



Construction Recycling Systems, Inc.

15400 72nd Street
South Haven, MI 49090

Mobile Recyclers of Concrete & Asphalt

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June 4, 2014

Dorothy Bohn
Michigan Department of Environmental Quality
7953 Adobe Road
Kalamazoo, MI 49009-5025

Re: Violation Notice response, SRN: N6301, PTI 264-97

Ms. Bohn:

This letter shall serve as the written response to the Violation Notice dated June 2, 2014.

Special Condition 20.c:

Date(s) of Violation: 6/1/12 to 5/27/14

Explanation: The failure to submit timely relocation notices was an administrative error. Plant relocation has been minimal in the recent years which caused the complacency / oversight. The MDEQ complaint investigation site visit served as a reminder that a relocation notice should have been submitted to the Kalamazoo District Office. The violation is not ongoing.

Actions taken: A relocation notice was immediately completed and mailed to the Kalamazoo District Office on the date of the complaint investigation site visit.

Date of actions: 5/23/14

Prevention: Administrative controls have been put in place to ensure that any plant relocation is documented with a relocation notice and provided to the appropriate MDEQ District Office.

Plant operation since April 2012:

<u>Dates of Operation</u>	<u>Name / Location</u>	<u>Quantity</u>
6/1/12 – 4/19/13	Construction Recycling Systems, Inc. 15400 72 nd Street South Haven, MI 49090	25,000 Tons
4/20/13 – 7/10/13	Lake Arvesta Farms/ deBest Inc. Phoenix Road (CR 388) South Haven, MI 49090	14,000 Tons
7/11/13 – 4/29/14	Construction Recycling Systems, Inc. 15400 72 nd Street South Haven, MI 49090	23,000 Tons

4/30/14 – 6/6/14 Lake Arvesta Farms/ deBest Inc. 5,000 Tons
Phoenix Road (CR 388)
South Haven, MI 49090

Special Condition 20.f:

Date(s) of Violation: 5/23/14

Explanation: A copy of the PTI was provided to the site supervisor managing the crusher operation when the PTI was issued in 1997. The supervisor was aware that the PTI was required to be onsite and believed that he had a copy. He was not aware that the PTI document was misplaced and therefore did not request a replacement copy. The violation is not ongoing.

Actions taken: Two (2) copies of the PTI have been provided to the supervisor. A copy will be posted in the job trailer (no operator office/work station available) and in the supervisor's vehicle.

Date of Actions: 5/24/14

Prevention: The location and availability of the PTI Document will be verified weekly.

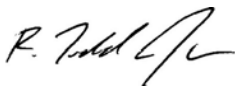
Special Condition 18:

The roadway area where dust was being generated traversed the crushing area, but was being used as a haul road by the property Owner (deBest / Lake Arvesta) for a completely separate activity unrelated to the crushing operation. It is difficult for Construction Recycling Systems (CRS) to require dust control of a property Owner in areas that are not related to the specific crushing activity (i.e. Agriculture, Nursery, Borrow Pits etc.) CRS will express the need for dust control by the property Owner for its activities while CRS is operating on the site, but some limitation for the responsibility of CRS should be recognized when it is apparent that the dust generating activity is entirely unrelated to the crushing operation. Since the site visit CRS has purchased "10 mph speed limit" signs which will be posted in the area of the crusher operation on all future sites.

Please contact me with any additional comments or concerns. My hope is that this response letter will provide assurance that our intent is to continue to provide adequate dust suppression controls and fully comply with the general conditions, special conditions and fugitive dust control plan outlined in the PTI.

Regards,

Construction Recycling Systems, Inc.



R. Todd Jensen
President