

Ajax Materials Corporation – Permit to Install Application No. APP-2021-0019

NOTE: A Permit to Install application can be modified from its original submittal through additional information submitted during the review process. This PDF includes additional information that was submitted after the original application submittal for the Ajax Materials Corporation – Permit to Install Application No. APP-2021-0019. It also includes the EGLE modeling report.

The information in this PDF has been available upon request but we are posting it on this website to help provide additional information for the public to prepare comments. This PDF does not contain all the information in the application which remains available upon request. If you have any questions about the information in this PDF or wish to request any additional information, please contact Ambrosia Brown at BrownA39@michigan.gov or 517-648-6216.

Appendix 1 - Particulate Emissions

Air Permit to Install

Ajax Materials, Genesee Twp, Michigan

Plant Capacity Rating	=	600	TPH	
Amount of Aggregate	=	568	TPH	
Amount of Asphalt Cement	=	32	TPH	Average AC Content 5.35%
Yearly Production Limitation	=	876,322	TPY	
Density of Oil	=	7.40	Lbs/gal	
Oil Fuel Use	=	2.5	Gals/ton HMA Produced (#2 rounded up)	
Specific Volume of H ₂ O	=	26.799	ft ³ /lb @ 212 °F	
Moisture Content	=	5.00	%	Manufacturer's maximum moisture content Avg. Aggregate Moisture Content during a 1999 test - 3.0%
Baghouse Temperature	=	300	°F	
Baghouse Fan Rating	=	100,000	ACFM	
NSPS PM Limit	=	0.04	Grain/DSCF	150
Specific Volume of H ₂ O	=	[(Specific Volume of H ₂ O) x (Baghouse Temperature + 460)]/(212 + 460)		
	=	[26.80	x (300 + 460)]/(212 + 460)	
	=	30.31	ft ³ /lb @ 249 °F	
Amount of H ₂ O in Exhaust Gas	=	(Moisture Content/100) x (Amount of Aggregate - TPH) x (2000 Lbs/Ton)		
	=	(5.00	/100) x (568	TPH) x (2000 lbs/ton)
	=	56,800	PPH	
	=	946.67	Lbs./Min.	
Total Volume of H ₂ O in Exhaust				
Gases	=	(Amount of Aggregate) x (Specific Volume of H ₂ O)		
	=	(946.67	lbs/min) x (30.31	ft ³ /lb)
	=	28,692	ft ³ /min	
Exhaust Gas Flow Rate				
(ACFM -dry)	=	(Fan Rating) - (Volume of H ₂ O)		
	=	(100,000	ACFM) - (28,692	ACFM)
	=	71,308	ACFM	
Exhaust Gas Flow Rate (DSCFM)	=	[(Exhaust Gas Flow Rate ACFM dry) x (70 °F + 460)]/(300 °F + 460)		
	=	[71,308	ACFM x (70 °F + 460)]/(300 °F + 460)	
	=	49,728	DSCFM	
Allowed Hourly Particulate				
Emissions	=	(NSPS PM Limit) x (Exhaust Gas Flow Rate DSCFM) x (1 lb/7000 grains) x (60 mins/hr)		
	=	(0.04	grain/DSCFM) x (49,728	DSCFM) x (1 lb/7,000 grains) x (60 mins/hr)
	=	17.05	Lbs/Hr	
		*Emission factor for H ₂ SO ₄ is based on prior permitting modeling results		
Particulate Emission Factor				
(Lbs/Ton HMA) ulfur	=	(Allowed Hourly Particulate Emissions)		
				Plant Capacity Rating
	=	17.05	Lbs/Hr	
	=	600	Tons HMA/Hr	
	=	0.03	Lbs/Ton HMA	
Requested Allowed Annual				
Particulate Emissions	=	Particulate Emission Factor (Lbs/Ton HMA) x Yearly Production Limitation		
	=	0.028	Lbs/Ton HMA x 876,322	Tons HMA/Yr
	=	24,902	Lbs/Yr	
	=	12.5	Tons/Yr	

Appendix 2 - Hydrogen Chloride Emissions

Air Permit to Install

Ajax Materials, Genesee Twp, Michigan

Rated Dryer Capacity	= 600	TPH
Yearly Production Limitation	= 876,322	TPY
Density of Oil	= 7.40	Lbs/gal
Maximum Halogen Content	= 4.00E-03	Lb/lb
Annual Average Halogen Content	= 3.45E-03	Lb/lb
Oil Fuel Use	= 2.0	Gals/ton HMA Produced (#2 rounded up)
Maximum Potential Oil Usage	= 1,200	Gal/hr
Molecular Weight of Chlorine	= 35.45	Moles
Molecular Weight of Hydrogen	= 1.01	Moles

Hydrogen Chloride Emission Calculations

$$\begin{aligned}
 \text{Total Chlorine Emissions} &= \text{Oil Usage (Gal/hr)} \times \text{Density of Oil (Lb/gal)} \times \text{Halogen Content (Lb/lb)} \\
 &= 1,200 \text{ gal/hr} \times 7.4 \text{ lb/gal} \times 0.0040 \text{ lb halogen/lb oil} \\
 &= 35.52 \text{ lb/hr (based on 4000 ppm oil)} \\
 &= 1,200 \text{ gal/hr} \times 7.4 \text{ lb/gal} \times 0.00345 \text{ lb halogen/lb oil} \\
 &= 30.64 \text{ lb/hr (based on 3450 ppm oil)}
 \end{aligned}$$

$$\begin{aligned}
 \text{HCl Emission Factor} &= \frac{\text{Molecular Weight of Chlorine} + \text{Molecular Weight of Hydrogen}}{\text{Molecular Weight of Chlorine}} \\
 &= \frac{(35.5 + 1.01)}{35.5} \\
 &= 1.03 \text{ lb HCl/lb Cl}
 \end{aligned}$$

$$\begin{aligned}
 \text{Maximum Potential HCl Emissions} &= \text{Total Chlorine Emissions (lbs/hr)} \times \text{HCl Emission Factor} \\
 &= 35.52 \text{ lbs Cl/hr} \times 1.03 \text{ lb HCl/lb Cl} \\
 &= 36.53 \text{ lbs/hr (based on 4000 ppm oil)} \\
 &= 30.64 \text{ lbs Cl/hr} \times 1.03 \text{ lb HCl/lb Cl} \\
 &= 31.51 \text{ lbs/hr (based on 3450 ppm oil)}
 \end{aligned}$$

$$\begin{aligned}
 \text{HCl Emission Factor} &= \frac{\text{Maximum Potential HCl Emissions (lbs/hr)}}{\text{Rated Dryer Capacity (tons/hr)}} \\
 &= \frac{36.53 \text{ lbs/hr}}{600 \text{ tons HMA/hr}} \\
 &= 0.0609 \text{ lb HCl/ton HMA Produced (based on 1000 ppm oil)} \\
 &= 0.053 \text{ lb HCl/ton HMA Produced (based on 3450 ppm oil)}
 \end{aligned}$$

Expected reduction in the theoretical HCl emission rate of 61%.

$$\begin{aligned}
 \text{Expected HCl Emission Factor} &= \text{HCl Emission Factor} \times (1 - \text{stack test reduction}) \\
 &= 0.061 \times (1 - 0.61) \\
 &= 0.024 \text{ lb HCl/ton HMA Produced (based on 4000 ppm oil)} \\
 &= 0.020 \text{ lb HCl/ton HMA Produced (based on 3450 ppm oil)}
 \end{aligned}$$

HCl Short Term and Annual Emissions

$$\begin{aligned}
 \text{Short Term Emissions} &= \text{HCL Emission Factor} \times \text{Hourly Production} \\
 &= 0.024 \text{ lb/ton} \times 600 \text{ tph} \\
 &= 14.247 \text{ lb/hr} \\
 \text{Annual Emissions} &= \text{HCL Emission Factor} \times \text{Annual Production} / 2000 \text{ lb/ton} \\
 &= 0.020 \text{ lb/ton} \times 876,322 \text{ tpy} / 2000 \text{ lb/ton} \\
 &= 8.8 \text{ ton/yr}
 \end{aligned}$$

Predicted Ambient Impacts

$$\begin{aligned}
 \text{Annual PAI (ITSL)} &= 0.018 \text{ (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 \text{Annual Model Results} &= 0.018 \text{ (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 \text{Predicted Ambient Impact} &= \text{HCL Emissions (lb/hr)} \times \text{Model Results (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 &= 14.247 \text{ lb/hr} \times 0.018 \text{ (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 &= 2.53E-01 \mu\text{g/m}^3 \\
 \text{AQD Screening Level} &= 20 \mu\text{g/m}^3 \text{ Annual averaging period} \\
 \text{Percent of Screening Level} &= 1.3\% \\
 \text{Pass} &= \text{YES}
 \end{aligned}$$

$$\begin{aligned}
 \text{Short Term PAI (2nd ITSL)} &= 0.711 \text{ (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 \text{1 hr Model Results} &= 0.711 \text{ (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 \text{Predicted Ambient Impact} &= \text{HCL Emissions (lb/hr)} \times \text{Model Results (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 &= 14.247 \text{ lb/hr} \times 0.711 \text{ (}\mu\text{g/m}^3\text{)/(lb/hr)} \\
 &= 10.1 \mu\text{g/m}^3 \\
 \text{AQD Screening Level} &= 2100 \mu\text{g/m}^3 \text{ 1 hr averaging period} \\
 \text{Percent of Screening Level} &= 0.5\% \\
 \text{Pass} &= \text{YES}
 \end{aligned}$$

Appendix 3 - EGLE Additional Source and Background Concentration Data

Air Permit to Install

Ajax Materials, Genesee Twp, Michigan

Year	NO2 Lansing		PM-10 Grand Rapids	PM-2.5 Flint		SO2 Grand Rapids			
	1-hr 98th pctl	Annual Avg	24-hr Max	24-hr 98th pctl	Annual Avg	1-hr 99th pctl	3-hr Max	24-hr Max	Annual Avg
2017	36.4	6.5	34.0	16.8	7.10	4.0	3.0	1.5	0.38
2018	29.9	6.5	31.0	16.9	7.33	4.4	3.9	1.1	0.12
2019	44.1	6.4	104.0	17.5	6.81	3.9	3.1	0.9	0.39
	36.8	6.5		17.1	7.1	4.1	3.9	1.5	0.39
	ppb	ppb		ug/m3	ug/m3	ppb	ppb	ppb	ppb

NAAQS MODELING BACKGROUND SUMMARY

NO2		PM-10	PM-2.5		SO2			
69.2	12.2	35.0	17.1	7.1	10.7	10.2	3.9	1.0
ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3
		(3-yr 4th High)						

Table 1 – Project Emission Summary (Revised June 2021)

Air Permit to Install
Ajax Materials, Genesee Twp, Michigan

Pollutant	HMA Dryer Emissions (tpy)	AC Tank Heater Emissions (tpy)	Silo Load Out (tpy)	Silo Filling (tpy)	Yard Emissions (Unpaved Vehicle Traffic, Aggregate Load in/Load out and Storage Pile Wind Erosion) (tpy)	Paved Road Emissions (tpy)	TOTAL Emissions (tpy)	Significant Emission Rate	% of SER	Exceeds SER?	PSD Major Source Threshold	Exceeds Major Source Threshold
CO	88.1	0.7	0.6	0.5	--	--	89.9	100	90%	No	250	No
NO _x	52.6	0.9	--	--	--	--	53.4	40	134%	Yes	250	No
PM	15.9	0.0	0.2	0.3	9.0	0.6	26.0	25	104%	Yes	250	No
PM ₁₀	29.1	0.1	0.4	0.4	3.1	0.1	33.1	15	221%	Yes	250	No
PM _{2.5}	29.1	0.1	0.4	0.4	0.3	2.93E-02	30.3	10	303%	Yes	250	No
SO ₂	78.0	0.0	--	--	--	--	78.1	40	195%	Yes	250	No
VOC	28.0	0.0	1.7	5.3	--	--	35.1	40	88%	No	250	No
CO ₂	21,689	1,024.7	--	--	--	--	22,713.7					
CH ₄	7.9	0.0	--	--	--	--	7.9					
N ₂ O	--	0.0	--	--	--	--	0.0					
CO _{2e}	21,886	1,025.8	--	--	--	--	22,911.9	75,000	31%	No	NA	NA
Lead	0.01	0.0	--	--	--	--	0.0	0.6	2%	No	NA	NA
Fluorides	--	--	--	--	--	--	--	3.0	0%	No	NA	NA
H ₂ S	--	--	--	--	--	--	--	10.0	0%	No	NA	NA
H ₂ SO ₄	1.4	--	--	--	--	--	1.4	7	20%	No	NA	NA
Highest Single HAP (Formaldehyde)	4.4	6.44E-04	1.60E-03	--	--	--	4.4	NA	NA	NA	NA	No
Aggregate HAPs*	22.9	0.02	0.04	0.08	--	--	23.0	NA	NA	NA	NA	No

Note: Control efficiency of 80% for an approved fugitive dust control plan - per MDEQ HMA Fact sheet could be used for the yard emissions from storage pile wind erosion and load in/load out. The Control Efficiency of 0% was conservative for use in modeling.

PSD Listed Source Categories with 100 tpy Major Source Thresholds¹

1. Fossil fuel-fired steam electric plants of more than 250 million Btu/hr heat input
2. Coal cleaning plants (with thermal dryers)
3. Kraft pulp mills
4. Portland cement plants
5. Primary zinc smelters
6. Iron and steel mill plants
7. Primary aluminum ore reduction plants
8. Primary copper smelters
9. Municipal incinerators capable of charging more than 250 tons of refuse per day
10. Hydrofluoric acid plants
11. Sulfuric acid plants
12. Nitric acid plants
13. Petroleum refineries
14. Lase plants
15. Phosphate rock processing plants
16. Coke oven batteries
17. Sulfur recovery plants
18. Carbon black plants
19. Primary lead smelters
20. Fuel conversion plants
21. Sintering plants
22. Secondary metal production plants
23. Chemical process plants
24. Fossil fuel boilers (or combinations thereof) totaling more than 250 million Btu/hr heat input
25. Petroleum storage and transfer units with a total storage capacity exceeding 500,000 barrels
26. Taconite ore processing plants
27. Glass fiber processing plants
28. Charcoal production plants

¹ Please be aware that any other source which has the potential to emit 250 tons per year of any regulated pollutant is subject to PSD major source regulations regardless of the sources manufacturing operations.

Table 2 - HMA Counter-flow Drum Dryer NSR Regulated Pollutant Estimated Emissions

Air Permit to Install
 Ajax Materials, Genesee Twp, Michigan

Maximum Short Term Production	tons HMA/hr	600
Daily Average Production	tons HMA/hr	500
Annual Production Limit	tons HMA/yr	876,322
Types of Fuel Permitted	Natural Gas, Propane , Fuel Oil 2-6, RUO	
Density of Fuel Oil (avg)	lb/gal	7.4
Fuel Oil/RUO Sulfur Content	% by weight	1.0

WebFire Name	NSR Regulated Pollutant	Emission Factor (see notes)	Notes	Maximum Short Term Emissions (lb/hr)	Annual Emissions (tpy)	WF EF #VALUE!
CO	CO	0.201 lb/ton HMA	1	120.6	88.1	
Nox	NO _x	0.12 lb/ton HMA	1	72.0	52.6	0.055
PM10 F	PM	0.04 lb/ton HMA	3	21.8	15.9	AP-42 condensable 28.0
PM10	PM ₁₀	0.07 lb/ton HMA	3,9	33.2	29.1	0.0194 6.4
PM2.5	PM _{2.5}	0.07 lb/ton HMA	3,9	33.2	29.1	1.5
SO2	SO ₂	0.18 lb/ton HMA	2	106.9	78.0	0.1
VOC	VOC	6.4E-02 lb/ton HMA	4	38.4	28.0	0.2 0.032
CO2	CO ₂	49.5 lb/ton HMA	5	29,700	21,689	33.0
CH4	CH ₄	1.8E-02 lb/ton HMA	5	10.8	7.9	0.012
N2O	N ₂ O	-- --		--	--	
CO2	CO ₂ e	49.95 lb/ton HMA	6	29,970	21,886	
	Lead	3.0E-05 lb/ton HMA	7	0.02	0.01	1.50E-05
	Fluorides	-- --		--	--	
	H ₂ S	-- --		--	--	
	H ₂ SO ₄	3.2E-03 lb/ton HMA	8	1.9	1.4	

¹ Emission factor is from the MDEQ Emission Factor Calculation Fact Sheet for HMA Plants waste oil asphalt heaters (3-05-002-10) for CO; and batch plant factor (3-05-002-46) for NOX.

