# MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

November 3, 2022

PERMIT TO INSTALL 146-22

ISSUED TO

American Classic Dumpster Service, LLC

LOCATED AT 2031 22 Mile Road Kent City, Michigan 49330

> IN THE COUNTY OF Kent

STATE REGISTRATION NUMBER P1308

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:				
September 15, 2022				
-				
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:			
November 3, 2022				
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

## PERMIT TO INSTALL

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#### **COMMON ACRONYMS**

AQD Air Quality Division

BACT Best Available Control Technology

CAA Clean Air Act

CAM Compliance Assurance Monitoring
CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

COMS Continuous Opacity Monitoring System

Department/department/EGLE Michigan Department of Environment, Great Lakes, and Energy

EU Emission Unit FG Flexible Group

GACS Gallons of Applied Coating Solids

GC General Condition
GHGs Greenhouse Gases

HVLP High Volume Low Pressure\*

ID Identification

IRSLInitial Risk Screening LevelITSLInitial Threshold Screening LevelLAERLowest Achievable Emission RateMACTMaximum Achievable Control TechnologyMAERSMichigan Air Emissions Reporting System

MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emission Standard for Hazardous Air Pollutants

NSPS New Source Performance Standards

NSR New Source Review
PS Performance Specification

PSD Prevention of Significant Deterioration

PTE Permanent Total Enclosure

PTI Permit to Install

RACT Reasonable Available Control Technology

ROP Renewable Operating Permit

SC Special Condition

SCR Selective Catalytic Reduction
SNCR Selective Non-Catalytic Reduction
SRN State Registration Number

Skin State Registration is

TBD To Be Determined

TEQ Toxicity Equivalence Quotient

USEPA/EPA United States Environmental Protection Agency

VE Visible Emissions

<sup>\*</sup>For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

## **POLLUTANT / MEASUREMENT ABBREVIATIONS**

acfm Actual cubic feet per minute

BTU British Thermal Unit °C Degrees Celsius CO Carbon Monoxide

CO2e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter Degrees Fahrenheit

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

HP Horsepower Hydrogen Sulfide

kW Kilowatt
lb Pound
m Meter
mg Milligram
mm Millimeter
MM Million
MW Megawatts

NMOC Non-Methane Organic Compounds

NO<sub>x</sub> Oxides of Nitrogen

ng Nanogram

PM Particulate Matter

PM10 Particulate Matter equal to or less than 10 microns in diameter PM2.5 Particulate Matter equal to or less than 2.5 microns in diameter

pph Pounds per hour ppm Parts per million

ppmv Parts per million by volume
ppmw Parts per million by weight
psia Pounds per square inch absolute
psig Pounds per square inch gauge

scf Standard cubic feet

sec Seconds SO<sub>2</sub> Sulfur Dioxide

TAC Toxic Air Contaminant

Temp Temperature

THC Total Hydrocarbons tpy Tons per year Microgram

μm Micrometer or Micron
VOC Volatile Organic Compounds

yr Year

## **GENERAL CONDITIONS**

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

## **EMISSION UNIT SPECIAL CONDITIONS**

## **EMISSION UNIT SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EUPROCESS	A combination of process equipment (screens, crushers, feeders, conveyors, etc.) used to reduce larger materials down to smaller sizes, classify and sort materials into various product types, material handling and transporting of material to storage areas. Control methods include equipment enclosures, water sprays, drop chutes and/or pant legs for transfer points.	NA
EUTRUCKTRAFFIC	Truck traffic for delivery of material products to customers; truck traffic from quarry pit to processing area and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road portions from the pile to the process area.	NA
EUSTORAGE	Open area stock piles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles.	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

## EUPROCESS EMISSION UNIT CONDITIONS

## **DESCRIPTION**

A combination of process equipment (screens, crushers, feeders, conveyors, etc.) used to reduce larger materials down to smaller sizes, classify and sort materials into various product types, material handling and transporting of material to storage areas. Control methods include equipment enclosures, water sprays, drop chutes and/or pant legs for transfer points.

Flexible Group ID: NA

## **POLLUTION CONTROL EQUIPMENT**

Water sprays to reduce fugitive dust

## I. EMISSION LIMIT(S)

1. Visible emissions from EUPROCESS shall not exceed the limits in the following table: (R 336.1205, R 336.1301, R 336.1901, 40 CFR 60.670)

	Equipment	Opacity Limit (%)*
a.	All crushers	15
b.	Screens	10
C.	Conveyors/Transfer points	10
d.	Wheel loaders and truck traffic	5
e.	Material storage piles	5
f.	Any other process equipment which is part of the nonmetallic mineral	10
	crushing facility or related processes	

<sup>\*</sup>Opacity limits are based on a six-minute average, when processing non-metallic minerals pursuant to 40 CFR Part 60 Subpart OOO.

