

US EPA ARCHIVE DOCUMENT

January 31, 2014

By FedEx and Electronic Mail

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, IL 60604

Nicole Cantello
Bonnie Bush
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60647
Cantello.Nicole@epa.gov
Bush.Bonnie@epa.gov

Re: Koch Mineral Services – Response to EPA Information Request Dated December 30, 2013

Dear Ms. Cantello and Ms. Bush:

This letter and its attachments are hereby submitted as a response to the above-referenced December 30, 2013 request for information, issued by the United States Environmental Protection Agency (“EPA”) to Koch Mineral Services, LLC pursuant to Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a). We note that Koch Mineral Services, LLC is a holding company that does not itself conduct any activities relevant to this information request, and are instead offering this response on behalf of Koch Minerals, LLC (a direct subsidiary of Koch Mineral Services, LLC) and its affiliates KCBX Terminals Company and The C. Reiss Coal Company (collectively for purposes of responding to EPA’s requests, “Koch Minerals”).

In your electronic message of January 14, 2014, EPA agreed to certain modifications and clarifications of the original information request. Koch Minerals’ understanding of the requests as modified is indicated with respect to each request below.

Koch Minerals has engaged in considerable effort to ensure that its submissions are complete, responsive, and useful to the Agency. Koch Minerals makes the following general qualifications and objections to EPA’s request:

- Koch Minerals objects to the request insofar as it seeks privileged information, including any and all communications and documents that are protected from disclosure by either the attorney-client communication privilege or attorney work-product doctrine.
- Koch Minerals objects to the request to the extent it improperly seeks information beyond the scope of EPA's authority under Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a), and therefore is not a proper exercise of EPA's information-gathering authority.
- Koch Minerals objects to the request to the extent it is vague, ambiguous, overbroad, or unduly burdensome.
- Koch Minerals reserves the right to supplement and revise its response, and reserves the right to assert additional objections as it continues to evaluate its response.
- Koch Minerals requests confidential treatment for the documents and information designated as "confidential business information" ("CBI") to the extent information in the files and documents is designated confidential.

Accordingly, notwithstanding the foregoing, and without waiving any of the foregoing qualifications and objections, below Koch Minerals has included the relevant numbered request followed by Koch Minerals' response.¹ The numbers of the responses below correspond to the numbers of the specific request included in Appendix B of the December 30, 2013 request.

Request No. 1:

Provide a list of all locations in Region 5 that Koch owned or operated for storage of petroleum coke from 2004 through the present. For each location, identify the following:

- a. The owner or operator of the petroleum coke storage or handling during the entire period you owned or handled petroleum coke at that site;
- b. The dates Koch first and last stored or handled petroleum coke at the site and all intervening dates when shipments were accepted at the site and when shipments were transported off the site;
- c. The dates and amounts (in tons) of each shipment from 2009 to the present; and
- d. Detailed descriptions of any measures taken to prevent fugitive emissions from each pile.

Response to Request No. 1:

As reflected in EPA's January 14th electronic message, Koch Minerals understands this Request to require it to identify, as to sites that Koch Minerals owned or operated in Region 5:

- a. The owner(s) or operator(s) of such sites at which Koch Minerals staged or handled petroleum coke since January 1, 2004;

¹ For all attached electronic files, KCBX has scanned the files for viruses using Symantec Endpoint Protection in accordance with the instructions in Appendix A of the information request.

- b. For the sites identified in (a) above, the first and last date petroleum coke was staged or handled there;
- c. For the sites identified in (a) above for the period 2009 to the present, the monthly throughput expressed in tons of petroleum coke; and
- d. For the sites identified in (a) above, descriptions of the measures taken to prevent fugitive emissions from piles.

Koch Minerals notes that subsection (a) appears to inadvertently omit the word "site" from "the owner or operator of the petroleum coke storage or handling [site] during the entire period you owned or handled petroleum coke at that site," and interprets that portion of the request accordingly.

Koch Minerals objects to this Request to the extent it implies that Koch Minerals "stores" or accepts for "storage" any petroleum coke. For purposes of identifying responsive information, Koch Minerals interprets these terms to refer to staging, rather than storage, of petroleum coke.

Koch Minerals owned or operated the following sites within Region 5 from January 1, 2004 until the present where petroleum coke was staged or handled.

1. **KCBX North (3259 E. 100th St., Chicago, Illinois) – Owned and operated by KCBX Terminals Company.** Koch Minerals presently stages and handles petroleum coke at this facility. Upon information and belief, Koch Minerals has staged and handled petroleum coke at this site since January 1, 2004. Therefore, for purposes of this request, the date petroleum coke was first staged or handled at this facility is January 1, 2004. Further, please note that Koch Minerals purchased and began to operate the facility in 1990. Koch Minerals would have staged and handled petroleum coke at this facility from time to time between the date of purchase and December 31, 2003. However, Koch Minerals is unable to identify with precision or certainty when it might have received the first shipment of petroleum coke at the facility because Koch Minerals, in accordance with its record retention policy, has not retained the records sufficient to definitively state an exact date. Total monthly throughput of petroleum coke from January 2009 through December 2013 is set forth in the spreadsheet designated "KM00000001_Native_Format" (with a duplicate provided in bates-numbered pdf format), attached hereto on Disc 1 in an electronic file folder labeled Response #1c. A detailed description of the measures taken to prevent fugitive emissions from piles at the site is contained in a document designated "KM00000017," attached hereto on Disc 1 in an electronic file folder labeled Response #1d.
2. **KCBX South (10730 S. Burley Ave., Chicago, Illinois) – Owned by KM Railways, LLC and operated by KCBX Terminals Company.** Koch Minerals presently stages and handles petroleum coke at this facility. Koch Minerals acquired the facility on December 20, 2012. It has staged and handled petroleum coke at the facility from that date. The first shipment of petroleum coke from this facility was on or about December 21, 2012. Total monthly throughput of petroleum coke from December 2012 through December 2013 is

set forth in the spreadsheet designated "KM00000001_Native_Format" (with a duplicate provided in bates-numbered pdf format), attached hereto on Disc 1 in an electronic file folder labeled Response #1c. A detailed description of the measures taken to prevent fugitive emissions from piles at the site is contained in the document designated "KM000000031," attached hereto on Disc 1 in an electronic file folder labeled Response #1d.

3. **Duluth (50th Avenue West & LeSure, Duluth, Minnesota)** – Owned and operated by The C. Reiss Coal Company. Koch Minerals presently stages and handles petroleum coke at this facility. Koch Minerals has staged and handled petroleum coke at this site since January 1, 2004. Therefore, for purposes of this request, the date petroleum coke was first staged or handled at this facility is January 1, 2004. Further, please note that Koch Minerals purchased and began to operate the facility in December 1986. Koch Minerals would have staged and handled petroleum coke at this facility from time to time between the date of purchase and December 31, 2003. However, Koch Minerals is unable to identify with precision or certainty when it might have received the first shipment because Koch Minerals, in accordance with its record retention policy, has not retained the records sufficient to definitively state an exact date. Total monthly throughput of petroleum coke from January 2009 through December 2013 is set forth in the spreadsheet designated "KM00000001_Native_Format" (with a duplicate provided in bates-numbered pdf format), attached hereto on Disc 1 in an electronic file folder labeled Response #1c. A detailed description of the measures taken to prevent fugitive emissions from piles at the site is contained in the document designated "KM00000003," attached hereto on Disc 1 in an electronic file folder labeled Response #1d.
4. **Green Bay (111 W. Mason St., Green Bay, Wisconsin)** – Owned and operated by The C. Reiss Coal Company. Koch Minerals presently stages and handles petroleum coke at this facility. Koch Minerals has staged and handled petroleum coke at this site since January 1, 2004. Therefore, for purposes of this request, the date petroleum coke was first staged or handled at this facility is January 1, 2004. Further, please note that Koch Minerals purchased and began to operate the facility in 1986. Koch Minerals would have staged and handled petroleum coke at this facility from time to time between the date of purchase and December 31, 2003. However, Koch Minerals is unable to identify with precision or certainty when it might have received the first shipment of petroleum coke at the facility because Koch Minerals, in accordance with its record retention policy, has not retained the records sufficient to definitively state an exact date. Total monthly throughput of petroleum coke from January 2009 through December 2013 is set forth in the spreadsheet designated "KM00000001_Native_Format" (with a duplicate provided in bates-numbered pdf format), attached hereto on Disc 1 in an electronic file folder labeled Response #1c. A detailed description of the measures taken to prevent fugitive emissions from piles at the site is contained in the document designated "KM000000008," attached hereto on Disc 1 in an electronic file folder labeled Response #1d.

Scott Lebbin (Vice-President of Operations – Koch Minerals, LLC), William Reiss (President – The C. Reiss Coal Company), Robert Valley (Dock Superintendent – The C. Reiss Coal Company), Richard Schlies (Manager of Transportation – Koch Minerals, LLC), Kathy Meese (Administrative Assistant – The C. Reiss Coal Company), Roberta Peterson (Administrative Clerk – KCBX Terminals Company), Christian Zuidmulder (Operations Supervisor – The C. Reiss Coal Company), Pete Rotundo (Distribution Manager – KCBX Terminals Company), Mark Cummings (Manager of Bulk Sales & Dev. – The C. Reiss Coal Company), Terry Steinert (Environmental Compliance Manager – Koch Minerals, LLC), John Hydock (Controller – Koch Minerals, LLC), Tom Kramer (General Manager – KCBX Terminals Company), Kermit Altendorfer (General Manager North American Marketing – Koch Carbon, LLC), Dave Emmerich (Operations Manager – The C. Reiss Coal Company) and Michelle Joki (Office Supervisor – The C. Reiss Coal Company) were consulted in preparation of this response and the appendices attached hereto.

Request No. 2:

Identify all locations owned or operated by Koch currently used for petroleum coke storage or handling in Region 5.

Response to Request No. 2:

Koch Minerals objects to this Request to the extent it implies that Koch Minerals “stores” or accepts for “storage” any petroleum coke. For purposes of identifying responsive information, Koch Minerals interprets these terms to refer to staging, rather than storage, of petroleum coke. The following facilities are currently used for petroleum coke staging and handling:

KCBX North (Chicago, Illinois)
KCBX South (Chicago, Illinois)
Duluth (Duluth, Minnesota)
Green Bay (Green Bay, Wisconsin)

Scott Lebbin (Vice-President of Operations – Koch Minerals, LLC), William Reiss (President – The C. Reiss Coal Company), Robert Valley (Dock Superintendent – The C. Reiss Coal Company) and Richard Schlies (Manager of Transportation – Koch Minerals, LLC) were consulted in preparation of this response.

Request No. 3:

Identify all locations owned or operated by Koch where future petroleum coke storage or handling is planned, permitted, or zoned in Region 5. Continue to identify and notify EPA of such sites through December 31, 2015. For each location, identify the date Koch plans to use the location and the date when operations commence. Provide an explanation for how and why the location was chosen.

Response to Request No. 3:

Koch Minerals objects to this Request as improperly issued under Clean Air Act Section 114(a), 42 U.S.C. § 7414(a), because the information sought is not necessary to serve any of the purposes outlined in Section 114(a)(i), (ii), or (iii). Any future petroleum coke staging or handling by Koch Minerals is not currently subject to regulation under the Clean Air Act and therefore is not within the scope of EPA's authority under Section 114(a). Koch Minerals further objects to the request insofar as EPA seeks to require Koch Minerals to "[c]ontinue to identify and notify EPA of such sites through December 31, 2015," as beyond the scope of EPA's Clean Air Act Section 114(a) authority. Furthermore, information regarding "how and why" any location for petroleum coke staging or handling "was chosen" is not relevant to Clean Air Act compliance and therefore is also outside EPA's Section 114(a) authority.

In its January 14th electronic message, EPA modified this request to require Koch Minerals to submit documents regarding "locations where there is a current permit application, current permit or current permit that does not prohibit the storage of petcoke." It is Koch Minerals' understanding that air permits issued by state and federal authorities do not typically "prohibit" the handling of a bulk material. Nonetheless, Koch Minerals responds that, in addition to the four sites identified in its response to Request 1, it owns and operates four additional facilities within Region 5 that could at least potentially stage or handle petroleum coke at some point in the future.

Ashland (601 ½ Lake Shore Drive, Ashland, WI)
Escanaba Dock 1 (Power Plant Road, Escanaba, MI)
Escanaba Dock 2 (1010 3rd Avenue North, Escanaba, MI)
Manitowoc (937 S. Fifth St., Manitowoc, WI)

Relevant permitting documents and/or applications for each respective facility are attached hereto on Disc 1 in an electronic file folder labeled Response #3 (KM00000044-KM00000478).

In addition to the sites identified above, Koch Minerals or its affiliates own the following industrial sites within Region 5 that do not involve the handling of petroleum coke:

Benton Facility, 5182 State Highway 37, Benton, IL 62812 (Magnetite Handling Facility)
Clarkson Dock, end of 11th Ave. East, Ashland, Wisconsin 54806 (Koch Minerals is not presently operating this site and has not since at least January 1, 2004)
Superior-Berwind Dock, Adjacent to 3200 Winter Street, Superior, Wisconsin 54880 (Koch Minerals has not operated this site since the early 1980s)
Sault Ste. Marie Dock, South Street, Sault Ste. Marie, MI 49783 (Koch Minerals has not operated this site since the 1990s)

Koch Minerals or its affiliates also own real estate located at 2400 Winter Street, Superior, WI 54880, which it leases to a third party. That third party has informed Koch Minerals that it has not handled petroleum coke at the property at any time since January 1, 2004. Koch Minerals does not have specific information as to whether the facility has permits to handle petroleum coke.

Scott Lebbin (Vice-President of Operations – Koch Minerals, LLC), William Reiss (President – The C. Reiss Coal Company), Robert Valley (Dock Superintendent – The C. Reiss Coal Company) and Richard Schlies (Manager of Transportation – Koch Minerals, LLC) were consulted in preparation of this response and the appendices attached hereto.

Koch Minerals welcomes further discussion with EPA regarding the purpose and scope of this Request.

Request No. 4:

For all petroleum coke Koch owns or owned that was stored or handled by Detroit Bulk Storage at 115 Rosa Parks Boulevard, Detroit, Michigan, identify each location to which that petroleum coke has been transported. Provide the name of the entity that owns each location with the complete address along with copies of all supporting documentation.

Response to Request No. 4:

In its January 14th electronic message, EPA modified this request to require Koch Minerals to submit "information regarding the users or end users in Region 5 only." Further, EPA clarified that Koch Minerals should submit "just locations" of users, and that EPA "do[es] not require all back up information."

Koch Minerals responds that it does not own and has never owned any petroleum coke that was stored or handled by Detroit Bulk Storage at 115 Rosa Parks Boulevard, Detroit, Michigan.

David Stout (General Manager West Coast Pet Coke – Koch Carbon, LLC), Kathy Jordan (Carbon Process Improvement Manager – Koch Carbon, LLC, Michael Albrecht (Manager, North American Pet Coke Marketing – Koch Carbon, LLC) were consulted in preparation of this response.

Request No. 5:

For all petroleum coke Koch owns or owned that was stored or handled by Detroit Bulk Storage in River Rouge, Michigan, identify each location to which that petroleum coke has been transported. Provide the name of the entity that owns each location with the complete address along with copies of all supporting documentation.

Response to Request No. 5:

In its January 14th electronic message, EPA modified this request to require Koch Minerals to submit "information regarding the users or end users in Region 5 only." Further, EPA clarified that KCBX should submit "just locations" of users, and that EPA "do[es] not require all back up information."

Koch Minerals responds that it does not own and has never owned any petroleum coke

that was stored or handled by Detroit Bulk Storage in River Rouge, Michigan.

David Stout (General Manager West Coast Pet Coke – Koch Carbon, LLC), Kathy Jordan (Carbon Process Improvement Manager – Koch Carbon, LLC, and Michael Albrecht (Manager, North American Pet Coke Marketing – Koch Carbon, LLC) were consulted in preparation of this response.

The certification requested in the December 30, 2013 information request is attached hereto.

Koch Minerals stands willing to discuss the foregoing responses and the attached appendices with EPA at a mutually convenient time.

Sincerely,



Adam M. Kushner

Partner

adam.kushner@hoganlovells.com

(202) 637-5724

Enclosures

Koch Minerals Certification of January 31, 2014**Response To****EPA's December 30, 2013 Clean Air Act Section 114(a) Information Request**

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.



Scott Lebbin
Vice President of Operations
Koch Minerals, LLC

	KCBX N	KCBX N	Green Bay	Green Bay	Duluth	Duluth			KCBX N	KCBX N	Green Bay	Green Bay	Duluth	Duluth			KCBX N	KCBX N	Green Bay	Green Bay	Duluth	Duluth
2009	IN	OUT	IN	OUT	IN	OUT		2010	IN	OUT	IN	OUT	IN	OUT		2011	IN	OUT	IN	OUT	IN	OUT
Jan	74768	3039	29211	13461	2901	3007		Jan	26886	0	788	11683	3378	2637		Jan	50267	9899	0	13018	4957	1596
Feb	65265	3486	28839	12603	1521	1417		Feb	16795	0	814	14915	2756	2089		Feb	29205	2731	0	8722	1331	804
Mar	100071	61699	6480	14249	0	1952		Mar	20460	8047	3163	14518	4335	2698		Mar	64508	27328	6816	13449	3490	404
Apr	135371	108189	10080	12714	25	1897		Apr	22232	50151	15098	15295	630	1193		Apr	71942	82925	7844	3605	0	586
May	83543	105611	15930	7058	0	0		May	59248	80420	5596	10464	2967	2266		May	109385	99013	7008	2998	25	1122
Jun	74900	156503	0	18203	0	1784		Jun	64875	132197	11970	16449	2775	2814		Jun	68118	163913	12480	6385	0	0
Jul	83451	77846	20272	16419	278	2893		Jul	57626	61985	10890	11656	705	2292		Jul	102558	65800	25754	13494	0	0
Aug	71757	90320	9	16329	3174	2407		Aug	85909	59379	24519	14219	374	681		Aug	105455	102741	7008	17695	0	790
Sep	55724	40215	15763	13909	2696	1739		Sep	72593	90898	12600	16352	402	0		Sep	100077	136912	0	16137	0	813
Oct	48550	75041	28537	12020	2055	1851		Oct	83568	116145	6570	7485	452	0		Oct	118582	60268	6528	9339	0	678
Nov	34424	90756	29665	13397	2033	1739		Nov	73172	71369	35606	14014	1597	2604		Nov	126033	151946	18685	14446	0	490
Dec	45696	2049	4575	15554	0	3337		Dec	73905	48760	18995	14333	3361	2160		Dec	73532	82326	19391	11181	0	543
TOTAL	873,520	814,754	189,361	165,916	14,683	24,023		TOTAL	657,269	719,351	146,609	161,383	23,732	21,434		TOTAL	1,019,662	985,802	111,514	130,469	9,803	7,826

	KCBX N	KCBX N	KCBX S	KCBX S	Green Bay	Green Bay	Duluth	Duluth			KCBX N	KCBX N	KCBX S	KCBX S	Green Bay	Green Bay	Duluth	Duluth
2012	IN	OUT	IN	OUT	IN	OUT	IN	OUT		2013	IN	OUT	IN	OUT	IN	OUT	IN	OUT
Jan	68316	37061	0	0	0	12336	2450	746		Jan	63322	24817	18093	0	0	16981	0	248
Feb	34483	0	0	0	0	5774	2088	600		Feb	49628	0	0	0	0	11503	0	245
Mar	42750	80348	0	0	20352	11601	0	499		Mar	20980	56530	0	136	7844	15576	0	294
Apr	63471	44894	0	0	13632	11710	0	471		Apr	80498	86047	0	3241	15199	11128	0	381
May	43064	70783	0	0	20297	12024	0	331		May	108659	87731	0	3649	14112	11557	0	295
Jun	59160	63293	0	0	22792	11431	0	283		Jun	95696	112636	12588	2623	29589	11292	0	297
Jul	98543	134066	0	0	14180	15228	1301	280		Jul	80916	69860	35077	0	14650	16993	0	315
Aug	109769	76470	0	0	15688	17612	0	247		Aug	140795	150245	15769	52409	16465	16084	0	228
Sep	69462	29313	0	0	15476	13183	0	255		Sep	104834	59955	13403	40631	20279	10587	0	334
Oct	90940	117583	0	0	31376	10658	0	239		Oct	122115	173618	24843	21327	12560	17422	0	86
Nov	67672	92037	0	0	7632	15268	0	332		Nov	57321	40402	32248	40276	32248	13588	0	0
Dec	42698	70011	13766	0	0	14349	0	396		Dec	76187	138227	78525	66190	0	15488	0	0
TOTAL	790,328	815,859	13,766	-	161,425	151,174	5,839	4,679		TOTAL	1,000,951	1,000,068	230,546	230,482	162,946	168,199	-	2,723

**Fugitive Dust Control and
Malfunction Prevention and Abatement Plan
The C. Reiss Coal Company – Duluth, Minnesota**

Created: January 2006

Revised: March 2011

I. Purpose

The precautions and activities listed below are used at the Duluth Dock of The C. Reiss Coal Company ("Reiss Coal") to address the potential for fugitive dust generation. This plan meets the requirements of Minn. R. 7007.0800 subps. 2 and 3, Minn. R. 7009.0020 and Minn. R. 7011.0150 as called out in Permit No. 13700071-001 OPERATIONAL REQUIREMENTS.

