



QUIKRETE - FNT
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August 12, 2016

Mr. Robert Elmouchi, Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality,
Southeast Michigan District Office,
27700 Donald Court,
Warren Mi 48092-2793

Dear Mr. Elmouchi:

Quikrete received your written notification of Notice of Violation on July 21, 2016, based on the onsite inspection conducted June 29th, 2016 of our facility. It identifies a number of deficiencies in our monitoring, recording, and reporting requirements outlined in Air Permit to install (PTI) number 530-96C, which was granted to QUIKRETE Flint.

In response to the N.O.V, dated July 21, 2016 please be advised QUIKRETE Flint plant management and maintenance personnel performed a detailed inspection of all plant air quality documentation. In addition, we have initiated steps to further enhance the preventative maintenance of the equipment, the standard operating procedure, and the record keeping practices to maintain compliance with the current existing permits at our facility.

As always, it is our full intent to operate this facility within the acceptable guidelines and regulations set forth from the Environmental Protection Agency.

Please allow me this opportunity to bring you up to date on a number of operational enhancements and improved record keeping practices that we have implemented since your inspection. We are confident the Department of Environmental Quality (DEQ) will find the corrective action taken sufficient in addressing the deficiencies identified during your inspection.

Rule/Permit Condition Violated - PIT No. 530-96C

- 1.) EU-DRYER: Special Condition IV.1 and R336.1910. – Permittee operated EU-Dryer while wet scrubber was not operated nor maintained in a satisfactory manner.

Corrective action has been implemented. We immediately took the piping apart in the scrubber, cleaned out all the pipes and installed clean nozzles. In addition, we

are opening up the scrubber doors, inspecting and documenting the water flow through the nozzles daily. Once we determine the proper inspection and maintenance frequency we'll adjust our inspection frequency.

- 2.) EU-DRYER: Special Condition IV.4.b. – Permittee failed to record the wet scrubber liquid flow rate.

Corrective action has been implemented. Dryer operator associates were trained and retrained where to take the flow reading, how to take the reading and where to record the reading. In addition, we're sourcing a new flow meter with a readout in an easier accessible location.

- 3.) EU-Process: Special Condition VI.2 & VI.4. – Permittee failed to maintain the belt scale and keep daily records of the throughput rate from the belt scale.

Corrective action has been implemented. Although we had implemented a process whereby we were calculating the amount of aggregate we were drying daily; we will also be getting the belt scale calibrated in August and be keeping a record from the belt scale to comply with the request to use the belt scale to gather throughput data.

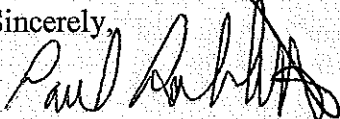
- 4.) Small Buzzi raw material silo exempt from R336.1201 per R336.1284 (k). – R336.1201 (1) & R336.1910. – Permittee failed to maintain and operate fabric filter collection system associated with the silo.

Corrective action has been implemented. The Buzzi silo and bag house was inspected and all was in proper working order and the bags were clean. Upon further investigation we discovered the tanker driver was blowing off his load at a pressure exceeding our maximum and thereby triggered the relief valve and emitted particulate. We will be ordering a sign outlining the maximum pressure that can be used to blow off tankers and will also communicate this requirement to our contract bulk haulers.

As always, it is our full intent to operate this facility within the acceptable guidelines and regulations set forth from the Environmental Protection Agency.

It is QUIKRETE's position to not only be in compliance with all regulations, but to also be a partner in the community. The QUIKRETE Companies would like to thank the DEQ for their assistance in helping identify potential hazardous areas.

Sincerely,



Paul Robbins
Plant Manager
QUIKRETE - Flint