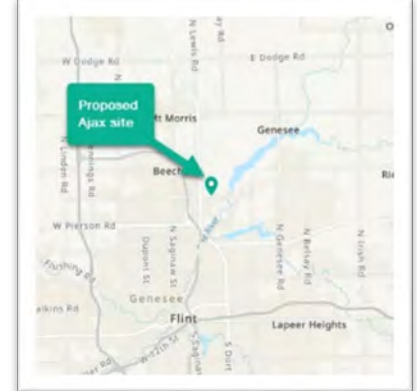


PERMIT DECISION SUMMARY

AJAX MATERIALS CORPORATION – GENESEE TWP, GENESEE COUNTY, MICHIGAN

AJAX MATERIALS CORPORATION

The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), has approved Permit to Install (PTI) No. 90-21 (Application, APP-2021-0019) for Ajax Materials Corporation (Ajax) on November 15, with changes. The changes to the permit conditions were based on comments received during the July 1 through September 22, 2021, public comment period. This document provides a summary of comments received, responses to comments, and changes made to the permit conditions.



WHEN WAS THE COMMENT PERIOD?

A public comment period was held for Ajax Materials Corporation's proposed permit from July 1, 2021, through September 22, 2021.

Additional considerations were made during the comment period due to the location Ajax proposed being in an Environmental Justice Community, including:

- Notice provided to those interested in facilities around the proposed location.
- Additional notifications sent regarding the proposal through media outlets, our subscription distribution list serve(s), U.S. Mail, and over the phone.
- Two extensions of the comment period were granted to accommodate requests.
- Two virtual hearings were held, with informational sessions.
- An in-person comment opportunity was held near the proposed location, with AQD staff on hand to answer questions and to help residents submit comments.

HOW WAS THIS PERMIT APPLICATION REVIEW DIFFERENT?

The AQD identified Ajax's proposed location as being in an area designated as an Environmental Justice Community. Once this was determined, planning for enhanced outreach ensued and

additional permit review, beyond a standard permit review for a minor source, was completed. These included additional computer modeling performed for toxics screening levels and National Ambient Air Quality Standards/Prevention of Significant Deterioration Increment which included fugitive sources of emissions at the proposed location.

WHAT WAS INCLUDED IN THE ORIGINAL PERMIT CONDITIONS?

The original permit review and draft conditions included:

- At wind speeds 12 mph and lower, no visible emissions are allowed. This was added to the conditions based on computer modeling. Accompanying requirement to monitor and record wind speed based on modeling.
- Pressure across the baghouse to be continuously monitored and recorded; pressure drop alarm system required.
- In addition to the federal particulate matter testing, the following tests are required upon startup:
 - Particulate Matter
 - Nitrogen Oxides
 - Lead
- Wind speed monitor and continuous recording.

- Silt content limit for materials stored on-site.

WHAT COMMENTS WERE RECEIVED?

Over 340 comments were received during the comment period from individual citizens, the federal government, and environmental advocacy groups. A detailed listing of comments received and the AQD's responses to those comment can be found in the [Response to Comments Document](#). The comments and responses include the following topics:

- Ambient Monitoring Concerns
- Dispersion Modeling
- Odor Concerns
- Permit Requirements
- Air Emissions and Testing
- Air Monitoring
- Permit Review Process

The comments received also included requests for:

- Cumulative Impact Analysis
- Additional stack testing or compliance testing
- Additional monitoring
- Enhanced Fugitive Dust management requirements

WAS A CUMULATIVE ANALYSIS DONE?

Yes, the AQD evaluated cumulative emissions in a number of ways, those included:

- 1) National Ambient Air Quality Standards evaluation, for all pollutants from all emission points on-site, including off-site contributing sources.
 - a. This is cumulative impact analysis for modeling multiple sources for the various criteria pollutants
- 2) Toxic air contaminants, including asphalt fumes and other carcinogenic compounds.
 - a. This is a cumulative risk assessment for multiple pollutants from the site

- 3) Additionally, after comment, the analysis for the National Ambient Air Quality Standards was updated to include 5 years of meteorological data, and to expand the inclusion of more background sources

- a. This is cumulative impact analysis for modeling multiple sources for the various criteria pollutants

WERE CHANGES MADE IN RESPONSE TO COMMENTS?

Yes. The AQD completes a thorough review of every permit application submitted and determines if what is proposed by a company meets the applicable rules and regulations before posting for public comment. During public comment, the AQD may update our review and make changes based on comments or additional information received. The AQD made several changes to the permit conditions based on comments received, those included:

- Removal of the use of recycled used oil as a fuel
- A condition clarifying allowed materials and fuels
- Installation of rumble strips at the facility exit to lessen materials carried out by trucks
- Requirement for the emissions collected from the top of the storage silo be routed to the control device
- Requirements to limit site access
- Additional visible emission requirements
- Additional and more frequent stack testing
- More frequent recordkeeping on amount of recycled asphalt material
- Volatile organic compound emissions limit and associated recordkeeping
- The additional installation of a bag leak detection system
- Additional requirements in the fugitive dust plan

WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

Comments from the public are very important. It is also important to know the law is clear about what we can and cannot consider when we make our decision.

WHAT ABOUT NOISE, TRAFFIC, AND ZONING?

The AQD evaluates the potential air emissions from the proposed facility to determine if they comply with the air quality rules and regulations. The AQD does not have authority to regulate noise or traffic outside the facility and does not have authority to evaluate compliance with local zoning requirements.

WHAT CANNOT AFFECT CHANGES IN THE PERMIT?

What we can consider	What we can't consider
<ul style="list-style-type: none"> ✓ Other rules the action should consider and why ✓ Why the action will not follow the rules ✓ Technical mistakes in the review ✓ Grammar and spelling mistakes 	<ul style="list-style-type: none"> • Air, land, or water issues not part of the project • Indoor air pollution • Traffic • Noise and lights • Zoning issues • Anything unrelated to the project

WHERE CAN I FIND MORE INFORMATION?

Other information, like the Response to Comments Document and the [final permit conditions](#) can be found at: Michigan.gov/EGLEAirPublicNotice, choose “PTI Final Decisions”.

The Response to Comments Document has additional details about the permit decision and detailed responses to comments received. The document is divided into sections including:

- An introduction to the public participation process
- Details of the public participation process for the proposed permit
- Responses and changes to the final permit based on comments received
- Other comments received and responses from the AQD that did not result in changes to the final permit conditions
- Any comments in support of the proposed permit
- Appendices
 - Redlined version of the permit conditions
 - Responses to USEPA comments

AQD staff can provide additional information upon request.

WHO CAN I TALK TO ABOUT THE PERMIT DECISION?

For more information about the final permit, please contact **Mark Mitchell**, AQD, at: MitchellM7@Michigan.gov or 517-582-5293.

EGLE promotes the equitable treatment and meaningful involvement of Michigan’s residents regarding the development, implementation, and enforcement of laws, regulations, and policies. Equitable treatment means that no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies. Meaningful involvement means all people have an opportunity to participate in decisions that affect their environment and/or health.

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