II. Responsibility

All employees involved in activities that have the potential to generate fugitive dust are trained to identify problem areas and how to address visible emissions once identified. All employees will use their training and judgment in the implementation of this plan to determine whether particular measures, in addition to those which are required on a regular basis, should be applied to reduce the potential for fugitive dust. Each employee has the responsibility and authority to cease any operation that may result in the transport of visible fugitive dust emissions off the facility property. If guidance is needed, employees are to immediately contact their supervisor for instructions. The supervisor will evaluate operating conditions and any Air Pollution Alerts, Warnings or Emergency Declarations issued by the Minnesota Pollution Control Agency and implement this plan, or any other measures necessary, to address the potential for fugitive dust.

III. Potential Sources of Fugitive Dust

- A. **Vessel unloading** - conveying products from lake vessels to the dock
- B. **Storage pile maintenance/Product Transfer (active piles)** – moving product from one location on the dock to another, compacting piles, and/or shaping piles to lessen wind profile, improve storage characteristics and/or reduce potential for spontaneous combustion.
- C. **Storage Piles (inactive)** – storing product in storage piles in and undisturbed state for at least 24 hours.
- D. **Material screening** – material separation by size and conveying/transferring screened material to storage piles or railcars
- E. **Vehicle traffic** – operating mobile material handling equipment, haul trucks and other vehicles on the dock.
- F. **Truck loading (active piles)** – loading haul trucks by front-end loader.
- G. **Rail car loading (active piles)** – loading rail cars by front-end loader.

Title: Fugitive Dust Control Plan	Page 1 of 5	Effective Date: 05-01-20011	Revision No. 6: Final
Owner: Duluth Plant Manager	Controlled Copy: only the electronic version is current		
Approval: Environmental Compliance Manager	Review: Annual	Last Review: 03/31/2011	

IV. Fugitive Dust Controls

A. Vessel and Truck Unloading

1. Vessels apply adequate water to the conveyor belt/material drop to control fugitive dust during unloading.
2. When warranted, Reiss Coal applies additional water as vessels unload, using portable water cannons.
3. The drop distances from vessel discharge spouts to receiving storage piles are minimized. Because of the many variables involved in unloading (e.g. vessel draft, vessel-specific unload equipment, existing storage pile height, etc.), exact drop distances between the discharge spout and receiving piles cannot be specified. However, vessels use the minimum drop distance the conditions and equipment allow until the storage pile height is within ten (10) feet of the spout. Thereafter, spouts are maintained within ten (10) feet of storage pile crests.
4. Product received by truck is unloaded at the final storage location to minimize transfers and may be wetted with the portable water cannon or the water cannon mounted on the water truck for spot application or the pole-mounted water cannons for broader application.
5. Under extreme weather conditions¹, Reiss Coal ceases unloading operations.

B. Active Storage Piles

1. Water is applied to bulk material storage piles during transferring, compacting, pile shaping, truck loading and railcar loading operations as needed. Material transfers and storage pile shaping are completed prior to receiving bulk materials by vessel, truck or rail to allow unloading to occur in the shortest time possible.
2. Active storage pile faces are sloped at the end of any workday when it is known that an operator will not be working at the dock the next day(s). This action minimizes "sloughing" which reduces the effectiveness of wetting.

¹ Extreme weather conditions may include, but are not limited to, freezing temperatures with low pre-existing product moisture; prolonged dry, windy conditions; sustained winds exceeding 30 mph; or wind gusts exceeding 45 mph.

Title: Fugitive Dust Control Plan	Page 2 of 5	Effective Date: 05-01-20011	Revision No. 6: Final
Owner: Duluth Plant Manager	Controlled Copy: only the electronic version is current		
Approval: Environmental Compliance Manager	Review: Annual	Last Review: 03/31/2011	

3. During dry weather conditions water is applied to the working faces of active storage piles as needed. Wetting the active portion of storage piles reduces the visible dust generated during pile maintenance and while transferring bulk materials to trucks or screening equipment. Water is typically not applied: a) on days when 0.3 inches of precipitation or more falls on the site; b) when no activity occurs at the site (e.g. weekends and holidays); and c) when antecedent conditions in active bulk material storage piles are adequately wet. Under extreme weather conditions, surfactant /encrusting products and/or snow-producing equipment are used during storage pile maintenance, material transfers and truck or railcar loading operations as needed. Unless presented with extreme weather conditions, water is only applied during non-freezing conditions.
4. Stacker operations and storage pile reclaiming (loading trucks or railcars from piles) are curtailed when sustained wind speeds exceed 30 miles per hour (mph) or gusts exceed 45 mph.
5. During the warm season, Operators monitor wind speeds and the weather forecast, and frequently observe the facility for visible dust generation. As conditions warrant, Operators can increase the amount of water or frequency of application from the water cannons, or arrange for spot application of water using the water truck.
6. During freezing weather months, typically November through March, storage pile heights are maintained as low as possible to reduce wind profiles. Activities associated with reducing storage pile heights to limit wind exposure are only performed during periods when winds are less than 25 mph. Operators may also apply man-made snow to minimize the potential for air-borne visible dust to leave the property. Operators monitor the following conditions when storage piles are active to determine if man-made snow should be applied:
 - Temperatures should be 28° F and falling².
 - Presence of dust on active working face of the pile, and
 - Low pre-existing product moisture (i.e. < 6-8%) evidenced by above normal visible airborne dust.

C. Inactive Storage Piles

1. Storage piles and weather are visually monitored each working day and water is applied as needed to control visible dust or prepare for forecasted high winds.
2. Newly received materials being transferred to a final storage location are considered "active" and are managed as outlined in Section IV.B above.
3. Salt piles are covered within 15 days of material receipt if the piles are inactive.

D. Material Screening

²According to the manufacturer, Areco Snowsystem of Underhill Center, VT.

Title: Fugitive Dust Control Plan	Page 3 of 5	Effective Date: 05-01-20011	Revision No. 6: Final
Owner: Duluth Plant Manager	Controlled Copy: only the electronic version is current		
Approval: Environmental Compliance Manager	Review: Annual	Last Review: 03/31/2011	

1. The discharge chute for fines on the fixed screening plant is enclosed.
2. The drop point on the fixed screening plant fines discharge belt does not exceed six (6) feet.
3. Belt covers are used on the fixed screening plant.
4. Screening operations on the portable screening plant are curtailed under extreme weather conditions.

E. Paved/Unpaved Traffic Routes

1. Reiss Coal enforces a 10-mile per hour speed limit on the property.
2. During dry weather conditions, water is applied to unpaved vehicle travel routes to address the potential for dust generated from traffic using the 8800 gallon water truck. Water is applied at rate of approximately 0.18 gallons per square foot of surface area when conditions warrant. Additional water is applied if the normal application rate is insufficient to control visible dust. Water is not applied during freezing conditions.
3. To limit the potential for freeze-drying under extreme winter weather conditions, chlorides or road salt may be spread as necessary and activated by water spray or man-made snow to maintain wet, unfrozen travel routes.
4. Trucks hauling bulk materials from the plant are covered with tarps to address the potential for material being blown or spilled from the trucks.

V. Administrative Controls

A. Training. All employees involved in activities that have the potential to generate fugitive dust are trained:

1. To identify conditions that could result in visible dust leaving the facility, and
2. In methods to address this potential before visible dust leaves the facility.

This Fugitive Dust Control Plan is part of the training course material.

B. Weather Monitoring. Employees monitor wind speed in real time using the site anemometer, the Marine Radio weather channel, the Park Point station in Duluth at <http://www.wunderground.com/cgi-bin/findweather/getForecast?query=55807&wuSelect=WEATHER> or the National Weather Service station at Duluth International Airport. An initial wind speed reading is obtained each workday morning and additional readings are obtained anytime Operators sense a significant increase in wind speed. The highest reading taken each workday is recorded in the daily log. Approximate wind direction and rainfall is also logged.

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Approval: Environmental Compliance Manager	Review: Annual	Last Review: 03/31/2011	

C. Recordkeeping. Reiss Coal maintains various forms of records to demonstrate compliance with regulatory requirements as well as best management practices. Included in these records are:

- daily inventory of material in storage,
- daily records of activities to address the potential for fugitive dust, including volume of water applied,
- daily observations of precipitation, wind speed, wind direction, and visible dust,
- maintenance records on the water application system (e.g. pumps, piping, nozzles, etc.) and the water truck, and
- training records.

Records created under this plan have Record Series number EHS91 and are maintained in accordance with the Koch Fertilizer/Koch Minerals records retention schedule.

VI. Change Log

Rev & Date	Description of Change
Rev 6, 04/04/2011	Added s.III screening & railcar loading definitions; revised s.IV.B.1 and B.3 to include truck and railcar loading; added s.IV.A.4; s.V change log; added control footer; made administrative changes

Facility Manager: Bob Valley

Office Phone: 906-786-2793

Home Phone: 906-789-0470

Mobile Phone: 906-420-2793

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Owner: Duluth Plant Manager	Controlled Copy: only the electronic version is current		
Approval: Environmental Compliance Manager	Review: Annual	Last Review: 03/31/2011	

**Fugitive Dust Control and
Malfunction Prevention and Abatement Plan
The C. Reiss Coal Company – Green Bay, Wisconsin
111 West Mason Street**

I. Purpose

The activities listed below are used at The C. Reiss Coal Company ("Reiss Coal") Green Bay facility to control fugitive dust. This plan meets the requirements of Wis. Adm. Code NR 445.10(2), serves as an Emission Control Action Plan, pursuant to NR 493.04, and contains elements for prevention and abatement of dust control system malfunctions (see Section VI) pursuant to NR 439.11.

II. Responsibility

All employees involved in activities that have the potential to generate fugitive dust are trained to identify problem areas and how to address visible emissions once identified. All employees will use their training and judgment in the implementation of this plan to determine whether particular measures, in addition to those which are required on a regular basis, should be applied to reduce the potential for fugitive dust. Each employee has the responsibility and authority to cease any operation that may result in the transport of visible fugitive dust off the facility property. If guidance is needed, employees are trained to immediately contact their supervisor for instructions. The supervisor will evaluate operating conditions and any Air Pollution Alerts, Warnings or Emergency Declarations issued by the Wisconsin Department of Natural Resources and implement this plan, or any other measures necessary, to address the potential for fugitive dust.

III. Potential Sources of Fugitive Dust

- A. **Vessel unloading** – conveying products from lake vessels to the dock.
- B. **Rail car unloading** – removing products from rail cars and conveying them to appropriate storage locations.
- C. **Truck unloading** – off-loading products from trucks directly at their storage location.
- D. **Storage Pile maintenance/Product Transfer (active piles)** – moving product from one location on the dock to another, compacting piles, and/or shaping piles to lessen wind profile, improve storage characteristics, and/or reduce potential for spontaneous combustion.
- E. **Storage Piles (inactive piles)** – storing product in stockpiles in an undisturbed state for at least 24 hours.

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- F. **Material screening** – material separation by size and conveying screened material to storage piles or railcars.
- G. **Vehicle traffic** – operating mobile material handling equipment, haul trucks and other vehicles on the dock.
- H. **Truck loading (active piles)** – loading haul trucks by front-end loader.
- I. **Rail car loading (active piles)** – loading rail cars by front-end loader.

IV. Fugitive Dust Controls

A. Vessel, Railcar and Truck Unloading

1. Vessels apply adequate water to the conveyor belt/material drop to control fugitive dust during unloading.
2. When warranted, Reiss Coal applies additional water as vessels unload, using portable water cannons or the fixed cannon system.
3. The drop distances from vessel discharge spouts to receiving storage piles are minimized. Because of the many variables involved in unloading (e.g. vessel draft, vessel-specific unload equipment, existing storage pile height, etc.), exact drop distances between the discharge spout and receiving piles cannot be specified. However, vessels use the minimum drop distance the conditions and equipment allow until the storage pile height is within ten (10) feet of the spout. Thereafter, spouts are maintained within ten (10) feet of storage pile crests.
4. Petroleum coke ("coke") is typically received in railcars with sufficient water content to control dust generation. However, spray bars may be used to apply water to bulk materials received at the north rail unloading station, as necessary to control fugitive dust.
5. Product received by truck is unloaded at the final storage location to minimize transfers and may be wetted with the portable water cannon or the water cannon mounted on the water truck for spot application or the pole-mounted water cannons for broader application.
6. Under extreme weather conditions¹, Reiss Coal ceases unloading operations.

¹Extreme weather conditions may include, but are not limited to, freezing temperatures with low pre-existing product moisture; prolonged dry, windy conditions; sustained winds exceeding 30 mph; or wind gusts exceeding 45 mph.

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B. Active Storage Piles

1. Water is applied to bulk material storage piles during transferring, compacting, pile shaping, truck loading and railcar loading operations as needed. Material transfers, compaction and storage pile shaping are completed prior to receiving bulk materials by vessel, truck or rail to allow unloading to occur in the shortest time possible.
2. Active storage pile faces are sloped at the end of any workday when it is known that an operator will not be working at the dock the next day(s). This action minimizes "sloughing" which reduces the effectiveness of wetting.
3. During dry weather conditions water is applied to the working faces of active storage piles as needed. Wetting the active portion of storage piles reduces the visible dust from pile maintenance and transfer of bulk materials to trucks or screening equipment. Water is typically not applied: a) on days when 0.3 inches of precipitation or more falls on the site; and b) when antecedent conditions in active bulk material storage piles are adequately wet. Under extreme weather conditions, surfactant /encrusting products and/or snow-producing equipment are used during storage pile maintenance, material transfers and truck or railcar loading operations as needed. Unless presented with extreme weather conditions, water is only applied during non-freezing conditions.
4. Unless deemed essential by facility management, stacker operations and storage pile reclaiming (loading trucks or railcars from piles) are curtailed when sustained wind speeds exceed 30 miles per hour (mph) or gusts exceed 45 mph.
5. During the warm season, Operators monitor wind speeds and the weather forecast, and frequently observe the facility for visible dust generation. As conditions warrant, Operators can increase the amount of water or frequency of application from the water cannons, or arrange for spot application of water using the water truck.
6. During freezing weather months, typically November through March, storage pile heights are maintained as low as possible to reduce wind profiles. Activities associated with reducing storage pile heights to limit wind exposure are only performed during periods when winds are less than 25 mph. Operators may also apply man-made snow to minimize the potential for air-borne visible dust to leave the property. Operators monitor the following conditions when storage piles are active to determine if man-made snow should be applied:
 - Temperatures should be 28° F and falling².
 - Presence of dust on active working face of the pile, and

²According to the manufacturer, Areco Snowsystem of Underhill Center, VT.

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- Low pre-existing product moisture (i.e. < 6-8%) evidenced by above normal visible airborne dust.

C. Inactive Storage Piles

1. Storage piles and weather are visually monitored each working day and water is applied as needed to control visible dust or prepare for forecasted high winds.
2. Newly received materials being transferred to a final storage location are considered "active" and are managed as outlined in Section IV.B above.
3. Salt piles are tarped as soon as practical after receipt from lake vessels and truck loading. During transfer to trucks, the salt pile is uncovered to the minimum extent practical to allow access to the pile.
4. During non-freezing weather, the potential for fugitive dust is controlled using water application (see Sections A and B). During freezing weather (typically November through March), the heights of uncovered piles are maintained as low as possible to reduce the wind profile of the piles. Activities associated with reducing pile height to limit wind exposure are only performed during periods of low wind and may be followed by application of water or pile sealing with surfactant as needed (see Section B).
5. Under extreme weather conditions, heavy equipment operation on storage piles is limited to only those operations deemed essential by facility management.
6. Under high activity periods, heavy equipment operation on bulk piles is not typically performed, due to the equipment being utilized in other aspects of dock operation. If weather conditions warrant, equipment will be dedicated to pile height reductions that may be coupled with watering or sealing in response to observed conditions or forecasted events.
7. To address the potential for wind erosion, open storage piles of coal have a surfactant/encrusting agent applied each fall year to seal the non-active portions of the pile. Active portions of the piles are addressed as stated in Section B.
8. Coke does not typically require an encrusting agent or snow cover. In cases where dust is observed to be emanating from coke piles, sealing with an encrusting agent or snow cover may be performed.

D. Material Screening

1. The discharge chute for fines is protected from wind to the extent feasible.
2. Drop points are minimized to the extent possible.

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3. Covers are used to the extent feasible.
4. Screening operations are curtailed under extreme weather conditions.

E. Paved/Unpaved Traffic Routes

1. Reiss Coal enforces a 15-mile per hour speed limit on the property.
2. During dry conditions when truck traffic is present, water is applied to unpaved vehicle travel routes to address the potential for dust. Water is applied using the facility dust suppression system with pole mounted cannons, the portable water cannon, front-end loaders distributing water from Retention Ponds, and the water truck equipped with a spray bar and a water cannon either solely or in any combination. Water is typically not applied during freezing conditions.
3. Trucks hauling bulk materials from the plant are covered with tarps to address the potential for material being blown or spilled from the trucks.
4. To limit the potential for freeze-drying under extreme weather conditions in winter, brines or water-activated chloride salts may be spread as necessary to maintain unfrozen travel routes. This prevents freeze-dried particulates from becoming airborne. The facility speed limit is also lowered to 10 mph.
5. As identified by the Plant Manager or his designee during periods of high activity, increased watering of unpaved roadways may be implemented by utilizing the pole-mounted water cannons, the water truck, water carried by front-end loader and/or the portable water cannon.
6. A sweeper/vacuum is used to remove dust from the paved areas of the facility as well as in the immediate vicinity of the approach on State Street. The sweeper is designed to vacuum and collect loose material rather than pushing it off the roadway. Water is applied using spray bars mounted on the sweeper, weather permitting. The sweeper operates, at a minimum, once each day when truck traffic is present at the facility unless operation is unnecessary due to precipitation or road salting. However, the sweeper may be operated more frequently as necessary to minimize the potential for fugitive dust from paved areas.
7. During non-freezing conditions, trucks enter and leave the plant through standing water which serves to remove dirt and particulates from the wheels and undercarriage,. This rinsing reduces the drag out of particulates that may later become airborne.

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8. The facility also contracts for street sweeping services on State Street when visual evidence of removable dust originating from trucks leaving the facility is present. Staining is not considered evidence of removable dust.

V. Administrative Controls

- A. Training.** All employees involved in activities that have the potential to generate fugitive dust are trained to identify problem areas and how to address potential fugitive dust emissions before they become problematic. **This Fugitive Dust Control Plan is part of the training course material.** New employees are trained on fugitive dust minimization and control as part of their orientation. Existing employees are trained on dust minimization and control at least once in a two year training cycle.
- B. Monitoring.** The facility operates an anemometer on site to allow employees to monitor wind speed and direction in real time and record wind data for future reference.
- C. Recordkeeping.** The facility maintains the following records to demonstrate compliance with regulatory requirements and the implementation of this Fugitive Dust Control Plan:
- ♦ records of water truck and sweeper/vacuum run hours,
 - ♦ records of employee hours spent on dust suppression
 - ♦ records of water withdrawals from Fox River,
 - ♦ records of employee training on the Dust Control Plan,
 - ♦ daily records of precipitation received at the facility, and
 - ♦ records of dust control equipment weekly inspections.

In addition, climate records for the NWS Station at Green Bay are available on the internet at www.crh.noaa.gov/grb/data/climate/grblcdxyy.txt

Where xx is the month (i.e., 01, 02...12), and yy is the year in two digit format (i.e., 2005 = 05).

Records created under this plan have Record Series number EHS91 and are maintained in accordance with the Koch Minerals records retention schedule.

VI. Malfunction Prevention and Abatement

- A. Control Equipment.** Fugitive Dust Control Equipment is listed in Attachment A, along with routine maintenance frequency, inspection frequency, items to be inspected, and spare parts that are kept at the facility.

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- B. **Sweeper.** In the event the sweeper is not operational, every attempt will be made to repair the unit and return it to service within 24 hours. If this is not possible, water will be used to keep paved areas wet until the unit returns to service or sweeping services are contracted.
- C. **Water Truck.** In the event the water truck is not available, the portable water cannon will be placed in the area of highest potential fugitive dust generation that cannot be reached by the pole-mounted water cannons. Water cannons will continue to be operated as needed to control dust from unpaved surfaces. Water sprays from the cannons may be supplemented by distribution of water in the buckets of front-end loaders to areas where the cannons are not effectively controlling dust.
- D. **Portable Cannon.** In the event the portable cannon is inoperable, the pole-mounted cannons will be used, supplemented by the cannon mounted on the water truck, as needed.
- E. **Pole-Mounted Cannons.** In the event the pole-mounted cannons are inoperable, every effort will be made to repair the malfunctioning component and to return the system to service within 24 hours. Working faces will be minimized or eliminated during periods of inoperability as judged necessary by facility management. The portable and truck mounted water cannons will be used to control dust in the areas of greatest potential dust generation. The facility will keep spare parts on site or ensure local availability to facilitate returning the system to service.
- F. **Snow Maker.** In the event the snow making equipment is inoperable, a portable generator and a 6-inch water pump is available for rent at the local Fabco dealer (498-8000), a snow making machine is available at either the Manitowoc or Escanaba facilities. Also, the Gravity Park winter recreation area has snow makers available (920-849-7223) if needed.
- G. **Responsibility.** The facility manager is responsible for inspecting dust control equipment at least weekly, or as otherwise specified on the inspection sheet. The facility manager may delegate this task to a person instructed on proper completion of inspections. Inspection sheets are signed by the person conducting the inspection.