² Emission factor is based on RUO sulfur content of 1% and a 43% control for SO2 from RAP - See SO2/RAP calculation methodology below

³ PM emissions are based on NSPS emission limit of 0.4 grains/DSCF. See Appendix 2 for particulate emission calculation data. PM10 and PM2.5 emissions are based on PM emissions plus AP-42 condensable emissions, plus H2SO4 and HCL emissions, which are assumed to form condensable PM.

⁴ VOC emission factor from AP-42, Section 11.1, Table 11.1-8 for waste oil fired dryer, plus a 100% safety factor.

⁵ Emission factor is from EPA Webfire emission factor for #6 oil-fired counterflow drum mix plant (3-05-002-63); plus a 50% safety factor

⁶ CO₂e emission factor based on global warming potentials for CO₂ (1), CH₄ (25) and N₂O (298) obtained from 40 CFR 98 Subparts A and C, respectively.

⁷ Lead emission factor is based on maximum ppm allowed in RUO (100 ppm) and 98% control for baghouse, as follows:

$7.4 \text{ lb/gal} * 100 \text{ ppm} / 1e6 * 2 \text{ gal oil/ton HMA} * (1-.98)$

⁸ AQD Default Allowable Emission Rate from June 2012 "Eliminating the Mandatory Testing Requirement for Toxic Air Contaminants for Hot Mix Asphalt Plants in Michigan"

⁹lb/hr emission rates based on daily average production

Emission Calculation Methods

PM

See particulate emission calculation methodology. Particulate is assumed to be less than 10 microns in diameter.

SO₂ (RAP)

Design Capacity Emissions (lb/hr) = [Design Material Usage (ton of HMA/hr) x Unit Fuel Consumption (gal/ton) x Fuel Density (lb/gal) x (Sulfur Content (% by Weight)/100) x 64 (lb SO₂)/32 (lb S)] x (1 - (43 (% SO₂ control for RAP)/100))

Potential Emissions (lb/hr) = [Permit Limit Material Usage (ton of HMA/hr) x Unit Fuel Consumption (gal/ton) x Fuel Density (lb/gal) x (Sulfur Content (% by Weight)/100) x 64 (lb SO₂)/32 (lb S)/((1/2000) (lb/ton))] x (1 - (43 (% SO₂ control for RAP)/100))

Expected Emissions (lb/hr) = [Expected Material Usage (ton of HMA/hr) x Unit Fuel Consumption (gal/ton) x Fuel Density (lb/gal) x (Sulfur Content (% by Weight)/100) x 64 (lb SO₂)/32 (lb S)/((1/2000) (lb/ton))] x (1 - (43 (% SO₂ control for RAP)/100))

NO_x, CO, VOC

Design Capacity Emissions (lb/hr) = Design Material Usage (ton of HMA/hr) x Emission Factor (lb/ton)

Potential Emissions (ton/yr) = Permit Limit Material Usage (ton of HMA/yr) x Emission Factor (lb/ton) x 1/2000 (ton/lb)

Expected Emissions (ton/yr) = Expected Material Usage (ton of HMA/yr) x Emission Factor (lb/ton) x 1/2000 (ton/lb)

CO₂e

CO₂e (lb/hr) = CO₂ (lb/hr) x 1 + CH₄ (lb/hr) x 25 + N₂O (lb/hr) x 298

$E_{ST} = \text{Maximum Short Term HMA Production (ton HMA/hr)} \times EF$

$E_A = E_F \times \text{Annual Production Limit (ton HMA/yr)} / 2,000 \text{ lb/ton}$

where:

E_{ST} = Short Term Emissions (lb/hr);

E_A = Annual Emissions (tpy);

EF = emission factor (lb/ton HMA)

Grade	Heating Value (Btu/US gal)		Comments	density (lb/gal)	Fuel - gal/hr	Fuel - gal/ton	Fuel (lb/ton)	Max S Content	Sulfur (lb/ton)
Fuel Oil No. 1	132900	137000	Small Space Heaters	6.88	1128.668172	1.88	12.94	0.50%	0.06
Fuel Oil No. 2	137000	141800	Residential Heating	7.05	1094.890511	1.82	12.86	0.50%	0.06
Fuel Oil No. 4	143100 - 148100		Industrial Burners						
Fuel Oil No. 5 (Light)	146800 - 150000		Preheating in General Required						
Fuel Oil No.5 (Heavy)	149400 - 152000		Heating Required						
Fuel Oil No. 6	151300	155900	Bunker C	7.88	991.4077991	1.65	13.02	1.0%	0.13

Burner

150 MMBtu/hr Low NOX (assumed)
 137000 Btu/gal
 gal/hr
 1.65 gal/ton

Table 1. Stack Sampling Data Summary

Toxic Air Contaminant	High test value, lb/ton	Low test value, lb/ton	Average test value, lb/ton	Standard Deviation	Default Allowable Limit, lb/ton
Acrolein	8.83E-4	4.00E-6	1.52E-4	0.00024	1.00E-3
Arsenic	8.32E-7	5.25E-8	2.64E-7	2.68E-7	1.00E-6
Benzene	8.94E-4	3.80E-5	3.61E-4	0.00024	1.00E-3
Ethyl benzene	4.00E-4	5.46E-6	8.67E-5	0.00013	1.00E-3
Formaldehyde	4.30E-5	2.00E-3	1.25E-3	0.0013	1.00E-2
Hydrogen chloride	1.25E-3	2.40E-5	3.44E-4	0.00034	6.00E-3
Lead	3.50E-6	2.11E-9	1.36E-6	9.25E-7	1.50E-5
Manganese	3.50E-5	1.18E-6	9.24E-6	1.04E-5	5.00E-5
Napthalene	2.00E-4	6.20E-6	5.47E-5	5.95E-5	1.00E-3
Nickel	3.39E-6	1.62E-7	1.54E-6	1.12E-6	1.00E-4
Sulfuric acid mist	2.20E-3	4.00E-5	7.87E-4	7.40E-4	3.20E-3
Toluene	1.63E-3	6.55E-7	2.70E-4	1.6E-4	6.00E-3
Xylene	4.94E-4	1.33E-6	1.39E-4	1.60E-4	1.00E-3

Units	FACTORID	SCC	SCCID	LEVEL1	LEVEL2	LEVEL3	LEVEL4	NEI_POLLU CAS	POLLUTAN	POLLUTAN'	CONTROLC	CONTROLII	CONTROL	Primary
/														
Lb/Tons	17978	30500263	5510	Industrial Prc Mineral Pri	Asphalt Co Drum Mix I	NOX			Nitrogen o	303	0	129	UNCONTROLLED	
Lb/Tons														
Lb/Tons														
Lb/Tons	18022	30500263	5510	Industrial Prc Mineral Pri	Asphalt Co Drum Mix I	SO2		2025884	Sulfur diox	380	0	129	UNCONTROLLED	
Lb/Tons	18034	30500263	5510	Industrial Prc Mineral Pri	Asphalt Co Drum Mix I	VOC			Volatile org	417	0	129	UNCONTROLLED	
Lb/Tons	17925	30500263	5510	Industrial Prc Mineral Pri	Asphalt Co Drum Mix I	CO2		124-38-9	Carbon dio	136	0	129	UNCONTROLLED	
Lb/Tons	17968	30500263	5510	Industrial Prc Mineral Pri	Asphalt Co Drum Mix PI: Rotary DI			74-82-8	Methane	261	0	129	UNCONTROLLED	
/														
/														
Lb/Tons	17585	30500260	5507	Industrial Prc Mineral Pri	Asphalt Co Drum Mix I			7439921 7439-92-1	Lead	250	127	188	FABRIC FILTER	
/														
/														
/														

SO2 (lb/ton)	43% Control - RAP
0.13	0.07
0.13	0.07
0.26	0.15

FACTOR	UNIT	MEASURE	MATERIAL ACTION	FORMULA	AP42SECTII	NOTES	REF_DESC	QUALITY	NUMSOUR	Created	REVOKED	Dupcount	Dupreason
5.50E-02	Lb	Tons	Hot Mix As Produced		11.1		EPA. 2000 C		0	36861		0	
5.80E-02	Lb	Tons	Hot Mix As Produced		11.1		EPA. 2000 B		0	36861		0	
3.20E-02	Lb	Tons	Hot Mix As Produced		11.1	VOC equal:	EPA. 2000 E		0	00:00.0		0	
33	Lb	Tons	Hot Mix As Produced		11.1	CO2 can al:	EPA. 2000 A		0	36861		0	
0.012	Lb	Tons	Hot Mix As Produced		11.1		EPA. 2000 C		0	36861		0	
0.000015	Lb	Tons	Hot Mix As Produced		11.1		EPA. 2000 C		0	36861		0	

¹²C emission factor is based on #6 Oil-Fired Counterflow Drum Mix HMA Plant (3-05-003-63) plus a Metal TAC safety factor of 4.
¹³Hydrochloric Acid pH emissions based on 4000 ppm Halogen RUD. Assumes all halogens are Cl and are converted to HCl with a 61% capture in process. Annual Emissions based on annual average 3450 cpm Halogen. See emission factor calculations.

Emission Calculation Method

E_{ST} = Maximum Short Term HMA Production (ton HMA/hr) X EF

E_A = E_{ST} X Annual Production Limit (ton HMA/yr) / 2,000 lb/ton

where:

E_{ST} = Short Term Emissions (lb/hr);

E_A = Annual Emissions (tons);

EF = emission factor (lb/ton HMA)

Industrial Boiler < 10 MMBtu/hr

Table 4 - Miscellaneous Combustion Equipment - NSR Emissions

Air Permit to Install

Ajax Materials, Genesee Twp, Michigan

AC Tank Heater

Heat Input Capacity	MMBtu/hr	2.0
Heat Input Capacity	MMBtu/hr	1,965.00
Annual Operating Hours	hr/yr	8,760
Annual Heat Input Limit or Capacity	MMBtu/yr	17,520
Fuel Heat Value	MMBtu/MMBtu	1,000

DATE	INITIALS	NOTES
		Initial Spreadsheet completed
		Initial QC
		Use rows for follow-up changes and QCs

NSR Regulated Pollutant	Emission Factor (See Notes)	Notes	Maximum Short Term Emissions per Unit (lb/hr)	Annual Emissions (tpy)
CO	84 lb/MMCF	1	0.2	0.72
Nox	100 lb/MMCF	1	0.2	0.86
PM10 F	1.9 lb/MMCF	1	0.0	0.02
PM10	7.6 lb/MMCF	1	0.0	0.07
PM2.5	7.6 lb/MMCF	1	0.0	0.07
SO2	0.6 lb/MMCF	1	0.0	0.01
VOC	5.5 lb/MMCF	1	0.0	0.05
CO2	53.1 kg/MMBtu	2	234	1004.72
CH4	1.0E-03 kg/MMBtu	2	0.0	0.02
N2O	1.0E-04 kg/MMBtu	2	0.0	0.00
CO2e	53.1 kg/MMBtu	2	234	1005.78
Lead	5.0E-04 lb/MMCF	2	9.85E-07	4.29E-06

Emission factors are from Webfire for SCE 1-03-006-03 for a Boiler with a heat input capacity of less than 10 MMBtu/hr.

*CO₂ global warming potential and emission factors obtained from 40 CFR 98 Subpart A and C, respectively. The global warming potential for CH₄, CO₂ and N₂O (100) are consistent with the USEPA published changes on November 29, 2013.

*Emission factors are from Webfire for SCE 1-03-006-02 for a Boiler with a heat input capacity of greater than 10

Emission Calculation Methods

Using lb/MMCF Emission Factors

$E_{ST} = C_{max} \times EF_{max}$

$E_{ST} = C_{max} \times 2.2 \times 10^{12} \text{ Btu} \times EF_{max}$

$E_A = E_{ST} \times \text{Annual Operating Hours} / 2,000 \text{ Btu/hr}$

$E_{ST} = \text{Short Term Emissions (lb/hr)}$

$E_A = \text{Annual Maximum Emissions (tpy)}$

$C_{max} = \text{Max Fuel Usage (MMCF/hr)}$ and

$EF_{max} = \text{Emission Factor (lb/MMCF)}$ and

$EF_{max} = \text{Emission Factor (kg/MMBtu)}$

WF	EF	Units	FACTORID	SCC	SCCD	LEVEL1	LEVEL2	LEVEL3	LEVEL4	NEI_POLLU	CAS	POLLUTAF	POLLUTAN	CONTROLC	CONTROLI	CONTROL	Primary	FACTOR	UNIT	MEASURE	MATERIAL	ACTION	FORMULA	AP42SECTI	NOTES	REF_DESC	QUALITY	NUMSQUR	Created	REVOKED	Dupcount	Dispersion
84	lb/Million Cubic Feet	5935	10200603	125	External Cor	Industrial	Natural Ga < 10 Millio	CO	630-08-0	Carbon m	137	0	129	UNCONTR	1	8.40E+01	Lb	Million Cu	Natural Ga	Burned		1.4	EPA, Marc	B	0	00:00:0	0	0	0	0		
100	lb/Million Cubic Feet	5936	10200603	125	External Cor	Industrial	Natural Ga < 10 Millio	NOX		Nitrogen i	303	0	129	UNCONTR	1	1.00E+02	Lb	Million Cu	Natural Ga	Burned		1.4	Emission f	EPA, Marc	A	0	00:00:0	0	0	0		
1.9	lb/Million Cubic Feet	5938	10200603	125	External Cor	Industrial	Natural Ga < 10 Millio	PM-FI		PM, filtere	334	0	129	UNCONTR	1	1.90E+00	Lb	Million Cu	Natural Ga	Burned		1.4	All PM (bot	EPA, Marc	B	0	00:00:0	0	0	0		
7.6	lb/Million Cubic Feet	5943	10200603	125	External Cor	Industrial	Natural Ga < 10 Millio	PM10-PRI		PM10, pri	339	0	129	UNCONTR	1	7.60E+00	Lb	Million Cu	Natural Ga	Burned					0	00:00:0	0	0	0	0		
7.6	lb/Million Cubic Feet	5945	10200603	125	External Cor	Industrial	Natural Ga < 10 Millio	PM2.5-PRI		PM2.5, pr	341	0	129	UNCONTR	1	7.60E+00	Lb	Million Cu	Natural Ga	Burned					0	00:00:0	0	0	0	0		
0.6	lb/Million Cubic Feet	5946	10200603	125	External Cor	Industrial	Natural Ga < 10 Millio	Btu/hr		Sulfur oxi	381	0	129	UNCONTR	1	6.00E-01	Lb	Million Cu	Natural Ga	Burned		1.4	EPA, Otto	A	0	00:00:0	0	0	0	0		
5.5	lb/Million Cubic Feet	5949	10200603	125	External Cor	Industrial	Natural Ga < 10 Millio	VOC		Volatile or	417	0	129	UNCONTR	1	5.50E+00	Lb	Million Cu	Natural Ga	Burned		1.4	EPA, Marc	C	0	00:00:0	0	0	0	0		
5.00E-04	lb/Million Cubic Feet	5908	10200602	124	External Cor	Industrial	Natural Ga 10-100 Mil	74399311	7439-93-1	Lead	250	0	129	UNCONTR	1	5.00E-04	Lb	Million Cu	Natural Ga	Burned		1.4	Hazardous	EPA, Marc	D	0	00:00:0	0	0	0		

Table C-1 to Subpart C of Part 98—Default CO₂ Emission Factors and High Heat Values for Various Types of Fuel

Default CO₂ Emission Factors and High Heat Values for Various Types of Fuel

Fuel type	Default high heat value	Default CO ₂ emission factor
Natural Gas	1.026 × 10 ⁷	53.06

Table C-2 to Subpart C of Part 98—Default CH₄ and N₂O Emission

Fuel type	Default CH ₄ emission factor (kg CH ₄ /mmBtu)	N ₂ O emission (kg N ₂ O/ton)
Natural Gas	1.00E-03	1.00E-04

Industrial Boiler <10 MMbtu/hr

Table 5 - Miscellaneous Combustion Equipment - TAC Emissions

Table with 2 columns: Category and Value. Categories include Air Permit to Install, Annual Operating Hours, Annual Heat Input Limit or Capacity, Fuel Heat Value, Heat Input Capacity, MMBtu/hr, MMBtu/yr, and MMBtu/MMbt.