## II. MATERIAL LIMIT(S)

- 1. The permittee shall not process any asbestos tailing or waste materials containing asbestos in EUPROCESS pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61, Subpart M. (40 CFR Part 61 Subpart M)
- 2. The permittee shall not process more than 2,000,000 tons of material combined, at all locations, through EUPROCESS per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1901, 40 CFR 52.21(c) & (d))
- 3. The permittee shall process only shingle manufacturer by-product shingle waste material (end cuts), clean tear-off asphalt shingle scrap, or asphalt roll roofing material in EUPROCESS. The material processed in EUPROCESS must meet the standards specified in the following table:

Acceptable Material	Asphalt shingle manufacturer by-product (end cuts)			
	Tear-off asphalt shingle scrap, asphalt roll roofing and other incidental roofing waste. Processing of incidental roofing waste shall be minimize but less than 2 percent by weight of material such as felt attached to shingles, wood, cardboard, flashing, nails, or plastic wrap may be processed.			
	Shingles shall meet the American Society for Testing and Materials (ASTM) specifications for roofing shingles: ASTM D 225-86 (Asphalt Shingles (Organic Felt) Surfaced with Mineral Granules) or ASTM D3462-87 (Asphalt Shingles Made from Glass Felt and Surfaced with Mineral Granules)			
Prohibited Material	Unacceptable materials include: household trash, paint, solvents, gasoline, anti-freeze, dead animals, asbestos, explosives, or any other material deemed hazardous or inappropriate by the AQD district supervisor."  The following materials shall not be processed:  1. Cementitious shingles, shake shingles, and transite siding that may be suspect asbestos containing material.  2. Non-asphalt roll roofing, built-up roofing, tile, cedar shake shingles, coal tar, rubber, slate, or metal roofing  3. Any type of hazardous waste (e.g., mercury containing devices such as thermostats, paint, solvents or other volatile liquids, etc.).  4. Significant amounts (more than 2 percent by weight) of other debris that is not asphalt shingles (e.g., plastic, paper, glass, metal, or trash).  The following items shall be separated, to an extent acceptable to the AQD district supervisor, from the shingles before processing: Wood  Metal flashings, gutters, etc.  Nails (best effort)  Plastic wrap, buckets  Paper waste  Other garbage, trash or dirt			

(R 336.1201(3), R 336.1205, R 336.1224, R 336.1225)

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate any portion of EUPROCESS unless each portion of EUPROCESS meets the specific opacity limit listed in Appendix A of this permit. (R 336.1301, 40 CFR 52.21 (c) & (d), 40 CFR 60.670)
- 2. The permittee shall not operate EUPROCESS 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. (R 336.1371, R 336.1372, R 336.1901, Act 451 324.5524)
- 3. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and OOO, as they apply to EUPROCESS. (40 CFR Part 60 Subparts A & OOO)

## IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate any portion of EUPROCESS unless the equipment's specified control device is installed, maintained, and operated in a satisfactory manner as listed in Appendix A. (R 336.1205, R 336.1901, R 336.1910, 40 CFR 52.21(c) and (d))
- 2. The permittee shall not operate EUPROCESS unless the sampling and testing plan outlined in Appendix C is implemented. (40 CFR 61 Subpart M)

## V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. Within 60 days after achieving the maximum production rate, but not later than 180 days after commencement of trial operation, the permittee shall evaluate visible emissions from EUPROCESS, as required by federal Standards of Performance for New Stationary Sources, at owner's expense, in accordance 40 CFR Part 60 Subparts A and OOO. Visible emission observation procedures must have prior approval by the AQD Technical Programs Unit and District Office. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 45 days following the last date of the test. (R 336.1301, 40 CFR Part 60 Subparts A & OOO)
- 2. The permittee shall sample and test each type of tear-off shingle material in accordance with the sampling protocol outlined in Appendix C. The presence of asbestos shall be analyzed using the polarized light microscopy (PLM) methods [EPA Method 600/R-93/116] as per NESHAP 40 CFR Part 61 Subpart M using an accredited laboratory, or personnel certified to conduct PLM, Method 600. The permittee shall document and maintain adequate records of the results of analyses and make the records available to the department upon request. (40 CFR Part 61 Subpart M)

## VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (40 CFR 52.21 (c) & (d))
- 2. The permittee shall keep, in a satisfactory manner, monthly records of the amount of material processed, in tons, through EUPROCESS. The amount of material shall be calculated using the volume of the material processed multiplied by the density of the material. Further, the permittee shall calculate on a monthly basis, the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of material processed on file and make them available to the Department upon request. (40 CFR 52.21 (c) & (d))
- 3. Each load of material accepted for recycling shall be inspected by personnel trained to visually detect possible Asbestos Containing Material. The permittee shall keep a list of trained personnel on file and make it available to the Department upon request. (40 CFR 61 Subpart M)
- 4. The permittee shall provide, for each load of roofing materials, a record of the following information:
  - a) A statement indicating where the roofing material was generated.
  - b) Re-roof customer address(es) where the roofing material originated.
  - c) A statement that the roofing waste material consists only of asphalt shingles, asphalt roll roofing, and associated roofing debris and contains no hazardous material. If the roofing material is subject to 40 CFR Part 61 Subpart M, the permittee shall keep records of the asbestos inspection report for each building. Each statement or report shall include the date it was generated.

(R 336.1201(3), R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR Part 61 Subpart M)

## VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify

the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, or modification is considered to occur not later than commencement of trial operation of EUPROCESS. (R 336.1201(7)(a))

- 2. The permittee shall submit notification to the AQD District Supervisor at least 10 days prior to relocating EUPROCESS to this site; however, if electronic notification is used, the notification shall be submitted at least 5 days before the change of location or 2 business days if the owner provided the AQD District Supervisor a list of anticipated operating locations for that calendar year at least 10 days before the change of location and if the proposed location is on that list. (Act 451 324.5505, 40 CFR 52.21 (c) & (d))
- 3. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. (40 CFR 60.7)

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

- 1. Within 45 days of issuance of this permit, the permittee shall label all equipment using the company ID Numbers in Appendix A, according to a method acceptable to the AQD District Supervisor. Labels shall be in a conspicuous location on the equipment. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. (R 336.1201)
- 2. The permittee shall not relocate EUPROCESS to any new geographical site in Michigan unless all the following criteria are met: (Act 451 324.5505(5), R 336.1201, R 336.1205, R 336.1901)
  - a) The facility shall have no outstanding unresolved violations of any of the Michigan Department of Environmental Quality Air Pollution Control rules, orders, or permits; or Federal air quality regulations.
  - b) A notice of intent to relocate (Relocation Notice Form EQP5757); a copy of the original general permit forms (EQP5727, EQP5729 and EQP5756); any Process Information forms for previous modifications; and a proposed site plan identifying the proposed new geographical site and the probable duration at the new site shall be provided to the appropriate district office and the Permit Section not less than 10 days prior to the scheduled relocation; however, if electronic notification is used, the notification shall be submitted at least 5 days before the change of location or 2 business days if the owner provided the AQD District Supervisor a list of anticipated operating locations for that calendar year at least 10 days before the change of location and if the proposed location is on that list.. All residential or commercial establishments and places of public assembly within 1,000 feet of the proposed facility site shall be clearly identified on the proposed site plan.
  - c) The crusher(s) shall be located a minimum of 500 feet from any residential or commercial establishment or place of public assembly.
  - d) A copy of this permit and conditions shall be clearly posted in the operator's office or workstation.

## Footnotes:

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

# EUTRUCKTRAFFIC EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Truck traffic for delivery of material products to customers; truck traffic from quarry pit to processing area and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. All commercial truck areas and unpaved road portions from the pile to the process area.

Flexible Group ID: NA

## POLLUTION CONTROL EQUIPMENT

Water, calcium chloride, or other acceptable materials to control fugitive dust

## I. EMISSION LIMIT(S)

 Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUTRUCKTRAFFIC, shall not exceed five (5) percent opacity, based on a six-minute average. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). (R 336.1205, R 336.1301, 40 CFR 52.21(c) & (d))

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUTRUCKTRAFFIC 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. (R 336.1371, R 336.1372, R 336.1901, Act 451 324.5524)

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

## V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

## VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

## VII. REPORTING

NA

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

NA

## Footnotes:

<sup>&</sup>lt;sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

# EUSTORAGE EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Open area stock piles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles.

