

December 3, 2014

Dorothy Bohn  
AQD DEQ  
7953 Adobe Road  
Kalamazoo, MI 49009  
**VIA FAX:** (269) 567-9440  
**VIA EMAIL:** BOHND@michigan.gov

**RE: Response to October 23, 2014 Violation Notice concerning the Kalamazoo facility**

Ms. Bohn:

Rieth-Riley Construction Co., Inc. ("Rieth-Riley") is in receipt of your Violation Notice ("NOV") dated October 23, 2014 concerning missing maintenance records at the Rieth-Riley facility in Kalamazoo located at 911 Hatfield Avenue, Kalamazoo, MI. The notice indicated that records were missing regarding maintenance and sweeping of roads 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 we performed the required maintenance items, and that fugitive dust was controlled by watering regularly and sweeping the roads on an as-needed basis. Future training beginning with the 2015 construction season will emphasize this to avoid any such future documentation errors.

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,

**RIETH-RILEY CONSTRUCTION COMPANY, INC.**

John Berscheit  
Technical Services Manager

