The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), is asking for comments from the public on a proposed Permit to Install (PTI) for Ajax Materials Corporation (Ajax). The AQD will accept comments on the proposed PTI until the close of the comment period on August 16, 2021. A virtual public hearing is being held on August 3, 2021. We will review all comments before we make a final decision on the proposal.

**What is Ajax proposing to do?**
Ajax is proposing to install equipment to make asphalt, which would be used for roads, driveways, parking lots and more. The type of facility Ajax is wanting to install is called a Hot Mix Asphalt (HMA) plant. Ajax is proposing to locate the plant at 5088 Energy Drive, Flint, Michigan (Figure 1). A HMA plant mixes aggregates and heated asphalt cement to produce asphalt ready to be used. Recycled Asphalt Pavement (RAP) can also be added to the mix.

The new equipment would include a mixer called a counter-flow drum, a fabric filter control system (baghouse), six asphalt cement tanks with natural gas heaters, eight HMA storage silos, as well as material storage piles/bins. A diagram of a generic asphalt plant is shown below (Figure 2).

**What is a PTI and why is one needed?**
A PTI, commonly known as an air use permit, is required for projects that involve installing, constructing, reconstructing, relocating, or modifying most processes or process equipment that emit, or may emit, air contaminants. The proposed new asphalt plant would create some air pollution by burning fuel during the process of making the asphalt and by storing and moving raw materials and finished products, as well as releasing fumes from the asphalt mix materials.

The counter-flow drum and the fabric filters are considered some of the best technologies for keeping air pollutants low. Additionally, if approved, Ajax would have an annual limit on how much asphalt they may produce. This will also serve to limit air pollutants.

Although asphalt plants do have air emissions, the draft permit looks at all rules and regulations that apply and serves to keep air emissions as low as possible. The proposed permit is written to keep public health and the environment protected.

**Figure 1. Location of the Proposed Facility and the Flint Monitoring Station**
WHAT DO I REALLY NEED TO KNOW ABOUT THE PROPOSED PERMIT?
The proposed permit has a lot of specific requirements Ajax would have to follow if the permit is approved. Key areas that you may be interested in, or that you may want more details on, include:

- **Emission limits** – this is the amount of air emissions Ajax would be allowed to emit for that pollutant.
- **Testing Requirements** – This has testing that Ajax would need to do to show they are meeting their emission limits.
- **Monitoring and Recordkeeping** – This has records Ajax would need to keep showing they are meeting the requirements of their permit.

IS THERE OTHER INDUSTRY IN THE AREA?
The location Ajax is proposing was zoned for industrial use by Flint Township and is close to some existing Industry. These include Genesee Power, Universal Coatings, and RJ Torching. For more information about existing industry in this area, you may search our Facility Specific Information page or contact the Lansing District Office at 517-648-7547.

WHAT IS THE CURRENT AIR QUALITY IN THE AREA?
The United States Environmental Protection Agency (US EPA) has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS).

There are NAAQS for sulfur dioxide \( (\text{SO}_2) \), nitrogen dioxide \( (\text{NO}_2) \), carbon monoxide \( (\text{CO}) \), particulate matter equal to or less than 10 microns in diameter \( (\text{PM}10) \), particulate matter equal to or less than 2.5 microns in diameter \( (\text{PM}2.5) \), ozone, and lead.

Poor air quality from high levels of pollution can cause health problems. NAAQS are developed from research studies and set at levels to protect public health. This includes health protection for sensitive groups, like those with heart and lung problems.

The proposed location of the Ajax facility is in Genesee County, Michigan which is currently meeting all the NAAQS. The AQD currently operates one monitoring station in Flint at Whaley Park (see Figure 1). For graphs of the Whaley Park air monitoring results compared to the NAAQS, please see the Technical Fact Sheet.

IF INSTALLED, WILL AIR QUALITY STANDARDS BE MET?
A computer model was used to look at the expected impacts of the proposed project’s emissions on the air quality in the area surrounding the Ajax facility. This type of computer model is called an air dispersion model and considers many factors, such as quantity and type of emissions, prevailing wind direction, and other factors.

The model showed the AQD that the expected impacts of the emissions, plus the existing monitored levels, are less than the applicable NAAQS for \( \text{NO}_2, \text{SO}_2, \text{CO}, \text{PM}10, \) and \( \text{PM}2.5 \).

Michigan has developed health-based levels for additional pollutants referred to as toxic air containments (TACs) under its Air Toxics rules. The proposed TAC emissions from the project would also comply with the AQD’s health-based screening levels.

WHAT ABOUT NOISE, TRAFFIC, AND ZONING?
The AQD evaluates the potential air emissions from the proposed facility to determine if they comply with the air quality rules and regulations. The AQD does not have authority to regulate noise or traffic outside the facility and does not have authority to evaluate compliance with local zoning requirements.
WHERE CAN I FIND MORE INFORMATION?

Other information, like the Technical Fact Sheet and the draft permit conditions can be found at: Michigan.gov/Air, choose “Public Notice.”

The Technical Fact Sheet has additional details about the project and how it will meet the rules and regulations, such as:

- A summary of the reviews completed by the AQD staff.
- How the project will affect air quality and public health.
- A summary of what the proposed permit would require Ajax to do.
- A summary of the allowed emissions included in the proposed permit.
- The rules and regulations that apply to the proposed project.
- Example emission calculations.

AQD staff can provide additional information upon request.

SUMMARY:

The AQD has reviewed the PTI application submitted by Ajax and prepared a proposed permit. If the proposed permit is approved, it will ensure the facility meets the applicable air quality requirements. Therefore, we recommend approving the proposed permit.

However, before the AQD acts on the proposed permit, we are requesting comments from the public. The AQD will review all comments received during the public comment period and the virtual public hearing, then decide whether to approve, approve with modifications, or deny the proposed permit. If approved, the AQD may decide to add or change permit conditions based on the comments received.

WHO CAN I TALK TO ABOUT THE PROPOSED PERMIT?

For more information about the proposed permit, please contact Ambrosia Brown, AQD, at: BrownA39@Michigan.gov or 517-648-6216.
WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

Comments from the public are very important. It is also important to know the law is clear about what we can and cannot consider when we make our decision.

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<th>What we can consider</th>
<th>What we can’t consider</th>
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<td>• Air, land, or water issues not part of the project</td>
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<td>✓ Grammar and spelling mistakes</td>
<td>• Indoor air pollution</td>
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<td>✓ Other rules the action should consider and why</td>
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<td>✓ Why the action will not follow the rules</td>
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<td>• Anything unrelated to the project</td>
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HOW CAN I MAKE A COMMENT?

The AQD welcomes comments from the public during the comment period. Prior to making a comment, it is a good idea to “VIEW AN EXAMPLE” of how to do it. YOU MAY ALSO WANT TO READ THE “PUBLIC HEARINGS - WHAT YOU SHOULD KNOW” CARD.

- **Via email**
  EGLE-aqd-ptipubliccomments@michigan.gov

- **Via US mail**
  Annette Switzer, Permit Section Manager, EGLE, AQD, P.O. Box 30260 Lansing, MI 48909-7760

- **Via voicemail**
  by calling 517-284-0900

- **At the Virtual Public Hearing**
  To be held on August 3, 2021

Comments must be received by **August 16, 2021**.

EGLE promotes the equitable treatment and meaningful involvement of Michigan’s residents regarding the development, implementation, and enforcement of laws, regulations, and policies. Equitable treatment means that no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies. Meaningful involvement means all people have an opportunity to participate in decisions that affect their environment and/or health.

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