



The Future is Riding on Ajax.™

January 24, 2020

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

RECEIVED

JAN 24 2020

Air Quality Division
Warren Office

**RE: Odor Letter of Violation dated December 2, 2019, Second Response
Ajax Materials Corporation-Plant 2 (SRN B1956)**

Dear Mr. Joseph,

This letter is in response to your email dated January 10, 2020 regarding an odor violation letter sent to Ajax Materials Corporation, dated December 2, 2019. Ajax initial response was submitted December 23, 2019. A follow up email was sent by Ajax requesting specific dates and times that odor complaints were received by the department. EGLE replied with the following dates and times for the odor complaints received:

10/12: 9 a.m-10 a.m and early afternoon
10/15: 10:30 p.m-5:30 a.m.
10/15: overnight hours
10/15: overnight hours
10/15: all-day
10/16: 7:45 a.m-through the morning hours
10/17: After 12:30 p.m
10/23: After 7:30 am.-through the morning hours
11/06: overnight hours
11/07: After 7 p.m-overnight hours

Also, in your January 10th email, you included a video clip of the Ajax Orion Township stack during production. Ajax is unsure of the intent of this video clip because it does not demonstrate that Ajax was in violation of any permit conditions. Please clarify the intent of this video clip; MDEQ/EGLE has never provided a video to Ajax in the past.

Ajax received that above information from you via email on January 15, 2020. As a result, Ajax completed a comparison and evaluation of the dates and times of the complaints and the operating times of the Orion Township plant.

Ajax Materials Corporation
830 Kirts Blvd., Suite 100, Troy, MI 48084

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EGLE AQD Response
December 20, 2019

Previously, on October 15, 2019 Ajax [Kathleen Anderson] received an email from you asking, "...Has the Ajax Orion plant been operating during the late night/overnight hours within the last week?".

Ms. Anderson responded, "yes they have". In her response, Ms. Anderson did not say the plant was operating during "all" overnight hours. Attached is a copy of this email exchange.

As a result of comparing Ajax Orion Township plant operating times to the complaint times you provided to Ajax, it is evident there are times when odor complaints occurred when the plant was not running. In fact, of the 10 complaint times you provided, 5 of these occurred when the plant was not operating. This is shown on the attached spreadsheet. Therefore, because only 50% of the time a complaint occurs when the plant is operational, the level of confidence correlating a complaint to our Orion Township production is very low.

Although Ajax's detailed analysis of production during complaint times did not result in a definitive cause for odors and even though only 50% of the complaint times you provided to Ajax were during times the Orion plant was operating, Ajax is committed to working towards eliminating all complaints. Therefore, Ajax Materials Corporation will experiment with the use of an odor mitigating additive at the beginning of the 2020 paving season. We invite you to visit the plant with us while the additive is being used during the start of the 2020 paving season.

If you have any questions regarding this submittal, please feel free to contact me at (248) 388-5639.

Sincerely,

AJAX MATERIALS CORPORATION


Mark E. Boden
Vice President

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

Attachment