

February 12, 2019

Mr. Robert Joseph
Environmental Engineer
MDEQ Air Quality Division
Southeast Michigan District Office
27700 Donald Ct.
Warren MI 48092

Subject: Response to Violation Notice
Rock Recyclers; PTI 217-00; SRN N6837

Dear Mr. Joseph,

Great Lakes Aggregates (GLA) has prepared this response to the Violation Notice (VN) dated January 22, 2019 that was issued to Rock Recyclers for its nonmetallic mineral crushing facility.

The VN specifies six (6) alleged permit violations, which are addressed individually below. However, we wish to first address the premise of the letter that the inspection was triggered by recent complaints "regarding fugitive dust attributed to concrete crushing operations." Rock Recyclers is a mobile crushing plant and is primarily contracted by other companies to crush materials that have been stockpiled at sites that are owned by companies other than GLA and Rock Recyclers. It is our understanding that the fugitive dust complaints were predominantly from vehicle traffic on the on-site haul roads, not from the actual crushing operations. This was verified by you during the inspection. When contracted to operate at an owner's site, we have no legal authority to maintain the roads that are owned by owner / operator of the site.

1. Daily Material Processing Records

The VN indicates that material processing records were not made available during the inspection.

Material processing records are maintained by GLA. Not only is this a permit requirement but a core requirement of our business. Records were provided by the site operator at the time of the inspection. Because the facility is mobile, historical records are not always immediately available at the operating location.

For future inspections, we request that the MDEQ allow the site operator to contact the GLA Operations Manager to obtain the records in a reasonable amount of time if the records provided at the time of the inspection do not meet the inspector's request. GLA was not aware until after the inspection that the records provided during the inspection did not satisfy your request.

Attached are the material processing records for the Rock Recyclers facility for the months of November and December 2018 and January 2019.

2. Equipment Labeling

The VN indicates that not all equipment had labels that were visible and in a conspicuous location.

Attached are photographs of new, replacement, or improved equipment labels that have been affixed to the equipment (and some that were existing).

3. Water Sprays

The VN indicates that the screen was not equipped with a water spray.

Following the January 10 inspection, it was determined that the existing water spray at the screen had been dislodged at some point in time. The water spray has since been reattached and a photo is included with the attachments.

4. Equipment Replacements

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

GLA acknowledges that certain pieces of equipment (primarily conveyors) have been replaced with newer pieces of equipment. However, no equipment has been added to the plant. The equipment inventory specified in the General Permit to Install Application dated June 16, 2000 remains accurate (i.e, the number of feeders, crushers, screens, and conveyors remains the same).

Attached is a list of equipment that comprises the Rock Recyclers facility. Four (4) individual pieces of equipment have been replaced with new equipment as described below.

ID	Function	Original Information	Replacement Information
CR1	Crusher	Hazemag 1515	Hazemag 1515
C2	Transfer Conveyor	24" x 30' belt	36" x 55' Hoover
C6	Transfer Conveyor	30" x 80' Hoover	36" x 80' Masaba
C8	Stacking Conveyor	36" x 125' Kohlberg	36" x 136' Superior

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

A Process Information form identifying the equipment above is included with this correspondence.

5. Initial Testing

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

By February 22, 2019 (ten days from the date of this letter) GLA will submit to the MDEQ a test plan for performing visible emission (VE) testing for the equipment identified in the previous section. With MDEQ's approval, we will schedule the VE testing for March when the facility operating schedule is more reliable due to the weather.

6. Watering Records

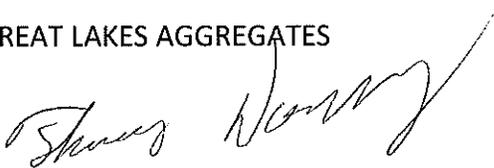
The VN indicates that records of fugitive dust suppression watering were incomplete.

Records of fugitive dust suppression watering have been maintained on the daily operator's log. From our communications, it appears that the MDEQ would prefer that these records be maintained on a separate, stand-alone log. Attached is a watering log that has been prepared by GLA that will be used going forward.

We appreciate your review of the submitted information and look forward to your concurrence with the proposed corrective actions specified in this correspondence. Please contact me should you have any questions or require additional information.

Sincerely,

GREAT LAKES AGGREGATES



Thomas Downs
Operations Manager

Attachments