VII. Change Log

Rev & Date	Description of Change
Rev 7, 10/01/2012	Removed KF from RIM schedule reference, changed facility manager
Rev 6, 04/04/2011	Revised format to match Duluth. Added change log

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Facility Manager: Christian Zuidmulder
Office Phone: 920-436-7600
Home Phone: 920-883-8725
Mobile Phone: 920-562-2982

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Attachment A

Maintenance and Inspection of On-Site Monitoring and Dust Control Equipment

Monitoring or Control Equipment	Routine Maintenance Frequency	Inspection Interval	Items Inspected	Spare Parts
Sweeper	Engine oil changed at 150 Hours	Daily	1. Engine oil 2. Engine Coolant 3. Fuel	Side and main brooms
		Weekly	1. Brooms 2. Tank 3. Hydraulic. oil	
Water System (Portable and Fixed Cannons)		Weekly	1. Piping 2. Valves 3. Fittings	One (1) back-up pump, One (1) water cannon, Gaskets, valves & piping, 500 ft of spare fire hose for portable cannon
Water Truck	Engine oil changed at 150 Hours	Daily	1. Engine oil 2. Engine coolant 3. Portable Pump	One (1) pump One (1) water cannon- see Water System above
		Monthly	1. Tires 2. Piping 3. Valves	
Snow Machine		Before Each Use	1. Elect. Cords 2. Water Fittings 3. Nozzles	
Anemometer		Calibrated Annually	N/A	None

None of the inspection frequencies listed above exceed the manufacturer's recommendation

Employee _____ Date _____

Comments _____

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
1021 NORTH GRAND AVENUE, EAST
SPRINGFIELD, ILLINOIS 62702

OPERATING PROGRAM FOR
FUGITIVE PARTICULATE CONTROL

K KCBX TERMINALS COMPANY

1. THIS FORM IS USED TO APPLY FOR A FUGITIVE DUST OPERATING PROGRAM AS REQUIRED BY 35 IAC 212.309. COMPLETE THE FORM, KEEP ONE COPY FOR YOUR RECORDS, AND RETURN TWO COPIES TO THE ATTENTION OF BUREAU OF AIR PERMIT SECTION MANAGER AT THE ADDRESS LISTED ABOVE.

2a. NAME OF OWNER: KCBX Terminals Co.		3a. NAME OF OPERATOR: KCBX Terminals Co.	
2b. STREET ADDRESS OF OWNER: 3259 East 100th Street		3b. STREET ADDRESS OF OPERATOR: 3259 East 100th Street	
2c. CITY OF OWNER: Chicago		3c. CITY OF OPERATOR: Chicago	
2d. STATE OF OWNER: IL	2e. ZIP CODE: 60617	3d. STATE OF OPERATOR: IL	3e. ZIP CODE: 60617

4a. NAME OF CORPORATE DIVISION OR PLANT: KCBX Terminals Co.		4b. STREET ADDRESS OF EMISSION SOURCE: 3259 East 100th Street		
4c. CITY OF EMISSION SOURCE: Chicago	4d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	4e. TOWNSHIP:	4f. COUNTY: COOK	4g. ZIP CODE: 60617

5. SUBMIT A SCALE MAP SHOWING ALL STORAGE PILES, CONVEYOR LOADING OPERATIONS, STORAGE PILE ACCESS ROADS, NORMAL TRAFFIC ROADS, PARKING FACILITIES, LOCATION OF UNLOADING AND TRANSPORTING OPERATIONS WITH POLLUTION CONTROL EQUIPMENT.

6a. DO STORAGE PILES CONTAIN A TOTAL OF MORE THAN 260,000 TONS OF MATERIAL IN A CALENDER YEAR? ☒ YES ☐ NO	
6b. IF THE ANSWER TO 6a WAS YES, PLEASE SUBMIT THE FOLLOWING INFORMATION. TOTAL AMOUNT OF MATERIAL IN THE STORAGE PILES: 800,000 tons typical TONS/YEAR: 2.5MM - 5.0 MM tpy typical Permit allows 13MM tpy throughput AND SUBMIT AN ATTACHED SHEET DESCRIBING: I) DETAILED OPERATING PROCEDURES AND CONTROL METHODS BY WHICH FUGITIVE PARTICULATES FROM THESE STORAGE PILES WILL BE MINIMIZED DURING LOADING, UNLOADING, PILE MAINTENANCE, AND WIND EROSION. HOW OFTEN WILL THESE PILES BE TREATED WITH SURFACTING AGENT? NAME THE TYPE AND CONCENTRATION OF SURFACTANT THAT WILL BE USED. II) TYPE OF CONTROL METHODS USED FOR FUGITIVE PARTICULATE EMISSIONS FROM CONVEYOR LOADING OPERATIONS AND NORMAL TRAFFIC PATTERN ROADS SERVING THESE STORAGE PILES. IF SURFACTING AGENT IS USED STATE TYPE AND CONCENTRATION OF SURFACTING AGENT AND FREQUENCY OF ITS USE. III) TYPE OF CONTROL METHODS USED FOR FUGITIVE PARTICULATE EMISSIONS FROM ALL PAVED OR UNPAVED PARKING LOTS AND NORMAL TRAFFIC PATTERN ROADS AT THIS FACILITY. IF ROADS ARE PAVED INDICATE FOOTAGE OF ROADS THAT WILL BE PAVED AND HOW FREQUENTLY THESE ROADS WILL BE CLEANED.	

7. DOES THIS FACILITY HAVE ANY OF THE FOLLOWING SOURCES?

a.) CRUSHERS	☐ YES ☒ NO
b.) GRINDING MILLS	☐ YES ☒ NO
c.) SCREENING OPERATIONS	☒ YES ☐ NO
d.) BUCKET ELEVATORS	☐ YES ☒ NO
e.) CONVEYORS	☒ YES ☐ NO
f.) CONVEYOR TRANSFER POINTS	☒ YES ☐ NO
g.) BAGGING OPERATIONS	☐ YES ☒ NO
h.) STORAGE BINS	☐ YES ☒ NO
i.) FINE PRODUCT TRUCK AND TRAILER LOADING OPERATIONS	☐ YES ☒ NO
j.) UNLOADING AND TRANSPORTING OPERATIONS OF MATERIAL COLLECTED BY POLLUTION CONTROL EQUIPMENT	☒ YES ☐ NO
k.) UNPAVED NORMAL TRAFFIC ROADS	☒ YES ☐ NO
l.) PAVED NORMAL TRAFFIC ROADS	☒ YES ☐ NO
m.) UNPAVED PARKING LOTS	☐ YES ☒ NO
n.) PAVED PARKING LOTS	☒ YES ☐ NO

7b. FOR EACH SOURCE MARKED YES, ATTACH AN ADDITIONAL SHEET DESCRIBING THE TYPE OF CONTROL METHODS THAT WILL BE USED TO CONTROL FUGITIVE PARTICULATE EMISSIONS. IF SURFACTANT IS USED, STATE THE TYPE AND CONCENTRATION OF SURFACTANT AND FREQUENCY OF ITS APPLICATION. IF THE ROADS AND PARKING LOTS ARE PAVED, STATE THE FREQUENCY OF CLEANING.

8. VEHICULAR MILES TRAVEL INFORMATION:

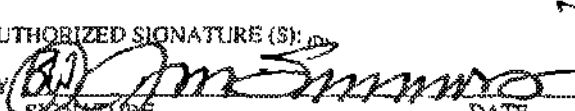
THIS INFORMATION IS TO BE DETERMINED BY THE NUMBER OF CARS MULTIPLIED BY THE DISTANCE TRAVELED FOR THE FOLLOWING ROADS.

- I) TRAFFIC ON UNPAVED NORMAL TRAFFIC ROADS IN MILES PER YEAR 15,000 Miles Per Year
- II) TRAFFIC ON PAVED NORMAL TRAFFIC ROADS IN MILES PER YEAR 5,000 Miles Per Year
- III) TRAFFIC ON UNPAVED PARKING LOTS IN MILES PER YEAR 0 Miles Per Year
- IV) TRAFFIC ON PAVED PARKING LOTS IN MILES PER YEAR 10 Miles Per Year

9. IS THIS FUGITIVE PARTICULATE CONTROL PROGRAM IMPLEMENTED AT THE PRESENT? ☒ YES ☐ NO

10.

AUTHORIZED SIGNATURE (S):

BY  SIGNATURE

DATE

BY

SIGNATURE

DATE

Jim Simmons

TYPED OR PRINTED NAME OF SIGNER

TYPED OR PRINTED NAME OF SIGNER

Terminal Manager

TITLE OF SIGNER

TITLE OF SIGNER

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

Consolidated Fugitive Particulate Operating Program and Contingency Measures Plan

Rev 14

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Facility ID No.: 031600AHI

Facility Telephone: (773) 375-3700

Responsible Persons: Site EHS Manager (primary for Operating Program)
Operations Manager (primary for Contingency Measures)

Prepared: November 18, 1999

Current Revision: #14 – May 29, 2013

Regulatory Driver: 35 IAC 212.309 through 212.312 (operating program)
35 IAC 212.700 through 212.705 (contingency measures)

1. Fugitive Particulate Operating Program

KCBX Terminals Company ("KCBX") handles bulk solid materials, primarily coal and petroleum coke, which are transported via truck, train, barge, and vessel. KCBX can transfer material either directly from one transportation mode to another or indirectly using intermediate stockpiling. KCBX has identified and implemented the requirements of 35 IAC 212.304 through 212.308 to control fugitive particulate matter emissions from these activities.

- A. Stockpiles. Bulk solid materials are stockpiled on-site to satisfy customer needs throughout the year. Stockpiles, defined as emission units in 35 IAC 211.1950, have existed prior to April 14, 1972 and normally would be subject to the 30 percent opacity limit of 212.123. However, such stockpiles are subject to the 10 percent opacity limit in 212.316(d) because they are located in an area defined by 212.324(a)(1) per 212.316(a).

Certain coals can have a tendency to develop a "hot spot" characterized by wispy, white smoke. These conditions develop spontaneously and are neither planned nor predictable and are not directly regulated in the Federally Enforceable State Operating Permit (FESOP) issued to KCBX. KCBX extinguishes hot spots by active stockpile maintenance. Operations may be altered to reduce smoke from hot spot sources.

Even though uncontrolled emissions from individual stockpiles should not exceed 50 tons/year (tpy), water is applied from permanent, pole-mounted water cannons to control fugitive particulate emissions in conformance with 35 IAC 212.301 (prohibiting visible emissions of fugitive particulates beyond the property line), 212.304 (requiring watering or other controls), and 212.316(d) (limiting fugitive particulate emissions from stockpiles to 10 percent opacity). Stockpiles may not consistently receive 100 percent coverage from the pole-mounted water spray system due to meteorological conditions or stockpile configurations. The portable water cannon mounted on the facility water truck is utilized in an attempt to water areas not covered by the pole-mounted water spray system. The facility water truck may also be used for supplemental water addition as needed during windy conditions.

Consolidated Fugitive Particulate Operating Program and Contingency Measures Plan

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Figure 1 shows the permanent, fixed-pole water spray system consisting of 19 water cannons, set on 4-inch diameter risers mounted on poles approximately 65 feet above grade, providing a design throw radius of 260-foot for each cannon at 100 psi and 500 gpm (see Table 1 for engineering specifications per 35 IAC 212.310(e)). Spare parts are readily attainable from local suppliers per 35 IAC 212.324(g)(3). Automated controls allow programmed sequencing of the cannons, regulating the duration of time the cannons are used and the timing of cycle initiation. Water for the system is supplied by one pump designed to deliver up to 600 gallons per minute (gpm) through approximately 6000 feet of buried 8-inch diameter pipe. KCBX has a backup 600 gpm pump that can be installed if necessary. Only one pump, typically supplying two cannons, operates at any given time. Operators are instructed to be aware of system operating performance and report any anomalies, such as low pressure or plugged/malfunctioning cannons. In addition, the system is inspected twice per month with no more than 21 days between inspections.

The fixed-pole water spray system is operated to apply water as conditions warrant, wetting the exteriors of stockpiles which are exposed to the eroding forces of wind and the mechanical displacement of operating equipment. Stockpiles are not kept saturated because only the surface is exposed to wind erosion and therefore, wetting the outer portion of the pile is all that is required. This prevents over-application of water which would result in increased controls associated with runoff management. The frequency and duration of watering are adjusted based on existing conditions, prevailing or forecasted weather, or as directed by the Illinois Environmental Protection Agency (IEPA) as discussed in Part 2. Watering is completed daily (7 days per week), unless any of the following are present:

1. freezing conditions¹, or
2. mitigating conditions such as carryover moisture from previous precipitation or water application.

Inactive stockpiles² are treated with a surfactant approximately every two months, weather permitting, starting in April and ending with the onset of freezing conditions. Operating logs of the water spray system and surfactant application are maintained.

¹ The permanent, fixed water spray system is typically drained and shut down from November 1 through March 31 to protect against freeze damage. Except during hard freezing conditions, the portable water cannon attached to the water truck is available to provide spot application of water, as needed.

² Inactive stockpiles are those piles that are not receiving or having material removed during the period of surfactant application, including the "backside" of piles that have a working face.

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TABLE 1. Specifications for Fixed-Pole Water Spray System

Description (may use equivalent substitutions)	Supplier/ MFR	MFR. Part No.
Nelson Big Gun (part circle) Model SR150-24 Deg, rated at 500 gpm @ 100 psi, 260' radius, 34' height, 34MM bore, including ring nozzle, 4" FNPT gun connection flange	Nelson	SR150-24 Deg
Pipe - Schedule 40 - galvanized (3 - lengths)		
Pipe Coupling Threaded - 4" class 150		
Hose 4" Dia. - Flex Hose to connect underground piping to piping on spray pole	Black Industrial	AZN4 RoyalFlex
Hose clamps for 4" hose - install 2 clamps each hose end		
Combination (Hose to MNPT) nipple - Serrated shank for hose connection and NPT Male threads for piping connection		
Pipe 45 degree elbow - 4" class 150, threaded		
CLA-VAL, 6" Roll Seal - Solenoid Control Valve - Model 736-01, 24 VDC Pilot Solenoid w/speed control, flanged design	CLA-VAL, Roll Seal	Model 736-01
6" x 4" FNPT Threaded Raised Face Flange, ANSI 150# galvanized for mating to 6" roll seal valve		
4" Ball Valve - Conbraco/Apollo 8BA14A01-150# raised face, standard port, carbon steel ball valve with WCB-B 16-34 body and 316 SS ball	Conbraco	8BA14A01
4" FNPT Threaded Raised Face Flange, ANSI 150# galvanized, 2 flanges for mating to 4" ball valve, 1 flange to mate to underground feed pipe		
Gaskets 4" pipe flange (ball valve & feed pipe)		
Gaskets 6" pipe flange (control valve)		
Control Valve Enclosure - 24x24x16, NEMA 12	Rittal / Electromate	E242416
Control Valve Enclosure Bracket		

Control of fugitive particulate emissions from bulk solid materials stored on barges berthed at KCBX is similar to controls for land-based stockpiles. As with stockpiles on the storage pad, bulk solid materials on barges typically develop a crust that is resistant to wind erosion unless the material is mechanically disturbed. When present, visible fugitive emissions from bulk solid material stored on barges are controlled by applying river water from portable water pumps as conditions warrant.

- B. Bulk solid material unloading. Best Management Practices (BMP) to control fugitive particulate emissions in conformance with the opacity limits of 35 IAC 212.316(d) and (f) are achieved as follows:

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1. Barges are unloaded using a clamshell bucket either to a storage pile or to a portable box hopper that transfers the material to a conveying system. In accordance with 35 IAC 212.308, water from the pole-mounted water cannons is used, as conditions warrant, to control fugitive particulate emissions at the hopper and along the conveying system. Fugitive emissions from barges unloaded directly to stockpiles are controlled by the pole-mounted water cannons.
 2. Rail cars are unloaded via a bottom dump receiving system. Fugitive particulate emissions are controlled by choke-feeding inside a partial enclosure and multiple spray bar headers are operated as conditions warrant in accordance with 35 IAC 212.308. Spray bars are inspected twice per month with no more than 21 days between inspections.
 3. Trucks are unloaded directly to stockpiles. Unloaded bulk solid materials typically have moisture contents adequate to minimize the generation of fugitive particulate emissions. When conditions warrant, water sprays from the pole-mounted water cannons or the water truck are applied to control fugitive particulate emissions during truck unloading in accordance with 35 IAC 212.304 and 212.306.
- C. Material Transfers. Material transfers may be utilized to move product to and from barges, vessels, rail cars, and stockpiles.
1. At multiple fixed transfer points throughout the main conveyance systems, water from full-width spray bars is applied to control fugitive particulate emissions when conditions warrant. Dust suppressants may also be added if requested by customers. Spray bars are inspected twice per month with no more than 21 days between inspections.
 2. At portable and mobile transfer points, front-end loaders, bulldozers, box hoppers, conveyors, and stacking equipment are generally utilized. When conditions warrant, water sprays from the pole-mounted water cannons are applied to control fugitive particulate emissions and water sprays from a portable water cannon attached to the water truck may also be used for spot or supplemental control of fugitive particulate emissions.
 3. As stated in 1.A, uncontrolled emissions from stockpiles should not exceed 50 tpy and therefore, dedicated spray systems and telescopic chutes for conveyor loading operations to storage piles are not required by 35 IAC 212.305. However, water from the pole-mounted water cannons or the portable water cannon attached to the water truck is available for control at these transfer points as needed and drop distances are minimized as an additional control

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- D. Bulk solid material loading. In addition to the controls described below, carryover moisture from controls described in Sections A through C also minimizes fugitive particulate emissions during loading of receiving vehicles (i.e., barges, vessels, trucks or railcars). Choke-feeding, in accordance with 35 IAC 212.308 is utilized where possible given the physical configuration of equipment.
1. For barge and vessel loading, material drop distance is minimized, feed rate is monitored and adjusted as needed, and spray bars are used on the fixed conveyances as warranted. Spray bars are inspected twice per month with no more than 21 days between inspections.
 2. For vessel to barge transfer, vessels that are equipped with water sprays on the discharge conveyor may activate this control as conditions warrant or as requested by KCBX. If a vessel does not have the ability to apply water, KCBX will stop the transfer if warranted by the conditions present.
 3. For truck loading, front-end loaders transfer bulk solid material from stockpiles to the trucks. During non-freezing conditions, water applied from the pole-mounted water cannons to control fugitive particulate emissions also provides wetting that minimizes emissions from the truck loading. Truck drivers are trained to tarp their loads in accordance with 35 IAC 212.315 prior to leaving the site. During non-freezing conditions, the trucks pass through a wheel-wash prior to leaving the site.
- E. Screening. Bulk solid material may be sized in a screening process to remove foreign material (trash) and/or to satisfy customer product specifications. When conditions warrant, water is applied to the unscreened stockpile or the target hopper from the water truck to control fugitive particulate emissions to achieve an opacity of 10 percent or less in accordance with 35 IAC 212.316(b). Choke-feeding, in accordance with 212.308, is employed where possible given the physical configuration of equipment.
- F. Plant roads and parking areas. KCBX utilizes large, heavy mobile equipment to transfer bulk solid materials. This equipment frequently traverses the storage pad and roads shown on Figure 1. Water spray from pole-mounted water cannons is applied to control fugitive particulate emissions on interior plant roads generated by this heavy equipment traffic. Water from a truck-mounted spray bar and/or portable water cannon attached to the water truck is applied as needed to control fugitive particulate emissions from interior plant roads on days when heavy equipment traffic is present and as otherwise needed to control fugitive particulate emissions from parking areas. In addition, a mechanical sweeper is used during normal business days, except days with precipitation or freezing conditions, to remove particulates from paved interior plant roads, parking areas, the south lanes of 100th Street from Road 1 to Road 3, and Road 1 from 100th Street to the Retention Basin. Trucks leaving the storage pad and entering Road 1 are required to pass through a wheel-wash prior to leaving. The wheel-wash operates each day that truck traffic is present except during freezing conditions. The wheel wash is inspected twice

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per month with no more than 21 days between inspections. These best management practices are implemented in accordance with the requirements of 35 IAC 212.306 and are designed to meet the 10 percent opacity limit of 212.316(c).

Each day that trucks are loaded or unloaded, the roads on Figure 1 are swept as described above and watered unless precipitation, freezing conditions, snow cover, or other mitigating conditions are present, such as carryover moisture from previous day(s). Sweeping is accomplished using a wet vacuum system that moistens the particles and prevents their migration when the sweeper is unloaded. Written records of water truck use are maintained. Contractor tickets are used as documentations of sweeper operations.

The watering program also covers Road 1 from 100th Street to the Retention Basin although this private road is neither owned nor leased by the company. KCBX voluntarily implements fugitive dust control measures on Road 1 as a community betterment effort and will continue this practice as long as Road 1 is safe to traverse and it does not become a public thoroughfare.

