

RIETH-RILEY CONSTRUCTION Co., Inc.

100% Quality • 100% Employee Owned • Over 100 Years

Ms. Michelle Luplow
Air Quality Division
Department of Environmental Quality
Constitution Hall
525 Allegan Street, Lansing, MI 48909-7742

10-28-16
DEQ-AQD LANSING D.O.

OCT 31 2016

RE: Response to October 10, 2016 Violation Notice

Ms. Luplow:

Rieth-Riley Construction Co., Inc. ("Rieth-Riley") is in receipt of your Violation Notice ("NOV") dated October 10, 2016 concerning the Baghouse at the Rieth-Riley facility in Lansing located at 4150 South Creyts Road, Lansing, MI. The notice indicated that records were missing regarding maintenance and repair of the baghouse at our facility.

Rieth-Riley has conducted a thorough investigation, and determined that we are keeping records, but not all of required elements were routinely included due to oversights. Rieth-Riley expends considerable time and effort in training and monitoring to ensure compliance with all environmental rules. Thorough investigation of the available information leads us to the conclusion that the oversights noted in the NOV were not willful. The discovery of these documentation oversights has effectively pointed out to Rieth-Riley the existence of the issue raised in the NOV. Knowledge of the oversight has corrected the deficiency. We remain confident that required maintenance is being performed, and that the baghouse is effectively collecting dust as required.

Records provided immediately after the August 15th inspection included copies of dated "Failed Bag Location Charts", "MEDQ Recordkeeping Daily Report" forms, and many other documents & forms. All of these are maintained and routinely updated as part of ongoing compliance efforts. Please note that the 1331 tons produced prior to the first recorded blacklight test for the 2016 season represents less than 0.5% of this plants year-to-date production, and that the first recorded blacklight test was performed as prescribed prior to any further production.

There are no records available from Rieth-Riley's trained personnel or from MDEQ that indicate that the baghouse emissions from July 1, or July 5, were in excess of the 20% average opacity limit listed under General Condition 11 of the Permit, however, Rieth-Riley staff observe emissions regularly, and if it appears the emissions are outside of normal operating conditions, proactive investigations are conducted, and any needed repairs are completed promptly. Normal operations are not routinely conducted at or near the 20% opacity limit.

There were no noted visible emissions August 15th during the cited inspection, which indicates that the cause of any limited visible emissions noted earlier had been corrected.

It should be noted that Tom Harris is misquoted in the Violation Notice. The baghouse is NOT inspected every 10 days. This has never been standard practice. Inspections are done at the beginning of the season, and then only as needed based on visible emissions observations or other problem indicators.

Please contact me at (574) 875-5183 if you have any questions or wish to discuss this matter further.

Respectfully,


John Berscheit

Technical Services Manager
Office 574-875-5183
Fax 574-875-8405
Cell 574-532-0032
jberscheit@rieth-riley.com

