



Monday, November 28, 2022

RE: Enclosed Violation Noticed dated 11/10/2022

To: Environment, Great Lakes, and Energy
AQD, Cadillac District
120 West Chapin Street
Cadillac, MI 49601

CC: Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, MI 48909-7760

VIA EMAIL and U.S Mail

To Whom It May Concern:

I am responding the enclosed Violation Notice dated November 10, 2022. This violation resulted from an onsite inspection dated October 21, 2022. Following are the 2 violations noted and Molon Asphalt's corrective action:

- I. EUHMAPLANT – Molon Asphalt is seeking to acquire a handheld monitor along with implementing corporate policy and standard operating procedures by which we will conform with EGLE AQD regulations including but not limited to:
 - a. Conduct carbon monoxide monitoring to fine tune the drum mix burners for proper burner operation and performance. This will be conducted upon plant start-up commencing with our expected start up on or around the first week of May 2023.
 - b. Conduct same testing and fine tuning each 500 hours (or less) in compliance with regulations.
- II. EUSILOS – Molon Asphalt will acquire and properly install the necessary silo sensors in accordance with EGLE AQD regulations. Additionally, Molon Asphalt will re-work the silos presently onsite with top control emission capture system to control fugitive emissions in compliance with EGLE AQD regulations. We are actively sourcing the materials, sensors and working on the engineering of said systems. These modifications will be completed prior to plant start-up, anticipated to be the first week of May 2023.

Molon Asphalt last fired the asphalt plant on November 11th 2022. We have since transitioned to winterization and seasonal maintenance. We anticipate firing the plant the first week of May 2023 once all maintenance items are completed including but not limited to the corrective actions noted herein.

Please note, it is my business directive to be fully compliant with EGLE AQD and to meet or exceed all regulations regarding the operation of our asphalt plant. It has always been my personal belief and

understanding that Molon Asphalt was operating under full compliance. Molon has invested significant resources since acquiring the asphalt plant in 2019 with specific goals of increasing uptime and being fully compliant with all regulations and safety standards. These violations were a complete surprise to me, and I personally take them very seriously.

If I can be of any further assistance with this, please call me directly.

Thank you,



Scott Porter
President, Molon Asphalt, Inc.
Cell (231) 392-5701