Copy Column G & Insert between Columns G & H for multiple units with Varying Capacity

Table with 2 columns: DATE and INITIALS. Includes notes: Initial Spreadsheet completed, Initial GC, and Use rows for follow-up changes and GCs.

Main emission table with columns: CAS No., Emission Factor, Notes, Maximum Short Term Emissions per Unit (lb/hr), Annual Emissions (tpy), HAP?, and various pollutant levels (WF, EP, UNITS, FACTOR, SCC, LEVEL1, LEVEL2, LEVEL3, LEVEL4, NH, POLL CAS, POLLUTAN, POLLUTAN, CONTROL, CONTROL, CONTROL, Primary, FACTOR, UNIT, MEASURE, MATERIAL, ACTION, FORMULA, AP42SECT1, NOTES, REF_DESC, QUALITY, NUMSOUR, Created, REVOKED, Dupcount, Dupreason).

Emission factors are from Web-fee for SCC 1.02.006-02 because no TAC factors are available for SCC 1.02.006-03.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

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Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Additional emission factors for various pollutants like Nitrogen, Sulfur, and others.

Table 5.1 - Proposed Silo Load Out NSR Regulated Pollutant Estimated Emissions

Air Permit to Install Application
 Alcoa Materials, Concrete Test, Michigan
 Maximum Short Term Production tons (MMa) 500
 Daily Average Production tons (MMa) 500
 Annual Production Limit tons (MMa) 676,241
 Temperature F 325
 Ambient Visibility Factor 0.5

NSR Regulated Pollutant	Emission Factor (See Notes)	Notes	Maximum Short Term Emissions (lb/yr)	Annual Emissions (Tpy)
CO	1.93E-03 lb/ton MMA	1	0.8	0.8
NO _x				
PM ₁₀ F	5.22E-04 lb/ton MMA	1	0.3	0.3
PM _{2.5}	8.63E-04 lb/ton MMA	1.2	0.4	0.4
PM _{2.5}	8.63E-04 lb/ton MMA	1.2	0.4	0.4
SO ₂				
VOC	1.31E-03 lb/ton MMA	1	2.3	1.7

¹Emission factors are from AP-42 Table 11.1-1 for SEC 3-02-02-04 for Truck Load-out Emissions
²the emission rates based on only average production

Emission Calculation Methods:

E_{ST} = Maximum Short Term MMA Production (ton/MMa/yr) x EF
 E_A = E_{ST} x Annual Production Limit (ton/MMa/yr) / (2,650 lb/ton MMA)

E_{ST} = Short Term Emissions (lb/yr)
 E_A = Annual Emissions (Tpy)
 EF = Emission Factor (lb/ton MMA)

CO₂ = (lb/yr) x CO₂ (lb/yr) x 1 + CH₄ (lb/yr) x 25 + N₂O (lb/yr) x 298

NSR Regulated Pollutant	Emission Factor (See Notes)	Notes	Maximum Short Term Emissions (lb/yr)	Annual Emissions (Tpy)
CO	1.93E-03 lb/ton MMA	1	0.8	0.8
NO _x				
PM ₁₀ F	5.22E-04 lb/ton MMA	1	0.3	0.3
PM _{2.5}	8.63E-04 lb/ton MMA	1.2	0.4	0.4
PM _{2.5}	8.63E-04 lb/ton MMA	1.2	0.4	0.4
SO ₂				
VOC	1.31E-03 lb/ton MMA	1	2.3	1.7

¹Emission factors are from AP-42 Table 11.1-1 for SEC 3-02-02-04 for Truck Load-out Emissions
²the emission rates based on only average production

Emission Calculation Methods:

E_{ST} = Maximum Short Term MMA Production (ton/MMa/yr) x EF
 E_A = E_{ST} x Annual Production Limit (ton/MMa/yr) / (2,650 lb/ton MMA)

E_{ST} = Short Term Emissions (lb/yr)
 E_A = Annual Emissions (Tpy)
 EF = Emission Factor (lb/ton MMA)

CO₂ = (lb/yr) x CO₂ (lb/yr) x 1 + CH₄ (lb/yr) x 25 + N₂O (lb/yr) x 298

Table 5.2 - Proposed Proposed Silo Load-Out TAC Emissions

Air Permit to Install Application

Ajax Materials, Genesee Twp, Michigan

Maximum Short Term Production	tons HMA/hr	600
Annual Production Limit	tons HMA/yr	876,322
Organic PM	lb/ton	3.41E-04
TOC	lb/ton	4.16E-03

CAS No hyphens	Toxic Air Contaminant	CAS No.	Emission Factor (See Notes)	Notes	Maximum Short Term Emissions (lb/hr)	Annual Emissions (tpy)	HAP?	
83329	Acenaphthene	83-32-9	8.86E-07	lb/ton HMA	1	5.32E-04	3.88E-04	Yes
208968	Acenaphthylene	208-96-8	9.55E-08	lb/ton HMA	1	5.73E-05	4.18E-05	Yes
120127	Anthracene	120-12-7	2.39E-07	lb/ton HMA	1	1.43E-04	1.05E-04	Yes
56553	Benzo (a) anthracene	56-55-3	6.48E-08	lb/ton HMA	1	3.89E-05	2.84E-05	Yes
205992	Benzo (b) fluoranthene	205-99-2	2.59E-08	lb/ton HMA	1	1.55E-05	1.14E-05	Yes
207089	Benzo (k) fluoranthene	207-08-9	7.50E-09	lb/ton HMA	1	4.50E-06	3.29E-06	Yes
191242	Benzo (g,h,i) perylene	191-24-2	6.48E-09	lb/ton HMA	1	3.89E-06	2.84E-06	Yes
50328	Benzo (a) pyrene	50-32-8	7.84E-09	lb/ton HMA	1	4.70E-06	3.44E-06	Yes
192972	Benzo (e) pyrene	192-97-2	2.66E-08	lb/ton HMA	1	1.60E-05	1.17E-05	Yes
218019	Chrysene	218-01-9	3.51E-07	lb/ton HMA	1	2.11E-04	1.54E-04	Yes
53703	Dibenz(a,h) anthracene	53-70-3	1.26E-09	lb/ton HMA	1	7.57E-07	5.53E-07	Yes
206440	Fluoranthene	206-44-0	1.70E-07	lb/ton HMA	1	1.02E-04	7.47E-05	Yes
86737	Fluorene	86-73-7	2.63E-06	lb/ton HMA	1	1.58E-03	1.15E-03	Yes
193395	Indeno(1,2,3-cd)pyrene	193-39-5	1.60E-09	lb/ton HMA	1	9.61E-07	7.02E-07	Yes
91576	2-Methyl Naphthalene	91-57-6	8.11E-06	lb/ton HMA	1	4.87E-03	3.56E-03	Yes
91203	Naphthalene	91-20-3	4.26E-06	lb/ton HMA	1	2.56E-03	1.87E-03	Yes
198550	Perylene	198-55-0	7.50E-08	lb/ton HMA	1	4.50E-05	3.29E-05	Yes
85018	Phenanthrene	85-01-8	2.76E-06	lb/ton HMA	1	1.66E-03	1.21E-03	Yes
129000	Pyrene	129-00-0	5.11E-07	lb/ton HMA	1	3.07E-04	2.24E-04	Yes
108952	Phenol	108-95-2	4.02E-06	lb/ton HMA	1	2.41E-03	1.76E-03	Yes
67641	Acetone	67-64-1	1.91E-06	lb/ton HMA	1	1.15E-03	8.38E-04	No
74851	Ethylene	74-85-1	2.95E-05	lb/ton HMA	1	1.77E-02	1.29E-02	No
71432	Benzene	71-43-2	2.16E-06	lb/ton HMA	1	1.30E-03	9.48E-04	Yes
74839	Methyl bromide	74-83-9	3.99E-07	lb/ton HMA	1	2.40E-04	1.75E-04	Yes
78933	Methyl ethyl ketone	78-93-3	2.04E-06	lb/ton HMA	1	1.22E-03	8.93E-04	Yes
75150	Carbon sulfide	75-15-0	5.41E-07	lb/ton HMA	1	3.24E-04	2.37E-04	Yes
75003	Ethyl chloride	75-00-3	8.73E-09	lb/ton HMA	1	5.24E-06	3.83E-06	Yes
74873	Methyl chloride	74-87-3	6.24E-07	lb/ton HMA	1	3.74E-04	2.73E-04	Yes
98828	Isopropylbenzene	98-82-8	4.57E-06	lb/ton HMA	1	2.74E-03	2.00E-03	Yes
100414	Ethylbenzene	100-41-4	1.16E-05	lb/ton HMA	1	6.99E-03	5.10E-03	Yes
50000	Formaldehyde	50-00-0	3.66E-06	lb/ton HMA	1	2.20E-03	1.60E-03	Yes
110543	N-Hexane	110-54-3	6.24E-06	lb/ton HMA	1	3.74E-03	2.73E-03	Yes
540841	2,2,4-Trimethylpentane	540-84-1	7.49E-08	lb/ton HMA	1	4.49E-05	3.28E-05	Yes
75092	Dichloromethane	75-09-2	0.00E+00	lb/ton HMA	1	0.00E+00	0.00E+00	Yes
1634044	Tert-butyl methyl ether	1634-04-4	0.00E+00	lb/ton HMA	1	0.00E+00	0.00E+00	Yes
100425	Styrene	100-42-5	3.04E-07	lb/ton HMA	1	1.82E-04	1.33E-04	Yes
127184	Perchloroethylene	127-18-4	3.20E-07	lb/ton HMA	1	1.92E-04	1.40E-04	Yes
108883	Toluene	108-88-3	8.73E-06	lb/ton HMA	1	5.24E-03	3.83E-03	Yes
71556	1,1,1-Trichloroethane	71-55-6	0.00E+00	lb/ton HMA	1	0.00E+00	0.00E+00	Yes
79016	Trichloroethylene	79-01-6	0.00E+00	lb/ton HMA	1	0.00E+00	0.00E+00	Yes
75694	Trichlorofluoromethane	75-69-4	5.41E-08	lb/ton HMA	1	3.24E-05	2.37E-05	No
1330207	Isomers of xylene	1330-20-7	1.71E-05	lb/ton HMA	1	1.02E-02	7.47E-03	Yes
95476	p-Xylene	95-47-6	3.33E-06	lb/ton HMA	1	2.00E-03	1.46E-03	Yes

* Emission factors are from Web-fire for Truck Load-out (SCC 3-05-002-14)

Emission Calculation Methods

$$E_{ST} = \text{Maximum Short Term HMA Production (ton HMA/hr)} \times EF$$

$$E_A = E_{ST} \times \text{Annual Production Limit (ton HMA/yr)} / 2,000 \text{ lb/ton}$$

where:

$$E_{ST} = \text{Short Term Emissions (lb/hr)}$$

$$E_A = \text{Annual Emissions (tpy)}$$

$$EF = \text{emission factor (lb/ton HMA)}$$

Pollutant	CAS	Compound d/Organic or Compound specific	(lb/ton)		
Acenaphthene	83-32-9	0.26%	8.86E-07		
Acenaphthylene	208-96-8	0.03%	9.55E-08		
Anthracene	120-12-7	0.07%	2.39E-07		
Benzo (a) anthracene	56-55-3	0.02%	6.48E-08		
Benzo (b) fluoranthene	205-99-2	0.01%	2.59E-08		
Benzo (k) fluoranthene	207-08-9	0.00%	7.50E-09		
Benzo (g,h,i) perylene	191-24-2	0.00%	6.48E-09		
Benzo (a) pyrene	50-32-8	0.00%	7.84E-09		
Benzo (e) pyrene	192-97-2	0.01%	2.66E-08		
Chrysene	218-01-9	0.10%	3.51E-07		
Dibenz(a,h) anthracene	53-70-3	0.00%	1.26E-09		
Fluoranthene	206-44-0	0.05%	1.70E-07		
Fluorene	86-73-7	0.77%	2.63E-06		
Indeno(1,2,3-cd)pyrene	193-39-5	0.00%	1.60E-09		
2-Methyl Naphthalene	91-57-6	2.38%	8.11E-06		
Naphthalene	91-20-3	1.25%	4.26E-06		
Perylene	198-55-0	0.02%	7.50E-08		
Phenanthrene	85-01-8	0.81%	2.76E-06		
Pyrene	129-00-0	0.15%	5.11E-07		
Phenol	108-95-2	1.18%	4.02E-06		
Acetone	67-64-1	0.05%	1.91E-06		
Ethylene	74-85-1	0.71%	2.95E-05		
Benzene	71-43-2	0.05%	2.16E-06		
Methyl bromide	74-83-9	0.01%	3.99E-07		
Methyl ethyl ketone	78-93-3	0.05%	2.04E-06		
Carbon sulfide	75-15-0	0.01%	5.41E-07		
Ethyl chloride	75-00-3	0.00%	8.73E-09		
Methyl chloride	74-87-3	0.02%	6.24E-07		
Isopropylbenzene	98-82-8	0.11%	4.57E-06		
Ethylbenzene	100-41-4	0.28%	1.16E-05		
Formaldehyde	50-00-0	0.03%	3.66E-06		
N-Hexane	110-54-3	0.15%	6.24E-06		
2,2,4-Trimethylpentane	540-84-1	0.00%	7.49E-08		
Dichloromethane	75-09-2	0	0.00E+00		
Tert-butyl methyl ether	1634-04-4	0	0.00E+00		
Styrene	100-42-5	0.01%	3.04E-07		
Perchloroethylene	127-18-4	0.01%	3.20E-07		
Toluene	108-88-3	0.21%	8.73E-06		
1,1,1-Trichloroethane	71-55-6	0	0.00E+00		
Trichloroethylene	79-01-6	0	0.00E+00		
Trichlorofluoromethane	75-69-4	0.00%	5.41E-08		
Isomers of xylene	1330-20-7	0.41%	1.71E-05		
p-Xylene	95-47-6	0.08%	3.33E-06		

0.037664

Table 5.3 - Proposed Silo Filling NSR Regulated Pollutant Estimated Emissions

Air Permit to Install Application
 Alcoa Materials, Commerce Park, Michigan
 Maximum Short Term Production tons (MMt/yr) 500
 Daily Average Production tons (MMt/yr) 500
 Annual Production Limit tons (MMt/yr) 676,242
 Temperature F 325
 Ambient Visibility Factor 0.5

