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Great Lakes Aggregates, LLC

Sylvania Minerals, LLC

5699 Ready Road
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Monday, November 28, 2016

Diane Kavanaugh Vetort
Senior Environmental Quality Analyst

Department of Environmental Quality
Air Quality Division
Jackson District Office
Jackson State Office Building
301 East Louis Glick Highway
Jackson, Michigan 49201



Dear Ms. Diane Kavanaugh Vetort

This letter is in response to the violation notice sent to Great Lakes Aggregates on November 4, 2016 following the inspection of Sylvania Minerals on October 4, 2016. There were three (3) violations cited in the violation notice.

1. There were four (4) day in our production records that that exceeded permitted production limits.
2. During the inspection on October 4, 2016 we were unable to provide records of inspections on the water spray equipment on the sandstone processing plant.
3. Our blasting records did not include the square footage area of individual shots.

The first observation made during the October 4, 2016 inspection that was in violation to our permit was that we exceeded our daily production limit of 16,500 tons on four (4) dates for EULIMESTONE in 2016. On June 30, 2016 the production records for the limestone plant showed 18,000 tons. The actual production on June 30th for EULIMESTONE was 14,150 tons. The reason for the discrepancy in the production records is that we occasionally adjust inventory by adding or subtracting tons to the daily production numbers. This is a practice that we have used when we find that we have overstated or understated the actual inventory of a specific product. The other three (3) dates in the production records that show that we exceeded the production limit of 16,500 tons for EULIMESTONE were generated by the same practice. On August 24th the actual production for EULIMESTONE was 9,513 tons. On September 21st the actual production

for EULIMESTONE was 7,917 tons. And on September 28th the actual production for EULIMESTONE was 10,203 tons.

We will adjust the production records to accurately reflect production for the above noted dates. Also, we now have a drone that we can employ to do more frequent inventory surveys. We will survey the stockpiles more frequently to insure that the inventory is more accurate, eliminating the need to make large corrections in production to match inventory.

The second observation made during the October 4, 2016 inspection that was in violation to our permit was that there was no record of inspections or maintenance on the dust suppression equipment installed on the sandstone processing plant EUSANDSTONE. The standard operating procedure regarding the water spray equipment on the sandstone plant is to turn it on when dust is observed, and during start up and shut down of the plant since the plant is more likely to generate fugitive dust when it is not running at full production. Since the October 4th inspection, we have altered the Daily Workplace Examination Form to include the dust suppression equipment. The new form includes the date of the inspection, who performed the inspection, and any corrective actions that were taken to correct deficiencies. The inspection will be done once per month at a minimum.

The third observation made during the October 4, 2016 inspection that was in violation to our permit was that there was no record of square footage area for individual blasts. This is a parameter that we have not collected and recorded in our records. Since the October 4th inspection we have included the area in square feet for each shot on the blast reports, and will record the area in our blasting records.

Sincerely

William Begley



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CC: Mr. Chris Kinney, President, Great Lakes Aggregates, LLC