- H. Program. Each day, fugitive particulate sources and current weather conditions are monitored and the Best Management Practices (BMP) listed in Sections A through F are implemented to control fugitive particulate emissions when conditions warrant. Forecasts of expected weather conditions, including wind and precipitation, are monitored and the pole-mounted water spray program is adjusted accordingly. The responsible persons listed on page 1 have accountability for monitoring weather forecasts or assigning this responsibility. Forecasts are available through local and national public domain services.

35 IAC 212.314 provides an exception from the requirement of Section 212.301 to prevent visible emissions of fugitive particulate matter from any process, including material handling or storage activity, beyond the property line when wind speed exceeds 25 mph. Similarly, when wind speed exceeds 25 mph, spray systems and sweeping equipment are not required under Sections 212.304 through 212.310 and Section 212.212. However, 212.316(a) does not recognize the exceptions outlined in Section 212.314 for screening (212.316(b)), roads and parking areas (212.316(c)), and storage piles (212.316(d)) and the 10 percent opacity limit remains for these emission units and areas. KCBX will continue applying controls to screening operations, interior plant roads, parking areas, and storage piles unless deemed unsafe or environmentally detrimental.

There is currently no pollution control equipment in operation at the facility subject to the emission limits of 35 IAC 212.313 that collects residual materials subject to the requirements of 212.307.

Figure 1 depicting the following elements is included per 35 IAC 212.310(c) as an aid to implementing the consolidated plan:

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1. approximate locations of storage piles
2. fixed conveyor locations
3. areas where portable conveyors may be operated
4. roads
5. approximate locations of bulk solid material loading and unloading
6. locations of fixed pollution control systems

This Fugitive Particulate Operating Program is reviewed periodically by KCBX and revised to reflect current knowledge and practice. Any revisions made are consistent with 35 IAC Subpart K and submitted to IEPA in accordance with 35 IAC 212.312.

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2. Contingency Measure Plan

A. Plan Elements. This Contingency Measure Plan (CMP) is designed to achieve reductions in actual annual PM_{10} emissions. Terms of this CMP are federally enforceable per 35 IAC 212.702. There are two levels of control measures identified in Section 212.703:

1. Level I measures are designed to reduce total actual annual source-wide fugitive emissions of PM_{10} at least 15% by increasing both the frequency and the volume of water in the application cycles, thereby increasing the moisture of the stockpiles and the effectiveness of the fugitive emissions controls (see Table).
2. Level II measures are designed to reduce total actual annual source-wide fugitive emissions of PM_{10} at least 25% by further increasing both the frequency and the volume of water in the application cycles, thereby increasing the moisture of the stockpiles and the effectiveness of the fugitive emissions controls (see Table).

The BMP for meeting the contingency measure reductions specified in 35 IAC 212.703(a) follow those listed in Sections A through F of the Fugitive Particulate Operating Program in Part 1 of this consolidated plan. Because any control measure applied at any stage of the receiving or transferring aspect of bulk solid material handling tends to carry over to storage in stockpiles, the controls for these activities also constitute BMP that enable KCBX to meet the requirements of 212.304.

Scenario	Reduction Using Water Sprays [%]	Actual Annual PM_{10} Emission Reductions [%]
Base condition	80	N/A
Level I: Increase frequency and volume of pole-mounted and mobile water sprays from base condition	85	≥ 15
Level II: Increase frequency and volume of pole-mounted and mobile water sprays from Level I and defer or reschedule non-critical operations	90	≥ 25

In accordance with 35 IAC 212.704(b) and (c), KCBX will implement Level I controls within 90 days and Level II controls within 60 days of receiving notice from the IEPA that the CMP should be implemented. KCBX will make every effort to implement the measure as soon as possible, but in no case will delay implementation beyond the applicable 60 or 90 day period.

Assessment of operations as non-critical will be accomplished on as as-needed basis. Options may include, but are not limited to, cessation of certain activities such as screening and stockpile compaction and may involve rescheduling certain activities such as material deliveries or shipments to periods when less wind is forecast.

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- B. Alternative Compliance Plan: KCBX has the option of complying with 35 IAC 212.703 through an Alternative Compliance Plan that provides for reductions in emissions equal to the level of reduction of fugitive emissions sought by Level I and Level II control measures. An Alternative Compliance Plan must be approved by IEPA and USEPA as a federally enforceable permit condition. If source controls are included on process emission units or other fugitive emissions of PM₁₀ not subject to 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424, or 212.464 in an Alternative Control Plan, the Plan must include a reasonable schedule of implementation for the controls, not to exceed two (2) years. The implementation schedule is subject to IEPA review and approval.
- C. Revisions to the Contingency Measure Plan (CMP): Operational changes subject to 35 IAC 212.304, 212.305, 212.306, 212.308, 212.316 (a) through (e), 212.424, or 212.464 that require a new or revised permit must, within 30 days after making such changes, be submitted to IEPA with a request for permit modification to include the new or revised CMP per 212.701(c).
- D. Alternative Strategies Considered for Reduction of PM₁₀ Emissions: The following alternative strategies were considered and rejected as possible strategies to reduce PM₁₀ emissions from the KCBX operation:

1. KCBX considered the option of reducing the fines in the coal it handles by altering the crushing, screening or other mining techniques at the coal mine supply site. After due consideration, it was determined that KCBX does not have the decision rights to make this change. KCBX provides coal to its customers, sized to their specification. KCBX can not alter those specifications.

The petroleum coke shipped to KCBX is a refinery product. The sizing of the petroleum coke is dictated by the processing system at the refinery. KCBX has contractual obligations to accept the entire petroleum coke product stream from the refinery. Only the refinery can modify the coking equipment or alter the sizing specification of the petroleum coke.

2. KCBX evaluated the use of tarpaulins to cover the stockpiles, thereby reducing particulate emissions. This approach is not possible due to the way that stockpiles are utilized at KCBX. There may be up to 20 stockpiles present on the dock at any given time with active operations (i.e., loader or conveyor activity) at multiple stockpiles. Since stockpile locations and usage patterns are constantly changing, it is not feasible to use tarpaulins.

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3. Episode Action Plan

Episode Action Plans under 35 IAC 244 Subpart C are not required because the emission sources combusting fuel oil at the facility do not exceed 10 mmbtu/hr (see 244.142(c)).

Consolidated Fugitive Particulate Operating Program and Contingency Measures Plan

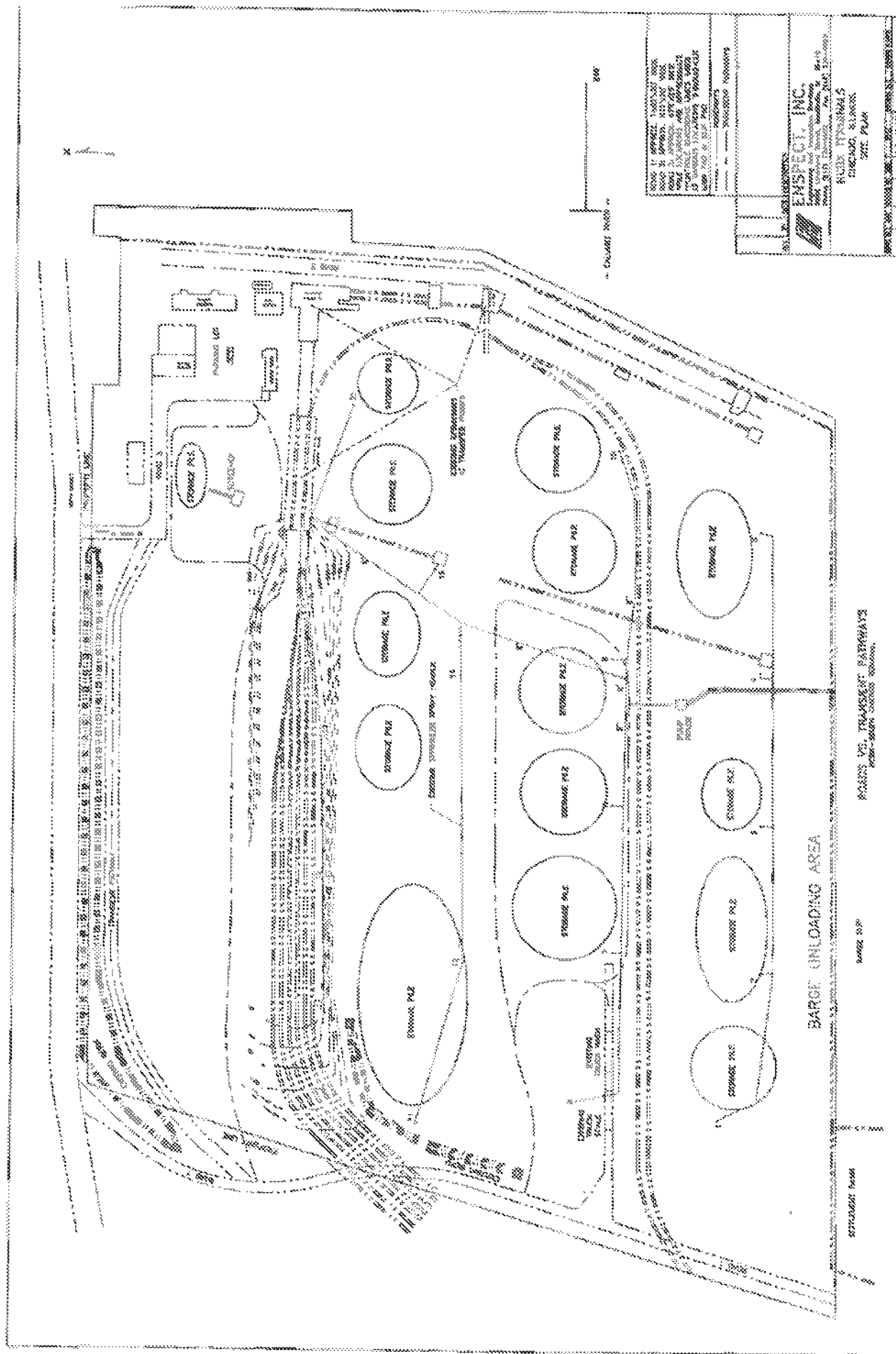
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4. Revision Log

Rev 1 01/21/01	Plant Manager changed to Gary Hosack from Ed Koerperich and changed PVC to Pipeline.
Rev 2 08/27/02	Added: (1) an estimated frequency for the application of water as a dust suppressant by the sprinklers, water truck and sweeper, and (2) inclusion of the truck wash as a method of fugitive dust control.
Rev 3 01/21/03	Changed responsible party from Gary Hosack to Duane Pecci and changed number of fixed water cannons from (22) to (21) in Paragraph K.
Rev 4 02/21/05	Deleted old paragraphs "I" Crushing Process and "B" Vessel Unloading which are no longer performed. Added new paragraph "G," vessel to barge transfer loading. Added new spray bars for rail unloading to paragraph "B"
Rev 5 07/07/05	Added surfactant application note to Paragraph J and clarified scope of sweeper services in Paragraph K.
Rev 6 10/23/06	Combined Fugitive Particulate Operating Program with Contingency Measure Plan, added regulatory drivers, changed Responsible Persons, clarified controls around box hopper in Sections H and I, and reformatted the document.
Rev 7 08/07/07	Minor edits to s. 1.A. to note spray cannon on high line and surfactant application to inactive piles is "approximately" every 60 days and s. 1.B. noting that product unloaded from trucks may be further reworked by mobile equipment. Added s. 3 rationale for no Episode Action Plan.
Rev 8 08/29/08	Corrected the number of fixed pole water cannons operating on-site from 21 to 19.
Rev 9 11/06/08	Edited: (1) footnote 1 regarding portable water cannons; (2) s. 1.A regarding 3 conditions related to running water system; (3) s. 1.F for conditions regarding reasons for sweeper not being run; (4) s. 1.A through 1.G for wording clarification; (5) s. 2.A adding abeyance and rescheduling as options.
Rev 10 06/23/09	(1) Clarified "portable water cannon" throughout the plan. (2) Made administrative edits for consistency in plan implementation.
Rev 11 05/04/10	(1) Made administrative edits for consistency in plan implementation. (2) Added language around the anemometer attached to cannon system.
Rev 12 05/16/11	Administrative changes to Sections 1.A, 1.B.3, 1.C.1, 1.D.1, 1.D.3, 1.F and Table 1 title
Rev 13 02/02/12	Revised tonnages on Form 6.b, added management of hot spots to Section 1.A, administrative changes to Sections 1.A, 1.B, 1.C, 1.D, 2.A, 2.C
Rev 14 05/29/13	Revised 1.A to clarify opacity limit for stockpiles and reference inspections of controls, 1.B to reference inspections of controls, 1.C to add stacker water spray and reference inspections of controls, 1.D to reference inspections of controls, 1.F to define roads, 1.H to clarify when exceptions for excess wind are not applicable, and made editorial changes throughout.

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
1021 NORTH GRAND AVENUE, EAST
SPRINGFIELD, ILLINOIS 62702

OPERATING PROGRAM FOR
FUGITIVE PARTICULATE CONTROL



KCBX TERMINALS COMPANY

1. THIS FORM IS USED TO APPLY FOR A FUGITIVE DUST OPERATING PROGRAM AS REQUIRED BY 35 IAC 212.309. COMPLETE THE FORM, KEEP ONE COPY FOR YOUR RECORDS, AND RETURN TWO COPIES TO THE ATTENTION OF BUREAU OF AIR PERMIT SECTION MANAGER AT THE ADDRESS LISTED ABOVE.

2a. NAME OF OWNER: KM Railways, LLC		3a. NAME OF OPERATOR: KCBX Terminals Company	
2b. STREET ADDRESS OF OWNER: 4111 East 37th Street North		3b. STREET ADDRESS OF OPERATOR: 10730 South Burley Avenue	
2c. CITY OF OWNER: Wichita		3c. CITY OF OPERATOR: Chicago	
2d. STATE OF OWNER: KS	2e. ZIP CODE: 67220	3d. STATE OF OPERATOR: IL	3e. ZIP CODE: 60617

4a. NAME OF CORPORATE DIVISION OR PLANT: KCBX Terminals Company		4b. STREET ADDRESS OF EMISSION SOURCE: 10730 South Burley Avenue		
4c. CITY OF EMISSION SOURCE: Chicago	4d. LOCATED WITHIN CITY LIMITS: ☒ YES ☐ NO	4e. TOWNSHIP:	4f. COUNTY: COOK	4g. ZIP CODE: 60617

5. SUBMIT A SCALE MAP SHOWING ALL STORAGE PILES, CONVEYOR LOADING OPERATIONS, STORAGE PILE ACCESS ROADS, NORMAL TRAFFIC ROADS, PARKING FACILITIES, LOCATION OF UNLOADING AND TRANSPORTING OPERATIONS WITH POLLUTION CONTROL EQUIPMENT.

6a. DO STORAGE PILES CONTAIN A TOTAL OF MORE THAN 260,000 TONS OF MATERIAL IN A CALENDER YEAR? ☒ YES ☐ NO

6b. IF THE ANSWER TO 6a WAS YES, PLEASE SUBMIT THE FOLLOWING INFORMATION.

TOTAL AMOUNT OF MATERIAL IN THE STORAGE PILES: 1,000,000 tons typical TONS/YEAR: 2.5MM - 5.0 MM tpy typical
Permit allows 11 MM tpy throughput

AND SUBMIT AN ATTACHED SHEET DESCRIBING:

I) DETAILED OPERATING PROCEDURES AND CONTROL METHODS BY WHICH FUGITIVE PARTICULATES FROM THESE STORAGE PILES WILL BE MINIMIZED DURING LOADING, UNLOADING, PILE MAINTENANCE, AND WIND EROSION. HOW OFTEN WILL THESE PILES BE TREATED WITH SURFACTING AGENT? NAME THE TYPE AND CONCENTRATION OF SURFACTANT THAT WILL BE USED.

II) TYPE OF CONTROL METHODS USED FOR FUGITIVE PARTICULATE EMISSIONS FROM CONVEYOR LOADING OPERATIONS AND NORMAL TRAFFIC PATTERN ROADS SERVING THESE STORAGE PILES. IF SURFACTING AGENT IS USED STATE TYPE AND CONCENTRATION OF SURFACTING AGENT AND FREQUENCY OF ITS USE.

III) TYPE OF CONTROL METHODS USED FOR FUGITIVE PARTICULATE EMISSIONS FROM ALL PAVED OR UNPAVED PARKING LOTS AND NORMAL TRAFFIC PATTERN ROADS AT THIS FACILITY. IF ROADS ARE PAVED INDICATE FOOTAGE OF ROADS THAT WILL BE PAVED AND HOW FREQUENTLY THESE ROADS WILL BE CLEANED.

7. DOES THIS FACILITY HAVE ANY OF THE FOLLOWING SOURCES?		
a.) CRUSHERS	☐ YES	☒ NO
b.) GRINDING MILLS	☐ YES	☒ NO
c.) SCREENING OPERATIONS	☐ YES	☒ NO
d.) BUCKET ELEVATORS	☐ YES	☒ NO
e.) CONVEYORS	☒ YES	☐ NO
f.) CONVEYOR TRANSFER POINTS	☒ YES	☐ NO
g.) RAGGING OPERATIONS	☐ YES	☒ NO
h.) STORAGE BINS	☐ YES	☒ NO
i.) FINE PRODUCT TRUCK AND TRAILER LOADING OPERATIONS	☐ YES	☒ NO
j.) UNLOADING AND TRANSPORTING OPERATIONS OF MATERIAL COLLECTED BY POLLUTION CONTROL EQUIPMENT	☒ YES	☐ NO
k.) UNPAVED NORMAL TRAFFIC ROADS	☒ YES	☐ NO
l.) PAVED NORMAL TRAFFIC ROADS	☒ YES	☐ NO
m.) UNPAVED PARKING LOTS	☐ YES	☒ NO
n.) PAVED PARKING LOTS	☒ YES	☐ NO

7b. FOR EACH SOURCE MARKED YES, ATTACH AN ADDITIONAL SHEET DESCRIBING THE TYPE OF CONTROL METHODS THAT WILL BE USED TO CONTROL FUGITIVE PARTICULATE EMISSIONS. IF SURFACTANT IS USED, STATE THE TYPE AND CONCENTRATION OF SURFACTANT AND FREQUENCY OF ITS APPLICATION. IF THE ROADS AND PARKING LOTS ARE PAVED, STATE THE FREQUENCY OF CLEANING.

8. VEHICULAR MILES TRAVEL INFORMATION:	
THIS INFORMATION IS TO BE DETERMINED BY THE NUMBER OF CARS MULTIPLIED BY THE DISTANCE TRAVELED FOR THE FOLLOWING ROADS.	
I) TRAFFIC ON UNPAVED NORMAL TRAFFIC ROADS IN MILES PER YEAR	15,000 Miles Per Year
II) TRAFFIC ON PAVED NORMAL TRAFFIC ROADS IN MILES PER YEAR	5,000 Miles Per Year
III) TRAFFIC ON UNPAVED PARKING LOTS IN MILES PER YEAR	0 Miles Per Year
IV) TRAFFIC ON PAVED PARKING LOTS IN MILES PER YEAR	10 Miles Per Year

9. IS THIS FUGITIVE PARTICULATE CONTROL PROGRAM IMPLEMENTED AT THE PRESENT?	☒ YES	☐ NO

10.			
AUTHORIZED SIGNATURE (8) (D)			
BY		DATE	BY
SIGNATURE			SIGNATURE
	1/NOV 2013		DATE
Mike Estadt			
TYPED OR PRINTED NAME OF SIGNER		TYPED OR PRINTED NAME OF SIGNER	
Operations Manager			
TITLE OF SIGNER		TITLE OF SIGNER	

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

Consolidated Fugitive Particulate Operating Program and Contingency Measures Plan

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Facility ID No.: 031600GSF

Facility Telephone: (773) 375-8974

Responsible Persons: Site EHS Manager (primary for Operating Program)
Operations Manager (primary for Contingency Measures)

Prepared: November 1, 2013

Current Revision: 1

Regulatory Driver: 35 IAC 212.309 through 212.312 (operating program)
35 IAC 212.700 through 212.705 (contingency measures)

I. Fugitive Particulate Operating Program

KCBX Terminals Company ("KCBX") handles bulk solid materials, primarily coal and petroleum coke, which are transported via truck, train, barge, and vessel. KCBX can transfer material either directly from one transportation mode to another or indirectly using intermediate stockpiling. KCBX has identified and implemented the requirements of 35 IAC 212.304 through 212.308 to control fugitive particulate matter emissions from this handling.

Stockpiles. Bulk solid materials are stockpiled on-site to satisfy customer needs throughout the year. Even though uncontrolled emissions from individual stockpiles should not exceed 50 tons/year (tpy), water is applied from permanent, pole-mounted cannons to control fugitive particulate emissions in conformance with 35 IAC 212.301 (prohibiting visible emissions of fugitive particulates beyond the property line), 212.304 (requiring watering or other controls), and 212.316(d) (limiting fugitive particulate emissions from stockpiles to 10 percent opacity). Stockpiles may not consistently receive 100 percent coverage from the pole-mounted water cannons due to meteorological conditions, stockpile configurations or pile placement. The portable water cannon mounted on the facility water truck may be utilized to water areas not covered by the pole-mounted cannons. The facility water truck may also be used for supplemental water addition as needed during windy conditions.

