI No. 184-08A, SC III.1 and III.2	Permittee has not prepared or submitted a MAP or FDP that is required for process operation.
EU-STORAGE SILOS	PTI No. 184-08A, SC IV.2	Permittee has not installed required cartridge filter system or bin vent filters on the grain by-product receiving silos that are required for process operation.
EU-STORAGE SILOS	PTI No. 184-08A, SC VI.2 and VII.1	Permittee is not conducting or recording weekly visible emission readings during silo loading operations. Written notification was not submitted to the AQD following completion of equipment installation.
EU-SIZING	PTI No. 184-08A, SC III.1 and VII.1	Permittee has not prepared or submitted a MAP that is required for process operation. Written notification was not submitted to the AQD following completion of equipment installation.
EU-SIZING	PTI No. 184-08A, SC IV.1	Permittee has not installed required baghouse controls on the roto chopping portion of EU-SIZING. The roto chopper currently vents in-plant.
EU-FINISHED FEED	PTI No. 184-08A, SC III.1 and VII.1	Permittee has not prepared or submitted a MAP that is required for process operation. Written notification was not submitted to the AQD following completion of equipment installation.
EU-PAPER REMOVAL	PTI No. 184-08A, SC VI.2	Permittee is not conducting or recording weekly visible emission readings during process operations.
EU-PAPER REMOVAL	PTI No. 184-08A, SC III.1 and VII.1	Permittee has not prepared or submitted a FDP that is required for process operation. Written notification was not submitted to the AQD following completion of equipment installation.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 22, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If ReConserve of Michigan 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 inspection of ReConserve of Michigan. If you have any questions regarding the violations or the actions necessary to bring this ReConserve of Michigan into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane
Senior Environmental Quality Analyst
Air Quality Division
269-567-3547

RIL:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