



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

September 13, 2016

Mr. Mark Boden, Vice President
Ajax Material Corporation
830 Kirts Blvd., Suite 100
Troy, MI 48084

SRN: B3120, Wayne County

Dear Mr. Boden:

VIOLATION NOTICE

On June 29, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ajax Materials Corporation, Plant 5 located at 8744 S. Inkster Road, Romulus, Michigan. The purpose of this inspection was to determine Ajax Materials Corporation's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Permit to Install (PTI) number 310-06B.

During the inspection, staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUSILOS	PTI No. 310-06B; S.C. 4.1 R. 336.1224	Emission capture system for the top of silos not properly maintained or operated to control emissions.
EUSILOS	PTI No. 310-06B; S.C. 4.2	Silo load out controls not properly maintained or operated to control emissions.

During my inspection on June 29, 2016, I observed particulate emissions coming from the top of the silos and from the truck load out area due to the failure of the control equipment to effectively capture emissions from these emission points. In addition, PTI No. 310-06B, Special Condition 4.1 requires the top of silo controls to demonstrate compliance with T-BACT; since the top of silo control system was not maintained and operated properly to capture emissions from the silos, T-BACT was not achieved, as required.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 4, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Ajax Materials Corporation believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. Should you require any further information, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Lamb". The signature is written in a cursive, flowing style.

Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