Figure 1 shows the permanent, fixed-pole water application system consisting of 42¹ water cannons set on 4- and 6-inch diameter risers mounted inside poles approximately 60 feet above grade. At 100 psi, the cannons provide design throw radii of 170 feet and 250 feet for 4-inch and 6-inch feed lines, at 100 psi and deliver 235 gallons per minute (gpm) and 660 gpm for the 4-inch and 6-inch feed lines, respectively (see Table 1 for engineering specifications per 35 IAC 212.310(e)). All spare parts are readily attainable from local suppliers per 35 IAC 212.324(g)(3). There are two systems, each with their own pumps and intakes that have automated controls allowing programmed sequencing

¹ The facility is designed for 43 permanent, pole-mounted water cannons. The 43rd cannon will be installed and operated once a storage pile that currently occupies the area of the tower and the pipe run is moved.

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of the cannons, regulating the duration of time the cannons are used and the timing of cycle initiation. Water for the north system is supplied from the north retention basin by two pumps designed to deliver up to 500 gpm each. The south system is designed to water withdrawn from the south retention basin using a single pump that can deliver up to 660 gpm flow at pressures exceeding 100 psi. A spare pump and motor are kept on site for the south system in case of pump or motor failure and an additional 500 gpm backup pump can be operated if necessary. The pumps feed through 10-inch diameter pipes. Make up water is provided to the north and south retention basins from the Calumet River by temporary pumps dedicated to each system.² Operators are instructed to be aware of system operating performance and report any anomalies, such as low pressure or plugged/malfunctioning cannons. In addition, the system is inspected twice per month with no more than 21 days between inspections.

The fixed-pole cannon system is operated to apply water as conditions warrant, wetting the exteriors of stockpiles which are exposed to the eroding forces of wind and the mechanical displacement of operating equipment. A water truck is also used when needed. Stockpiles are not kept saturated because only the surface is exposed to wind erosion and therefore, wetting the outer portion of the pile is all that is required. This prevents over-application of water which would result in increased controls associated with runoff management. The frequency and duration of watering are adjusted based on existing conditions, prevailing or forecasted weather, or as directed by the Illinois Environmental Protection Agency (IEPA) as discussed in Part 2. Watering is completed seven days per week unless any of the following are present:

1. freezing conditions³, or
2. adequate carryover moisture is present from previous precipitation or water application.

TABLE 1. Specifications for Fixed-Pole Water Cannon Systems

DESCRIPTION	TYPE	MANUFACTURER / MODEL
Pump, River ² /Basin Water Supply	Vertical Turbine	Flowserve 10EEM-8
Pump, River Water Jockey ²	Vertical Turbine	Flowserve 8ELL-8
Motor, River Water Jockey Pump ²	3-Phase	Flowserve
Pump, South Basin	Vertical Turbine	American Turbine 12-11-150 or equivalent
Motor, South Basin Pump	3-Phase	American Turbine
Pump, Sump	Vertical	Flowserve 3MSX7A
Motor, Sump Pump	3-Phase	Flowserve

² Installations of the permanent river pump intakes are awaiting authorization via a joint permit from the U.S. Army Corps of Engineers (USACOE), the Illinois Department of Natural Resources, and the Illinois Environmental Protection Agency. Temporary withdrawal into the basins is currently allowed by permission of the USACOE.

³ The permanent, fixed water cannon systems are typically drained and shut down from November 1 through March 31 to protect against freeze damage. However, KCBX will continue its use after November 1 and until freezing conditions require shut down. Except during hard freezing conditions, the portable water cannon attached to the water truck is available to provide spot application of water, as needed.

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Pump, Surfactant Dosing	Positive Displacement	LM1 S G6 6 x P P (Less Motor)
Motor, Surfactant Dosing Pump	3-Phase	LM1
Pump, Surfactant Dosing	Gear	Flowserve 5GAFM1D0
Motor, Surfactant Dosing Pump	3-Phase	Flowserve
Pump, Spray Nozzle Feed	Centrifugal	Flowserve 1J15X1US-6RV Mark 3
Motor, Spray Nozzle Feed Pump	3-Phase	Flowserve
Valve	Gate	NIBCO F-617-0
Valve	Check	NIBCO F-938-33, FLG
Valve	Check	NIBCO 400 Series, THRD
Valve	Motorized	NIBCO F-515-CS-F-66-F-5 + Actuator
Valve	Motorized	NIBCO 200NIBBRELNEMA6120VACASSY
Valve	Ball	NIBCO T585-7B
Valve	Butterfly	NIBCO FD-5765-1
Valve	Butterfly	NIBCO FD-5765-0
Valve	Solenoid	ASCO Redhat
Valve	PRV	Watts LFB223B/Cla Val 90-01AS or equivalent
Valve	Self-Contained PRV	Watts LFB223B/Cla Val 90-01AS or equivalent
Valve, Sprinkler Control	Full Port Ball	Bettis/Nibco
Valve	Air Combination	APCO 145C
Valve Actuator with Travel Limit Switches	EM-800 Motor Operator	Bettis/Nibco
Backflow Preventer	Double Check	Watts 709DCDA
Calibration Column		Harrington F-Series
Strainer, 6 [in]	Liquid In-Line	CLA-VAL X43H
Strainer, 10 [in]	Liquid In-Line	Watts 77F-DI-125
Strainer, 10 [in]	Basket	Mueller 166-DI
Valve, Pressure Reducing		CLA-VAL 90-01 BSX-X434
Valve, Pressure Reducing	Super Capacity	Watts ES-223
Valve, Pressure Reducing	Super Capacity	Watts N223B
Mixer	Static	Koflo-985
Filter, (Heat Pump Units)	Disposable, 2 in	
Filter, Stainless Steel	Washable	CAMFIL FARR Type 44
Backpressure Relief	Relief Pressure	Fisher NPS 293H

Inactive stockpiles⁴ are treated with a surfactant approximately every two months, weather permitting, starting in April and ending with the onset of freezing conditions. Surfactant may be applied through the cannon mounted on the water truck.⁵ Operating logs of surfactant application are maintained on-site.

Bulk solid materials stored on railcars not received into the facility and bulk solid materials stored on barges berthed at KCBX are not under the control of KCBX and emissions from such sources while they remain "in transport" are not regulated under the revised construction permit issued to KCBX on April 18, 2013. KCBX may attempt to use water application to control fugitive emissions from these sources, but only with the expressed permission of the owner of the materials and the owner of the property where the "in transport" materials reside.

⁴ Inactive stockpiles are those piles that are not receiving or having material removed during the period of surfactant application, including the undisturbed portion of piles that have a working face.

⁵ Capabilities to add surfactant through the pole-mounted cannons is currently in construction.

**Consolidated Fugitive Particulate Operating Program and
Contingency Measures Plan**

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Certain coals can develop a "hot spot" characterized by wispy, white smoke. This condition develops spontaneously and is neither planned nor predictable and is not directly regulated through the joint construction and operating permit issued to KCBX on December 20, 2012, or through the revised construction permit issued to KCBX on April 18, 2013. KCBX extinguishes hot spots by active stockpile maintenance. Operations may be altered to reduce smoke from hot spot sources.

B. Bulk solid material unloading. Best Management Practices (BMP) to control fugitive particulate emissions in conformance with the opacity limits of 35 IAC 212.316(d) and (f) are achieved as follows⁶:

1. Rail cars are unloaded via rotary and bottom dump receiving systems. Fugitive particulate emissions are controlled by choke-feeding inside a partial enclosure and multiple spray bar headers are operated as conditions warrant in accordance with 35 IAC 212.308. Spray bars are inspected twice per month with no more than 21 days between inspections.
2. Trucks are unloaded directly to stockpiles. Unloaded bulk solid materials typically have moisture contents adequate to minimize the generation of fugitive particulate emissions. When conditions warrant, water from the pole-mounted cannons or the water truck are applied to control fugitive particulate emissions during truck unloading in accordance with 35 IAC 212.304 and 212.306.
3. A baghouse draws air from the rotary rail dump enclosure, removes recoverable product, and returns the recovered product to conveyor FC-1 within an enclosure as required by 35 IAC 212.307. The baghouse exhaust is visually monitored and pressure drop is recorded as a means of ensuring compliance with the 0.03 gr/dscf requirement of 35 IAC 212.313. When visible emissions are evident from the exhaust or when pressure drop is outside of the range specified by the baghouse manufacturer, the system is examined for blinded or compromised bags and repairs or maintenance is conducted as necessary.

C. Material Transfers. Material transfers may be utilized to move product to and from barges, vessels, rail cars, and stockpiles.

1. At multiple fixed transfer points throughout the railcar unloading and ship loading fixed conveyance systems, water from spray bars is applied to control fugitive particulate emissions when conditions warrant. Dust suppressants may also be added

⁶ In addition to rail car and truck unloading, barge unloading capability will be installed, and will use a clamshell on a mobile crane to transfer material from barges to a box hopper that feeds the material to a conveying system. Water from a spray bar on the box hopper may be used, as conditions warrant, to control fugitive particulate emissions at the hopper and along the conveying system in accordance with 35 IAC 212.308. Additionally, the cannon on the water truck is available to apply water, if needed.

Consolidated Fugitive Particulate Operating Program and Contingency Measures Plan

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if requested by customers. Spray bars are inspected twice per month with no more than 21 days between inspections.

2. At portable and mobile transfer points, front-end loaders, bulldozers, box hoppers, conveyors, and stacking equipment are generally utilized. When conditions warrant, water from the pole-mounted cannons is applied to control fugitive particulate emissions and water from a portable cannon attached to the water truck may also be used for spot or supplemental control of fugitive particulate emissions.
 3. As stated in 1.A, uncontrolled emissions from stockpiles should not exceed 30 tpy and therefore, dedicated water spray systems and telescopic chutes for conveyor loading operations to storage piles are not required by 35 IAC 212.305. However, water from the pole-mounted cannons or the portable cannon attached to the water truck is available for control at these transfer points as needed and drop distances are minimized as an additional control.
- D. Bulk solid material loading. In addition to the controls described below, carryover moisture from controls described in Sections A through C also minimizes fugitive particulate emissions during loading of receiving vehicles (i.e., barges, vessels, trucks or railcars). Water application is used in lieu of choke-feeding where possible given the physical configuration of equipment as allowed by 35 IAC 212.308.
1. For barge and vessel loading, material drop distance is minimized, feed rate is monitored and adjusted as needed, and spray bars on the fixed conveyances are used as warranted. Spray bars are inspected twice per month with no more than 21 days between inspections.
 2. For vessel to barge transfer, vessels that are equipped with water sprays on the discharge conveyor may activate this control as conditions warrant or as requested by KCBX. If a vessel does not have the ability to apply water, KCBX will stop the transfer if warranted by the conditions present.
 3. For truck loading, front-end loaders transfer bulk solid material from stockpiles to the trucks. During non-freezing conditions, water applied from the pole-mounted cannons to control fugitive particulate emissions also provides wetting that minimizes emissions from the truck loading. Truck drivers are trained to tarp their loads in accordance with 35 IAC 212.315 prior to leaving the site.⁷

⁷ KCBX is constructing a wheel wash to reduce drag out of particulate from trucks leaving the facility. This control system may also be winterized as needed to avoid equipment damage. When operational, all drivers serving KCBX will be instructed to pass through the wheel wash on exiting the facility.

Consolidated Fugitive Particulate Operating Program and Contingency Measures Plan

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- E. Screening.⁸ The revised construction permit issued to KCBX on April 18, 2013 provides for the screening of soil or bulk solid materials to remove foreign material (trash) and/or to satisfy customer product size specifications. No screening has taken place at the facility under KCBX ownership, and no screening equipment is currently located at the facility, but if screening were to take place, water would be applied to the unscreened stockpile or the target hopper from the water truck to control fugitive particulate emissions to achieve an opacity of 10 percent or less in accordance with 35 IAC 212.316(b). Choke-feeding, in accordance with 212.308, would be employed where possible given the physical configuration of equipment.
- F. Plant roads and parking areas. KCBX utilizes large, heavy mobile equipment to transfer bulk solid materials. This equipment frequently traverses the storage pad and roads shown on Figure 1. Water from pole-mounted cannons is applied to control fugitive particulate emissions from interior plant roads. Water from a truck-mounted spray bar and/or portable cannon attached to the water truck is applied on interior plant roads within the range of the cannons as an additional dust control measure on days when heavy equipment traffic is present. Water application from the water truck is also used to control fugitive particulate emissions from parking areas. In addition, a mechanical sweeper is used during normal business days, except days with precipitation or freezing conditions, to remove dust from paved interior plant roads, parking areas, the entrance along Burley Avenue. These best management practices are implemented in accordance with the requirements of 35 IAC 212.306 and are designed to meet the 10 percent opacity limit of 212.316(c).

Each day that trucks are loaded or unloaded, the roads on Figure 1 are swept as described above and watered unless precipitation, freezing conditions, snow cover, or other mitigating conditions are present, such as carryover moisture from previous day(s). Sweeping is accomplished using a wet vacuum system that moistens the particles and prevents their migration when the sweeper is unloaded. Written records of water truck use are maintained. Contractor tickets are used to document sweeper operations.

- G. Program. Each day, fugitive emission sources and current weather conditions are monitored and the Best Management Practices (BMP) listed in Sections A through F are implemented to control fugitive particulate emissions when conditions warrant. Forecasts of expected weather conditions, including wind and precipitation, are monitored and the pole-mounted watering program is adjusted accordingly. The responsible persons listed on page 3 have accountability for monitoring weather forecasts or assigning this responsibility. Forecasts are available through local and national public domain services.

⁸ No screening equipment is currently located at the facility, and KCBX has no plans to permanently locate screening equipment at the facility. Rather, if screening were to take place, KCBX would bring rental screening equipment to the facility on a temporary basis as allowed in the revised construction permit issued to KCBX on April 18, 2013.

**Consolidated Fugitive Particulate Operating Program and
Contingency Measures Plan**

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Figure 1 depicting the following elements is included per 35 IAC 212.310(c) as an aid to implementing the consolidated plan and depicts the approximate location of:

1. storage piles;
2. fixed conveyors;
3. portable conveyors;
4. roads;
5. bulk solid material loading and unloading; and
6. fixed pollution control systems.

This Fugitive Particulate Operating Program is reviewed periodically by KCBX and revised to reflect current knowledge and practice. Any revisions made are consistent with 35 IAC Subpart K and submitted to IEPA in accordance with 35 IAC 212.312.

Consolidated Fugitive Particulate Operating Program and Contingency Measures Plan

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2. Contingency Measure Plan

A. Plan Elements. This Contingency Measure Plan (CMP) is designed to achieve reductions in actual annual PM₁₀ emissions. Terms of this CMP are federally enforceable per 35 IAC 212.702. There are two levels of control measures identified in Section 212.703:

1. Level I measures are designed to reduce total actual annual source-wide fugitive emissions of PM₁₀ at least 15% by increasing both the frequency and the volume of water in the application cycles, thereby increasing the moisture of the stockpiles and the effectiveness of the fugitive emissions controls (see Table).
2. Level II measures are designed to reduce total actual annual source-wide fugitive emissions of PM₁₀ at least 25% by further increasing both the frequency and the volume of water in the application cycles, thereby increasing the moisture of the stockpiles and the effectiveness of the fugitive emissions controls (see Table).

The BMP for meeting the contingency measure reductions specified in 35 IAC 212.703(a) follow those listed in Sections A through F of the Fugitive Particulate Operating Program in Part 1 of this consolidated plan. Because any control measure applied at any stage of the receiving or transferring aspect of bulk solid material handling tends to carry over to storage in stockpiles, the controls for these activities also constitute BMP that enable KCBX to meet the requirements of 212.304.

Scenario	Reduction Using Water [%]	Actual Annual PM ₁₀ Emission Reductions [%]
Base condition	80	N/A
Level I: Increase frequency and volume of pole-mounted and mobile water application from base condition	85	≥ 15
Level II: Increase frequency and volume of pole-mounted and mobile water application from Level I and defer or reschedule non-critical operations	90	≥ 25

In accordance with 35 IAC 212.704(b) and (c), KCBX will implement Level I controls within 90 days and Level II controls within 60 days of receiving notice from the IEPA that the CMP should be implemented. KCBX will make every effort to implement the measure as soon as possible, but in no case will delay implementation beyond the applicable 60 or 90 day period.

Assessment of operations as non-critical will be accomplished on an as-needed basis. Options may include, but are not limited to, cessation of certain activities such as screening and stockpile compaction and may involve rescheduling certain activities such as material deliveries or shipments to periods when less wind is forecast.

KM00000040

**Consolidated Fugitive Particulate Operating Program and
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- B. Alternative Compliance Plan: KCBX has the option of complying with 35 IAC 212.703 through an Alternative Compliance Plan that provides for reductions in emissions equal to the level of reduction of fugitive emissions sought by Level I and Level II control measures. An Alternative Compliance Plan must be approved by IEPA and USEPA as a federally enforceable permit condition. If source controls are included on process emission units or other fugitive emissions of PM_{10} not subject to 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424, or 212.464 in an Alternative Control Plan, the Plan must include a reasonable schedule of implementation for the controls, not to exceed two (2) years. The implementation schedule is subject to IEPA review and approval.
- C. Revisions to the Contingency Measure Plan (CMP): Operational changes subject to 35 IAC 212.304, 212.305, 212.306, 212.308, 212.316 (a) through (e), 212.424, or 212.464 that require a new or revised permit must, within 30 days after making such changes, be submitted to IEPA with a request for permit modification to include the new or revised CMP per 212.761(c).

**Consolidated Fugitive Particulate Operating Program and
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3. Episode Action Plan

Episode Action Plans under 35 IAC 244 Subpart C are not required because the emission sources combusting fuel oil at the facility do not exceed 10 mmbtu/hr (see 244.142(c)).

Consolidated Fugitive Particulate Operating Program and
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4. Revision Log

Rev 1 11/01/2013	Plan revised from interim FPOP to reflect current and planned operations and controls installed and planned.



March 21, 1995

Wisconsin Department of Natural Resources
Bureau of Air Management
101 S. Webster Street; P.O. Box 7921
Madison, WI 53707-7921
Attn: Keith Pierce

Subject: Confirmation of Title V Permit Exempt Status as Pure Minor Stationary Sources - Coal Docks

Dear Mr. Pierce:

Attached find a copy of Koch's most recent "potential" emission inventory for coal docks located in Wisconsin (Green Bay, Manitowoc, Sheboygan, Ashland and Superior). Pursuant to Wisconsin rules and regulations, potential emissions are computed using AP-42 emission factors and calculation procedures as if equipment and processes are operated at maximum capacity, 24 hours/day, 365 days/year (i.e. 8760 hours/year). Included in the attached emission inventory are fugitive emissions as well as point source emissions. In summary, criteria emissions come from handling equipment (screens, conveyor belts, stackers, etc.), and fugitive PM10 emissions from front end loaders, active and passive coal storage piles as well as wheel dust emissions from in-plant roads. In addition, HAP emissions are well below major source triggers (bulk materials often contain trace HAPs). Although emissions are only presented for coal, other bulk materials such as road salt, petroleum coke, limestone, etc. are also handled based on customer demand. Coal emission factors represent the worst case from a particulate matter emission perspective.

Based on this submittal, Koch requests confirmation as to the permit status of these facilities, as non part 70 sources (pure minor sources), and that based on recent amendments to Wisconsin rules and regulations, operating permits for non part 70 sources are now required with specific statutory permit application filing dates in 1997 and 1998. Our analysis (attached) indicates that the coal docks have potential PM10 emissions of less than 100 tons/year, thus qualifying as non part 70 sources. They are also exempt from emission fees.

Please confirm in writing that the above coal docks are; (1) Title V (part 70) permit exempt, (2) emission fee exempt and (3) required to submit an application only as a minor non part 70 source by 1997 and 1998.

Thank you for your cooperation in this matter. Please call me at (316 832-8255) (Wichita, Kansas) if you have any questions.

c.c. w/att.: Bob Beach
Dan Gerovac
Ken Musolf
Tom Roehrig
Bob Valley

Respectfully submitted,

David L. Nickel
David L. Nickel

List of Equipment - Ashland Coal Dock, Wisconsin

- 1 - Horizontal Welded 500 gal. Diesel Tank
- 1 - Michigan 175 Loader
- 1 - IH-80 Loader
- 1 - Water Truck
- 1 - 100' Horizontal Conveyor
- 1 - 80' Horizontal Conveyor

Ashland

C. Reiss Coal Company - Ashland, Wisconsin**I. EMISSION FACTORS**

Ashland, Wisconsin wind speed: 11.1 mph avg.

a) **Batch/Continuous Drop Operations**

Using AP-42 (11.2.3) Aggregate Handling and Storage Piles

Coal Moisture M = 4.8 % avg.

