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

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FACILITY: Geocycle LLC		SRN / ID: N8267		
LOCATION: 4365 EVANSTON	AVE, MUSKEGON	DISTRICT: Grand Rapids		
CITY: MUSKEGON		COUNTY: MUSKEGON		
CONTACT: Patrick Barry, Site	Manager	ACTIVITY DATE: 06/20/2023		
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR		
SUBJECT: On site inspection t	o assess compliance with air quality rules and regulation	ons.		
RESOLVED COMPLAINTS:				

Intro

On June 20, 2023, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division staff member Scott Evans conducted an on-site inspection of the Geocycle Recycling facility located at 4365 Evanston Ave. in Muskegon, Michigan, to assess compliance with the requirements of Permit to Install (PTI) No. 183-14 and all other applicable air quality rules and regulations. Geocycle is a shingle recycling plant that takes used roofing shingles to grind and sort into useable materials that are sold to other facilities for use. Upon arrival at the facility there were no observable odors or visible emissions (VEs). SE was greeted by Patrick Barry upon arrival and after a conversation about the purpose of the visit an inspection was conducted.

PTI No. 183-14

This PTI has requirements for the following three emission units (EUs):

- EU-Process
- EU-Truck Traffic
- EU-Storage

EU-Process

This EU is the material sorting and separation equipment including a crusher, belt magnet, and deck screener.

This EU is limited to no more than 10% opacity from visible emissions during operation. During the inspection, the crusher was operating, and no instances of opacity exceedance occurred. It was discussed and the facility expressed that no instances of high VEs had occurred since the last inspection in 2018.

This EU is not permitted to process any material that contains asbestos and may only process approved shingles as outlined in the permit. During the inspection this was discussed, and the facility expressed that it only accepts approved materials. The facility conducts asbestos testing as outlined further below to demonstrate compliance with the asbestos limit.

This EU may only operate if an appropriate fugitive dust plan is established and followed. The dust plan is included with the PTI as Appendix A. The parameters within Appendix A appeared to be followed by the facility including control of dust on the yard and roadways, minimized drop distances for material, appropriate stockpile dust control, and coverage of truck loads as needed.

During the last inspection it was identified that the facility had not conducted visible emissions testing as required within the permit. As identified in notes within the facility file, testing was

conducted in 2019 and so the issue has since been rectified. The facility is required to test for asbestos as outlined in Appendix B of the permit. This was discussed and the facility was able to provide documentation that demonstrated compliance with this requirement. The test results showed compliance with the above outlined asbestos limitation.

The facility is required to keep the following records for this EU:

- · Daily and Monthly records for hours of operation.
- · Record of confirmation that materials do not contain asbestos.
- The following records for each load of processed shingles:
 - Statement affirming that scrap was generated from private, residential homes only.
 - Address of origin for the scrap.
 - Statement affirming that the scrap contains no asbestos or other hazardous materials.
- · Daily observations of VEs.

All records were observed on site. Hours of operation of equipment follow a consistent single shift operation five days per week. When shipments of shingles for destruction are received, it is confirmed where they arrive from and what materials they consist of. The facility confirmed that only residential quality shingles are disposed of at this facility and no commercial roofing materials such as rubber membrane or hot tar are accepted at the facility. Records verified that only shingles have been received at the facility. The facility also observes for VEs and knows to immediately address instances of noticeably high VEs. No instances of VEs above 10% opacity were recorded since the last inspection.

The facility also conducts materials testing of shingles on a regular basis to confirm the absence of many hazardous materials including asbestos. The most recent testing records from May and June of 2023 confirmed that there was no asbestos present in processed shingle piles. A copy of this report is included with this report.

EU-Truck Traffic

This EU is described as all traffic on facility yards and roadways.

This EU is required to limit all dust from traffic to no more than 5% opacity for visible emissions. During the inspection there were no observed VEs and the facility appeared to be managing dust as required in Appendix A of the permit. As discussed above, the facility appeared compliant with all parameters within Appendix A.

EU-Storage

This EU is described as the piles of processed and unprocessed shingle scrap.

VEs from this EU are limited to 5% opacity. During the inspection there were no observed VEs and the facility expressed that no instances had occurred since the last inspection. As with the other EUs above, this EU is required to adhere to Appendix A and, as discussed, the facility appeared compliant with this requirement during the inspection.

Conclusion

At the conclusion of this inspection the facility appeared to be compliant with the requirements of PTI No. 183-14 and all other applicable air quality rules and regulations.

NAME_Scott Evans

DATE 7/25/2023