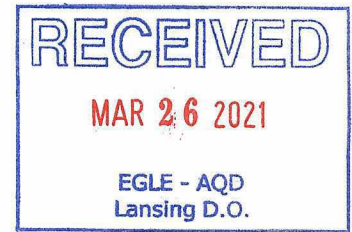




3820 East Serr Road  
Corunna, Michigan 48817  
meridianbrick.com



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 H<sub>2</sub>O 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 H<sub>2</sub>O 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 H<sub>2</sub>O. 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 H<sub>2</sub>O. The basis for this is that during the inspection, while the pressure drop reading was 1.6 inches H<sub>2</sub>O, 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 cursive script that reads "Jerry Greger".

Jerry Greger  
Plant Manager

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

## Torrit Dust Collector weekly pressure drop

April	Start: _____ Finish: _____	Start: _____ Finish: _____
Facility: Meridian Brick - Michigan Plant	Source: _____	Source: _____
Address: 3820 E. Serr Rd.	Operating mode: _____	Operating mode: _____
Corunna, MI. 48817	Min. 0 15 30 45 Remarks	Min. 0 15 30 45 Remarks
Observer: Greger	0	0
	1	1
Observation Point: Side panel	2	2
	3	3
Pressure Drop week of	4	4
4/5/2021 -	5	5
4/12/2021 -	6	6
4/19/2021 -	7	7
4/26/2021 -	8	8
	9	9
	10	10
	11	11
	12	12
	13	13
	14	14
	15	15
	16	16
	17	17
	18	18
	19	19
	20	20
	Highest 6-min. average: _____	Highest 6-min. average: _____
Signature: _____	2nd highest 6-min. ave.: _____	2nd highest 6-min. ave.: _____