

Mr. Chris Robinson
Air Quality Division
Department of Environmental Quality
Grand Rapids District Office



RE: Response to September 4, 2019 Violation Notice

Mr. Robinson:

Rieth-Riley Construction Co., Inc. ("Rieth-Riley") is in receipt of your Violation Notice ("NOV") dated September 4, 2019 concerning the Baghouse at the Rieth-Riley facility in Big Rapids located at 20251 19 Mile Road, Big Rapids, MI. The notice indicated that opacity in excess of 20% was present, the baghouse was improperly operated, and the records were inadequate regarding maintenance and repair of the baghouse at our facility. Additional statements in the letter allege that Rieth-Riley had no certified Visible emissions ("VE") reader available within 60 minutes, and that maintenance records could not be produced.

Rieth-Riley has conducted a thorough investigation, and determined that we are keeping records, but that requests for specific records was either misunderstood or not followed up on at the time of the inspection. 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 records were in fact present at the time of the inspection. The documentation attached should be enough to assure MDEQ that there were adequate records being kept. We remain confident that required maintenance is being performed, and that the baghouse is effectively collecting dust as required.

Records provided include copies of dated "Failed Bag Location Charts", "Annual Record – Air System Maintenance Log" forms, and other documents. All of these are maintained and routinely updated as part of ongoing compliance efforts.

There are no records available from Rieth-Riley's trained personnel that indicate that the baghouse emissions from 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. Routine operations are not conducted at or near the 20% opacity limit. There were no notes regarding VE problems the date of the cited inspection, which should serve as proof that this process works. It should be noted that Chad Waldo is misquoted in the Violation Notice. There was most definitely a Certified VE Reader available within 60 minutes. This has always been standard practice. A time sheet for Andy Lockhart (Certified 3-23-19) is included in the attachments.

Please contact me at (574) 875-5183 if you have any questions or wish to discuss this matter further. Thank you in advance for your time and consideration.

Respectfully,

John Berscheit

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