



June 29, 2021

Michael Conklin
Environmental Engineer
Air Quality Division
Michigan Department of Environmental Quality
420 5th Street, Gwinn, Michigan
49891

Subject: Fugitive Air Emissions

Dear Mr. Conklin:

Carmeuse Lime and Stone Drummond Island operations located at 23311 East Haul Road, Drummond Island, Michigan received a complaint from a resident located on the west side of the island approximately 1.5 miles from our production plant location. The dust complaint received from the resident through EGLE on June 4th by a phone call and then was sent on to Carmeuse through Michael Conklin.

After further investigation by John Abbitt Area Operations Manager and Roger Nash Site Operations Manager it was determined the fugitive, dust that affected the residents came from our settling ponds. It has been a very dry winter without much snow cover or precipitation and the settling pond had the top layer of fine material become dry and loose. This top layer became airborne because of the high winds.

In speaking with Roger Nash and John Abbitt, we have determined the settling ponds were the cause of the fugitive dust that affected Mr. Coppings property during the times he had complained. We first thought it was the stockpile but after visually seeing the material being transported by the wind from the settling pond, we changed our focus. The facility made some fixes to the embankments to direct and hold water in pond 1 and 2 longer to keep them flooded and eliminate the potential of dust coming from the pond area. See photo 1 and 2.

Photo #1



Photo #2



Additional, we have knocked down the original pile that we thought was contributing to the fugitive dust. Please see Photo #3

Photo #3



The other location for fugitive dust was our internal roadway from the production office to the quarry face which I approximately 8 miles. It was noted through Michael Conklin that the opacity reach 40 percent on an instantaneous reading. The 6-minute average were approximately at 6.5 Percent. We noted from the photo that the opacity was 5%. Carmeuse has always committed to reduce fugitive dust from our roadways. We continue to use and spray the roads with water. In addition to water, we have finally been able to have a supply truck over to apply Brine to our road to continually keep the road with dust suppression on them. The brine is scheduled for July for 7-12. Carmeuse Drummond island facility will update our fugitive dust plan with the uses of brine and to ensure that we minimize the impact of the dust being lifted off the settling ponds.

Carmeuse Lime Drummond operation strives to comply with all legislation by conducting visible emission observations. If emissions are noted, Carmeuse will take necessary action to rectify any problems immediately. We have been in contact with the resident and we noted that he reported incidents on April 6 and May 21 of this year. We did note that there was heavy winds on those days. Roger Nash and I have mentioned to EGLE and the residents that we would prefer that we be contacted immediately so that we can react or understand if we have a problem area that is affecting our neighbours. We have been in contact with the affected parties and will provide any additional help need to clean up any dust that has impacted their homes. Our facility management will be reviewing our

inspection frequencies of the pond and stockpile areas. They will work with the environmental manager to identify additional dust suppressions options. We invite to you visit our facility so we can demonstrate the philosophical approach we take in dealing with environmental issues. If you have any additional questions, or would like to discuss this matter further, please call me at 519 535 0530 or Roger Nash at 989 351 9628.

Sincerely,

Christopher Martin

Christopher Martin
Carmeuse Americas
Senior Environmental Manager
Great lakes

| [cc](#). John Abbitt
[cc](#). Roger Nash