



08/04/2022

Dear Michigan Department of Environment, Great Lakes, and Energy,

This letter constitutes Carmeuse's response to NOV dated 8/4/22 for the Schlegel Sand and Gravel Operation, PTI 59-22. The NOV alleges that on 7/19/22 the VSI crusher at the facility emitted fugitive dust at levels above allowed limits on conveyor CR016.

We are of the position that the fugitive dust readings should not be applied to this conveyor and instead be associated with the VSI crusher itself, EU SCR 014. In investigating the cause of the dust, we determined that the VSI crusher was releasing material at a high velocity out of its exhaust port. Although the port is the outlet by which conveyor CR016 meets the crusher, it was not the conveyor itself that caused the dust but the crusher. Further, controls added will be added to the crusher and not the conveyor. Therefore, we contend that the compliance limit should be instead a 12% opacity on a 6 minute average (NSPS 40 CFR 60, Subpart 000, Table 3).

We do not dispute that the readings taken on 7/19 were in excess of this 12% opacity compliance limit. Prior to the 19th, the site had been running a sand product through the crusher which, in preparation for initial testing, was below the 12% limit. On 7/19, the plant changed to a larger stone product which yielded the increased dust emissions.

Upon showing the inspector and receiving the results of their Method 9 readings, the site ceased operations and will not operate until the time that a suitable control can be installed on the SCR 014. As of August 4th, we have begun engineering to explore various control methods including adding freezer stripes to slow the velocity of the material and a shelled enclosure. We hope to implement this controls as soon as possible and will notify the State promptly of testing to verify the devices meet compliance limits.

Please reach out to me with any questions at 219-292-5206 or at Raymond.Rummel@carmeuse.com



Salutation,

Raymond Rummel
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