



***The Future is Riding on Ajax.™***

December 28, 2015

Ms. Kerry Kelly  
Environmental Quality Analyst  
Michigan Department of Environmental Quality  
Air Quality Division  
27700 Donald Ct.  
Warren, MI 48092

**RE: Response to Letter of Violation Dated December 7, 2015  
Ajax Materials Corporation-Plant 2, Auburn Hills, MI  
SRN: B1956, Oakland County**

Dear Ms. Kelly,

This letter is in response to your letter of violation dated December 7, 2015 regarding Ajax-Plant 2 located at 4875 Bald Mountain Road, Auburn Hills, Oakland County, Michigan. Your letter indicates that on November 25, 2015, you performed an investigation of an odor complaint received by the Michigan Department of Environmental Quality-Air Quality Department (AQD). Your letter also states that you observed odors on November 25, 2015 that resulted in a Rule 901 violation.

On December 4, 2015, MDEQ requested a conference call with representatives from Ajax. During the call with you and Mr. Chris Etheridge, AQD District Supervisor, the following was discussed:

- Ajax has taken steps to mitigate odors from plant operations, including installing a new 100' stack in March 2015. The stack project was engineered based on scientific odor modeling and the design was discussed with and approved by the MDEQ prior to installation. The new stack resulted in significantly less odor complaints from the neighboring area during the 2015 paving season. Mr. Chris Etheridge stated there was a definite improvement in the reduction of odor complaints. Ajax believes this has had a beneficial impact on the neighboring community.
- During the time of the odor investigation, there were paving operations in the vicinity of the plant site, which may have contributed to the odors Ms. Kelly said she observed on November 25, 2015. This is supported by the fact that complaints were minimal during the busiest asphalt production months of the summer, but all of the sudden there were complaints in October and November when paving operations were taking place nearby.
- Ajax has been in compliance with all other MDEQ Air Permit requirements.

**Ajax Materials Corporation**  
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- As a team, MDEQ and Ajax determined that we should work collectively on determining odors from the operations when it is deemed necessary. MDEQ agreed to contact a member of Ajax in the event there is an odor complaint and if it results in an odor evaluation, that the MDEQ would coordinate the odor evaluations with Ajax.

Per our verbal agreement, please notify one of the individuals listed below in the event that you get an odor complaint from any of the Ajax Materials Corporation facilities.

	<u>Cell Phone No.</u>
Ms. Kathleen Anderson, Environmental Consultant	810-845-3925
Mr. David Grabowski, Operations Manager	248-388-1670
Mr. Mark Boden, Vice President	248-388-5639

Ajax Materials Corporation is committed to being a responsible corporate neighbor. We have been proactive at resolving issues in the past and will continue to do so. If you have any questions regarding this letter, please contact me at (248) 388-3300.

Sincerely,

**Ajax Materials Corporation**



Mark E. Boden  
Vice President

cc: Kathleen Anderson, Axis Environmental Consulting Corp.  
David Grabowski, Ajax Materials Corporation