

NORTH AMERICAN EXCAVATING & TRUCKING CO., INC.

A Roseville Crushed Concrete Company

29765 Groesbeck Highway
Roseville, MI 48066

September 26th, 2019



Robert Joseph
Environmental Engineer, Air Quality Division
Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, MI 48092-2793

SRN: N6658, Macomb County

Response to Violation Notice

EUProcess: R336.1201 Permit to Install/40 CFR Part 60, Subpart OOO

Response: On June 1st, 2019 was the first operating day of new Eagle Crusher, we had already submitted the application for the Permit to install, at which Nicholas Carlson was working on, and wanted to know what the throughput would be with new machine. We had many bugs to work out on the install and going back and forth with Mr. Carlson, at no time were we told we could *not* be operating the new equipment without the New "Permit to install". (It did take 47 days from June 1st to get the machine operating at rated capacity) The Permit was approved July 1st, 2019. Again, after that date, not at any time were we aware that we had to send a signatory acceptance or a form to sign accepting the draft. On July 8th, 2019 a "formal" acceptance from Roseville Crushed Concrete was completed.

EU Process: PTI 143-11 Special Condition VI.2

Response: Attached are the copies of what I submitted for review to Mr. Joseph. The CEC Minyu was rated at 100 tons per hour originally by Robert Elmouchi. The 12-month rolling reflects what Tyler Salamasick and I developed when he was my acting inspector. As for the Eagle Crusher we have a capacity rating of 300 tons per hour, which is reflected in the Daily Worksheet Robert Elmouchi designed. Mr. Joseph and I are now working on tweaking that "Worksheet" to his specifications.

EUPROCESS: PTI 143-11, Special Conditions VI.3

Response: When Tyler Salamasick was my inspector, he wanted a condense version of the reporting on the daily emissions and activities. Therefore, we modified the "Worksheet" to his specifications, at that time he found them acceptable. Upon the August 20th, 2019 inspection with Mr. Joseph he expressed we go back to the original format from Mr. Elmouchi, and that Mr. Joseph and I will develop a report on "Emissions" and "Daily Activities" and "Throughput" that is satisfactory to him.

EUPROCESS: PTI-143-11 Special Conditions VI.5

Response: As stated in response to Special Condition VI.3, I was still doing as directed by the last inspector. Monthly Emission Testing was still being implemented.

EUTRUCKTRAFFIC: PTI-143-11 VI.1

Response: As stated in previous responses, I was under the direction of previous inspector for documenting "Emissions" and Daily Activities. Mr. Joseph and I have discussed that using the method put in place with Mr. Elmouchi will go back into place, and that we will work together to Mr. Josephs satisfaction.

EUSTORAGE: PTI-143-11 Special Condition VI.1

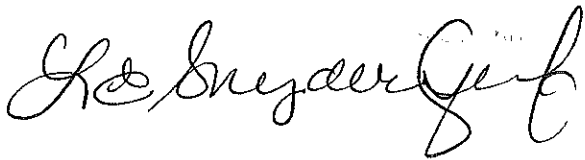
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Fugitive Dust Control Plan: PTI 143-11 Appendix B, Special Condition I.G

Response: Back when Carrie Kelly was our inspector a letter was submitted in reference to the way we were handling the track out, Roseville Crushed Concrete never received the letter, and no response was submitted by Ms. Kelly or the MDEQ as to the devices we implemented. It wasn't until the 2018 inspection that the method was questioned. This recent inspection on August 20th, 2019 Mr. Joseph suggested that we find a solution to address this "track out" situation. As of recently an email to Mr. Joseph from this inspection and talking to Eric Moore from the Wastewater Division Mr. Joseph has given the assurance that we could still implement water with the track out pad to control Fugitive Dust from wheel traffic. We have consulted and determined that a 50'x10' 3"CC pad be installed before the scales on the West end, most of the traffic dust is from vehicles leaving the back of the yard after dumping or being loaded. While still maintain the water suppression at entrance and complying to the Wastewater rules with Catch Basin filters for sediment control.

Sincerely,



L. E. Snyder-Perfili
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CC: Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE