



Titan Concrete LLC.
6497 East Ten Mile Road
Centerline MI

January 19, 2023

Noshin Khan
Environmental Engineer
Air Quality Division
Warren District Office
27700 Donald Court
Warren, MI 48092
Michigan Department of Environment, Great Lakes, and Energy

JAN 21 2023

Dear Ms. Kahn:

Please accept this letter as Titan Concrete LLC's ("Titan"). response to your Letter of Violation dated January 11, 2023, regarding – 6497 East Ten Mile Road - Titan Concrete LLC. - SRN: P1297 – December 21, 2022 site inspection, which was the date the violation occurred. The violation occurred because the staff was not applying the requisite dust suppression measures, citing freezing temperatures as the reason. However, since the date of the inspection, I have become the new plant manager, and I will be creating the daily dust reports. Additionally, a new yard employee position has been added to apply additional water to truck tires when coming off the plant. Since the date of the violation, Titan has instituted additional measures to eliminate fugitive dust emanating from the site, even during freezing temperatures, which will allow the site to comply with Rule 289(2)(d)(vii)(E), and avoid having to obtain a permit under that Rule. Those measures include:

1. Calcium Chloride will be applied to paved and unpaved surfaces as needed during winter months as a dust suppressant.
2. Increased frequency in applying dust suppressant to the site on windy and dry days;
3. Unpaved gate areas closed, barriers placed;
4. New yard employee position added to apply additional water to truck tires as they cross from unpaved to paved portions of the site;
5. 1x3 (large stone) has been placed in the unpaved area of the yard;
6. Street sweepers to sweep 10 Mile Road and all paved areas on the site;

7. Site sprinklers have been added and positioned to soak concrete areas, roadways, and stock piles;
8. High pressure hoses have been added to reach hard pavement and temporary unpaved areas.

These measures are being enacted to control the dust at the site, however, as your Letter of Violation notes and as discussed during our January 18, 2023 phone call, the dust is being caused by trucks traversing over the unpaved portions of the site. Titan has been prepared to pave those portions of the site on which trucks traverse since November 2022, however, the City of Warren is currently reviewing our request to install said pavement. We are hopeful that The City of Warren will soon approve our request to pave those remaining portions of the site, which will eliminate any fugitive dust issues. Until that time at which we can pave the site, we will institute the above additional measures to control dust.

We appreciate your diligence and patience in this matter. If you have any questions, please do not hesitate to contact me directly.

Sincerely,



Jason Reiss
Plant Manager

cc: Joe Jashowski, EGLE
Jenine Camilleri, EGLE
Gary Kelley, Titan Concrete (via email)
Ronald F. Wuerth, Planning Director, City of Warren (via email)