



D. C. Byers Co./Grand Rapids, Inc.

SPECIALISTS IN RESTORATION OF STRUCTURES SINCE 1903

February 11, 2022

EGLE
AQD
Grand Rapids District
350 Ottawa ave. NW Unit 10
Grand Rapids, MI 49503

Attn: April Lazzaro, Senior Environmental Quality Analyst - AQD

RE: Corrections of Violations Noted at the January 12th Site Inspection

Dear Ms. Lazzaro:

In response to the Violation Notice we received from EGLE for our PTI No. 280-99, we submit the following record of actions undertaken by DC Byers Company/Grand Rapids, Inc. to ameliorate the conditions recorded during the inspection.

PTI No. 280-99, Special Condition No. 5.

We hereby submit a spreadsheet detailing the Rolling Record of Sand Usage as required in Special Condition No. 5. We have been maintaining this log as required and have recently digitized it into the spreadsheet, which is attached.

Therefore, we do not believe this qualifies as a violation. I did not understand your request for the sand usage data at the time of the inspection. That was my error. Our current protocol has the accounts payables dept. forwarding the monthly load tickets for delivered sand to our warehouse supervisor, who then updates the spreadsheet accordingly. **A copy of the Sand Usage Log is attached.**

PTI No. 280-99, General Condition 13; Rule 370(1)

In response to the noted loose sand that was lying on the parking lot surfaces, we have taken the following actions:

1. Purchase and installation of a truck mounted salt spreader to deal with the icy conditions in the parking lot. We are no longer using sand of any kind for traction in our warehouse areas. **(Pictures attached).**
2. Installation of a skidsteer brush and capture accessory on our Skid-Steer equipment. This will allow for faster, more thorough, clean up of bulk sand that is accidentally spilled during tower fill operations, or incidental sand tracking out of the sandblast bay. **(Pictures attached).**
3. We have established protocols for periodic clean up and capture of any migrating, spent blast sand that may exit the overhead and mandors of the blast bay during normal operations.

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4. We have installed new stairs and platforms at the dust collector and blast pot to enhance our ability to clean the interior and exterior of the equipment to prevent sand migration. **(Pictures attached)**.
5. Priority parking lot sand cleanup and was conducted on Monday, Jan 31st. **(Pictures are attached)**.

Solid Waste Management Practices (Part111, Rule 302 and 311)

1. All blasting projects to be evaluated and assessed for potential hazardous materials by-products from blasting operations, identified in a log that records the date, type of project, and brief description.
2. Waste sand sampling and TCLP testing for heavy metals will be conducted prior to disposal. All testing to be conducted by an accredited, analytical laboratory. Recent testing of three random samples, taken from the blast bay at different times, has resulted in non-detectable levels of heavy metals in the waste sand. This testing was completed on Jan. 31st and February 8, 2022. **Test results are attached.**
3. Disposal of all non-hazardous, waste sand will be at a licensed disposal facility, (South Kent Landfill), per the protocols and criteria of Kent County Department of Public Works Rules for Special Waste.
4. Any material that tests beyond the non-hazardous criteria, will be sent to a licensed, hazardous waste disposal facility, through a licensed hazardous waste hauler.
5. All sampling records, disposal records and receipts, and load tickets will be maintained in a data base at our office.

Equipment Maintenance Inspections

1. A full maintenance inspection of the dust collection system was completed on 2/1/2022. Ductwork in the blast bay, exterior ductwork, dust collector cabinet, filters, blower, poppers and solenoids, and all fittings and attachments were inspected. The followings deficiencies were noted and remedied by 2/9/2022. Blasting operations were halted until the repairs were completed.
 - A. The 12 dust collector filters were operational, but in need of general maintenance cleaning. 12 new filters were ordered from the manufacturer and installed. The old filters are scheduled to be cleaned by a third-party subcontractor. Regular rotation of the filters will be as necessary, based on differential pressure.
 - B. All six solenoids that operate the "poppers" within the dust collector were functional. One solenoid was deemed to have a weak return spring, resulting in adequate, but less than optimal performance. A new solenoid has been ordered and will be installed upon arrival.
 - C. All six diaphragms of the "popper" mechanisms were changed out as part of the normal maintenance operations. All are operational.
 - D. Automatic Timeclock operation of the "poppers" was verified.
 - E. Electrical disconnects and exhaust fan rotation were verified.
 - F. No holes or deficiencies were noted in the ductwork or dust collector cabinet.
 - G. A test run of the dust collector resulted in no visible dust being emitted from the exhaust stream during routine blast operations.

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We are confident that we have addressed the issues and violations noted in your Violations Notice. We will do all that we can to be in compliance with our Permit requirements.

If there is any further information you may require, please call me at 538-7300.

Sincerely,
D.C. Byers Company/Grand Rapids, Inc.

A handwritten signature in black ink, appearing to read "Doug Lectka". The signature is fluid and cursive, with the first name "Doug" written in a larger, more prominent script than the last name "Lectka".

Doug Lectka
President