NSR Regulated Pollutant	Emission Factor (See Notes)	Notes	Maximum Short Term Emissions (lb/yr)	Annual Emissions (Tpy)
CO	1.18E-01 lb/ton HMA	1	0.7	0.5
NO _x	5.85E-04 lb/ton HMA	1	0.4	0.3
PM ₁₀	8.40E-04 lb/ton HMA	1.2	0.4	0.4
PM _{2.5}	8.40E-04 lb/ton HMA	1.2	0.4	0.4
SO ₂	1.22E-02 lb/ton HMA	1	7.3	5.3
VOC				

Emission factors are from AP-42 Table 11.1-14 for SEC, 3-02-02-04 for Truck Load-out Emissions
 *All emissions rates based on daily average production

Emission Calculation Method:

E_{ST} = Maximum Short Term HMA Production (ton HMA/yr) x EF
 E_A = E_{ST} x Ambient Production Limit (ton HMA/yr) / (2,000 lb/ton HMA)

E_{ST} = Short Term Emissions (lb/yr)
 E_A = Annual Emissions (Tpy)
 EF = Emission Factor (lb/ton HMA)

CO₂
 CO₂ = (lb/yr) x CO₂ (lb/yr) x 1 + CH₄ (lb/yr) x 25 + N₂O (lb/yr) x 298

FORMER AIRSOCI HOTEL REF. SOURCE QUALITY NUMREQ Granted REVIEWED Duponts Dupressen
 11.1 Calculated EPA 2008 E 0 0500.0 0

11.1 This factor EPA 2008 E 0 36861 0

Table 5.4 - Proposed Silo Filling TAC Emissions

Air Permit to Install Application
 Ajax Materials, Genesee Twp, Michigan

Maximum Short Term Production	tons HMA/hr	600
Annual Production Limit	tons HMA/yr	876,322
Organic PM	lb/ton	2.54E-04
TOC	lb/ton	1.22E-02

Toxic Air Contaminant	CAS No.	Emission Factor (See Notes)	Notes	Maximum Short Term Emissions (lb/hr)	Annual Emissions (tpy)	HAP?	
CAS No hydrogens							
83329	Acenaphthene	83-32-9	1.19E-06 lb/ton HMA	1	7.16E-04	5.23E-04	Yes
208968	Acenaphthylene	208-96-8	3.55E-08 lb/ton HMA	1	2.13E-05	1.56E-05	Yes
120127	Anthracene	120-12-7	3.30E-07 lb/ton HMA	1	1.98E-04	1.45E-04	Yes
56553	Benzo (a) anthracene	56-55-3	1.42E-07 lb/ton HMA	1	8.53E-05	6.23E-05	Yes
205992	Benzo (b) fluoranthene	205-99-2	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
207089	Benzo (k) fluoranthene	207-08-9	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
191242	Benzo (g,h,i) perylene	191-24-2	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
50328	Benzo (a) pyrene	50-32-8	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
192972	Benzo (e) pyrene	192-97-2	2.41E-08 lb/ton HMA	1	1.45E-05	1.06E-05	Yes
218019	Chrysene	218-01-9	5.33E-07 lb/ton HMA	1	3.20E-04	2.34E-04	Yes
53703	Dibenz(a,h) anthracene	53-70-3	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
206440	Fluoranthene	206-44-0	3.81E-07 lb/ton HMA	1	2.29E-04	1.67E-04	Yes
86737	Fluorene	86-73-7	2.56E-06 lb/ton HMA	1	1.54E-03	1.12E-03	Yes
193395	Indeno(1,2,3-cd)pyrene	193-39-5	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
91576	2-Methyl Naphthalene	91-57-6	1.34E-05 lb/ton HMA	1	8.03E-03	5.86E-03	Yes
91203	Naphthalene	91-20-3	4.62E-06 lb/ton HMA	1	2.77E-03	2.02E-03	Yes
198550	Perylene	198-55-0	7.62E-08 lb/ton HMA	1	4.57E-05	3.34E-05	Yes
85018	Phenanthrene	85-01-8	4.57E-06 lb/ton HMA	1	2.74E-03	2.06E-03	Yes
129000	Pyrene	129-00-0	1.12E-06 lb/ton HMA	1	6.70E-04	4.89E-04	Yes
108952	Phenol	108-95-2	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
67641	Acetone	67-64-1	6.70E-06 lb/ton HMA	1	4.02E-03	2.94E-03	No
74851	Ethylene	74-85-1	1.34E-04 lb/ton HMA	1	8.04E-02	5.87E-02	No
71432	Benzene	71-43-2	3.90E-06 lb/ton HMA	1	2.34E-03	1.71E-03	Yes
74839	Methyl bromide	74-83-9	5.97E-07 lb/ton HMA	1	3.58E-04	2.62E-04	Yes
78933	Methyl ethyl ketone	78-93-3	4.75E-06 lb/ton HMA	1	2.85E-03	2.08E-03	Yes
75150	Carbon sulfide	75-15-0	1.95E-06 lb/ton HMA	1	1.17E-03	8.54E-04	Yes
75003	Ethyl chloride	75-00-3	4.87E-07 lb/ton HMA	1	2.92E-04	2.14E-04	Yes
74873	Methyl chloride	74-87-3	2.80E-06 lb/ton HMA	1	1.68E-03	1.23E-03	Yes
98828	Isopropylbenzene	98-82-8	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
100414	Ethylbenzene	100-41-4	4.63E-06 lb/ton HMA	1	2.78E-03	2.03E-03	Yes
50000	Formaldehyde	50-00-0	8.41E-05 lb/ton HMA	1	5.05E-02	3.68E-02	Yes
110543	N-Hexane	110-54-3	1.22E-05 lb/ton HMA	1	7.31E-03	5.34E-03	Yes
540841	2,2,4-Trimethylpentane	540-84-1	3.78E-08 lb/ton HMA	1	2.27E-05	1.66E-05	Yes
75092	Dichloromethane	75-09-2	3.29E-08 lb/ton HMA	1	1.97E-05	1.44E-05	Yes
1634044	Tert-butyl methyl ether	1634-04-4	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
100425	Styrene	100-42-5	6.58E-07 lb/ton HMA	1	3.95E-04	2.88E-04	Yes
127184	Perchloroethylene	127-18-4	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
108883	Toluene	108-88-3	7.56E-06 lb/ton HMA	1	4.53E-03	3.31E-03	Yes
71556	1,1,1-Trichloroethane	71-55-6	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
79016	Trichloroethylene	79-01-6	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	Yes
75694	Trichlorofluoromethane	75-69-4	0.00E+00 lb/ton HMA	1	0.00E+00	0.00E+00	No
1330207	Isomers of xylene	1330-20-7	2.44E+05 lb/ton HMA	1	1.46E-02	1.07E-02	Yes
95476	o-Xylene	95-47-6	6.95E-06 lb/ton HMA	1	4.17E-03	3.04E-03	Yes

¹ Emission factors are from Web-fire for Truck Load-out (SCC 3-05-002-14)

Emission Calculation Methods

$$E_{ST} = \text{Maximum Short Term HMA Production (ton HMA/hr)} \times EF$$

$$E_A = E_{ST} \times \text{Annual Production Limit (ton HMA/yr)} / 2,000 \text{ lb/ton}$$

where:

E_{ST} = Short Term Emissions (lb/hr);

E_A = Annual Emissions (tpy);

EF = emission factor (lb/ton HMA)

Pollutant	CAS	Compound/Organic PMc or Compound/TOC	(lb/ton)	
Acenaphthene	83-32-9	0.47%	1.19E-06	
Acenaphthylene	208-96-8	0.01%	3.55E-08	
Anthracene	120-12-7	0.13%	3.30E-07	
Benzo (a) anthracene	56-55-3	0.06%	1.42E-07	
Benzo (b) fluoranthene	205-99-2	0.00%	0.00E+00	
Benzo (k) fluoranthene	207-08-9	0.00%	0.00E+00	
Benzo (g,h,i) perylene	191-24-2	0.00%	0.00E+00	
Benzo (a) pyrene	50-32-8	0.00%	0.00E+00	
Benzo (e) pyrene	192-97-2	0.01%	2.41E-08	
Chrysene	218-01-9	0.21%	5.33E-07	
Dibenz(a,h) anthracene	53-70-3	0.00%	0.00E+00	
Fluoranthene	206-44-0	0.15%	3.81E-07	
Fluorene	86-73-7	1.01%	2.56E-06	
Indeno(1,2,3-cd)pyrene	193-39-5	0.00%	0.00E+00	
2-Methyl Naphthalene	91-57-6	5.27%	1.34E-05	
Naphthalene	91-20-3	1.82%	4.62E-06	
Perylene	198-55-0	0.03%	7.62E-08	
Phenanthrene	85-01-8	1.80%	4.57E-06	
Pyrene	129-00-0	0.44%	1.12E-06	
Phenol	108-95-2	0.00%	0.00E+00	
Acetone	67-64-1	0.06%	6.70E-06	
Ethylene	74-85-1	1.10%	1.34E-04	
Benzene	71-43-2	0.03%	3.90E-06	
Methyl bromide	74-83-9	0.00%	5.97E-07	
Methyl ethyl ketone	78-93-3	0.04%	4.75E-06	
Carbon sulfide	75-15-0	0.02%	1.95E-06	
Ethyl chloride	75-00-3	0.00%	4.87E-07	
Methyl chloride	74-87-3	0.02%	2.80E-06	
Isopropylbenzene	98-82-8	0.00%	0.00E+00	
Ethylbenzene	100-41-4	0.04%	4.63E-06	
Formaldehyde	50-00-0	0.69%	8.41E-05	
N-Hexane	110-54-3	0.10%	1.22E-05	100-54-3
2,2,4-Trimethylpentane	540-84-1	0.00%	3.78E-08	
Dichloromethane	75-09-2	0.00%	3.29E-08	
Tert-butyl methyl ether	1634-04-4	0	0.00E+00	
Styrene	100-42-5	0.01%	6.58E-07	
Perchloroethylene	127-18-4	0.00%	0.00E+00	
Toluene	108-88-3	0.06%	7.56E-06	
1,1,1-Trichloroethane	71-55-6	0	0.00E+00	
Trichloroethylene	79-01-6	0	0.00E+00	
Trichlorofluoromethane	75-69-4	0.00%	0.00E+00	
Isomers of xylene	1330-20-7	0.20%	2.44E-05	
o-Xylene	95-47-6	0.06%	6.95E-06	

0.080607

Table 5.5b - Proposed Yard Haul Road NSR Regulated Pollutant Estimated Emissions - Front End Loader in Storage Yard(Revised June 2021)

Air Permit to Install Application
 Ajax Materials, Genesee Twp, Michigan

Daily Average Production	tons HMA/hr	500
Annual Production Limit	tons HMA/yr	876,322
Control ⁷ (Approved Fugitive Dust Control Plan)		90%
Distance to Piles (average)	feet	525
Vehicle Type	Front End Loader	
Weight Loaded (ton)	Max Payload	55.27
Weight Unloaded (ton)	CAT 988H	42.77
FEL Payload (ton)		12.5
Annual Vehicle Miles Traveled	VMT	597

Particle Size	k ² Particle Size Multiplier (lb/VMT)	s ³ Surface Material Silt Content (%)	a ² Constant	b ² Constant	W Average weight of vehicles (tons)	Particulate Emission ⁴ (lb/VMT)	p ⁵ Number of Wet Days in average period	Particulate Emission ⁶ (lb/VMT)	Fugitive Dust Control Program additional control ⁷ (%)	Vehicle Miles Traveled (annual) ⁸	Emissions (ton/yr)
PM30	4.90	3.9	0.7	0.45	49.0	7.84	120	5.26	90%	597	0.16
PM10	1.50	3.9	0.9	0.45	49.0	1.92	120	1.29	90%	597	0.04
PM2.5	0.15	3.9	0.9	0.45	49.0	0.19	120	0.13	90%	597	0.00

Short Term Emissions for Modeling - Max lb/hr

Trips per hour	VMT per hour (round trip)	Particulate Emissions lb/hr
1.00	1.99E-01	0.10
1.00	1.99E-01	0.03
1.00	1.99E-01	0.00

- 1 - Emission estimation from Ap-42 Chapter 13.2.2 Unpaved Roads (November 2006)
- 2 - AP-42 Table 13.2.2-2
- 3 - Information updated from the MS Excel spreadsheet containing a list of Surface Material Silt Content by State in the related information for AP-42 Section 13.2.2
- 4 - Predictive Emission Factor Equation AP-42 Chapter 13.2.2 Equation 1a - $E = k \times (s/12)^3 \times (W/3)^b$
- 5 - AP-42 Figure 13.2.2-1 (averaging period 365 days)
- 6 - Predictive Emission Factor Equation AP-42 Chapter 13.2.2 Equation 2 - $E_{ext} = E \times [(365 - P)/365]$
- 7 - Fugitive Dust control, which may include dust suppressants, will be applied to unpaved roads as needed.
- 8 - Vehicle miles traveled estimated as Distance/trip X 2 trips / 5280 feet X 3000 trips per year

Table 5.5c - Proposed Yard Haul Road NSR Regulated Pollutant Estimated Emissions - Aggregate Truck in Storage Yard (Revised June 2021)
 Air Permit to Install Application
 Aiax Materials, Genesee Twp, Michigan

Daily Average	
Maximum Short Term Production	tons HMA/hr 500
Annual Production Limit	tons HMA/yr 276,211
Control ¹ (Approved Fugitive Dust Control Plan)	50%
Distance to Yard	feet 500
Vehicle Type	Aggregate Trucks
Weight Loaded (ton)	Max Payload 73.50
Weight Unloaded (ton)	23.50
Truck Payload (ton)	50
Annual Vehicle Miles Traveled	VMT 588

Particle Size	k ² Particle Size Multiplier (lb/VMT)	s ² Surface Material Silt Content (%)	s ² Constant	W ² Constant	W Average weight of vehicles (tons)	Particulate Emission ⁶ (lb/VMT)	p ⁷ Number of Wet Days in average period	Particulate Emission ⁶ (lb/VMT)	Fugitive Dust Control Program additional control ⁸ (%)	Vehicle Miles Traveled (annual) ⁹	Emissions (ton/yr)
PM10	4.90	3.9	0.7	0.45	48.5	7.81	120	5.24	90%	568	0.15
PM10	1.50	3.9	0.9	0.45	48.5	1.91	120	1.28	90%	568	0.04
PM2.5	0.15	3.9	0.9	0.45	48.5	0.15	120	0.13	90%	568	0.00

Short Term Emissions for Modeling - Max lb/hr

Trip per hour	VMT per hour (round trip)	Particulate Emissions (lb/hr)
1.00	0.19	0.10
1.00	0.19	0.02
1.00	0.19	0.00

- 1 - Emission estimation from AP-42 Chapter 13.2.2 Unpaved Roads (November 2006)
- 2 - AP-42 Table 13.2.2.2
- 3 - Information updated from the MS Excel spreadsheet containing a list of Surface Material Silt Content by State in the related information for AP-42 Section 13.2.2
- 4 - Predictive Emission Factor Equation AP-42 Chapter 13.2.2 Equation 1a - $E = k \cdot X \cdot (W/A)^3$
- 5 - AP-42 Figure 13.2.2-1 (averaging period 365 days)
- 6 - Predictive Emission Factor Equation AP-42 Chapter 13.2.2 Equation 2 - $E_{wet} = E \cdot X \cdot [0.65 - P/365]$
- 7 - Fugitive Dust control, which may include dust suppressants, will be applied to unpaved roads as needed.
- 8 - Vehicle miles traveled estimated as Distance/trip X 2 trips / 5280 feet X 3000 trips per year

- PTY 0001
- PTY 0002
- PTY 0003
- PTY 0004
- PTY 0005
- PTY 0006
- PTY 0007
- PTY 0008
- PTY 0009
- PTY 0010
- PTY 0011
- PTY 0012
- PTY 0013
- PTY 0014
- PTY 0015
- PTY 0016