PM10: (<10 um) k= 0.35

$$E = k (0.0032) ((U/5)^{1.3} / (M/2)^{1.4}) \text{ lb/ton}$$

$$E(\text{pm10}) = 0.000927 \text{ lb/ton}$$

b) **Screening Operations**

Using AP-42 (8.19.1-1) Sand and Gravel Processing

For Open Dust Sources Screening; Flat Screen (dry product)

$$E (\text{pm10}) (<10 \text{ um}) = 0.12 \text{ lb/ton}$$

Controls:

Because of water application on the dock, a 70%
reduction in emissions is used on an avg. of 12
months out of the year. Therefore:

$$E (\text{pm10}) (<10 \text{ um}) = 0.036 \text{ lb/ton}$$

c) **Storage Piles (active)**

Using AP-42 (8.19.1-1) Sand and Gravel Processing

$$E (\text{pm10}) (<10 \text{ um}) = 6.3 \text{ lb/acre/day}$$

Controls:

Due to moisture in the piles, a 70% reduction in emission factor is used.
Therefore:

$$E (\text{pm10}) (<10 \text{ um}) = 1.89 \text{ lb/acre/day}$$

Ashland

d) **Fugitive Emissions from Unpaved Roads**
 Using AP-42 (11.2.1-1) Unpaved Roads

VMT = Vehicle Mile Traveled

$$E = k (5.9) (s/12) (S/30) (W/3)^{0.7} (w/4)^{0.5} ((365-p)/365) \text{ lb/VMT}$$

PM10: (<10 um) k= 0.36

p= 0 Number of days with at least 0.01 in. of precipitation per year.

<i>factors</i>	Trucks	Pickups	Loaders/Dozers
s (silt content %):	5	5	5
S (miles/hour):	5	15	2.5
W (weight, tons):	13	2	10
w (no. of wheels):	18	4	4

	Trucks	Pickups	Loaders/Dozers
E(pm10; <10 um) =	0.873321	0.333157	0.171308

<u>Total facility acreage:</u>	<u>acres</u>	<u>%</u>
Annex area (unpaved):	4	50.00
Concrete storage pad:	4	50.00
	8	100.00

Controls:	
Efficiency due to unpaved and watered:	70%
Efficiency due to paved and watered:	95%

Weighted average of control efficiencies: **83%**

	Trucks	Pickups	Loaders/Dozers
E(pm10; <10 um) =	0.152831	0.058303	0.029979

Note:

- 1 Silt content assumed at 5%
- 2 Average semi-truck weight (empty & full) / 2
- 3 Mean number of wheels = 18 (worst case), 4 (pickup)

Ashland

II. POTENTIAL EMISSIONS (PM 10)

a) Batch/Continuous Drop Operations

					TPH
0 stackers	@	550 TPH	each	=	0
2 conveyors	@	550 TPH	each	=	1,100
1 ship unload *	@	700 TPH		=	700
1 rail unload *	@	0 TPH		=	0
1 H-80 loader	@	350 TPH		=	350
1 Mich-175 loader	@	350 TPH		=	350

 2,500 TPH Total

* - Combined rail and ship unloading is adjusted to match front end loader capacity.

$$2,500 \text{ TPH} \times 0.000927 \text{ lb/ton} = 2.32 \text{ lb/hour}$$

$$= 10.15 \text{ TPY}$$

b) Screening Operations

1 screens	@	75 TPH		=	<u>Total TPH</u> 75
75 TPH x		0.036000 lb/ton		=	2.70 lb/hour
				=	11.83 TPY

c) Storage Piles (active)

	Acres
Dock Storage	8
Ship Hold	0.1
	8.10 acres total

$$8.10 \text{ acres} \times 1.89 \text{ lb/acre/day} = 15.31 \text{ lb/day}$$

$$= 2.79 \text{ TPY}$$

US EPA ARCHIVE DOCUMENT

Ashland

d) Fugitive Emissions from Unpaved Roads

Semi-Trucks:		<u>6,132,000</u> TPY total throughput	
		25.00 tons/truck	
		=	245,280 trucks/year
		x	0.40 miles/truck
		=	98,112 miles/year
			98,112 miles/year
		x	0.152831 lb/VMT
		=	14,995 lb/year
		=	7.50 TPY
Pickups:	1 pickup(s)	x	15 miles/hour
		=	15 miles/hour
		=	131,400 miles/year
			131,400 miles/year
		x	0.058303 lb/VMT
		=	7,681 lb/year
		=	3.83 TPY
Loaders/ Dozers:	3 vehicles	x	2.50 miles/hour
		=	8 miles/hour
		=	65,700 miles/year
			65,700 miles/year
		x	0.029979 lb/VMT
		=	1,970 lb/year
		=	0.98 TPY
Total Fugitive PM 10 Emissions:			<u>12.31</u> TPY

TOTAL POTENTIAL THROUGHPUT: 6,132,000 TPY

TOTAL POTENTIAL EMISSIONS (PM 10): 37.09 TPY

Ashland

III. ACTUAL EMISSIONS (PM 10)**TOTAL ACTUAL THROUGHPUT (1994):** 117,000 TPY

$$\frac{\text{Actual throughput}}{\text{Potential throughput}} = \frac{117,000}{6,132,000} = 1.91\%$$

$$\begin{aligned} \text{TOTAL ACTUAL EMISSIONS (PM 10):} & 1.91\% \times 37.09 \text{ TPY} \\ &= 0.71 \text{ TPY} \\ &\times \frac{2}{1.42 \text{ TPY (1994)}} \end{aligned}$$



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, MN 55155-4194 | 651-296-6300 | 800-675-3843 | 651-282-5332 TTY | www.pca.state.mn.us

December 8, 2009

Mr. Robert Valley
Terminal Manager
The C. Reiss Coal Company
P.O. Box 16718
Duluth, MN 55816

RE: Air Emission Permit No. 13700071-001

Dear Mr. Valley:

The enclosed permit, Air Emission Permit No. 13700071-001, authorizes operation of your facility located at 50th Avenue West & LeSure, Duluth, St. Louis County, Minnesota.

The permit is effective from the issuance date of the permit until the expiration date of the permit. Please read through the permit and review its conditions and requirements. Distribute the permit to staff members responsible for ensuring compliance with the conditions and limitations in the permit. If appropriate, post the permit at the facility.

We appreciate your cooperation and compliance with environmental laws. If you have questions about the permit, please contact me at 651-757-2623.

Sincerely,

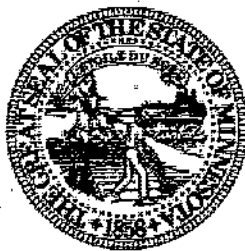
A handwritten signature in black ink, appearing to read "Amrill Okonkwo".

Amrill Okonkwo
Senior Engineer Specialist
Air Quality Permits Section
Industrial Division

ASO:lao

Enclosure

cc: ~~Terry Steinert, Koch Carbon LLC~~
Robert Beresford, MPCA, Duluth
AQ File No. 1675A



AIR EMISSION PERMIT NO. 13700071- 001

IS ISSUED TO

THE C. REISS COAL COMPANY

Duluth Dock
50th Avenue West and LeSure
Duluth, St. Louis County, MN 55816

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the Permit Applications Table.

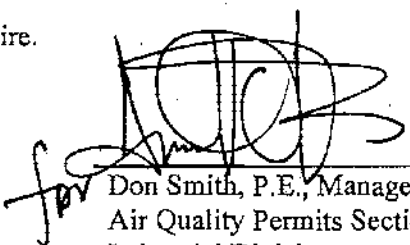
This permit authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into State Implementation Plan under 40 CFR § 52.1220 and as such as are enforceable by U. S Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: State, Limits to Avoid Pt. 70/Minor for NSR

Operating Permit Issue Date: December 8, 2009

Expiration Date: Permit Does Not Expire
All Title I Conditions do not expire.


Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for Paul Eger
Commissioner
Minnesota Pollution Control Agency

TDD (for hearing and speech impaired only): (651) 282-5332

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KM00000054

Permit Application Type	Application Date(s)	Permit Action
Total Facility Operating Permit - State	April 16, 1997; October 22, 2001	001

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Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

Table C: *Compliance Schedule (Not used in this Permit)*

Appendix I: Insignificant Activities and Applicable Requirements

NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

The C. Reiss Coal Company operates a bulk solid material handling facility at the Duluth Dock, located on the St. Louis River in Duluth, Minnesota. The facility handles coal, limestone, petroleum coke, salt, and other bulk solid fuels and bulk material commodities.

The materials are brought in by ship, railway, and truck. The materials are unloaded onto the 19.5-acre storage pad area. Salt piles are usually covered while the other materials are stored uncovered. The materials are then loaded onto rail cars or trucks for shipment to the end user. Limestone, and small quantities of coal are screened before shipment off-site. Dust emissions are controlled on-site with dust suppressants.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1 12/07/09

Facility Name: The C Reiss Coat Co - Duluth Dock

Permit Number: 13700071 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility

What to do	Why to do it
TOTAL FACILITY EMISSION LIMITS	hdr
This permit establishes limits on the facility to keep it a minor source under 40 CFR Section 70.2. The Permittee cannot make any change at the source that would make the source a major source under 40 CFR Section 70.2 until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.	Title I Condition: To avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
Carbon Monoxide: less than or equal to 90 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period.	Title I Condition: To avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
RECORDKEEPING AND CALCULATIONS REQUIREMENT	hdr
CO Emissions Recordkeeping: The Permittee shall calculate and record the 12-month rolling sum of CO emissions by the 15th day of each month for the previous 12-month period.	Title I Condition: To avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
CO emissions (tons/yr) = [Fuel Usage (gal/month) x Emission Factor (lb/gal)] x 0.006 month/yr(ton/lbs).	
The Permittee shall use the most recent AP-42 emission factors or other MPCA approved emission factors.	
OPERATIONAL REQUIREMENTS	hdr
Ambient Air Quality: The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, supbs. 7A, 7L & 7M; Minn. R. 7007.0800, supbs. 1, 2 & 4; Minn. R. 7009.0010-7009.0080.
Circumvention: The Permittee shall not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: The Permittee shall operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: The Permittee shall not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne.	Minn. R. 7011.0150
CONTINUED BELOW	
The Permittee shall not cause or permit a building or its appurtenances or a road, or a driveway, or an open area to be constructed, used, repaired, or demolished without applying all such reasonable measures as may be required to prevent particulate matter from becoming airborne. All persons shall take reasonable precautions to prevent the discharge of visible fugitive dust emissions beyond the lot line of the property on which the emissions originate. The commissioner may require such reasonable measures as may be necessary to prevent particulate matter from becoming airborne including, but not limited to, paving or frequent clearing of roads, driveways, and parking lots; application of dust-free surfaces; application of water; and the planting and maintenance of vegetative ground cover.	Minn. R. 7011.0150
Fugitive Emissions Control Plan: The Permittee shall submit to the Commissioner and implement a fugitive emissions control plan within 60 days of the date of permit issuance. The plan shall identify all fugitive emission sources, primary and contingent control measures, and recordkeeping. The Permittee shall follow the actions and recordkeeping specified in the control plan. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive emission control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0100; Minn. R. 7007.0800, subp.2; Minn. R. 7011.0150; Minn. R. 7009.0020.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-2 12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
General Conditions: The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and B.	Minn. R. ch. 7017
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Table A of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7017.2025, subp. 3
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A and B monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For nonexpiring permits, these records shall be kept for a period of five years from the date that the change was made. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.	Minn. R. 7007.1200, subp. 4
REPORTING/SUBMITTALS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-3 12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-4

12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 001 Screening

Associated Items: FS 006 Stone Screening (Primary)

FS 008 Limestone Secondary Screen

FS 018 Coal Screening

What to do	Why to do it
Moisture Content: greater than or equal to 2.88 percent	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
The Permittee shall demonstrate the feed moisture content is greater than 2.88% by the following below: 1. Test moisture content of each different feed material source (sampled at an area representative of the feed source and physically capable of being sampled), as follows: a. Use American Society for Testing and Materials (ASTM) method numbers D 2216-92 or D 4643-93 (or equivalent). b. Keep records of each moisture content test summarizing the method used, results, date, time, and initials of person performing test. c. Test weekly, when operating, unless three consecutive tests at the facility location show moisture contents of greater than or equal to 2.8 percent after which testing is no longer required until the source of the feed material changes. CONTINUED	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
d. When testing indicates that feed material moisture content is less than 2.88 percent, or in situations where it is infeasible to sample and test, or where the Permittee elects not to sample and test, the Permittee must operate a moisture addition device to achieve a moisture content greater than or equal to 2.8 percent. Moisture addition during operation shall continue until subsequent moisture content testing demonstrates that feed material moisture content is greater than or equal to 2.8 percent. Daily, when operating, either: (i) keep records of the date, water flow rate, material throughput rate, and initials of the person making the record and the time the record was made; or (ii) conduct moisture content testing daily on the feed material after water application following a. and b. above, and if results show moisture content is less than 2.8 percent, increase water to insure moisture is 2.8% or greater and re-test to verify.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-5 12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 002 Fugitive Sources

Associated Items: CE 001 Dust Suppression by Water Spray

FS 004 Stone Ship Unloading

FS 005 Stone Piles

FS 006 Stone Screening (Primary)

FS 007 Limestone Transfer to Rail

FS 008 Limestone Secondary Screen

FS 009 Limestone Stockpiled

FS 010 Limestone Transfer to Truck

FS 011 Petroleum Coke Unloading

FS 012 Petroleum Coke Storage

FS 013 Petroleum Coke Loading

FS 017 Fugitive Road Dust (Unpaved and Paved Roads)

What to do	Why to do it
Stockpile Construction: a. The Permittee shall not operate the stacker equipment unless the free fall height from the conveyor belt to the stockpile is ten feet or less after stockpile is established. b. The Permittee shall not operate the stacker equipment when steady wind speeds exceed 30 miles per hour or when wind gusts exceed 45 miles per hour unless vessel is being unloaded or wet suppression is used.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
Access Areas, Roads, Parking Facilities, and Traffic: a. The Permittee shall be required to apply water or appropriate dust suppression chemicals to the main roads, access and parking areas to the extent necessary to prevent particulate matter from becoming airborne. b. The Permittee shall not apply any surface hardening agents, wetting or chemical agents or oils that may cause ground water or surface water contamination in violation of any applicable water pollution law. c. The Permittee shall ensure that all vehicular traffic does not exceed 10 miles per hour on the facility.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
Wet Suppression Systems: a. The Permittee shall operate the seasonal water spray systems anytime during operations when fugitive emissions are visible at any conveyor transfer points, stockpiling points, or other material unloading, handling or loading locations. The rate of water application shall be based on the amount of dust suppression required to significantly reduce fugitive emissions. b. In the event the operation of the water spray systems at rated capacity is insufficient to significantly reduce fugitive emissions, the Permittee shall reduce the belt feeding rate until fugitive emissions are not visible.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
CONTINUED c. The Permittee shall maintain a quarterly report indicating the hours each day for each quarter period in which stockpile materials were handled without the operation of the wet suppression system on the 15th day of the month following the monitored quarter. d. The Permittee shall have a mobile water truck or sprinklers available and shall maintain a quarterly report indicating the periods in which the mobile truck or sprinklers were not available on the 15th day of the month following the monitored quarter. e. Minimum Liquid flow and pressure: The Permittee shall provide sufficient flow and pressure in the wet suppression systems to provide for the operation of the wet suppression systems as designed or reduce/cease material handling operations as necessary to provide no visible emissions at the facility boundary	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-6

12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Stockpile Maintenance and Reclaiming: a. The Permittee shall control fugitive emissions by wet suppression methods whenever feasible. b. Reclaiming of material from stockpiles, including loading trucks or railcars shall not be conducted when the steady wind velocity exceeds 30 miles per hour or when gusts exceed 45 miles per hour unless wet suppression is used.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
Material Handling Operations: a. The Permittee shall use storage pads FS 004, and FS 011 to unload from railcars, vessels, and trucks and shall take all reasonable measures to prevent material matter from becoming airborne. b. The Permittee shall use wet suppression systems as necessary to control particular matter from becoming airborne when loading materials.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
Visible Emission Evaluation Certification: The Permittee shall retain one or more employees or have at least one contractor available that maintain a valid certification for EPA Method 9 visible emissions monitoring.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-7 12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 003 Coal Handling

Associated Items: FS 001 Coal Unloading

FS 002 Coal Stockpiles

FS 003 Coal Loading

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity	40 CFR Section 60.252 (c); Minn. R. 7011.1150
Access areas, roads or parking facilities: No person shall cause or permit the use of access areas surrounding coal stockpiles and use of all active truck haul roads and parking facilities which are located within a coal handling facility whose coal throughput by truck is less than 200,000 tons unless such areas and roads are treated with water, oils, or chemical agents.	Minn. R. 7011.1105, subp. A(2)
Coal loading stations: Control fugitive particulate emissions from the loading of trucks, haulers, and railcars by dust suppression methods so that emissions from such sources are minimized.	Minn. R. 7011.1105, subp. B
Truck and hauler unloading stations: Control fugitive particulate emissions from the unloading of trucks or haulers by dust suppression methods so that emissions from such sources are minimized.	Minn. R. 7011.1105, subp. C
Barge or vessel unloading station: Cranes, shovels, and conveyors shall be operated in a manner which decreases as much as practical the vertical free fall of coal. Control fugitive particulate emissions during unloading so that fugitive particulate emissions are minimized.	Minn. R. 7011.1105, subp. E
Stockpiles, stockpile construction, and reclaiming: Control fugitive particulate emissions by dust suppression methods on such operations so that fugitive particulate emissions are minimized.	Minn. R. 7011.1105, subp. F(1)
Railcar unloading: control fugitive particulate emissions during unloading so that fugitive particulate emissions are minimized.	Minn. R. 7011.1105, subp. H
Operating practices: Clean up all coal spilled on roads or access areas as soon as practicable using methods that minimize the amount of dust suspended. Maintain air pollution control equipment in proper operating condition and utilize air pollution control systems as designed.	Minn. R. 7011.1105, subp. I
Exemption: During freezing temperatures, owners or operators shall not be required to apply water or dust suppressants.	Minn. R. 7011.1120
Cessation of Operations: The owner or operator of a coal handling facility shall not conduct any nonessential coal handling operations that are not shielded from the wind or enclosed in a building when steady wind speeds exceed 30 miles per hour as determined at the nearest official station of the United States Weather Bureau or by wind speed instruments on or adjacent to the site.	Minn. R. 7011.1125

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-8

12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 004 Engines

Associated Items: EU 002 Miller Welder

EU 003 Pacer Water Pump 5.5 hp

EU 004 Brigs Water Pump 11hp

EU 005 Brigs Water Pump 5.5 hp

EU 006 Brigs Water Pump 9 hp

EU 008 Norberg Track Drill 3 hp

What to do	Why to do it
EMISSION LIMITS	hdr
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained. This limit applies to each unit individually.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input using 3-hour Rolling Average. The potential to emit from each unit is due to equipment design and allowable fuels.	Minn. R. 7011.2300, subp. 2
This limit applies to each unit individually.	
OPERATING REQUIREMENTS	hdr
Fuel type: The Permittee shall only combust gasoline in these engines.	Minn. Stat. 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
The Permittee shall keep records of fuel use on a monthly basis.	Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-9

12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 005 Salt Handling

Associated Items: FS 014 Salt Unloading

FS 015 Salt Storage Piles

FS 016 Salt Loading

What to do	Why to do it
Stockpile Construction: a. The Permittee shall not operate the stacker equipment unless the free fall height from the conveyor belt to the stockpile is ten feet or less after stockpile is established. b. The Permittee shall not operate the stacker equipment when steady wind speeds exceed 30 miles per hour or when wind gusts exceed 45 miles per hour unless vessel is being unloaded.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
Stockpile Maintenance and Reclaiming: Reclaiming of material from stockpiles, including loading trucks or railcars shall not be conducted when the steady wind velocity exceeds 30 miles per hour or when gusts exceed 45 miles per hour.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
Unloading Operations: a. The Permittee shall use storage pads FS 014 to unload from railcars, vessels, and trucks and shall take all reasonable measures to prevent material matter from becoming airborne.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150
Salt Operations: the Permittee shall cover salt stockpiles within 15 days of unloading. Stockpiles shall remain covered except for the working face of the stockpiles which can be uncovered for loading trucks.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2.
Visible Emission Evaluation Certification: The Permittee shall retain one or more employees or have at least one contractor available that maintain a valid certification for EPA Method 9 visible emissions monitoring.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-10 12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: EU 007 Air Compressor

What to do	Why to do it
EMISSION LIMITS	hdr
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input using 3-hour Rolling Average. The potential to emit from the unit is 0.23 lb/MMBtu due to equipment design and allowable fuel.	Minn. R. 7011.2300, subp. 2
OPERATING REQUIREMENTS	hdr
Fuel type: The Permittee shall only combust diesel in this engine.	Minn. Stat. 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
The Permittee shall keep records of fuel type on a monthly basis.	Minn. R. 7007.0800, subp. 5
Fuel Supplier Certification: The Permittee shall obtain and maintain a fuel supplier certification for each shipment of diesel, certifying that the sulfur content does not exceed 0.50% by weight.	Minn. R. 7007.0800, subps. 4 & 5

TABLE B: SUBMITTALS

B-1 12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock
Permit Number: 13700071 - 001

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

TABLE B: RECURRENT SUBMITTALS

B-2 12/07/09

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year following Permit issuance (for the previous calendar year). The Permittee shall submit this to the Commissioner on a form approved by the Commissioner. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX I- Insignificant Activities Required to be Listed

Facility Name: The C. Reiss Coal Co - Duluth Dock

Permit Number:13700071-001

Insignificant Activities and Applicable Requirements

Minn. R. 7007.1300, subpart	Rule Description and Actual Description of the Activity	Applicable Requirement
3(B)(2)	Fuel burning equipment with a capacity less than 500,000 Btu/hr and total combined capacity of less than or equal to 2,000,000 Btu/hr • Steam Cleaner • Portable Heater • Garage Furnaces Total capacity of the units are 1.125 mmBtu/hr	Minn. R. 7011.0710/0715.
3(E)	Non-hazardous pollutant VOC storage tanks with a combine total tankage capacity of not more than 10,000 gallons of non-hazardous air pollutant VOCs Fuel Storage Tanks (capacity varies, 55 gallon drums tanks to small containers; and 275 gallon totes).	Minn. R. 7011.1505
3(H)(4)	Miscellaneous: brazing, soldering, or welding equipment Portable Electric, Oxygen/Acetylene Welder.	Minn. R 7011.0710/0715.

