



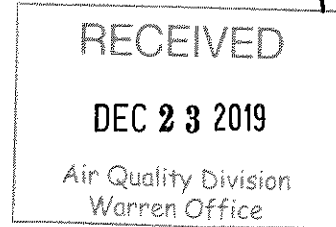
**Ajax Materials
Corporation**

An Equal Opportunity Employer

1957 Crooks Rd., Suite A • Troy, MI 48084
Main: 248.244.3300 • Fax: 248.244.0800

December 20, 2019

Mr. Robert Joseph
Environmental Engineer
Air Quality Division
Michigan EGLE
27700 Donald Ct.
Warren, MI 48092-2793



RE: Violation Notice dated December 2, 2019
Ajax Materials Corporation-Plant 2 (SRN B1956)

Dear Mr. Joseph,

This letter is in response to your letter of violation dated December 2, 2019 regarding Ajax Materials Corporation- Plant 2 located at 4875 Bald Mountain Road, Auburn Hills, Oakland County, Michigan. Your letter indicates that on October 25, 2019, you performed an investigation regarding odor complaints received by the Michigan EGLE -Air Quality Department (AQD) between the dates of October 12-23, 2019. Your letter also states that you observed odors on October 25, 2019 that resulted in a Rule 901 violation.

On October 15, 2019, you contacted Ajax representatives via email to ask for operating records for the 2019 paving season, but you did not identify there had been odor complaints. Following that you inspected the facility for odors 10 days later on October 25 2019. On numerous occasions in the past, Ajax has asked the AQD to notify us in the event that objectionable odors are detected off site. These conversations and verbal agreements were made specifically with past AQD inspectors and the SE Michigan District Supervisor on 12/4/15 (and again in 2016) who stated in a conference call, "it is completely feasible that the AQD can call and let Ajax know when odor evaluations will take place so Ajax can be involved to help identify odors and resolve the situation".

In the recent past, Dave Grabowski, Operations Manager, asked that that you can call his mobile phone any time to communicate issues and that Ajax is committed to resolving issues in cooperation with the AQD. Ajax has not received any timely calls nor notifications from you regarding these complaints. When Ajax is notified 10 days or more after the fact, that is 10 days we could have been aware of the situation and been working proactively with your Department.

In the past we have been very proactive at working to mitigate and prevent odors including:

- Voluntarily increasing the stack height in 2015. Modeling suggested raising the height from 60' to 90' to mitigate odors. Ajax installed a stack that was 100' in height.
- Installing new state of the art equipment in 2018 including a new counterflow drum to replace the old parallel flow technology, a low NOx burner, advanced top of storage silo and silo load out emission capture/filtration system and increasing the stack height to 120'.

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All of these improvements have helped significantly improve the reduction in odor complaints, which the Michigan EGLE has acknowledged.

In conclusion, Ajax is committed to being a good neighbor and we know that residential houses have been built extremely close to our heavy industrial asphalt production plant which was established in the 1960s. We also know that odor complaints have been called in on days that Ajax was not operating. There are other industrial facilities/landfill operations located in the area that can contribute to odors. It is our goal to work together with Michigan EGLE to identify odors. In the past the AQD and Ajax have worked together to resolve odor complaints.

Ajax respectfully requests that the Michigan EGLE contacts our organization as soon as practicable after being notified of a complaint as we have agreed in the past. The following mobile numbers can be called:

Dave Grabowski, Operations Manager:	248-388-1670
Kathleen Anderson, Environmental Consultant:	810-845-3925
Mark Boden, Vice President	248-388-5639

Thank you for your continued cooperation in this matter.

Sincerely,

AJAX MATERIALS CORPORATION



Mark E. Boden
Vice President

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