



3820 East Serr Road
Corunna, Michigan 48817
meridianbrick.com



March 16, 2021

EGLE – AQD – Lansing District
Constitution Hall, First Floor South
525 W. Allegan
Lansing, MI 48909
Attn: Michelle Luplow
517-294-9294

Dear Ms. Luplow:

Please accept this letter as Meridian Brick's written response to the received violation notice dated March 3, 2021 regarding our brick manufacturing operation in Corunna, Michigan. In this notice, there are two noted violations:

1. Dust collector was operating outside of the established pressure drop range
2. Pressure drop records not kept

With respect to Item 1, during the continuous operation of the dust collector, the pressure drop does fall into the 2 to 7 inches H₂O range. However, it was noticed that for a short period of time after conducting maintenance on the device, the pressure drop starts out at approximately 1.5 inches H₂O but then increases and operates within the prescribed range as the bags begin collecting particulate. During the continuous, long-term operation of the dust collector between maintenance activities, the pressure drop of the dust collector does operate within the range of 2 to 7 inches H₂O. Given this situation, Meridian Brick would like to request that the operational range of the dust collector's pressure drop be modified to a range of 1 to 8 inches H₂O. The basis for this is that during the inspection, while the pressure drop reading was 1.6 inches H₂O, there were no visible emissions being emitted from the unit.

With respect to Item 2, as you may know, the current Torit dust collector is a replacement for an old Whirl-wet dust collector. The operational configuration of the old Whirl-wet unit had the exhaust venting outside of the building. During the installation of the Torit unit, the configuration was changed such that the exhaust from the unit vented back inside the building. During the permitting process for the current Torit unit, conversations with EGLE took place whereby we agreed that, due to the exhaust venting inside the building, certain requirements applicable to the old Whirl-wet unit would not apply to the new Torit unit. One such requirement was the daily pressure drop reading that was previously in place for the Whirl-wet unit. Therefore, upon installing the Torit unit, the documenting of the pressure drop reading ceased. However, upon review of the current permit, it was discovered that the condition requiring the documenting of the pressure drop that was applicable to the Whirl-wet unit was still in the permit as applicable to the Torit unit. Thus, based on our conversations, we discontinued the logging of the pressure drop even though the condition errantly remained in our permit as applicable to the Torit and we missed it.



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Upon review of this response, please let us know if there is any additional data or information that we may be able to provide.

Sincerely,

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

Jerry Greger
Plant Manager

cc: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE – AQD
PO Box 30260
Lansing, MI 48909-7760