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 13700071-001

This technical support document (TSD) is intended for all parties interested in the draft/proposed permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp.1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 4011)
The C. Reiss Coal Company 50 th . Avenue and LeSure Duluth, Minnesota 55816	50th Avenue West & LeSure Duluth, Minnesota St. Louis County
Contact: Robert Valley Phone: 906/786-2793	

1.2. Description of the Permit Action

The permit action is a state operating permit for The C. Reiss Coal Company.

The C. Reiss Coal Company submitted an application for a Total Facility Air Emission Permit as required by Minnesota Rules chapter (Minn. R. ch.) 7007. Minn. R. ch. 7007 implements Title V of the federal Clean Air Act as amended 1990. The application was received by the Minnesota Pollution Control Agency (MPCA) on April 16, 1997, and updated on October 22, 2001. The C. Reiss Coal Company did not submit any information that was claimed to be confidential verbally or in written correspondence.

The C. Reiss Coal Company operates a bulk solid material handling facility at the Duluth Dock, located on the St. Louis River in Duluth, Minnesota. The facility handles coal, limestone, petroleum coke, salt, and other bulk solid fuels and bulk material commodities. The materials are brought in by ship, railway, and truck. The materials are unloaded onto the 19.5-acre storage pad area. Salt piles are usually covered while the other materials are stored uncovered. The materials are then loaded onto rail cars or trucks for shipment to the end user. Limestone, and small quantities of coal are screened before shipment off-site. Dust emissions are controlled on-site with dust suppressants.

The main sources of potential emissions are Carbon Monoxide (CO). The permit limits the emissions of the facility such that the facility is classified as a non-major source federal Operating Program (40 CFR pt. 70). The facility is a true minor source under federal New Source Review regulations (40 CFR § 52.21) and an area source federal National Emission Standards for Hazardous Air Pollutants (40 CFR pt. 63).

1.3 Description of any Changes Allowed with this Permit Issuance

This permit does not authorize any new emission units or allow for increase in emissions.

1.4 Description of All Amendments Issued Since the Issuance of the Last Total Facility Permit, and Permit History

Permit Number and Issuance Date	Action Authorized, and Permit History
1675-86-OT-1 March 27, 1986	Permit Issued March 27, 1986, Operation of a River Terminal and Air Pollution Control Equipment.

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

	PM tpy	PM ₁₀ tpy	PM _{2.5} tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions*	2.4	1.5	1.1	0.94	15	90	4.4	< 1	<1
¹ Total Facility Actual Emissions (2008)	9.6	3.9	NR	0	0	0	0	NR	

* These are the limited potential emissions from column 3 in GI-07 from Delta. The differ from those in the permit application sent by The C. Reiss Coal Co in that they have been verified as need as be MPCA staff. These are the potential emissions that would appear in the public notice.

¹ The PM/PM₁₀ emissions are higher than the PTE because based on Minn. 7019.3020, the fugitive emissions must be counted.

NR- Not Reported in emission inventory.

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD			PM, PM ₁₀ , PM _{2.5} , SO ₂ , NO _x , CO, VOC
Part 70 Permit Program		CO	PM ₁₀ , PM _{2.5} , SO ₂ , NO _x , VOC
Part 63 NESHAP			HAP

2. Regulatory and/or Statutory Basis

New Source Review

The facility is a non-major source under New Source Review Regulations (40 CFR § 52.21). "Per United States Environmental Protection Agency (USEPA) guidance letter dated March 6, 2003, letter from Cheryl L. Newton to the Indiana Department of Environmental Management, See attachment no. 3, which clarified to what extent from which emission units, ... fugitive emissions are counted towards major source applicability for Title V, NSR and prevention of significant deterioration (PSD)." Based on the guidance letter only the fugitive emissions associated with the coal screening operation are relevant to determine if the source is a major source.

Part 70 Permit Program

The facility is limited based on permit restrictions; therefore the facility is a non-major source under Part 70 permit program.

New Source Performance Standards (NSPS)

The coal screening unit is subject to New Source Performance Standards (NSPS) 40 CFR pt. 60, subpart Y (Standards of Performance for Coal Preparation Plants). The applicable requirements are included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is non-major source under 40 CFR pt. 63. Thus, no NESHAPs apply.

Compliance Assurance Monitoring (CAM)

CAM does not apply to this facility, since the facility is not subject to Title V permitting requirements.

National Ambient Air Quality Standard (NAAQS)

The Permittee was required to model for PM₁₀ to show compliance with NAAQS. Staff indicated that Total Suspended Particulate and PM₁₀ ambient monitors are located in the vicinity of the facility. The monitoring data showed that there are no violations of NAAQS since 2002; therefore no additional modeling was required for this facility.

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.0105 Visible Emission Restrictions for Existing Facilities
- Minn. R. 7011.1150 Standards of Performance for New Coal Preparation Plants

Table 3. Regulatory Overview of Facility

EU, GP, or SV	Applicable Regulations	Comments:
Total Facility (TF)	40 CFR pt. 70.2; Minn. R. 7007.0200	Title I Conditions: Limits taken for CO to avoid classification under Part 70.
TF	Minn. R. chs. 7002, 7007, 7009, 7011, 7019, 7030	Table A contains requirements that apply to all facilities in Minnesota. Reporting and monitoring requirements are contained in Table B of the permit.
TF	40 CFR pt. 50; Minn. R. 7009.0010-0080	Modeling requirements to ensure emissions do not cause a violation of the National Ambient Air Quality Standards (NAAQS)
TF and GP 002	Minn. R. 7011.0105	Visible Emission Restrictions for Existing Facilities The standard limits visible emissions.
GP 003	Minn. R. 7011.1105	Standards of Performance for Certain Coal Handling Facilities. The Permittee operates an existing coal handling facility and is located within the boundaries of the city of Duluth; therefore is subject to control requirements for fugitive particulate emissions.
GP 003	40 CFR Section 60.252; Minn. R. 7011.1150	Standards of Performance for New Coal Preparation Plants. The rule limits PM and opacity for coal handling facilities.
GP 004	Minn. R. 7011.2300	Standards of Performance for Internal Combustion Engines. The rule limits SO ₂ and Opacity for engines
TF	Minn. R. 7030.0010-7030.0080	The language 'This is a state-only requirement and is not enforceable by the EPA Administrator and citizens under

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		the Clean Air Act' refers to permit requirements that are mandated by state law rather than by the federal Clean Air Act. The language is to clarify the distinction between permit conditions that are required by federal law and those that are required by state law. State law requirements are not enforceable by U.S. EPA or by citizens under the federal Clean Air Act, but are fully enforceable by the MPCA and citizens under provisions of state law.

3. Technical Information

3.1 Calculations of Potential to Emit –

Attachment 1 to this Technical Support Document (TSD) contains a summary of the PTE of the facility, as well as detailed calculations and supporting information prepared by the Permittee and approved by MPCA staff.

Total emissions for all criteria pollutants except CO are true minors; therefore source-wide limits were not established for those pollutants.

a. Material Handling (FS 001, FS 002 and FS 003)

The fugitive emissions from the material handling are from loading, unloading and blending. Emission factors for these drop operations were taken from fifth Edition AP-42, Chapter 13.2.4, *Aggregate Handling and Storage Piles*, 11/2006. The potential emissions are based on the maximum throughput times the emission factors.

b. Screening (FS 006, FS 008 and FS 018)

The fugitive emissions from the screens are from the drop operations used to load the screener and the movement of product through the screens (under-sized) and onto storage piles or across the screens (over-sized) and onto storage piles. The emission factors were taken from AP-42, Chapter 11.19.2., *Crusher Stone Processing* to determine the uncontrolled and controlled emissions. The controlled emission factor assumed moisture content of 2.88%, which below the materials received at the facility.

c. Engines (GP 004 and EU 007)

The emission factors for engines were taken from AP-42, Chapter 1, Tables 1.3-1 and 1.3-3, and Chapter 3, Table 3.3-1.

3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 4. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
Total Facility (TF)	CO ≤ 90 tons/yr based on a 12-month rolling sum (limit to avoid Part 70)	a. Recordkeeping: Monthly recordkeeping and calculations using AP-42 emission factors and fuel usage. b. On going recordkeeping to verify and certify on an annual basis to maintain the source is a non-major.	The Permittee will calculate and maintain records of the 12-month rolling sum of CO limit on a monthly basis. The 12-month rolling sum is warranted for this facility due to the substantial and unpredictable variation in their usage.
GP 001	Material Moisture Content must be greater than 2.88% (Minn. Stat. Section 116.07, subd. 4a;	Recordkeeping and Testing: Moisture Content of the materials	The requirement to keep moisture content of the feed material greater than or equal to 2.88% is needed because the underlying emission

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
	Minn. R. 7007.0800, subp. 2)		calculations and basis for the permit limits are based on the moisture content level. The recordkeeping and testing requirements are adequate to demonstrate compliance with permit conditions.
GP 002	CE 001: Wet Suppression (Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150)	Recordkeeping: Must maintain quarterly report and maintain fugitive emissions control plan.	The Permittee will control fugitive emissions using wet suppression systems. There are mitigating requirements in the permit to ensure adequate compliance.
GP 003	Opacity: $\leq 20\%$ (40 CFR pt. 60.252)	None	The facility was required to conduct performance test for Opacity for the initial compliance in 2003. No additional performance test is required. There are adequate requirements to maintain compliance with the opacity limit.
GP 004	$\text{SO}_2 \leq 0.5 \text{ lb/mmBtu}$ Opacity: $\leq 20\%$ (Minn. R. 7011.2300) Fuel Type: Gasoline	Recordkeeping: Maintain records of fuel type.	The likelihood of violating the SO_2 and opacity emission standard is highly unlikely as long as the unit is properly operated and maintained.
EU 007	$\text{SO}_2 \leq 0.5 \text{ lb/mmBtu}$ Opacity: $\leq 20\%$ (Minn. R. 7011.2300) Fuel Type: Diesel	Fuel oil certification for each shipment and maintain records of fuel type	¹ See explanation below

¹ The Fuel Oil Certification is used as a monitoring requirement in permits to ensure that the sulfur content of distillate fuel oil is less than 0.49 percent by weight. Fuel oil with a sulfur content of less than 0.49 percent by weight will produce emissions of less than 0.50 lb SO_2 per mmBtu heat input and will be in compliance with the limit set out in Minn. R. 7011.2300, subp. 2. The MPCA developed the Fuel Oil Certification permit requirement in order to monitor compliance with the sulfur dioxide emission limit. The requirement is modeled after 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Although Subpart Dc does not apply to this facility, the use of a similar, but abbreviated, version of the fuel oil certification meets the requirements of Minn.

R. 7007.0800, subps. 4 and 5 to provide for periodic monitoring and recordkeeping for the sulfur emissions limit. The certification with each shipment of distillate fuel oil must include the name of the supplier and the maximum sulfur content of the fuel oil.

3.3 Insignificant Activities

This facility has several operations which are classified as insignificant activities. These are listed in Appendix I to the permit.

The permit is required to include periodic monitoring for all emission units, including insignificant activities, per EPA guidance. The insignificant activities at this facility are only subject to general applicable requirements. Using the criteria outlined earlier in this TSD, the following table documents the justification why no additional periodic monitoring is necessary for the current insignificant activities.

Table 5. Insignificant Activities

Insignificant Activity	General Applicable Emission limit	Discussion
Fuel use: heaters fueled by natural gas, diesel and gasoline (total capacity of 605,000 Btu/hr)	PM $\leq$ 0.6 lb/mmBtu Opacity $\leq$ 20% (Minn. R. 7011.0510, Minn. R. 7011.0515)	Based on the fuels used and EPA published emission factors, it is highly unlikely that these units could violate the applicable requirements.
Non-hazardous pollutant VOC storage tanks with a combine total tankage capacity of not more than 10,000 gallons of non-hazardous air pollutant VOCs	Minn. R. 7011.1505	These are 55 gallon drums and 275 gallon totes. There are no standards of performance because each tank has a storage capacity of 2,000 gallons or less.
Brazing, soldering or welding equipment	PM, variable depending on airflow Opacity $\leq$ 20% (Minn. R. 7011.0710/715)	Portable electric, Oxygen/Acetylene Welder. For these units, based on EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are typically operated and vented inside a building, so testing for PM or opacity is not feasible.

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

3.5 Comments Received

Public Notice Period: October 31, 2009- November 30, 2009

EPA 30 day Review Period: October 31, 2009- November 30, 2009

Comments were not received from the public during the public notice period.

4. Conclusion

Based on the information provided by The C. Reiss Coal Company, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 13700071-001, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Members on Permit Team: Amrill Okonkwo (permit writer/engineer)
Robert Beresford (Compliance/Enforcement)
Hien Le (peer reviewer)

AQ File No. 1675A; DQ No. 72

Attachments: 1. PTE Summary Calculation Spreadsheets
2. Facility Description and CD-01 Forms
3. USEPA Letter from Cheryl Newton, Acting Director Air and Radiation
Division to Janet McCabe, Assistant Commissioner, Office of Air Quality,
Indiana Department of Environmental Management

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Attachment No. 1
PTE Summary Calculations Spreadsheets
(Paper Copy Only)

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Emission Calculations - The C. Reis Coal Co. Duluth, MN

Emission Eq

1. Screening (PM and PM₁₀ from MPCA Air Emissions Summary for current year)

	PM	PM ₁₀	PM _{2.5}	
EF =	0.0022	0.00074	0.000059	lb pollutant/ton screened - controlled (AP-42 Table 11.19.2-2)
EF =	0.025	0.0087	0.00013	lb pollutant/ton screened - uncontrolled (AP-42 Table 11.19.2-2)

Emissions = Amount screened * Screening EF

PM_{2.5} controlled emissions are those with material moisture content of at least 2.88 %
(see footnote b to AP42 Table 11.19.2-2)

PTE Calculations

		tpm max	hrs/yr	tpy max	
		150	8760	13140	Coal Screening
Coal Screening	FS 018				
		Controlled	PM _{2.5}	PM ₁₀	PM _{2.5}
		Uncontrolled	PM _{2.5}	PM ₁₀	PM _{2.5}
		Controlled	PM _{2.5}	PM ₁₀	PM _{2.5}
		Uncontrolled	PM _{2.5}	PM ₁₀	PM _{2.5}

Equipment List - Emission Potential

Revised 5/14/2009

Equipment		Manufacturer	Model No.	Power	Engine		Comments	Install Date	Control Device	Potential Emissions (lb/hr)							Potential Emissions (lb/yr)							
ID	Description				Type	HP				mmBtu/hr	NOx	CO	SOx	PM	PM10	PM2.5	VOC	NOx	CO	SOx	PM	PM10	PM2.5	VOC
D01	Water Pump	Pacor	SEB20LE-550C	Gasoline	4SLB	5.5	Replaced 10 hp	Jul-04	None	0.0003	0.23	0.0003	0.0040	0.0040	0.0040	0.0119	0.028	1.13	0.014	0.017	0.017	0.017	0.017	0.017
D02	Water Pump	Briggs	256427	Gasoline	4SLB	1		May-01	None	0.012	4.8	0.0005	0.0079	0.0079	0.0079	0.0243	0.063	2.5	0.020	0.035	0.035	0.035	0.035	0.035
D03	Water Pump	Briggs	SEB20LE-550C	Gasoline	4SLB	5.5	Replaced 10 hp	Jul-04	None	0.0003	0.23	0.0003	0.0040	0.0040	0.0040	0.0119	0.028	1.13	0.014	0.017	0.017	0.017	0.017	0.017
D04	Water Pump	Briggs	155432	Gasoline	4SLB	2	Replaced 10 hp	Jul-04	None	0.0003	0.23	0.0003	0.0040	0.0040	0.0040	0.0119	0.028	1.13	0.014	0.017	0.017	0.017	0.017	0.017
D05	Welder	Miller	P220XOHV-2252A	Gasoline	4SLB	20.9	Replaced 10 hp	Jul-04	None	0.020	9.9	0.0012	0.015	0.015	0.015	0.044	0.19	7.9	0.063	0.109	0.109	0.109	0.109	0.109
D06	Track Drill	Nordberg	GB	Gasoline	4SLB	3	Briggs Engine	May-01	None	0.0033	1.3	0.0018	0.0022	0.0022	0.0022	0.0069	0.047	0.8	0.0078	0.0095	0.0095	0.0095	0.0095	0.0095
D07	Air Compressor	Clanham Drivew	SP40C	Diesel	CI	20		Jun-04	None	0.28	0.60	0.18	0.20	0.20	0.20	0.23	0.02	2.6	0.04	0.07	0.07	0.07	0.07	0.07
D08	Welding Machine	Miller	1000	Gasoline	4SLB	25.5		Jul-04	None	0.018	0.09	0.0005	0.0012	0.0012	0.0012	0.0044	0.027	0.09	0.044	0.053	0.053	0.053	0.053	0.053
D09	Generator	WCCO	1000	Gasoline	4SLB	25.5		Jul-04	None	0.022	0.06	0.0012	0.0014	0.0014	0.0014	0.0044	0.03	0.09	0.062	0.063	0.063	0.063	0.063	0.063
D10	Generator	WCCO	1000	Gasoline	4SLB	25.5		Jul-04	None	0.022	0.06	0.0012	0.0014	0.0014	0.0014	0.0044	0.03	0.09	0.062	0.063	0.063	0.063	0.063	0.063
D11	Steam Cleaner	Hot Seat	2000H QTPW 1573250	Diesel		0.27	Garage	Jun-04	None	0.039	0.006	0.014	0.0019	0.0019	0.0019	0.0050	0.023	0.08	0.019	0.023	0.023	0.023	0.023	0.023
C12	Portable Heater	Milgard	18038	Diesel		0.150	Garage	Apr-99	None	0.024	0.0054	0.0078	0.0021	0.0021	0.0021	0.0036	0.024	0.023	0.033	0.0094	0.0094	0.0094	0.0094	0.0094
C13	Garage Furnace	Chen	H775382	Diesel		0.245	Garage	Jul-01	None	0.035	0.0098	0.012	0.0033	0.0033	0.0033	0.0050	0.035	0.036	0.054	0.015	0.015	0.015	0.015	0.015
D14	Office Furnace	Mittler	AF-104X080	Diesel		0.210	Office	Jul-99	None	0.030	0.0075	0.011	0.0030	0.0030	0.0030	0.0051	0.019	0.033	0.047	0.013	0.013	0.013	0.013	0.013
Totals do not include proposed heater replacement										3.6	29	0.27	0.28	0.26	0.23	1.6	16	127	1.2	1.1	1.1	1.1	1.1	1.1

* CI = compression ignition

2SLB = spark ignition 2-stroke, lean-burn

4SLB = spark ignition 4-stroke, lean-burn

Horsepower converted to mmBtu/hr using: Horsepower (mechanical) * 0.0025425 = mmBtu/hr
from AP-42 Appendix A.

