



QUIKRETE - Flint
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FROM: Devin Kaufman (PM)

October 19, 2018

To: Mr. Robert Elmouchi

Please find below the written response to the violation notices which came from the onsite FNT-590 plant visit on September 13, 2018. Notice received 10/05/18.

1. **As written in the comments:** Exhaust gases from stack SV 002 are discharged horizontally. The permit requires the exhaust gases to be discharged unobstructed vertically upwards.
This was something that was changed 10-15 years ago. A requested change to the Permit to Install was couriered 10/18/2018 to reflect the discharge being horizontal has been submitted to correct the verbiage.
2. **As written in the comments:** From August 1, 2017 to August 31, 2018, the permittee exceeded the daily process limit of 1,000 tons per day on 2 separate dates. Quikrete processed 1,105 tons on June 11, 2018, and 1,179 tons on August 27, 2018.
The original documentation that was viewed during the inspection had some calculation errors and has been corrected (Saturday's numbers were included originally, broken out now). June 11, 2018 processed 635 tons and August 27, 2018 processed 772 tons. File is attached for review: Tons through FNT EU Process.
3. **As written in the comments:** Permittee failed to maintain a belt scale on the C1 transfer conveyor portion of EU-Process. The belt scale has not been maintained since at least August 2015.
The belt scale on the wet feed to the dryer has been out of operation for roughly 5-6 years and there were issues with it working for many years before that. A requested change to the Permit to Install was couriered 10/18/2018 to eliminate any verbiage referring to a belt scale and state that "The permittee shall record the throughput of material through the EU Process daily/monthly/rolling 12 month periods." We have been using a raw material receiving report to track the amount of sand dried through the dryer which has been kept up and logged for a number of years. A copy of the report is attached for your review.

If there are any questions of concerns with any of the responses, please let me know and thank you Mr. Elmouchi for working with us towards the common goal of making sure we're in compliance.

Respectfully,

Devin Kaufman