Table 13.2.2.2. CONSTANTS FOR EQUATIONS 1a AND 1b

Constant	Industrial Roads (Equation 1a)			Public Roads (Equation 1b)		
	PM _{2.5}	PM ₁₀	PM ₁₀ ^{30*}	PM _{2.5}	PM ₁₀	PM ₁₀ ^{30*}
k (lb/VMT)	0.15	1.5	4.9	0.15	1.5	4.9
a	0.9	0.9	0.7	1	1	1
b	0.81	0.45	0.45	-	-	-
c	-	-	-	0.2	0.2	0.3
d	-	-	-	0.5	0.5	0.5

*Quality Rating: B B B B B B B
 - = not used in the emission factor equation

https://www.trkattachments.com/specs/wheelloader.php?title=Caterpillar_988H_Wheel_Loader

TRK EXCAVATOR ATTACHMENTS

CATERPILLAR 988H WHEEL LOADER

DIMENSIONS

- A: Length with Bucket: 40.1 ft in (12215 mm)
- B: Width Over Tires: 11.8 ft in (3579 mm)
- C: Wheelbase: 14.8 ft in (4550 mm)
- D: Height to Top of Cab: 13.4 ft in (4128 mm)
- E: Ground Clearance: 1.7 ft in (549 mm)
- F: Hinge Pin - Max Height: 19.2 ft in (5853 mm)
- G: Dump Clearance: 11.3 ft in (3466 mm)
- H: Reach at Max Lift: 6.7 ft in (2028 mm)



Figure 13.2.2.1 Mean number of days with 0.01 inches or more of precipitation in United States

Table 5.5d - Proposed Paved Road NSR Regulated Pollutant Estimated Emissions (Revised June 2021)

Air Permit to Install Application
 Ajax Materials, Genesee Twp, Michigan

Daily Average Production	tons HMA/yr	500
Annual Production Limit	tons HMA/yr	876,322
Control ⁷ (Approved Fugitive Dust Control Plan)		90%
Vehicle Type	Asphalt Trucks	
Average Weight Loaded (ton)		49.07
Average Weight Unloaded (ton)		19.55
FEL Payload (ton)		29.52
Distance traveled unloaded	feet	925
Annual Vehicle Miles Traveled Unloaded	VMT	5,201
Distance traveled Loaded	feet	200
Annual Vehicle Miles Traveled Loaded	VMT	1,124
Vehicle Type	Aggregate Trucks	
Average Weight Loaded (ton)		73.50
Average Weight Unloaded (ton)		23.50
FEL Payload (ton)		50
Distance traveled one way - south route	feet	1,050
Annual Vehicle Miles Traveled Unloaded	VMT	6,971

Emission Factor Development

Particle Size	k ² Particle Size Multiplier (lb/VMT)	sL3 Road Surface Silt Loading (g/m ²)	W Average weight of vehicles (tons)	Particulate Emission ⁴ (lb/VMT)	Use for long term				
					p ⁵ Number of Wet Days in average period	N Averaging period (days)	Particulate Emission ⁶ (lb/VMT)	Vehicle Miles Traveled (annual)	Emissions (ton/yr)
Empty Trucks									
PM30	0.011	2.4	19.5	0.51	120	365	0.46	5,201	0.12
PM10	0.0022	2.4	19.5	0.10	120	365	0.09	5,201	0.02
PM2.5	0.00054	2.4	19.5	0.02	120	365	0.02	5,201	0.01
Loaded Trucks									
PM30	0.011	2.4	49.1	1.29	120	365	1.19	1,124	0.07
PM10	0.0022	2.4	49.1	0.26	120	365	0.24	1,124	0.01
PM2.5	0.00054	2.4	49.1	0.06	120	365	0.06	1,124	0.00

Aggregate Trucks - South Route									
PM30	0.011	2.4	48.5	1.28	120	365	1.17	6,971	0.41
PM10	0.0022	2.4	48.5	0.26	120	365	0.23	6,971	0.08
PM2.5	0.00054	2.4	48.5	0.06	120	365	0.06	6,971	0.02
PM Total									0.60
PM10 Total									0.12
PM2.5 Total									0.03

1 - Emission estimation from Ap-42 Chapter 13.2.1 Paved Roads (January 2011)

2 - AP-42 Table 13.2.1-1

3 - AP-42 Table 13.2.1-2 - peak Ubiquitous Silt Loading Default Values

4 - Predictive Emission Factor Equation AP-42 Chapter 13.2.1 Equation 1 - $E = k \times (sL)^{0.91} \times (W)^{1.02}$

5 - AP-42 Figure 13.2.1-2 (averaging period 365 days)

6 - Daily average Predictive Emission Factor Equation AP-42 Chapter 13.2.1 Equation 2 - $E = [k \times (sL)^{0.91} \times (W)^{1.02}] \times (1-P/4N)$

Table 5.6a -Proposed Yard Emissions - Load in/Load Out (Revised June 2021)

Air Permit to Install Application
 Ajax Materials, Genesee Twp, Michigan

Maximum Short Term Production	Daily Average tons HMA/hr	500
Annual Production Limit	tons HMA/yr	876,322
Control (Approved Fugitive Dust Control Plan)		80%

Emissions	Emissions (lb/ton)	% Control	Total (tpy)	Short term Emissions (lb/day)	Short term (lb/hr)	Emissions (g/s)
PM	1.60E-05		0.01	0.19	0.01	0.001008
PM ₁₀	1.60E-05		0.01	0.19	0.01	0.001008
PM _{2.5}	1.60E-05		0.01	0.19	0.01	0.001008

Table 11.19.2-2 (English Units). Emission Factors For Crushed Stone Processing Operations (lb/Ton) Truck unloading stone to pile Control efficiency of 80% for an approved fugitive dust control plan - per MDEQ HMA Fact sheet. The Control Efficiency of 0% indicated in the table was conservative for use in modeling.

Table 5.6a -Proposed Yard Emissions - Wind Emissions from Continuously Active Piles (Revised June 2021)

Air Permit to Install Application
 Ajax Materials, Genesee Twp, Michigan

Maximum Short Term Production	Daily Average tons HMA/hr	500
Annual Production Limit	tons HMA/yr	876,322
Control (Approved Fugitive Dust Control Plan) ²		
Acres of Active Storage Piles	acres	5

Emissions	% of total	s ³	p	f	Emissions (lb/day/acre)	% Control	Total ¹ (tpy)	Short term (lb/hr)	Emissions (g/s)
PM	100%	4.4	120	25.21	8.74	0%	7.97		
PM ₁₀	31%	4.4	120	29.00	3.08	0%	2.81	2.21	0.278510638
PM _{2.5}	3%	4.4	120	29.00	0.31	0%	0.28	0.22	0.027851064

1 - Emissions conservatively calculated based on Control of Open Fugitive Dust Sources. AP-42 Section 13.2.5 Industrial Wind Erosion methodology indicates a maximum potential emissions of 1,315 pounds per year, not taking into account control, snow, rain and frozen conditions.

2 - Control efficiency of 80% for an approved fugitive dust control plan - per MDEQ HMA Fact sheet. The Control Efficiency of 0% indicated in the table was conservative for use in modeling.

3 - Silt content represents a worst case used for short term dispersion modeling. Maximum silt content of materials proposed for use at Ajax is 4%. This silt content represents less 5% of annual usage. An additional 10% safety factor has been applied. Actual weighted silt content is only 1.9%.

Emissions only occur when wind speeds exceed 12 mph.

PM emissions can be calculated from continuously active storage piles using the methodology outlined in "Control of Open Fugitive Dust Sources" Equation 4-9:

$$E = 1.7 \times (s/1.5) \times ((365-p)/235) \times (f/15)$$

E = Emissions TSP or PM in (lb/day/acre)

s = silt content (AP-42 Table 13.2.2-1 for sand and gravel yard)

p = number of days with > 0.01 inches precipitation per year from AP-42 Figure 13.2.2-2 (averaging period 365 days)

f = percentage of time that the unobstructed wind speed exceeds 5.14 m/s, 11.5 mph (using Flint Airport data for 2019), 2,540 hours in 2019

PM percent of total:

From AP-42 13.2.2-2 the Particulate constants were used to determine PM10 and PM2.5 percent of total PM as follows

	PM	PM10	PM2.5
k	4.9	1.5	0.15
% of PM	100%	31%	3%

Table 5.5a - Proposed Yard Haul Road NSR Regulated Pollutant Estimated Emissions - Front End Loader to Piles (Revised May 2021)

Air Permit to Install Application
 Ajax Materials, Genesee Twp, Michigan

Daily Average Production	tons HMA/yr	500
Annual Production Limit	tons HMA/yr	876,322
Control ¹ (Approved Fugitive Dust Control Plan)		90%
Distance to Piles (average)	feet	100
Vehicle Type	Front End Loader	
Weight Loaded (ton)	Max Payload	55.27
Weight Unloaded (ton)	CAT 988H	42.77
FEL Payload (ton)		12.5
Annual Vehicle Miles Traveled	VMT	2,656

Particle Size	k ² Particle Size Multiplier (lb/VMT)	s ³ Surface Material Silt Content (%)	a ² Constant	b ² Constant	W Average weight of vehicles (tons)	Particulate Emission ⁴ (lb/VMT)	p ⁵ Number of Wet Days in average period	Particulate Emission ⁶ (lb/VMT)	Fugitive Dust Control Program additional control ⁷ (%)	Vehicle Miles Traveled (annual) ⁸	Emissions (ton/yr)
PM30	4.90	3.9	0.7	0.45	49.0	7.84	120	5.26	90%	2,656	0.70
PM10	1.50	3.9	0.9	0.45	49.0	1.92	120	1.29	90%	2,656	0.17
PM2.5	0.15	3.9	0.9	0.45	49.0	0.19	120	0.13	90%	2,656	0.02

- 1 - Emission estimation from AP-42 Chapter 13.2.2 Unpaved Roads (November 2006)
- 2 - AP-42 Table 13.2.2-2
- 3 - Information updated from the MS Excel spreadsheet containing a list of Surface Material Silt Content by State in the related information for AP-42 Section 13.2.2
- 4 - Predictive Emission Factor Equation AP-42 Chapter 13.2.2 Equation 1a - $E = k \times (s/12)^3 \times (W/3)^3$
- 5 - AP-42 Figure 13.2.2-1 (averaging period 365 days)
- 6 - Predictive Emission Factor Equation AP-42 Chapter 13.2.2 Equation 2 - $E_{ext} = E \times [(365 - P)/365]$
- 7 - Fugitive Dust control, which may include dust suppressants, will be applied to unpaved roads as needed.
- 8 - Vehicle miles traveled estimated as Annual HMA / Payload X Distance/trip X 2 trips / 5280 feet

Short Term Emissions for Modeling - Max lb/hr

Trips per hour	VMT per hour (round trip)	Particulate Emissions w/o rain days lb/hr	Number of Sources	Particulate Emissions days lb/hr/source	Particulate Emissions g/s/source
40.00	1.52	0.80	55	0.0145	1.83E-03
40.00	1.52	0.20	55	0.0035	4.47E-04
40.00	1.52	0.02	55	0.0004	4.47E-05

202 FEL_0052	4.4565	3.2343
203 FEL_0053	4.4565	3.2343
204 FEL_0054	4.4565	3.2343
205 FEL_0055	4.4565	3.2343

Table 12.1 - Maximum Hourly Emission Rates

0
0

Toxic Air Contaminant	CAS No.	HMA Dryer (lb/hr)	Silo Heater (lb/hr)	Silo Load Out (lb/hr)	AC Tank (lb/hr)	Silo Filling (lb/hr)	Total (lb/hr)
Ethylbenzene	100-41-4	0.60	-	0.01	0.01	0.00	0.62
Benzaldehyde	100-52-7	0.13	-	-	-	-	0.13
Quinone	106-51-4	0.21	-	-	-	-	0.21
n-Butane	106-97-8	0.80	-	-	-	-	0.80
Acrolein	107-02-8	0.60	-	-	-	-	0.60
Toluene	108-88-3	3.60	0.00	0.01	0.01	0.00	3.62
N-Pentane	109-66-0	0.25	-	-	-	-	0.25
1-Pentene	109-67-1	2.64	-	-	-	-	2.64
N-Hexane	110-54-3	1.21	0.00	0.00	0.00	0.01	1.23
Valeraldehyde	110-62-3	0.08	-	-	-	-	0.08
Anthracene	120-12-7	0.00	0.00	0.00	0.00	0.00	4.6E-03
Propionaldehyde	123-38-6	0.17	-	-	-	-	0.17
Butyraldehyde	123-72-8	0.19	-	-	-	-	0.19
Pyrene	129-00-0	0.00	0.00	0.00	0.00	0.00	5.2E-03
Isomers of xylene	1330-20-7	0.60	-	0.01	0.01	0.01	0.64
Heptane	142-82-5	11.28	-	-	-	-	11.28
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746-01-6	0.00	-	-	-	-	2.8E-10
Chromium (VI)	7440-47-3	0.00	0.00	-	-	-	1.8E-03
Benzo (g,h,i) perylene	191-24-2	0.00	0.00	0.00	0.00	-	6.1E-05
Benzo (e) pyrene	192-97-2	0.00	-	0.00	0.00	0.00	1.9E-04
Indeno(1,2,3-cd)pyrene	193-39-5	0.00	0.00	0.00	0.00	-	1.1E-05
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	19408-74-3	0.00	-	-	-	-	1.3E-09
Perylene	198-55-0	0.00	-	0.00	0.00	0.00	1.5E-04
Benzo (b) fluoranthene	205-99-2	0.00	0.00	0.00	0.00	-	1.6E-04
Fluoranthene	206-44-0	0.00	0.00	0.00	0.00	0.00	1.2E-03
Benzo (k) fluoranthene	207-08-9	0.00	0.00	0.00	0.00	-	6.3E-05
Acenaphthylene	208-96-8	0.03	0.00	0.00	0.00	0.00	0.03
Chrysene	218-01-9	0.00	0.00	0.00	0.00	0.00	9.8E-04
Octachlorodibenzo-p-dioxins, total	3268-87-9	0.00	-	-	-	-	3.6E-06
Hexachlorodibenzo-p-dioxins, total	34465-46-8	0.00	-	-	-	-	7.1E-09
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	35822-46-9	0.00	-	-	-	-	4.5E-08
Octachlorodibenzofurans, total	39001-02-0	0.00	-	-	-	-	6.3E-09
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	39227-28-6	0.00	-	-	-	-	5.5E-10
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	40321-76-4	0.00	-	-	-	-	4.1E-10
2-Butenal	4170-30-3	0.10	-	-	-	-	0.10
Formaldehyde	50-00-0	6.00	0.00	0.00	0.00	0.05	6.05
Benzo (a) pyrene	50-32-8	0.00	0.00	0.00	0.00	-	2.2E-05
2,3,7,8-Tetrachlorodibenzofuran	51207-31-9	0.00	-	-	-	-	1.3E-09
2-Methyl-2-butene	513-35-9	0.70	-	-	-	-	0.70
2,2,4-Trimethylpentane	540-84-1	0.05	-	0.00	0.00	0.00	0.05
1,2,3,4,7,8,9-Heptachlorodibenzofuran	55673-89-7	0.00	-	-	-	-	3.6E-09
Benzo (a) anthracene	56-55-3	0.00	0.00	0.00	0.00	0.00	4.4E-04
2,3,4,7,8-Pentachlorodibenzofuran	57117-31-4	0.00	-	-	-	-	1.1E-09
1,2,3,7,8-Pentachlorodibenzofuran	57117-41-6	0.00	-	-	-	-	5.7E-09
1,2,3,6,7,8-Hexachlorodibenzofuran	57117-44-9	0.00	-	-	-	-	1.6E-09
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	57653-85-7	0.00	-	-	-	-	1.7E-09
Isovaleraldehyde	590-86-3	0.04	-	-	-	-	0.04
2,3,4,6,7,8-Hexachlorodibenzofuran	60851-34-5	0.00	-	-	-	-	2.1E-09
Hexanal	66-25-1	0.13	-	-	-	-	0.13
1,2,3,4,6,7,8-Heptachlorodibenzofuran	67562-39-4	0.00	-	-	-	-	1.5E-08
Acetone	67-64-1	1.00	-	0.00	0.00	0.00	1.00
1,2,3,4,7,8-Hexachlorodibenzofuran	70648-26-9	0.00	-	-	-	-	7.1E-09
Benzene	71-43-2	0.60	0.00	0.00	0.00	0.00	0.60

