

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

P039526055

FACILITY: AJAX PAVING INDUSTRIES PLANT NO. M-604		SRN / ID: P0395
LOCATION: 830 KIRST BLVD., SUITE 100, TROY		DISTRICT: Southeast Michigan
CITY: TROY		COUNTY: OAKLAND
CONTACT: Christine Poe, Vice President-Concrete Division		ACTIVITY DATE: 07/23/2014
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: 2014 Targeted Inspection		
RESOLVED COMPLAINTS:		

SRN: P0395

COMPANY: Ajax Paving Industries, Inc. Plant M-604

COMPANY ADDRESS: 830 Kirts Blvd., Suite 100 Troy, MI 48084

PURPOSE OF INSPECTION: Targeted

CONTACT PERSON: Mr. Christine Poe, Vice-President (Ph: 248-244-3300; Fax: 248-244-0800;

Email: cpoe@ajaxpaving.com)

COMPANY PHONE NUMBER: 248-244-3300

On July 23, 2014, AQD staff, Erik Gurshaw, conducted a targeted, announced inspection of Ajax Paving Industries, Inc. Plant M-604 operating on the I-96 right of way west of Telegraph Road in Detroit, Michigan. Plant M-604 is being operated under the Rule 289(d) exemption for concrete batch plants. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department Environmental Quality, Air Quality Division (MDEQ-AQD) Rules.

Upon arriving at the site, AQD staff introduced themselves and stated the purpose of the visit to Ms. Kathleen Anderson, Environmental Consultant with Axis Environmental Consulting Corporation (Ph: 810-845-3925; Email: [kanderson@ajaxpaving.com](mailto:kanderson@ajaxpaving.com)). Ms. Anderson is Ajax Paving's environmental consultant and is responsible for environmental compliance issues. The AQD received a relocation notice from the company on April 16, 2014, indicating that the plant would be operating at the location until September 1, 2014. A site map marking the location of the site was provided with the relocation notice. It is estimated that the plant will produce 110,000 cubic yards of concrete during this time period. The plant is making concrete for the reconstruction of I-96 between Telegraph and Newburgh Roads in Detroit. The aggregate mix used to produce the concrete consists of coarse aggregate, intermediate aggregate, fine aggregate, and cementitious material. These aggregates are mixed together in specific ratios to produce concrete of a desired consistency. As previously mentioned, the plant is being operated under the Rule 289(d) exemption for concrete batch plants. Batching was not occurring at the time of the inspection. Ms. Anderson assisted AQD staff during the inspection.

Plant M-604 has produced 40,498 cubic yards of concrete during the 2014 construction season. The company anticipates that 110,000 cubic yards of concrete will be produced for the I-96 construction job. This is well below the 200,000 cubic yard processing limit established in the Rule 289(d) exemption. The plant is using a central baghouse and water to control potential fugitive dust emissions. The cement handling operations are enclosed and dust is controlled with its own filtration system and a central baghouse. As previously mentioned, the plant sent a relocation notice indicating that it would be operating at the Detroit location until September 1, 2014, on April 16, 2014. The relocation notice contained all of the information required in the Rule 289(d) exemption. AQD staff verified that proper setback distances existed between the plant and any commercial establishment or place of public assembly in the area. The facility is abiding by all the conditions of the fugitive dust plan of the Rule 289(d) exemption. Specifically, the drop distance at each transfer point is being minimized, outgoing trucks are tarped before leaving the site, water is being applied to the plant's roadways and yard when necessary, paved roadways are swept when necessary, material spills are immediately cleaned up, and stockpiles are being watered when necessary. The plant is maintaining daily records of water applications to the plant yard, roadways, and storage piles. The plant's

roadways and yard were moist at the time of the inspection. A visible emission evaluation from the batch plant could not be made the time of the inspection since the plant was not in operation.

Based on this inspection, it was determined that Ajax Paving Industries Plant M-604 is in compliance with the Rule 289(d) exemption for concrete batch plants. The following records are attached to this report: the relocation notice for the plant's move to Detroit; baghouse maintenance records from May 23, 2011, through July 2, 2014; 2014 concrete production records; and Dust Emission Control Checklists from May 22, 2014, through July 21, 2014. The daily timing of the watering of the plant roadways and yard is listed on the backside of each daily Dust Emission Control Checklist.

NAME Erik Gushaw

DATE 7/28/14

SUPERVISOR CTE