



## Quikrete – Flint

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October 28, 2020

Mr. Robert Elmouchi  
EGLE  
AQD – Warren District  
27700 Donald Court  
Warren, MI 48092

RE: Violation Notice from October 13,2020 (SRN – B1945)

Mr. Elmouchi,

In accordance with the violation notice received via email on October 13, 2020, Quikrete – Flint (B1945) is submitting the following as our response to the AQD notification. This response includes, to the best of our ability, 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.

As the Violation Notice details, Quikrete was cooperating with Mr. Elmouchi in a virtual compliance audit when it was communicated to the AQD Analyst that the Process Baghouse (DC2) and associated Pressure Drop Monitoring Gauge (MD4) were disconnected from a portion of the EU-Process on or around the week of September 7, 2020. In the same week, the exhaust going to this control device was re-routed to the Wet Sand Dryer Cyclone (CY) & Wet Sand Wet Scrubber (S1) in series control devices. The reason to disconnect was to make room for a cement pad being installed. We also revealed that this pad installation was part of a larger project to install new drying equipment and associated emission control devices to the EU-Dryer and EU-Process units, a plan that had been discussed previously with no start date.

Quikrete-Flint was working in good faith and with the understanding that a permittee was afforded up to 18 months by the State of MI to submit and get approval for updates or changes to a current permit. This was evidently a misunderstanding of casual conversations previously had between Mr. Elmouchi & Mr. Kaufman on the subject.

Both parties immediately began discussions for mediating this potential violation. Following up on October 1, 2020, via a MS Teams video conference call with Quikrete and AQD staff, additional action items were discussed, and instructions were articulated for the process of submitting a new PTI as soon as possible. Quikrete electronically submitted the application and supporting documents to Mr. Elmouchi and Ms. Switzer on Oct 20, 2020.

We estimate that the new permit will be approved in 2 – 3 weeks. At that point, we will work towards compliance to the new PTI. We anticipate full compliance by the end of the calendar year.

Regards,

*Devin Kaufman*

Devin Kaufman  
Plant Manager

Cc: Jenine Camilleri, EGLE  
Paul Robbins, Quikrete  
John Kehlbeck, Quikrete