1,1,1-Trichloroethane	71-55-6	0.06	-	-	-	-	0.06
1,2,3,7,8,9-Hexachlorodibenzofuran	72918-21-9	0.00	-	-	-	-	1.1E-08
Manganese	7439-96-5	0.03	0.00	-	-	-	0.03
Mercury	7439-97-6	0.00	0.00	-	-	-	6.2E-04
Nickel	7440-02-0	0.06	0.00	-	-	-	0.06
Silver	7440-22-4	0.00	-	-	-	-	1.2E-03
Thallium	7440-28-0	0.01	-	-	-	-	5.3E-03
Antimony	7440-36-0	0.00	-	-	-	-	4.3E-04
Arsenic	7440-38-2	0.00	0.00	-	-	-	1.8E-03
Barium	7440-39-3	0.60	0.00	-	-	-	0.60
Beryllium	7440-41-7	-	0.00	-	-	-	2.4E-08
Cadmium	7440-43-9	0.00	0.00	-	-	-	6.0E-04
Chromium	7440-47-3	0.00	0.00	-	-	-	1.8E-03
Cobalt	7440-48-4	0.04	0.00	-	-	-	0.04
Copper	7440-50-8	0.41	0.00	-	-	-	0.41
Zinc	7440-66-6	0.43	0.00	-	-	-	0.43
Ethylene	74-85-1	8.40	-	0.02	0.02	0.08	8.52
Acetaldehyde	75-07-0	1.72	-	-	-	-	1.72
2-Methyl-1-pentene	763-29-1	4.80	-	-	-	-	4.80
Hydrogen chloride	7647-01-0	14.25	-	-	-	-	14.25
Phosphorus (yellow or white)	7723-14-0	2.88	-	-	-	-	2.88
Selenium	7782-49-2	0.01	0.00	-	-	-	5.8E-03
Methyl ethyl ketone	78-93-3	0.02	-	0.00	0.00	0.00	0.03
Acenaphthene	83-32-9	0.00	0.00	0.00	0.00	0.00	3.6E-03
Phenanthrene	85-01-8	0.03	0.00	0.00	0.00	0.00	0.04
Fluorene	86-73-7	0.01	0.00	0.00	0.00	0.00	0.02
Naphthalene	91-20-3	0.60	0.00	0.00	0.00	0.00	0.61
2-Methyl Naphthalene	91-57-6	0.22	0.00	0.00	0.00	0.01	0.24
3-Methylpentane	96-14-0	0.25	-	-	-	-	0.25
H2SO4	7664-93-9	1.92	-	-	-	-	1.92
Dibenzo(a,h) anthracene	53-70-3	-	0.00	0.00	0.00	-	1.5E-06
3-Methylcholanthrene	56-49-5	-	0.00	-	-	-	3.5E-09
Dimethylbenz(a)anthracene	57-97-6	-	0.00	-	-	-	3.1E-08
Molybdenum	7439-98-7	-	0.00	-	-	-	2.2E-06
Vanadium	7440-62-2	-	0.00	-	-	-	4.5E-06
Ammonia	7664-41-7	-	0.01	-	-	-	6.3E-03
Dichlorobenzene, mixed isomers	25321-22-6	-	0.00	-	-	-	2.4E-06

Notes:

No control is being accounted for due to silo load out enclosures or AC tank condenser

AC tank emissions equal to Silo Filling per AP-42 Table 11.1-15.

Model Results Table

	1 hr	8 hr	24 hr	annual
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Material ID	Usage	Silt Content
1	30.0%	1.7%
2	15.0%	3.7%
3	15.0%	1.5%
4	10.0%	1.0%
5	10.0%	1.1%
6	5.0%	1.2%
7	5.0%	4.0%
8	5.0%	1.0%
9	5.0%	1.0%
Weighted Average		1.9%
Maximum		4.0%
Maximum w/Safety Factor		4.4%

Table 12.2 - Predicted Ambient Impacts

0
0

Toxic Air Contaminant	CAS No.	Emissions (lb/hr)	Model Results (µg/m³)/(lb/hr)	PAI (µg/m³)	Screening Level (µg/m³)	Averaging Period (µg/m³)	Basis	Percent of Screening Level	Pass/Fail	FootNote
Ethylbenzene	100-41-4	0.62	0.231	1.42E-01	1000	24 hr	ITSL	0.0%	PASS	-
			0.018	1.10E-02	0.4	annual	IRSL	2.7%	PASS	
Benzaldehyde	100-52-7	0.13	0.018	2.35E-03	0.4	annual	IRSL	0.6%	PASS	-
Quinone	106-51-4	0.21	0.468	9.89E-02	4.4	8 hr	ITSL	2.2%	PASS	-
n-Butane	106-97-8	0.80	0.468	3.77E-01	23800	8 hr	ITSL	0.0%	PASS	22
Acrolein	107-02-8	0.60	0.018	1.07E-02	0.16	annual	ITSL	6.7%	PASS	13
			0.728	4.37E-01	5	1 hr	2nd ITSL	8.7%	PASS	
Toluene	108-88-3	3.62	0.231	8.34E-01	5000	24 hr	ITSL	0.0%	PASS	-
N-Pentane	109-66-0	0.25	0.468	1.18E-01	17700	8 hr	ITSL	0.0%	PASS	-
N-Hexane	110-54-3	1.23	0.018	2.20E-02	700	annual	ITSL	0.0%	PASS	-
Valeraldehyde	110-62-3	0.08	0.468	3.77E-02	1760	8 hr	ITSL	0.0%	PASS	-
Anthracene	120-12-7	4.6E-03	0.018	8.16E-05	1000	annual	ITSL	0.0%	PASS	-
Propionaldehyde	123-38-6	0.17	0.018	3.06E-03	8	annual	ITSL	0.0%	PASS	-
Butyraldehyde	123-72-8	0.19	0.018	3.42E-03	7	annual	ITSL	0.0%	PASS	-
Pyrene	129-00-0	5.2E-03	0.018	9.34E-05	100	annual	ITSL	0.0%	PASS	-
Isomers of xylene	1330-20-7	0.64	0.018	1.13E-02	390	annual	ITSL	0.0%	PASS	2
Heptane	142-82-5	11.28	0.468	5.28E+00	3500	8 hr	ITSL	0.2%	PASS	-
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746-01-6	2.8E-10	0.018	4.94E-12	0.000002	annual	ITSL	0.0%	PASS	33, D
			0.018	4.94E-12	0.00000023	annual	IRSL	0.0%	PASS	
Chromium (VI)	18540-29-9	1.8E-03	0.018	3.21E-05	0.1	annual	ITSL	0.0%	PASS	-
			0.018	3.21E-05	0.000083	annual	IRSL	38.7%	PASS	
Benzo (g,h,i) perylene	191-24-2	6.1E-05	0.018	1.08E-06	13	annual	ITSL	0.0%	PASS	-
Benzo (e) pyrene	192-97-2	1.9E-04	0.231	4.42E-05	0.002	24 hr	ITSL	2.2%		A
Perylene	198-55-0	1.5E-04	0.018	2.63E-06	13	annual	ITSL	0.0%	PASS	B
Fluoranthene	206-44-0	1.2E-03	0.018	2.21E-05	140	annual	ITSL	0.0%	PASS	-
Acenaphthylene	208-96-8	0.03	0.018	5.20E-04	35	annual	ITSL	0.0%	PASS	-
2-Butenal	4170-30-3	0.10	0.728	7.51E-02	9	1 hr	ITSL	0.8%	PASS	-
Formaldehyde	50-00-0	6.05	0.231	1.40E+00	30	24 hr	ITSL	4.7%	PASS	E
		1.01	0.018	1.80E-02	0.08	annual	IRSL	22.5%	PASS	
Benzo (a) pyrene	50-32-8	2.2E-05	0.231	5.15E-06	0.002	24 hr	ITSL	0.3%	PASS	5
			0.018	3.98E-07	0.001	annual	IRSL	0.0%	PASS	
2-Methyl-2-butene	513-35-9	0.70	0.018	1.24E-02	106	annual	ITSL	0.0%	PASS	-
2,2,4-Trimethylpentane	540-84-1	0.05	0.468	2.48E-02	3500	8 hr	ITSL	0.0%	PASS	1
Isovaleraldehyde	590-86-3	0.04	0.018	6.84E-04	800	annual	ITSL	0.0%	PASS	-
Hexanal	66-25-1	0.13	0.018	2.35E-03	2	annual	ITSL	0.1%	PASS	-
Acetone	67-64-1	1.00	0.468	4.69E-01	5900	8 hr	ITSL	0.0%	PASS	-
Benzene	71-43-2	0.60	0.018	1.08E-02	30	annual	ITSL	0.0%	PASS	-
			0.231	1.39E-01	30	24 hr	2nd ITSL	0.5%	PASS	
			0.018	1.08E-02	0.1	annual	IRSL	10.8%	PASS	
1,1,1-Trichloroethane	71-55-6	0.06	0.231	1.46E-02	6000	24 hr	ITSL	0.0%	PASS	-
Manganese	7439-96-5	0.03	0.018	5.35E-04	0.3	annual	ITSL	0.2%	PASS	29
Mercury	7439-97-6	6.2E-04	0.018	1.11E-05	0.3	annual	ITSL	0.0%	PASS	7

Add Rows

Add Row

Add Row

Add Row

Add Row

50-32-8
191242

Add Row

Annual avg

Add Row

Add Row

ADD TWO ROWS

Add Row

Mercury	7439-97-0	0.2E-04	0.231	1.44E-04	1	24 hr	2nd ITSL	0.0%	PASS	-
Nickel	7440-02-0	0.06	0.018	1.07E-03	0.006	annual	IRSL	17.8%	PASS	-
Silver	7440-22-4	1.2E-03	0.468	5.40E-04	0.1	8 hr	ITSL	0.5%	PASS	-
Thallium	7440-28-0	5.3E-03	0.018	9.41E-05	0.1	annual	ITSL	0.1%	PASS	-
			0.468	2.47E-03	0.2	8 hr	2nd ITSL	1.2%	PASS	-
Antimony	7440-36-0	4.3E-04	0.018	7.70E-06	0.2	annual	ITSL	0.0%	PASS	-
Arsenic	7440-38-2	1.8E-03	0.018	3.21E-05	0.0002	annual	IRSL	16.0%	PASS	-
Barium	7440-39-3	0.60	0.468	2.81E-01	5	8 hr	ITSL	5.6%	PASS	35
Beryllium	7440-41-7	2.4E-08	0.231	5.43E-09	0.02	24 hr	ITSL	0.0%	PASS	-
			0.018	4.19E-10	0.0004	annual	IRSL	0.0%	PASS	-
Cadmium	7440-43-9	6.0E-04	0.018	1.07E-05	0.0006	annual	IRSL	1.8%	PASS	-
Chromium	7440-47-3	1.8E-03	0.018	3.21E-05	0.5	annual	ITSL	0.0%	PASS	-
Cobalt	7440-48-4	0.04	0.468	1.69E-02	0.2	8 hr	ITSL	8.4%	PASS	-
		6.0E-03	0.018	1.07E-04	0.00013	annual	IRSL	82.3%	PASS	42
Copper	7440-50-8	0.41	0.468	1.91E-01	2	8 hr	ITSL	9.6%	PASS	-
Zinc	7440-66-6	0.43	0.468	2.02E-01	20	8 hr	ITSL	1.0%	PASS	C
Ethylene	74-85-1	8.52	0.018	1.52E-01	6240	annual	ITSL	0.0%	PASS	-
Acetaldehyde	75-07-0	1.72	0.018	3.06E-02	9	annual	ITSL	0.3%	PASS	-
			0.018	3.06E-02	0.5	annual	IRSL	6.1%	PASS	-
Hydrogen chloride	7647-01-0	14.25	0.018	2.54E-01	20	annual	ITSL	1.3%	PASS	-
			0.728	1.04E+01	2100	1 hr	2nd ITSL	0.5%	PASS	13
Phosphorus (yellow or white)	7723-14-0	2.88	0.231	6.64E-01	20	24 hr	ITSL	3.3%	PASS	32
Selenium	7782-49-2	5.8E-03	0.468	2.70E-03	2	8 hr	ITSL	0.1%	PASS	34
Methyl ethyl ketone	78-93-3	0.03	0.231	6.76E-03	5000	24 hr	ITSL	0.0%	PASS	-
Acenaphthene	83-32-9	3.6E-03	0.018	6.46E-05	210	annual	ITSL	0.0%	PASS	-
Phenanthrene	85-01-8	0.04	0.018	6.49E-04	0.1	annual	ITSL	0.6%	PASS	-
Fluorene	86-73-7	0.02	0.018	3.42E-04	140	annual	ITSL	0.0%	PASS	-
Naphthalene	91-20-3	0.61	0.018	1.08E-02	3	annual	ITSL	0.4%	PASS	-
			0.468	2.85E-01	520	8 hr	2nd ITSL	0.1%	PASS	-
			0.018	1.08E-02	0.08	annual	IRSL	13.5%	PASS	-
2-Methyl Naphthalene	91-57-6	0.24	0.018	4.32E-03	10	annual	ITSL	0.0%	PASS	-
3-Methylpentane	96-14-0	0.25	0.468	1.17E-01	3500	8 hr	ITSL	0.0%	PASS	-
H2SO4	7664-93-9	1.92	0.018	3.42E-02	1	annual	ITSL	3.4%	PASS	9,13
			0.728	1.40E+00	120	1 hr	2nd ITSL	1.2%	PASS	-
Molybdenum	7439-98-7	2.2E-06	0.468	1.01E-06	30	8 hr	ITSL	0.0%	PASS	-
Vanadium	1314-62-1	4.5E-06	0.728	3.28E-06	0.5	1 hr	ITSL	0.0%	PASS	-
Ammonia	7664-41-7	6.3E-03	0.728	4.57E-03	350	1 hr	ITSL	0.0%	PASS	39
Dichlorobenzene, mixed isomers	25321-22-6	2.4E-06								
1,2-dichlorobenzene	95-50-1	2.4E-06	0.018	4.19E-08	300	annual	ITSL	0.0%	PASS	-
1,4-dichlorobenzene	106-46-7	2.4E-06	0.018	4.19E-08	800	annual	ITSL	0.0%	PASS	-
			0.018	4.19E-08	0.25	annual	IRSL	0.0%	PASS	-
1,3-dichlorobenzene	541-73-1	2.4E-06	0.018	4.19E-08	3	annual	ITSL	0.0%	PASS	-

1308141

Annual avg

1314132

Add Row

Add Row

Add Row

Add Row

Add Row

ADD TWO ROWS

Add Row

Add Row

Polynuclear Aromatic Compounds with a Footnote of 5										PEF	
benzo(a)pyrene	50-32-8	2.23E-05	0.23	5.15E-06	0.002	24 hr	ITSL	0.3%	PASS	5	1
dibenz(a,h)anthracene	53-70-3	1.52E-06								5	1.1
3-methylcholanthrene	56-49-5	3.53E-09								5	5.7
benz(a)anthracene	56-55-3	4.40E-04								5	0.1
7,12-dimethylbenz(a)anthracene	57-97-6	3.14E-08								5	65
dibenzo(a,i)pyrene	189-55-9	-								5	10
dibenzo(a,h)pyrene	189-64-0	-								5	10
dibenzo(a,l)pyrene	191-30-0	-								5	10
dibenzo(a,e)pyrene	192-65-4	-								5	1
Indeno(1,2,3-cd)pyrene	193-39-5	1.12E-05								5	0.1
benzo(j)fluoranthene	205-82-3	-								5	0.1
Benzo(b)fluoranthene	205-99-2	1.63E-04								5	0.1
Benzo(k)fluoranthene	207-08-9	6.31E-05								5	0.1
chrysene	218-01-9	9.79E-04								5	0.01
5-methylchrysene	3697-24-3	-								5	1
PAH TOTAL	50-32-8	0.00	0.23	2.39E-05	0.002	24 hr	ITSL	1.2%	PASS	5	
			0.02	1.85E-06	0.001	annual	IRSL	0.2%	PASS		

Add Row

Add Row

A-compared to SL for Benzo(a)pyrene, which is conservative as Benzo(e)pyrene is not carcinogenic

B-compared to SL for benzo(g,h,i)perylene

C-compared to SL for zinc oxide

D-sum of all dioxins and furans, including totals, which is conservative. Used annual average emission rate for annual SL.

