



July 21, 2023

Mr. David Rauch, Environmental Quality Analyst
EGLE-AQD Lansing District Office
P.O Box 30242
Lansing, Michigan 48909-7742

Re: Response to Violation Notice
Unilock, Inc. (SRN: N7621)

Dear Mr. Rauch:

I am writing on behalf of Unilock, MI. Inc. in response to the July 10, 2023 Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE) for alleged violations of air quality regulations at the facility located at 12591 Emerson Road, Brighton, Michigan (the "Facility"). Unilock appreciates the opportunity to respond to the VN and the assistance that has been provided by EGLE staff.

The violation notice asserts that for calendar year 2021, the Brighton, Michigan facility exceeded the 200,000 cubic yard limitation for batch concrete processed. This limitation is set by Rule 336.1289(2)(d)(i) for a concrete batch plant.

Upon review of our records we determined that there was a conversion error in our calculations which inflated our 2021 cement throughput to 236,610 cubic yards in when in fact throughput was 44,429 cubic yards. Therefore, there has been no exceedance of the rule limit for our batch process. The error in the program has been corrected. For your file, we are including a summary spreadsheet with corrected monthly and annual cement throughput data.

In addition to this violation, your letter addresses the tumbler operation. While we see this process as an extension of the concrete production, we now fully understand that these are in fact two separate operations. The tumbler was installed to grind the surfaces of select pavers in order to provide a more weathered appearance. The tumbler is located within an enclosure inside a building, allowing for good collection of any fugitive dust, which is then directed to a cartridge style dust collection unit, with a control efficiency of 99.5%. For this operation, we believe that it's operation is applicable to Michigan Rule 336.1285(2)(l)(vi)(C). A Rule 278a evaluation is provided along with this letter, for your review.

Should you have any questions regarding the above explanation, please contact me by e-mail at Jerry.Harder@unilock.com or by telephone at 248-437-7037. We look forward to continued cooperation with EGLE-AQD.

Sincerely,

A handwritten signature in black ink that reads "Jerry Harder".

Jerry Harder
Plant Manager
Unilock, Inc.

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE

Batch Cement Plant Production History
 Unilock, Inc.
 Brighton, Michigan

	Equiv. Sq. Ft.	lbs concrete (27.44 lbs/Eq. sq ft)	cubic yds concrete (3,780 lb/yd ³)	Compliance (yd ³ Cement/yr)
Rule Limit				200,000
Jan-18	81,408.3	2,233,843.01	590.96	
Feb-18	-	-	-	
Mar-18	201,263.0	5,522,657.66	1,461.02	
Apr-18	511,664.1	14,040,061.70	3,714.30	
May-18	488,804.8	13,412,804.90	3,548.36	
Jun-18	470,875.2	12,920,816.43	3,418.21	
Jul-18	645,414.8	17,710,183.13	4,685.23	
Aug-18	720,192.1	19,762,072.16	5,228.06	
Sep-18	633,566.3	17,385,060.50	4,599.22	
Oct-18	606,567.2	16,644,204.36	4,403.23	
Nov-18	596,536.9	16,368,972.35	4,330.42	
Dec-18	458,824.0	12,590,129.38	3,330.72	39,309.74
Jan-19	-	-	-	
Feb-19	-	-	-	
Mar-19	233,396.6	6,404,403.99	1,694.29	
Apr-19	557,868.8	15,307,919.34	4,049.71	
May-19	325,223.9	8,924,142.50	2,360.88	
Jun-19	504,383.9	13,840,294.47	3,661.45	
Jul-19	568,340.5	15,595,262.50	4,125.73	
Aug-19	546,353.1	14,991,930.23	3,966.12	
Sep-19	530,458.3	14,555,775.33	3,850.73	
Oct-19	654,533.8	17,960,408.36	4,751.43	
Nov-19	601,196.5	16,496,831.39	4,364.24	
Dec-19	414,906.9	11,385,045.89	3,011.92	35,836.51
Jan-20	-	-	-	
Feb-20	-	-	-	
Mar-20	9,451.8	259,357.39	68.61	
Apr-20	-	-	-	
May-20	519,117.9	14,244,593.91	3,768.41	
Jun-20	485,211.1	13,314,193.48	3,522.27	
Jul-20	627,921.4	17,230,163.95	4,558.24	
Aug-20	711,531.0	19,524,410.12	5,165.19	
Sep-20	746,707.3	20,489,649.02	5,420.54	
Oct-20	650,803.3	17,858,042.29	4,724.35	
Nov-20	469,435.3	12,881,304.03	3,407.75	
Dec-20	456,893.2	12,537,149.37	3,316.71	33,952.08
Jan-21	406,753.9	11,161,327.77	2,952.73	
Feb-21	52,964.4	1,453,343.86	384.48	
Mar-21	599,783.6	16,458,061.68	4,353.98	

Apr-21	561,017.8	15,394,327.07	4,072.57	
May-21	636,104.0	17,454,694.80	4,617.64	
Jun-21	620,877.5	17,036,879.26	4,507.11	
Jul-21	490,202.9	13,451,167.47	3,558.51	
Aug-21	544,937.9	14,953,096.00	3,955.85	
Sep-21	586,580.9	16,095,778.92	4,258.14	
Oct-21	554,943.8	15,227,658.90	4,028.48	
Nov-21	571,848.2	15,691,515.74	4,151.19	
Dec-21	494,364.5	13,565,361.38	3,588.72	44,429.42
Jan-22	347,725.3	9,541,582.18	2,524.23	
Feb-22	-	-	-	
Mar-22	430,432.8	11,811,075.96	3,124.62	
Apr-22	485,913.2	13,333,458.51	3,527.37	
May-22	539,599.8	14,806,619.23	3,917.10	
Jun-22	643,090.6	17,646,406.57	4,668.36	
Jul-22	368,666.5	10,116,207.40	2,676.25	
Aug-22	347,913.2	9,546,738.67	2,525.59	
Sep-22	404,020.0	11,086,309.82	2,932.89	
Oct-22	498,865.8	13,688,876.80	3,621.40	
Nov-22	442,821.2	12,151,014.95	3,214.55	
Dec-22	255,636.1	7,014,654.58	1,855.73	34,588.08