

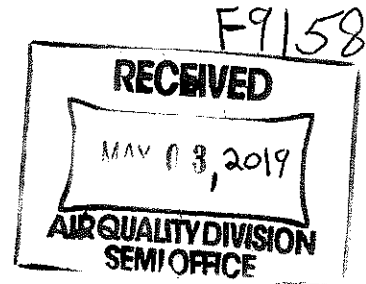
Mailing Address:
P.O. Box 2160
Brighton, MI 48116-2160800 395-ASTI
Fax: 810.225.3800

www.asti-env.com

Sent Via email and UPS
Ground

BE

May 2, 2019

Robert Elmouchi
Manager, Permit Section
MDEQ Air Quality Division
27700 Donald Court
Warren, MI 48092-2793

RE: *Permit-to-Install 244-98*
Response to MDEQ Correspondence Dated April 11, 2019
regarding the Fendt Builder's Supply facility located at
22005 Gill Road, Farmington Hills, MI 48335

Dear Mr. Elmouchi:

ASTI is submitting this letter on behalf of Fendt Builder's Supply to respond to the Michigan Department of Environmental Quality (MDEQ) correspondence dated April 11, 2019 and site visit on March 29, 2019 regarding the MIM processes located at 6401 East Seven Mile Road, Detroit, MI. The purpose of this inspection was to determine Fendt Builder's Supply's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 244-98.

Fendt Builder's Supply has contracted with ASTI to prepare the PTI application to include installation of a new storage silo, incorporation of the boilers, and outdoor storage piles.

DATES OF VIOLATION

Fendt Builder's Supply has been operating under the general conditions of PTI 244-98, dated August 18, 1998. It is Fendt's understanding that since the silos and boilers were existing structures at that time the permit was issued, the site was inspected and the permit issued that these structures were in compliance.

The number of stock piles on site increased from the permitted 6 piles at some time after the issue PTI date of August 18, 1998. There are no records that state the exact time period when production and products produced required the additional stock piles.

STORAGE SILO

The DEQ letter states: Special Condition 5 of PTI 244-98 states in part, "The exhaust gases from each of the storage silo portions of the concrete block manufacturing

process shall be discharged unobstructed to the ambient air from a stack at an exit point not less than feet 60 above ground level." During this inspection, AQD staff was informed that the round silo exhaust exit point was approximately 41 feet above ground level.

Fendt Builder's Supply response: A new silo system will be installed with a new bag house and enclosed auger conveyors. The discharge from the bag house will be a minimum of 60 ft. above ground. A PTI application will be submitted with details and specifications for the system. The exhaust will be monitored and observations recorded.

Since this is the production season for block and until the PTI is issued, Fendt Builder's Supply will continue to operate. If the silo is not operated, production cannot occur at the facility. The majority of employees would be laid off until the PTI and installation can occur.

OUTSIDE STORAGE PILES

The DEQ letter states: During this inspection, it was noted that Fendt Builder's Supply maintained eight (8) outside storage piles. Special Condition 8 of PTI 244-98 states in part, *"The maximum number of outside storage piles the applicant may maintain on site is six (6) ."*

Fendt Builder's Supply response: As production and the type of products manufactured has increased since 1998 additional stock piles in three sided bins has increased. The facility implements dust control measures and has not received complaints from the surrounding residential neighborhood regarding fugitive dust.

An application for a PTI will be completed and submitted that will include additional dust control measures and record keeping. The PTI application will include the additional stock piles, including the scrap product pile that does not contribute significantly to fugitive dust.

BOILERS

The DEQ letter states: During this inspection, it was noted that Fendt Builder's Supply had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Fendt Builder's Supply on April 8, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

Fendt Builder's Supply response: The two 60 hp boilers, cited in the April 11, 1998 letter, were operating at the time PTI 244-98 was issued. Fend Builder's Supply understands that AQD rules and enforcement have changed since the PTI was issued. An application for a PTI will be prepared and submitted to include the two boilers.

SCHEDULE FOR COMPLIANCE

Currently Fendt Builder's Supply is working with a design and construction firm to finalize the plans and equipment that will replace the silo and ancillary equipment. This plan also includes replacing two additional silos. Final plans and equipment specifications will be available May 31, 2019; the PTI application will be submitted 30 days after final plans are issued.

Robert Elmouchi
MDEQ Air Quality Division
May 2, 2019

Page 3 of 3

If you have any questions or comments, please do not hesitate to call me at 810 335-2600.

Sincerely yours,

ASTI ENVIRONMENTAL

A handwritten signature in cursive script, appearing to read "Bruce Bawkon".

Bruce Bawkon, P.E.
Director, Industrial Compliance

cc: Jenine Camilleri, Enforcement Unit Supervisor at the DEQ,