E-Used annual average emission rate for annual SL.

EGLE Referenced Footnotes

1. The combined ambient impact of all petroleum hydrocarbon materials with Note #1 cannot exceed the ITSL of 3500 µg/m3 (8-hour average). If a chemical with this footnote has an ITSL other than 3,500 µg/m3, the ambient impact for that chemical also cannot exceed the chemical specific ITSL.

2. The combined ambient impact of all forms of xylene with Note #2 cannot exceed the initial threshold screening level (ITSL) of 390 µg/m3 (annual average).

5. The polycyclic aromatic hydrocarbons (PAHs) with this footnote are carcinogenic and have potency equivalency factors (PEFs) that quantitate their potency relative to that of benzo(a)pyrene (CAS# 50-32-8). Air emission mixtures of carcinogenic PAHs, including asphalt fumes, should be evaluated additively using these PEFs and the benzo(a)pyrene IRSL and SRSL. The ITSL for benzo(a)pyrene applies only to benzo(a)pyrene and none of the other PAHs.

7. Besides the assessment of mercury ambient air impacts in comparison to the ITSLs, larger individual sources of mercury emissions undergoing permit review (e.g., greater than 5 to 10 lbs/yr) may be evaluated on a case-by-case basis to

13. This chemical has two ITSLs with different averaging times. Ambient air impacts cannot exceed either ITSL. Both ITSLs also apply for determinations of permit to install exemptions under R 336.1290 (Rule 290).

22. The combined ambient impact of butane (CAS# 106-97-8) and isobutane (CAS# 75-28-5) should be evaluated together so that the combined impact does not exceed a hazard index value of one.

29. The ITSL for manganese is 0.3 µg/m3 with an annual averaging time. This ITSL is most appropriately applied to PM10-Mn or PM2.5-Mn data rather than TSP-Mn data. This ITSL applies to “manganese and manganese compounds,” therefore emissions of multiple forms of manganese must be accounted for additively to ensure that the combined ambient air impact does not exceed the manganese ITSL. This ITSL applies to ambient air impacts of the manganese atom, therefore the emissions and modeled impacts of various manganese compounds may be molecular weight-adjusted to the equivalent emission rate and ambient air impact of the manganese alone. Please note that potassium permanganate (CAS# 7722-64-7) also has a short-term ITSL = 0.6 µg/m3 (8 hour averaging time).

32. The Chemical Abstract Service number (CAS#) has been changed to 12185-10-3. Since the original number 7723-14-0, is still used by many organizations, it is listed as the primary CAS#.

33. With regards to the health-based screening levels for tetrachlorodibenzo(p)dioxin (CAS# 1746-01-6), Rule 336.1225(6)(a) states that all polychlorinated dibenzodioxins and dibenzofurans shall be considered as one toxic air contaminant, expressed as an equivalent concentration of 2,3,7,8-tetrachlorodibenzo(p)dioxin based on the relative potency of the isomers emitted from the emission unit or units. The current toxic equivalency factors (TEFs) for use are those recommended by the World Health Organization (WHO, 2005), as provided in: Van den Berg, M. et al., 2006. The 2005 World Health Organization Reevaluation of Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-Like Compounds. Toxicological Sciences 93(2): 223-241.

34. The combined ambient impact of all selenium and inorganic selenium compounds with the CAS# 7446-08-4, 7446-34-6, 7488-56-4, 7783-00-8, 10102-18-8, and 13410-01-0 cannot exceed 2 µg/m3 (8-hour averaging time).

35. The combined ambient impact of all barium and soluble barium compounds with the CAS# 543-80-6, 1304-28-5, 10022-31-8, 10361-37-2, 10553-31-8, 13477-00-4, 13718-50-8, 17194-00-2, and 21109-95-5 cannot exceed 5 µg/m3 (8-hour averaging time).

Model Results Table

	1 hr	8 hr	24 hr	annual
Model Results	0.72758	0.46838	0.23057	0.01782

AQD_footnote	AQD_ITSL	AQD_Averaging_Ti me	AQD_Seco ndary_ITSL	AQD_Secondary_ITS L_Averaging_Time	AQD_IRSL	AQD_SRSL	AQD_Carcinogenicit y_Averaging_Time
-	#N/A	1000 24 hr	#N/A	#N/A	#N/A	0.4	4 annual
-	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-	-	-	-	-	-	0.4	4 annual
22		4.4 8 hr	-	-	-	-	-
13		23800 8 hr	-	-	-	-	-
		0.16 annual	5 1 hr	-	-	-	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		5000 24 hr	-	-	-	-	-
-		17700 8 hr	-	-	-	-	-
-		700 annual	-	-	-	-	-
-		1760 8 hr	-	-	-	-	-
-		1000 annual	-	-	-	-	-
-		8 annual	-	-	-	-	-
-		7 annual	-	-	-	-	-
-		100 annual	-	-	-	-	-
2		390 annual	-	-	-	-	-
-		3500 8 hr	-	-	-	-	-
33		0.000002 annual	-	-	0.000000023	0.00000023	annual
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		0.1 annual	-	-	0.000083	0.00083	annual
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		13 annual	-	-	-	-	-
5		0.002 24 hr	-	-	0.001	0.01	annual
-		13 annual	-	-	-	-	-
-		140 annual	-	-	-	-	-
-		35 annual	-	-	-	-	-
-		9 1 hr	-	-	-	-	-
-		30 24 hr	-	-	0.08	0.8	annual
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
5		0.002 24 hr	-	-	0.001	0.01	annual
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		106 annual	-	-	-	-	-
1		3500 8 hr	-	-	-	-	-
-		800 annual	-	-	-	-	-
-		2 annual	-	-	-	-	-
-		5900 8 hr	-	-	-	-	-
-		30 annual	30 24 hr	-	0.1	1	annual
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		6000 24 hr	-	-	-	-	-
29		0.3 annual	-	-	-	-	-
7		0.3 annual	1 24 hr	-	-	-	-

		Initial QC
Use rows for follow-up changes and QCs		

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	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-	-	-	-	-	-	0.006	0.06 annual	-
-		0.1 8 hr	-	-	-	-	-	-
-		0.1 annual		0.2 8 hr	-	-	-	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		0.2 annual	-	-	-	-	-	-
-	-	-	-	-	-	0.0002	0.002 annual	-
35		5 8 hr	-	-	-	-	-	-
-		0.02 24 hr	-	-	-	0.0004	0.004 annual	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-	-	-	-	-	-	0.0006	0.006 annual	-
-		0.5 annual	-	-	-	-	-	-
42		0.2 8 hr	-	-	-	0.00013	0.0013 annual	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		2 8 hr	-	-	-	-	-	-
-		20 8 hr	-	-	-	-	-	-
-		6240 annual	-	-	-	-	-	-
-		9 annual	-	-	-	0.5	5 annual	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
13		20 annual		2100 1 hr	-	-	-	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
32		20 24 hr	-	-	-	-	-	-
34		2 8 hr	-	-	-	-	-	-
-		5000 24 hr	-	-	-	-	-	-
-		210 annual	-	-	-	-	-	-
-		0.1 annual	-	-	-	-	-	-
-		140 annual	-	-	-	-	-	-
-		3 annual		520 8 hr	-	0.08	0.8 annual	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		10 annual	-	-	-	-	-	-
-		3500 8 hr	-	-	-	-	-	-
9,13		1 annual		120 1 hr	-	-	-	-
-		30 8 hr	-	-	-	-	-	-
-		0.5 1 hr	-	-	-	-	-	-
39		350 1 hr	-	-	-	-	-	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		300 annual	-	-	-	-	-	-
-		800 annual	-	-	-	0.25	2.5 annual	-
	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
-		3 annual	-	-	-	-	-	-

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5		0.002 24 hr	-	-		0.001	0.01 annual
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	-
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	-
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	-
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	annual
5	-	-	-	-	-	-	annual
5		0.002 24 hr	-	-		0.001	0.01 annual
#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A

**AIR DISPERSION ANALYSIS SUMMARY
STRATEGY DEVELOPMENT UNIT, AIR QUALITY DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY**

Ajax Materials
Carpenter Road and Energy Drive , Genesee Charter Township
20210019 / P1771

To: Amber Brown , Permit Section
From: Stephanie Hengesbach , Strategy Development Unit

Completed On: 6/30/2021 **Rev:** -
Date Received: 4/16/2021

MODEL INFORMATION

MET STN Flint
UPPER: White Lake

Modelers Comments:

Updated Modeling:

ABBR: FNT19
ANEM HT: 10.06
MODEL: AERMOD
LAND: RURAL
DWASH: Yes
TERRAIN Yes

Modeling was redone to assume different pile locations at the facility. Several scenarios were performed, and the final analysis was done with two large area sources; one representing the larger pile with emissions from the pile only being considered when wind speeds are greater than 11.5 mph, and the second area source represents yard emissions including smaller piles and truck traffic associated with transporting to and from those piles (traffic emissions from this location happen less frequently than the roads and associated emissions input into the model). This modeling analysis showed all criteria pollutants meet the required PSD and/or NAAQS levels.

The stack location was also updated at the facility. The updated criteria pollutant modeling accounted for the new location and the generic TAC analysis was redone as well.

All modeled parameters, emission rates, and impacts are attached.

Updated Modeling 5/18/21:

The permit engineer provided updated short-term emissions from the pile for both PM10 and PM2.5. Modeling for PM10 and PM2.5 was redone to account for the emission rate change. With the pile emission rate increase, impacts of both pollutants still meet associated PSD and/or NAAQS limits.

Original Report 5/5/21:

Modeling for the Ajax facility was requested to evaluate NOx, PM2.5, PM10, SO2, and TAC impacts from the proposed new HMA plant. Criteria and TAC modeling both considered the most recent year (2019) of one-minute adjusted u-star meteorological data from the Bishop International Airport (FNT). Since only one met year was modeled in the criteria pollutant analysis, the maximum impact was used for comparison against the SIL, PSD Increment, and NAAQS for all pollutants and averaging times.

Since this is a proposed new facility, all sources were included in SIL, PSD Increment, and NAAQS modeling. For NOx and SO2 emissions originate from the HMA Counterflow Drum Dryer stack. PM10 and PM2.5 modeling was performed with emissions from the Drum Dryer stack, but also from fugitives associated with a pile and two unpaved roads (one road representing emissions from front end loader traffic and the second representing emissions from truck traffic).

Modeling showed impacts for all criteria pollutants were greater than Significant Impact Levels (SILs), therefore, further PSD and/or NAAQS modeling was performed. A search did not result in any nearby sources

that need to be included in PSD Increment modeling, however, one additional SO₂ source was found and included in SO₂ NAAQS modeling. NO_x modeling was performed with a Tier I analysis assuming NO_x is equal to NO₂; this is a conservative assumption.

As mentioned above, only one year was modeled for criteria pollutants. PSD Increment modeling was performed for annual NO_x, both averaging times of PM₁₀ and PM_{2.5}, and for annual, 3-hour, and 24-hour NO_x. All pollutants resulted in impacts below allowed PSD Increments. NAAQS modeling was done for annual and 1-hour NO_x, 24-hour PM₁₀, annual and 24-hour PM_{2.5}, and 1-hour and 3-hour SO₂. One additional source was included in the SO₂ model and background concentrations of each pollutant were added to modeled impacts. Cumulative results of all pollutants and averaging times were below NAAQS limits.

Generic TAC modeling was run for the Drum Dryer stack with an emission rate of 1 lb/hr. To calculate TAC impacts, pollutant emission rates, in lb/hr, can be multiplied by the associated averaging times generic impact. The generic TAC impacts from the Drum Dryer stack were passed on to the permit engineer for the formal review.

Stack parameters, emission rates and impacts for all modeling is attached to this report.

Company: Ajax Materials Corporation
 SRN: P1771
 Application: 2021-0019
 Engineer: Ambrosia Brown
 Modeler: Stephanie Hengesbach
 Date: 6/21/2021

Significance Modeling - Impacts in ug/m3				
(all impacts are first high)				
Pollutant	Ave. Period	2019 Max Impact	Significant Impact Level	Below SIL?
NO2	1-hr	52.48	7.5	No
	annual	1.29	1	No
PM10	24-hr	28.48	5	No
	annual	4.13	1	No
PM2.5	24-hr	8.44	1.2	No
	annual	0.94	0.2	No
SO2	1-hr	77.70	7.8	No
	3-hr	63.22	25	No
	24-hr	24.61	5	No
	annual	1.90	1	No

PSD Modeling - Impacts in ug/m3				
(all impacts are first high)				
Pollutant	Ave. Period	2019 Max Impact	PSD Increment	% of Increment
NO2	annual	1.29	25	5.1%
PM10	24-hr	28.48	30	95%
	annual	4.13	17	24%
PM2.5	24-hr	8.44	9	94%
	annual	0.94	4	23%
SO2	3-hr	63.22	512	12%
	24-hr	24.61	91	27%
	annual	1.90	20	10%

NAAQS Modeling - Impacts in ug/m3						
(all impacts are first high)						
Pollutant	Ave. Period	2019 Max Impact	Background	Combined Impact	NAAQS	% of NAAQS
NO2	1-hr	52.48	69.2	121.68	188	64.72%
	annual	1.29	12.2	13.49	100	13.49%
PM10	24-hr	28.48	35.0	63.48	150	42.32%
PM2.5	24-hr	8.44	17.1	25.54	35	72.98%
	annual	0.94	7.1	8.04	12	67.00%
SO2	3-hr	63.22	10.2	73.42	1300	5.65%
	1-hr	77.70	10.7	88.40	196	45.10%

Company: Ajax Materials Corporation
SRN: P1771
Application: 2021-0019
Engineer: Ambrosia Brown
Modeler: Stephanie Hengesbach
Date: 6/11/2021

Stack	Modeled Impacts per Stack			
	Generic 1 lb/hr			
	annual	1-hr	8-hr	24-hr
STACK	0.01780	0.72682	0.46749	0.23023

Generic TAC Stack Parameters

Type	ID	Height	Diameter	Exit Velocity	Exit Temp	Release Type	Emission Rate	X1	Y1
		ft	in	ft/sec	F		lb/hr	[m]	[m]
POINT	STACK	80	68	66.1	300	VERTICAL	1.0	282836.39	4772990.96

NOx and SO2 Stack Parameters and Emission Rates

Type	ID	Height	Diameter	Exit Velocity	Exit Temp	Release Type	NOx Emission Rate	SO2 Emission Rate	X1
		ft	in	ft/sec	F		lb/hr	lb/hr	[m]
POINT	STACK	80	68	66.1	300	VERTICAL	72.2	106.9	282836.39
POINT	N3570*	220	94	69.2	337	VERTICAL	-	4.8	282670.00

***Additional Source only for SO2 analysis**

X2	Y2	X3	Y3	X4	Y4	
[m]	[m]	[m]	[m]	[m]	[m]	

Y1						
[m]	X3	Y3	X4	Y4		
	[m]	[m]	[m]	[m]		

4772990.96

4773725.00

PM10 and PM2.5 Stack Parameters and Emission Ra

Type	ID	Height	Diameter	Exit Velocity	Exit Temp	Release Type	Sigma Y	Sigma Z	Length X
		ft	in	ft/sec	F		[m]	[m]	ft
POINT	STACK	80	68	66.1	300	VERTICAL			
AREA	YARDP	10							656.17
AREA	PILE*	10							656.17

***PILE emissions are only included when the wind is greater that 5.14 m/sec (11.5 mph).**

This was applied by using Variable Emission Factors by Wind Speed within AERMOD.

