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Dear Jenifer Dixon,
Senior Environmental Quality Analyst
Air Quality Division
350 Ottawa Ave, NW (Unit 10)
Grand Rapids, MI 49503-2341



This letter is in response to the violation notice we received on October 22, 2013, concerning the operations at our asphalt plant located at 6900 East Paris Industrial Drive on the morning of October 15, 2013.

Firstly, we would like to indicate that there were no abnormalities in the operation of the plant or load out systems on this morning. There were no special circumstance regarding our equipment or operating procedures.

The condition that existed, as it has on every instance of a complaint from the Dutton Elementary School, is that we had unfavorable weather conditions that caused the plume generated from the drying process to be drafting directly in the direction of the school. The winds were over 20 mph and the humidity near 100%. This caused a lingering down draft that sent the plant exhaust directly across the playground.

These weather conditions have only happened 6 to 8 times in the last four years that we have been operating at this location, in a severe enough manner that we have received a complaint from the school. In the past the AQD staff has checked into the complaints by visiting the location and had judged that it wasn't a sufficient enough of a problem to warrant a violation of PTI No154-09 general condition 6 rule1901 (not 901 as stated in your letter). In short we had never been considered to have caused unreasonable interference with the enjoyment of life and property.

Nothing was different from this time to the others from our standpoint. We realize the degree of peoples tolerances differ with each individual but were surprised at, and think the language used in the letter is unfair. The statement that we had produced "the most objectionable odors associated with adverse physical effects" seemed a bit harsh. It was not reported that anyone became ill or had to leave the premises in this instance or any of the other instances.

We have employees that have worked in this environment for over sixty years that have never become ill from the asphalt fumes. The smell may be unpleasant to some but in the instance of a once or twice a year down draft of an exhaust plume would hardly cause adverse physical effects.

That being said, Superior Asphalt wants to be a good neighbor and avoid these incidents. We currently add an expensive additive to the incoming loads of liquid asphalt called Ecosorb 206 A. This is specifically designed to reduce the odor of asphalt. We also know that the smell gets worse when we unload a tanker into our bulk tank, thus we schedule the trucks for delivery at times when the kids are not present at Dutton Elementary.

Going forward we will be looking into whenever possible, according to our production schedule, not running the plant during the time in the morning when the kids are arriving at school and on the playground prior to school. This seems to be when we get the complaints.

Lastly, we are not trying to point fingers in another direction but there is another Company located directly behind the school that has tanks that hold asphalt products and they heat up their equipment that produces smells also. We have noted that they have been in to buy our product on the last couple of times that a complaint has been issued.

We would like you to seriously consider reversing the violation. We can't change the fact that asphalt has odors. We will cooperate and do all we can to alleviate the concerns of our neighbors and the AQD. This is our lively hood so we are very concerned. We are also open to any viable suggestions. We feel we are in compliance with our day to day operations and doing everything we can to be environmentally safe and proactive.

Superior Asphalt have earned Diamond Achievement Status from the National Asphalt Pavement Association. This is an award that has high criteria in both operation and eco-safe issues. It is only given to the top plants in the country.

Thank You for this consideration.

Sincerely,

Nithan Voruganti
Plant Manager
Superior Asphalt Inc.