Flexible Group ID: NA

## POLLUTION CONTROL EQUIPMENT

Water, calcium chloride, or other acceptable materials to control fugitive dust

## I. EMISSION LIMIT(S)

1. Visible emissions from each of the material storage piles maintained under EUSTORAGE shall not exceed five (5) percent opacity, based on a six-minute average. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). (R 336.1205, R 336.1301, 40 CFR 52.21(c) & (d))

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUSTORAGE 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. (R 336.1371, R 336.1372, R 336.1901, Act 451 324.5524)

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

## V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

## VII. REPORTING

NA

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

NA

## Footnotes:

<sup>&</sup>lt;sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

## **APPENDIX A**

Equipment Description	ID Number	Opacity Limit (Percent)	Control Device
Impaktor Shredder	250	15	Water sprays
Beast Grinder	3680-XP	15	Water sprays
RM Scalper Screen	HS7500M	10	Residual moisture
Model Conveyor	PS-80	10	Residual moisture

## APPENDIX B Nuisance Minimization Plan for Fugitive Dust

## I. Site Roadways / Plant Yard

- A. The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet all applicable emission limits. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.
- B. All paved roadways and the plant yards shall be swept as needed between applications.
- C. Any material spillage on roads shall be cleaned up immediately.

#### II. Plant

The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve. The transfer point from the re-circulating belt to the feed belt shall be equipped with an enclosed chute.

## III. Storage Piles

- A. Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.
- B. Stockpiles shall be watered on an as needed basis in order to meet the opacity limit of 5 percent. Equipment to apply water or dust suppressant shall be available at the site or on call for use at the site within a given operating day. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.

## IV. Truck Traffic

On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within 6 inches of the top of any side board, side panel or tailgate. Otherwise, the truck shall be tarped.

## V. AQD/EGLE Inspection

The provisions and procedures of this plan are subject to adjustment by written notification from the AQD if, following an inspection, the AQD finds the fugitive dust requirements and/or permitted emission limits are not being met.

## APPENDIX C Asbestos Testing and Site Management Plan

#### **Shingle Source:**

The company will accept only asphalt roofing materials and/or roofing manufacturer's scrap. The company will not accept any non-asphalt roll roofing, tile, cedar, shake, coal tar, rubber, slate, built up roofing, or metal roofing. The company absolutely does not allow any material containing asbestos. The company discourages, but does allow for a minimal amount of flashing, felt, wood, cardboard and plastic wrap. These items must be placed on top of the asphalt roofing materials for easy removal into a dumpster at our site. If there is an excess of non-asphalt roofing materials, the company reserves the right to reject the entire load. Policy is not to accept more than 10% non-shingle material.

#### **Acceptance and Testing:**

Asphalt roofing materials are delivered to the site via homeowner, roofing contractor or dumpster company. These sources must disclose the source of the roofing materials and pass a visual inspection by the receiving agent. Any load that does not meet criteria or visual inspection of receiving agent will be refused. The company will then perform one mandatory asbestos test of one sample for every 250 tons of shingles received. If any roofing materials are found to contain > 1% asbestos using the PLM EPA Method 600 testing, the entire lot will be immediately quarantined until all material contained therein can be removed and disposed of to an appropriately licensed disposal site. Should this occur, the company will either open a secondary staging area for new loads coming in, or will halt receiving any new drops until said area can be cleaned.

Any material that fails to meet the standard of asbestos free will be disposed of at an appropriately licensed disposal site within a seven-day period. We reserve the right to charge back any portion of disposal fee and/or handling fees associated with this contaminate to the individual or entity that has caused the clean-up procedures to be enacted.

## **Material Identification Procedure:**

In order to properly track a sample to the corresponding load the following procedure will be followed.

Any material that is unloaded into the untested staging area will be assigned an ID number comprised of the date received followed with a sequential number for that date, beginning each new day with 1.

When asphalt roofing materials are delivered to the facility, a job order identified by a unique number is generated. This job order will contain the source's name, address, telephone number, job-site address, container size or volume and date of drop. Any job found to be contaminated by asbestos will be identified on this job order as well. This database is maintained for a minimum of 5 years.

#### Visual Screening of Materials

Each load of material shall be inspected by personnel trained to visually detect possible asbestos containing material. All yard staff and drivers are trained by the yard manager to recognize the following unacceptable materials: Non-asphalt roll roofing, tile, cedar shake, coat tar, rubber, slate, built up roofing, and/or metal roofing.

#### Staging

The pre-tested staging area will be 100 -ton lot size. The pre-tested staging area will contain only untested asphalt shingles.

After asphalt roofing materials have been certified 100 percent asbestos free, and cleaned of deleterious material, they are transported from the tested staging area and may be fed via a front-end loader into the grinder or screener.