VOLUME	PAF_0001	11.475					5.343	3.254	75.37
VOLUME	PAF_0002	11.475					5.343	3.254	75.37
VOLUME	PAF_0003	11.475					5.343	3.254	75.37
VOLUME	PAF_0004	11.475					5.343	3.254	75.37
VOLUME	PAF_0005	11.475					5.343	3.254	75.37
VOLUME	PAF_0006	11.475					5.343	3.254	75.37
VOLUME	PAF_0007	11.475					5.343	3.254	75.37
VOLUME	PAF_0008	11.475					5.343	3.254	75.37
VOLUME	PAF_0009	11.475					5.343	3.254	75.37
VOLUME	PAE_0001	11.475					5.343	3.254	75.37
VOLUME	PAE_0002	11.475					5.343	3.254	75.37
VOLUME	PAE_0003	11.475					5.343	3.254	75.37
VOLUME	PAE_0004	11.475					5.343	3.254	75.37
VOLUME	PAE_0005	11.475					5.343	3.254	75.37
VOLUME	PAE_0006	11.475					5.343	3.254	75.37
VOLUME	PAE_0007	11.475					5.343	3.254	75.37
VOLUME	PAE_0008	11.475					5.343	3.254	75.37
VOLUME	PAE_0009	11.475					5.343	3.254	75.37
VOLUME	PAE_0010	11.475					5.343	3.254	75.37
VOLUME	PAE_0011	11.475					5.343	3.254	75.37
VOLUME	PAE_0012	11.475					5.343	3.254	75.37
VOLUME	PAE_0013	11.475					5.343	3.254	75.37
VOLUME	PAE_0014	11.475					5.343	3.254	75.37
VOLUME	PAE_0015	11.475					5.343	3.254	75.37
VOLUME	PAE_0016	11.475					5.343	3.254	75.37
VOLUME	PAE_0017	11.475					5.343	3.254	75.37
VOLUME	PAE_0018	11.475					5.343	3.254	75.37
VOLUME	PAE_0019	11.475					5.343	3.254	75.37
VOLUME	PAE_0020	11.475					5.343	3.254	75.37
VOLUME	PAE_0021	11.475					5.343	3.254	75.37
VOLUME	PAE_0022	11.475					5.343	3.254	75.37
VOLUME	PAE_0023	11.475					5.343	3.254	75.37
VOLUME	PAE_0024	11.475					5.343	3.254	75.37
VOLUME	PAE_0025	11.475					5.343	3.254	75.37
VOLUME	PAE_0026	11.475					5.343	3.254	75.37
VOLUME	PAE_0027	11.475					5.343	3.254	75.37
VOLUME	PAE_0028	11.475					5.343	3.254	75.37
VOLUME	PAE_0029	11.475					5.343	3.254	75.37
VOLUME	PAE_0030	11.475					5.343	3.254	75.37
VOLUME	PAE_0031	11.475					5.343	3.254	75.37

VOLUME APS_0041	11.475	5.343	3.254	75.37
VOLUME APS_0042	11.475	5.343	3.254	75.37
VOLUME APS_0043	11.475	5.343	3.254	75.37
VOLUME APS_0044	11.475	5.343	3.254	75.37
VOLUME FEL_0001	11.407	4.456	3.234	62.87
VOLUME FEL_0002	11.407	4.456	3.234	62.87
VOLUME FEL_0003	11.407	4.456	3.234	62.87
VOLUME FEL_0004	11.407	4.456	3.234	62.87
VOLUME FEL_0005	11.407	4.456	3.234	62.87
VOLUME FEL_0006	11.407	4.456	3.234	62.87
VOLUME FEL_0007	11.407	4.456	3.234	62.87
VOLUME FEL_0008	11.407	4.456	3.234	62.87
VOLUME FEL_0009	11.407	4.456	3.234	62.87
VOLUME FEL_0010	11.407	4.456	3.234	62.87
VOLUME FEL_0011	11.407	4.456	3.234	62.87
VOLUME FEL_0012	11.407	4.456	3.234	62.87
VOLUME FEL_0013	11.407	4.456	3.234	62.87
VOLUME FEL_0014	11.407	4.456	3.234	62.87
VOLUME FEL_0015	11.407	4.456	3.234	62.87
VOLUME FEL_0016	11.407	4.456	3.234	62.87
VOLUME FEL_0017	11.407	4.456	3.234	62.87
VOLUME FEL_0018	11.407	4.456	3.234	62.87
VOLUME FEL_0019	11.407	4.456	3.234	62.87
VOLUME FEL_0020	11.407	4.456	3.234	62.87
VOLUME FEL_0021	11.407	4.456	3.234	62.87
VOLUME FEL_0022	11.407	4.456	3.234	62.87
VOLUME FEL_0023	11.407	4.456	3.234	62.87
VOLUME FEL_0024	11.407	4.456	3.234	62.87
VOLUME FEL_0025	11.407	4.456	3.234	62.87
VOLUME FEL_0026	11.407	4.456	3.234	62.87
VOLUME FEL_0027	11.407	4.456	3.234	62.87
VOLUME FEL_0028	11.407	4.456	3.234	62.87
VOLUME FEL_0029	11.407	4.456	3.234	62.87
VOLUME FEL_0030	11.407	4.456	3.234	62.87
VOLUME FEL_0031	11.407	4.456	3.234	62.87
VOLUME FEL_0032	11.407	4.456	3.234	62.87
VOLUME FEL_0033	11.407	4.456	3.234	62.87
VOLUME FEL_0034	11.407	4.456	3.234	62.87
VOLUME FEL_0035	11.407	4.456	3.234	62.87
VOLUME FEL_0036	11.407	4.456	3.234	62.87
VOLUME FEL_0037	11.407	4.456	3.234	62.87
VOLUME FEL_0038	11.407	4.456	3.234	62.87
VOLUME FEL_0039	11.407	4.456	3.234	62.87
VOLUME FEL_0040	11.407	4.456	3.234	62.87
VOLUME FEL_0041	11.407	4.456	3.234	62.87
VOLUME FEL_0042	11.407	4.456	3.234	62.87
VOLUME FEL_0043	11.407	4.456	3.234	62.87
VOLUME FEL_0044	11.407	4.456	3.234	62.87
VOLUME FEL_0045	11.407	4.456	3.234	62.87
VOLUME FEL_0046	11.407	4.456	3.234	62.87
VOLUME FEL_0047	11.407	4.456	3.234	62.87

VOLUME FEL_0048	11.407	4.456	3.234	62.87
VOLUME FEL_0049	11.407	4.456	3.234	62.87
VOLUME FEL_0050	11.407	4.456	3.234	62.87
VOLUME FEL_0051	11.407	4.456	3.234	62.87
VOLUME FEL_0052	11.407	4.456	3.234	62.87
VOLUME FEL_0053	11.407	4.456	3.234	62.87
VOLUME FEL_0054	11.407	4.456	3.234	62.87
VOLUME FEL_0055	11.407	4.456	3.234	62.87

Y1	X2	Y2	X3	Y3	X4	Y4
[m]	[m]	[m]	[m]	[m]	[m]	[m]

4772990.96

4772988.00

4773013.93

Table 6 – Structure Heights

Air Permit to Install

Ajax Materials, Genesee Twp, Michigan

Structure ID in Model	Height (ft)
CTRL_BLD	24
AC_Tank1	40
AC_Tank2	40
AC_Tank3	40
AC_Tank4	40
AC_Tank5	40
AC_Tank6	40
RUO_Tank	40

Note: This table represents the structures for which the stack is located within the downwash area of the structure ("5L"). Other equipment onsite is elevated and does not obstruct air flow; elevated equipment was not included in the model.

Refer to the model for identification of each structure.

Brown, Ambrosia (EGLE)

From: Brown, Ambrosia (EGLE)
Sent: Tuesday, March 16, 2021 2:51 PM
To: Jarrett, Stephanie
Cc: McGeen, Dan (EGLE); Mitchell, Mark (EGLE); Magirl, Lauren (EGLE)
Subject: RE: Ajax Paving

Stephanie,

Unrelated to the reason I asked to arrange a call with the company:

As you know, I am in the process of reviewing the Ajax application. Since this is a new facility, all construction initially going in could be considered part of the same project. Since the project is greater than significance, then no exemptions can be used. That means even a space heater would need to be included (also, are they planning to add a pre-heater for processing RAP?). I want to confirm that we are including everything that we need to.

When screening for toxics, we need to review all of the toxics from the project added together. It appears that you screened using the AER table for the miscellaneous equipment separately than the drum which was modeled. If all of the emissions added together pass AER, then modeling is not needed. Otherwise we would assume the worst-case stack if we were going to model, assuming fugitives are exhausted out of the stack if appropriate.

Likewise with the NAAQS and Increment as the total criteria pollutants from the project should be reviewed and not just the ones from the drum.

I also am not seeing emission calculations for any fugitive sources of emissions like traffic, tank/silos fumes, and loadout. I believe the fugitive emissions from the elevators are included in the AP-42 emission factors. Some of the methods for calculating these emissions are in AP-42. These emissions should also be included in the NAAQS/Increment/toxics review as appropriate.

Ambrosia Brown, P.E.

Environmental Engineer

Air Quality Division - Permit Section

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

517-648-6216 | Browna39@Michigan.gov

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From: Jarrett, Stephanie <sajarrett@fishbeck.com>

Sent: Thursday, March 4, 2021 2:38 PM

To: Brown, Ambrosia (EGLE) <BrownA39@michigan.gov>

Subject: RE: Ajax Paving

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Sorry about that! Please see attached.

Thanks,
Stephanie

Stephanie A. Jarrett, P.E. | Senior Environmental Engineer
Fishbeck | w: 248.324.2146 | c: 248.417.9425 | Fishbeck.com

From: Brown, Ambrosia (EGLE) <BrownA39@michigan.gov>

Sent: Thursday, March 04, 2021 2:13 PM

To: Jarrett, Stephanie <sajarrett@fishbeck.com>

Subject: RE: Ajax Paving

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Stephanie,

I went to check the calculations but it looks like I did not receive the excel spreadsheet version. Can you please send the spreadsheets for AJAX? Thank you.

Ambrosia Brown, P.E.

Environmental Engineer

Air Quality Division - Permit Section

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

517-648-6216 | BrownA39@Michigan.gov

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From: Jarrett, Stephanie <sajarrett@fishbeck.com>
Sent: Monday, March 1, 2021 3:54 PM
To: Brown, Ambrosia (EGLE) <BrownA39@michigan.gov>
Subject: Ajax Paving

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Hi Ambrosia – I hope your doing well. Do you have any updates on the Ajax Paving HMA Plant PTI Application? Let me know if I can answer any questions for you.

Thanks,
Stephanie

Stephanie A. Jarrett, P.E. | Senior Environmental Engineer
Fishbeck | w: 248.324.2146 | c: 248.417.9425 | Fishbeck.com

Brown, Ambrosia (EGLE)

From: Brown, Ambrosia (EGLE)
Sent: Friday, May 28, 2021 10:40 AM
To: Kuieck, Sue; McGeen, Dan (EGLE); Myott, Brad (EGLE); Jarrett, Stephanie; mboden@ajaxpaving.com; kanderson@ajaxpaving.com; dgrabowski@ajaxpaving.com; kkissling@wnj.com
Cc: Mitchell, Mark (EGLE)
Subject: RE: Ajax 24-hour PM10 impacts
Attachments: PTI APP-2021-0019 R5.docx

I have attached the clean version of the draft with the changes discussed this morning.

I would like to point out that the daily limit could just be 12,000 tons/day rather than a having to calculate an hourly average on a daily basis or we can keep with the 500 tons per hour average if you prefer.

Of course the language related to the stockpile setback distance is subject to change/negotiation as discussed.

Thank you.

Ambrosia Brown, P.E.

Environmental Engineer

Air Quality Division - Permit Section

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

517-648-6216 | BrownA39@michigan.gov

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From: Kuieck, Sue <slkuieck@fishbeck.com>

Sent: Friday, May 28, 2021 10:21 AM

To: Brown, Ambrosia (EGLE) <BrownA39@michigan.gov>; McGeen, Dan (EGLE) <MCGEEND@michigan.gov>; Myott, Brad (EGLE) <MYOTTB@michigan.gov>; Jarrett, Stephanie <sajarrett@fishbeck.com>; mboden@ajaxpaving.com; kanderson@ajaxpaving.com; dgrabowski@ajaxpaving.com; kkissling@wnj.com

Cc: Mitchell, Mark (EGLE) <MITCHELLM7@michigan.gov>

Subject: RE: Ajax 24-hour PM10 impacts

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Thanks Ambrosia!

Attached are the revised emission calculations and model impacts for the change in the concentration of HCl. I'll get with Stephanie when she gets back on Tuesday to discuss the modeling.

Have a great weekend!

Sue Kuieck | Air Quality Engineer

Fishbeck | w: 616.464.3721 | c: 616.446.2496 | Fishbeck.com

From: Brown, Ambrosia (EGLE) <BrownA39@michigan.gov>
Sent: Friday, May 28, 2021 9:36 AM
To: McGeen, Dan (EGLE) <MCGEEND@michigan.gov>; Myott, Brad (EGLE) <MYOTTB@michigan.gov>; Jarrett, Stephanie <sajarrett@fishbeck.com>; mboden@ajaxpaving.com; kanderson@ajaxpaving.com; dgrabowski@ajaxpaving.com; kkissling@wnj.com; Kuieck, Sue <skuieck@fishbeck.com>
Cc: Mitchell, Mark (EGLE) <MITCHELLM7@michigan.gov>
Subject: FW: Ajax 24-hour PM10 impacts

EXTERNAL EMAIL

I am forwarding the email from Stephanie about the modeling which we discussed this morning.

Ambrosia Brown, P.E.

Environmental Engineer

Air Quality Division - Permit Section

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

517-648-6216 | BrownA39@Michigan.gov

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From: Hengesbach, Stephanie (EGLE) <HENGESBACHS1@michigan.gov>
Sent: Thursday, May 27, 2021 9:30 PM
To: Brown, Ambrosia (EGLE) <BrownA39@michigan.gov>; Mitchell, Mark (EGLE) <MITCHELLM7@michigan.gov>
Subject: Ajax 24-hour PM10 impacts

Hi Ambrosia,

Attached is a spread sheet showing the Ajax impacts with the original design and also impacts with moving the pile towards the west property and the stack. I also have individual stack impacts. Impacts with 'Pile' represent the original location and impacts with 'Pile2' the updated location towards the rest property. Impacts are quite a bit higher when moving the pile towards the west property.

I'll check email tomorrow morning before 8 am so send me an email if you want to talk about my modeling before your 8 am meeting. I'd have time to talk.

Let me know if you have questions.

Stephanie

Stephanie M. Hengesbach
Meteorologist
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
NEW Work Cell 517-648-7015 | hengesbachs1@michigan.gov
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