

October 8, 2021

Mr. Sam Liveson
Environmental Engineer
EGLE Air Quality Division
Detroit District Office
3058 West Grand Blvd.
Detroit, MI 48202-6058

Subject: Response to Violation Notice
Great Lakes Aggregates - Taylor Yard; PTI 81-00; SRN B4686

Dear Mr. Liveson,

Great Lakes Aggregates (GLA) has prepared this response to the Violation Notice (VN) dated October 7, 2021 that was issued to the Taylor Yard for its nonmetallic mineral crushing facility. During an inspection by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) on August 11, 2021 the following four (4) permit violations were found and reported in a VN. Each violation is individually referenced and addressed below.

- 1. Equipment Labeling**
 - a. PTI No. 81-00, Special Condition (SC) IV.2

The VN indicates that equipment was not labeled.

Equipment will be labeled according to equipment identification numbers presented in the attached new Process Information Form (EQP5756).

- 2. Equipment Replacements**
 - a. PTI No. 81-00, SC V.2

The VN indicates that equipment has been added and replaced but a revised Process Information form has not been submitted.

GLA acknowledges that new equipment has been added to the facility. Some equipment that was listed in the Process Information Form in PTI No. 81-00, dated March 3, 2000, was replaced with like equipment. Some equipment (primarily conveyors) have been added to the facility since the Process Information Form dated March 3, 2000 and have not been reported in an updated Process Information form. GLA has performed an audit on all process equipment at the facility and is submitting an updated Process Information form.

A list of new like equipment replacements is presented below. Four (4) individual pieces of equipment have been replaced with new like equipment as described below.

ID	Function	Original Information	Replacement Information
P-1	Jaw Crusher	Cedarapids 3660	Lippmann 38x62
F-1	Primary Grizzly Feeder	Simplicity 5120-0F1200	Lippmann 62x24 LLH26
S-1	Vibrating Screen	Simplicity 2720-LP160A	Diester 2720-HD
P-2	Secondary Crusher	Cedarapids Rollercone MVP	Hazemag ASPE1315

In general, the replacement equipment presented in the above list is the same or similar in size as the original piece of equipment. None of the equipment replacements resulted in an increase in throughput capacity or increase in particulate emissions.

All other process equipment listed in the attached new Process Information form is previously existing or additional as of the March 3, 2000 Process Information form.

3. Initial Testing

- a. PTI No. 81-00, SC V.3; 40 CFR Part 60 Subparts A & OOO

The VN indicates that new or additional equipment has not been tested.

A test plan for performing visible emission (VE) testing for the entire non-metallic mineral crushing facility (all subject equipment) is attached with this correspondence. The equipment listed in PTI 81-00 that still remains on site has likely been VE tested, but GLA no longer has records of the testing. GLA has opted to perform a site-wide VE test on all applicable equipment to ensure compliance. The VE testing is currently scheduled for October 27, 2021 at the Taylor Yard facility.

4. Startup Notice

- a. PTI No. 81-00, SC V.4; 40 CFR Part 60 Subparts A & OOO

The VN indicates that EGLE-AQD was not notified within 15 days after initial startup of the actual date new process equipment initial startup.

A startup notification letter has been attached to this correspondence. The attached letter is the first notification since initial equipment startup on June 4, 2020.

Each violation addressed above is a result of overlooked permit compliance reporting. GLA strives to operate their facility in a such a manner that reduces air emissions by following dust suppression procedures. GLA will work with their environmental consultant to submit all forms,

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notifications, and perform testing when any equipment is replaced in the future. The responses in this letter alongside the attached forms should be sufficient to correct the listed violations in the VN.

Sincerely,

GREAT LAKES AGGREGATES

A handwritten signature in black ink, appearing to read "Thomas Downs", with a long, sweeping flourish extending to the right.

Thomas Downs
Operations Manager

Cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE

Attachments