Conversion from cubic centimeters (engine) to hp is unique for each engine model. As a general rule 1 hp/20 cc is used.

stationary (fixed)

portable

mobile or propelled in their normal use

Emission Factors (lb/hp-hr)							
Diesel	0.031	0.0067	0.0021	0.0022	0.0022	0.0022	0.0025
Gasoline	0.011	0.44	0.00058	0.00072	0.00072	0.00072	0.022
VOC assumed to be TOC minus methane							

Emission Factors (lb/gal)								Source: AP-42 Tables 1.3-1 and 1.3-3	
Fuel Oil	0.020	0.0060	0.0071	0.0020	0.0020	0.0020	0.00034		
Distillate Oil	0.140	mmBtu/gal						Source: AP-42 Appendix A, p. A-5	

Emission Factors (lb/gal)							
Propane	0.014	0.0019	0.0015	0.0004	0.0004	0.0004	0.0003
15	gr S/100 scf	Source: Gas Processors Association Engineering Data Book (Ninth Edition, 1972, Figure 15-60 (GPA Liquefied Petroleum Gas Specifications, rev. 1979)) Source: AP-42 Appendix A, p. A-5					
0.034	mmBtu/gal						

Attachment No. 2
Facility Description and CD-01 Forms
(Paper Copy Only)

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FACILITY DESCRIPTION: GROUPS (GP)

Show: Active and Pending Records

Action: PER 001

AQD Facility ID: 13700071

Facility Name: The C Reiss Coal Co - Duluth Dock

	ID No.	Group Status	Added By (Action)	Retired By (Action)	Include in EI	Operator ID for Item	Group Description	Group Items
1	GP 001	Active	PER 001		☐		Screening	FS 006, FS 008, FS 018
2	GP 002	Active	PER 001		☐		Fugitive Sources	CE 001, FS 004, FS 005, FS 006, FS 007, FS 008, FS 009, FS 010, FS 011, FS 012, FS 013, FS 017
3	GP 003	Active	PER 001		☐		Coal Handling	FS 001, FS 002, FS 003
4	GP 004	Active	PER 001		☐		Engines	EU 002, EU 003, EU 004, EU 005, EU 006, EU 008
5	GP 005	Active	PER 001		☐		Salt Handling	FS 014, FS 015, FS 016

KMM00000092



FACILITY DESCRIPTION: EMISSION UNIT (EU)

Show: Active and Pending Records

Action: PER 001

AQD Facility ID: 13700071

Facility Name: The C Reiss Coal Co - Duluth Dock

	ID No.	Emission Unit Status	Added By (Action)	Retired By (Action)	Insignificant Activity	Operator ID for Item	Stack/Vent ID No(s)	Control Equip. ID No(s)	Operator Description	Manufacturer	Model Number	SIC	Max. Design Capacity	Maximum Design Capacity			Max Fuel Input (mil Btu)
														Materials	Units n	Units d	
1	EU 001	Removed	EIS 005		☐				Bituminous Coal Crushing			5052					
2	EU 001	Removed	PER 001		☐				Bituminous Coal Crushing			5052					
3	EU 002	Active	PER 001		☐				Miller Welder	Miller	P220GIOHV-2252A	5052	20.5	Fuel	Hp		0.0229
4	EU 003	Active	PER 001		☐				Pacer Water Pump 5.5 hp	Pacer	SEB2UL	5052	5.5	Fuel	Hp		0.0140
5	EU 004	Active	PER 001		☐				Brigs Water Pump 11hp	Brigs	256427	5052	11	Fuel	Hp		0.0260
6	EU 005	Active	PER 001		☐				Brigs Water Pump 5.5 hp	Brigs	SEB2UL ESIC	5052	5.5	Fuel	Hp		0.0140
7	EU 006	Active	PER 001		☐				Brigs Water Pump 9 hp	Brigs	185432	5052	9	Fuel	Hp		0.0029
8	EU 007	Active	PER 001		☐				Air Compressor	Gardener Denver		5052	90	Diesel Fuel	Hp		0.0521
9	EU 008	Active	PER 001		☐				Norberg Track Drill 3 hp	Norberg	CD	5052	3	Fuel	Hp		0.00763

KM00000094

8 December, 2009 09:56

FACILITY DESCRIPTION: EMISSION UNIT (EU)

KM000000095

	ID No.	Emission Unit Status	Added By (Action)	Commence Const. Date	Initial Startup Date	Removal Date	Firing Method	Pct. Fuel/ Space Heat	Bottleneck	Elevator Type
1	EU 001	Removed	EIS 005			12/31/2001				
2	EU 001	Removed	PER 001			12/31/2001				
3	EU 002	Active	PER 001	09/01/2002	09/01/2002					
4	EU 003	Active	PER 001	07/01/2006	07/01/2006					
5	EU 004	Active	PER 001	05/01/2001	05/01/2001					
6	EU 005	Active	PER 001	07/01/2002	07/01/2002					
7	EU 006	Active	PER 001	09/01/2002	09/01/2002					
8	EU 007	Active	PER 001	06/01/2003	06/01/2003					
9	EU 008	Active	PER 001	05/01/2002	05/01/2003					



FACILITY DESCRIPTION: CONTROL EQUIPMENT (CE)

Show: Active and Pending Records

Action: PER 001

AQD Facility ID: 13700071

Facility Name: The C Reiss Coal Co - Duluth Dock

	ID No.	Control Equip. Status	Added By (Action)	Retired By (Action)	Operator ID for Item	Control Equip. Type	Control Equipment Description	Manufacturer	Model	Pollutants Controlled	Capture Efficiency (%)	Destruction/Collection Efficiency (%)	Afterburner Combustion Parameters
1	CE 001	Active	EIS 001			061	Dust Suppression by Water Spray						
2	CE 001	Active	PER 001			061	Dust Suppression by Water Spray			PM2.5 PM10 PM	100 100 100	75 75 75	
3	CE 002	Active	EIS 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F						
4	CE 002	Removed	PER 001			018	Fabric Filter - Low Temperature, i.e., T<180 Degrees F						



FACILITY DESCRIPTION: FUGITIVE SOURCES (FS)

Show: Active and Pending Records

Action: PER 001

AQD Facility ID: 13700071

Facility Name: The C Reiss Coal Co - Duluth Dock

	ID No.	Fugitive Source Status	Added By (Action)	Retired By (Action)	Insignificant Activity	Operator ID for Item	Pollutant(s) Emitted	Control Equip. ID No(s).	Fugitive Source Description	Year Installed	Year Removed
1	FS 001	Active	EIS 001		☐			CE 001	Coal Receiving		
2	FS 001	Active	PER 001		☐			CE 001	Coal Unloading		
3	FS 002	Active	EIS 001		☐			CE 001	Coal Storage		
4	FS 002	Active	PER 001		☐			CE 001	Coal Stockpiles		
5	FS 003	Active	EIS 001		☐			CE 001	Coal Shipping		
6	FS 003	Active	PER 001		☐			CE 001	Coal Loading		
7	FS 004	Active	EIS 001		☐			CE 001	Limestone Convey from Boat		
8	FS 004	Active	PER 001		☐			CE 001	Stone Shlp Unloading		
9	FS 005	Active	EIS 001		☐			CE 001	Limestone Stockpiled (all)		
10	FS 005	Active	PER 001		☐			CE 001	Stone Piles		
11	FS 006	Active	EIS 001		☐			CE 001	Limestone Screening (large material)		
12	FS 006	Active	PER 001		☐			CE 001	Stone Screening (Primary)		
13	FS 007	Active	EIS 001		☐			CE 001	Limestone Transfer to Rail (90%)		
14	FS 007	Active	PER 001		☐			CE 001	Limestone Transfer to Rail		
15	FS 008	Active	EIS 001		☐			CE 001	Limestone Secondary Screen (10%)		
16	FS 008	Active	PER 001		☐			CE 001	Limestone Secondary Screen		
17	FS 009	Active	EIS 001		☐			CE 001	Limestone Stockpiled (10%)		
18	FS 009	Active	PER 001		☐			CE 001	Limestone Stockpiled		
19	FS 010	Active	EIS 001		☐			CE 001	Limestone Transfer to Truck (10%)		
20	FS 010	Active	PER 001		☐			CE 001	Limestone Transfer to Truck		
21	FS 011	Active	EIS 001		☐			CE 001	Petroleum Coke Unloading		
22	FS 012	Active	EIS 001		☐			CE 001	Petroleum Coke Storage		
23	FS 013	Active	EIS 001		☐			CE 001	Petroleum Coke Loading		
24	FS 014	Active	EIS 001		☐				Salt Unloading		
25	FS 015	Active	EIS 001		☐				Salt Storage Piles		
26	FS 016	Active	EIS 001		☐				Salt Loading		
27	FS 017	Active	PER 001		☐			CE 001	Fugitive Road Dust (Unpaved and Paved Roads)		

KM00000098



MINNESOTA POLLUTION CONTROL AGENCY
AIR QUALITY
520 LAFAYETTE ROAD
ST. PAUL, MN 55155-4194

8 December, 2009 09:57

FACILITY DESCRIPTION: FUGITIVE SOURCES (FS)

Show: Active and Pending Records
Action: PER 001
AQD Facility ID: 13700071
Facility Name: The C Refss Coal Co - Duluth Dock

	ID No.	Fugitive Source Status	Added By (Action)	Retired By (Action)	Insignificant Activity	Operator ID for Item	Pollutant(s) Emitted	Control Equip. ID No(s)	Fugitive Source Description	Year Installed	Year Removed
28	FS 018	Active	PER 001		☐			CE 001	Coal Screening		

US EPA ARCHIVE DOCUMENT

KM00000099

FACILITY DESCRIPTION: Potential-to-emit (by pollutant)

Show: Active and Pending Records

AQD Facility ID: 13700071

Facility Name: The C Reiss Coal Co - Duluth Dock

Pollutant	Item	Added By (Action)	Retired By (Action)	Hourly Potential (lbs per hr)	Unrestricted Potential (tons per yr)	Limited Potential (tons per yr)	Actual Emissions (tons per yr)
Carbon Monoxide							
	EU 002	PER 001		9.000E+00	3.900E+01	2.700E+01	
	EU 003	PER 001		2.400E+00	1.000E+01	7.000E+00	
	EU 004	PER 001		2.400E+00	2.100E+01	1.900E+01	
	EU 005	PER 001		2.400E+00	1.100E+01	1.000E+01	
	EU 006	PER 001		4.000E+00	1.700E+01	1.500E+01	
	EU 007	PER 001		6.000E-01	2.600E+00	3.000E+00	
	EU 008	PER 001		1.300E+00	5.800E+00	5.000E+00	
Totals					1.074E+02	9.000E+01	0.000E+00
Nitrogen Oxides							
	EU 002	PER 001		2.300E-01	9.900E-01	9.900E-01	
	EU 003	PER 001		6.100E-02	2.600E-01	2.600E-01	
	EU 004	PER 001		1.200E-01	5.300E-01	5.300E-01	
	EU 005	PER 001		6.100E-02	2.600E-01	2.600E-01	
	EU 006	PER 001		9.900E-02	4.300E-01	4.300E-01	
	EU 007	PER 001		2.800E+00	1.200E+01	1.200E+01	
	EU 008	PER 001		3.300E-02	1.400E-01	1.400E-01	
Totals					1.461E+01	1.461E+01	0.000E+00
PM < 2.5 micron							
	EU 002	PER 001		1.500E-02	6.500E-02	6.500E-02	
	EU 003	PER 001		4.000E-03	1.700E-02	1.700E-02	
	EU 004	PER 001		7.900E-03	3.500E-02	3.500E-02	
	EU 005	PER 001		4.000E-03	1.700E-02	1.700E-02	
	EU 006	PER 001		6.500E-03	2.800E-02	2.800E-02	
	EU 007	PER 001		2.000E-01	8.700E-01	8.700E-01	
	EU 008	PER 001		2.200E-03	9.500E-03	9.500E-03	
	FS 018	PER 001		1.900E-02	8.200E-02	3.300E-02	
Totals					1.124E+00	1.075E+00	0.000E+00
PM < 10 micron							
	EU 002	PER 001		1.500E-02	6.500E-02	6.500E-02	
	EU 003	PER 001		4.000E-03	1.700E-02	1.700E-02	
	EU 004	PER 001		7.900E-03	3.500E-02	3.500E-02	
	EU 005	PER 001		4.000E-03	1.700E-02	1.700E-02	
	EU 006	PER 001		6.500E-03	2.800E-02	2.800E-02	
	EU 007	PER 001		2.000E-01	8.700E-01	8.700E-01	
	EU 008	PER 001		2.200E-03	9.500E-03	9.500E-03	

FACILITY DESCRIPTION: Potential-to-emit (by pollutant)

Show: Active and Pending Records
AQD Facility ID: 13700071
Facility Name: The C Reiss Coal Co - Duluth Dock

Pollutant	Item	Added By (Action)	Retired By (Action)	Hourly Potential (lbs. per hr)	Unrestricted Potential (tons per yr)	Limited Potential (tons per yr)	Actual Emissions (tons per yr)
PM < 10 micron							
	FS 018	PER 001		1.300E+00	5.700E+00	4.900E+00	
Totals					6.742E+00	1.532E+00	0.000E+00
Total Particulate Matter							
	EU 001	PER 001				0.000E+00	0.000E+00
	EU 002	PER 001		1.500E-02	6.500E-02	6.500E-02	
	EU 003	PER 001		4.000E-03	1.700E-02	1.700E-02	
	EU 004	PER 001		7.900E-03	3.500E-02	3.500E-02	
	EU 005	PER 001		4.000E-03	1.700E-02	1.700E-02	
	EU 006	PER 001		6.500E-03	2.800E-02	2.800E-02	
	EU 007	PER 001		2.000E-01	8.700E-01	8.700E-01	
	EU 008	PER 001		2.200E-03	9.500E-03	9.500E-03	
	FS 018	PER 001		3.800E+00	1.600E+01	1.400E+00	
Totals					1.704E+01	2.442E+00	0.000E+00
Sulfur Dioxide							
	EU 002	PER 001		1.200E-02	5.300E-02	5.300E-02	
	EU 004	PER 001		6.500E-03	2.800E-02	2.800E-02	
	EU 005	PER 001		3.300E-03	1.400E-02	1.400E-02	
	EU 006	PER 001		5.300E-03	2.300E-02	2.300E-02	
	EU 007	PER 001		1.800E-01	8.100E-01	8.100E-01	
	EU 008	PER 001		1.800E-03	7.800E-03	7.800E-03	
Totals					9.358E-01	9.358E-01	0.000E+00
Volatile Organic Compounds							
	EU 002	PER 001		4.400E-01	2.800E-01	2.800E-01	
	EU 003	PER 001		1.200E-01	5.200E-01	5.200E-01	
	EU 004	PER 001		2.400E-01	1.000E+00	1.000E+00	
	EU 005	PER 001		1.200E-01	5.200E-01	5.200E-01	
	EU 006	PER 001		1.900E-01	8.500E-01	8.500E-01	
	EU 007	PER 001		2.300E-01	9.900E-01	9.900E-01	
	EU 008	PER 001		6.500E-03	2.800E-01	2.800E-01	
Totals					4.440E+00	4.440E+00	0.000E+00



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: Total Facility

	NC/ CA	Type	Citation	Requirement
1.0		CD	hdr	TOTAL FACILITY EMISSION LIMITS
2.0		CD	Title I Condition: To avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200	This permit establishes limits on the facility to keep it a minor source under 40 CFR Section 70.2. The Permittee cannot make any change at the source that would make the source a major source under 40 CFR Section 70.2 until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.
3.0		LIMIT	Title I Condition: To avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200	Carbon Monoxide: less than or equal to 90 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period.
4.0		CD	hdr	RECORDKEEPING AND CALCULATIONS REQUIREMENT
5.0		CD	Title I Condition: To avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200	CO Emissions Recordkeeping: The Permittee shall calculate and record the 12-month rolling sum of CO emissions by the 15th day of each month for the previous 12-month period. CO emissions (tons/yr) = [Fuel Usage (gal/month) x Emission Factor (lb/gal)] x 0.006 month/yr(ton/lbs). The Permittee shall use the most recent AP-42 emission factors or other MPCA approved emission factors.
6.0		CD	hdr	OPERATIONAL REQUIREMENTS
7.0		CD	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080.	Ambient Air Quality: The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.
8.0		CD	Minn. R. 7011.0020	Circumvention: The Permittee shall not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.
9.0		CD	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)	Air Pollution Control Equipment: The Permittee shall operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.
10.0		CD	Minn. R. 7019.1000, subp. 4	Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.
11.0		CD	Minn. R. 7011.0150	Fugitive Emissions: The Permittee shall not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. CONTINUED BELOW
12.0		CD	Minn. R. 7011.0150	The Permittee shall not cause or permit a building or its appurtenances or a road, or a driveway, or an open area to be constructed, used, repaired, or demolished without applying all such reasonable measures as may be required to prevent particulate matter from becoming airborne. All persons shall take reasonable precautions to prevent the discharge of visible fugitive dust emissions beyond the lot line of the property on which the emissions originate. The commissioner may require such reasonable measures as may be necessary to prevent particulate matter from becoming airborne including, but not limited to, paving or frequent clearing of roads, driveways, and parking lots; application of dust-free surfaces; application of water; and the planting and maintenance of vegetative ground cover.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

13.0		CD	Minn. Stat. Section 115.07, subd. 4a; Minn. R. 7007.0100; Minn. R. 7007.0800, subp.2; Minn. R. 7011.0150; Minn. R. 7009.0020.	Fugitive Emissions Control Plan: The Permittee shall submit to the Commissioner and implement a fugitive emissions control plan within 60 days of the date of permit issuance. The plan shall identify all fugitive emission sources, primary and contingent control measures, and recordkeeping. The Permittee shall follow the actions and recordkeeping specified in the control plan. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive emission control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors.
14.0		CD	Minn. R. 7007.0800, subp. 9(A)	Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).
15.0		CD	Minn. R. 7030.0010 - 7030.0080	Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.
16.0		CD	Minn. R. 7007.0800, subp. 16	General Conditions: The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.
17.0		CD	hdr	PERFORMANCE TESTING
18.0		CD	Minn. R. ch. 7017	Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and B.
19.0		CD	Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2	Performance Test Notifications and Submittals: Performance Tests are due as outlined in Table A of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.
20.0		CD	Minn. R. 7017.2025, subp. 3	Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.
21.0		CD	hdr	MONITORING REQUIREMENTS
22.0		CD	Minn. R. 7007.0800, subp. 4(D)	Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).
23.0		CD	Minn. R. 7007.0800, subp. 4(D)	Operation of Monitoring Equipment: Unless otherwise noted in Tables A and B monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.
24.0		CD	hdr	RECORDKEEPING
25.0		CD	Minn. R. 7007.0800, subp. 5(C)	Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).
26.0		CD	Minn. R. 7007.0800, subp. 5(B)	Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

27.0		CD	Minn. R. 7007.1200, subp. 4	If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For nonexpiring permits, these records shall be kept for a period of five years from the date that the change was made. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.
28.0		CD	hdr	REPORTING/SUBMITTALS
29.0		CD	Minn. R. 7019.1000, subp. 3	Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.
30.0		CD	Minn. R. 7019.1000, subp. 2	Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.
31.0		CD	Minn. R. 7019.1000, subp. 1	Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.
32.0		CD	Minn. R. 7019.1000, subp. 1	Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.
33.0		S/A	Minn. R. 7007.0800, subp. 6(A)(2)	Semiannual Deviations Report: due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.
34.0		CD	Minn. R. 7007.1150 through Minn. R. 7007.1500	Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.
35.0		CD	Minn. R. 7007.1400, subp. 1(H)	Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).
36.0		S/A	Minn. R. 7007.0800, subp. 6(C)	Compliance Certification: due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). The Permittee shall submit this to the Commissioner on a form approved by the Commissioner. This report covers all deviations experienced during the calendar year.



COMPLIANCE PLAN **CD-01**

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

37.0		CD	Minn. R. 7019.3000 through Minn. R. 7019.3100.	Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.
38.0		CD	Minn. R. 7002.0005 through Minn. R. 7002.0095	Emission Fees: due 60 days after receipt of an MPCA bill.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 001 Screening

Associated Items: FS 006 Stone Screening (Primary)

FS 008 Limestone Secondary Screen

FS 018 Coal Screening

	NC/ CA	Type	Citation	Requirement
1.0		LIMIT	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2	Moisture Content: greater than or equal to 2.88 percent
2.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2	The Permittee shall demonstrate the feed moisture content is greater than 2.88% by the following below: 1. Test moisture content of each different feed material source (sampled at an area representative of the feed source and physically capable of being sampled), as follows: a. Use American Society for Testing and Materials (ASTM) method numbers D 2216-92 or D 4643-93 (or equivalent). b. Keep records of each moisture content test summarizing the method used, results, date, time, and initials of person performing test. c. Test weekly, when operating, unless three consecutive tests at the facility location show moisture contents of greater than or equal to 2.8 percent after which testing is no longer required until the source of the feed material changes. CONTINUED
3.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2	d. When testing indicates that feed material moisture content is less than 2.88 percent, or in situations where it is infeasible to sample and test; or where the Permittee elects not to sample and test, the Permittee must operate a moisture addition device to achieve a moisture content greater than or equal to 2.8 percent. Moisture addition during operation shall continue until subsequent moisture content testing demonstrates that feed material moisture content is greater than or equal to 2.8 percent. Daily, when operating, either: (i) keep records of the date, water flow rate, material throughput rate, and initials of the person making the record and the time the record was made; or (ii) conduct moisture content testing daily on the feed material after water application following a. and b. above, and if results show moisture content is less than 2.8 percent, increase water to insure moisture is 2.8% or greater and re-test to verify.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 002 Fugitive Sources

Associated Items: CE 001 Dust Suppression by Water Spray

FS 004 Stone Ship Unloading

FS 005 Stone Piles

FS 006 Stone Screening (Primary)

FS 007 Limestone Transfer to Rail

FS 008 Limestone Secondary Screen

FS 009 Limestone Stockpiled

FS 010 Limestone Transfer to Truck

FS 011 Petroleum Coke Unloading

FS 012 Petroleum Coke Storage

FS 013 Petroleum Coke Loading

FS 017 Fugitive Road Dust (Unpaved and Paved Roads)

	NC/ CA	Type	Citation	Requirement
1.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Stockpile Construction: a. The Permittee shall not operate the stacker equipment unless the free fall height from the conveyor belt to the stockpile is ten feet or less after stockpile is established. b. The Permittee shall not operate the stacker equipment when steady wind speeds exceed 30 miles per hour or when wind gusts exceed 45 miles per hour unless vessel is being unloaded or wet suppression is used.
2.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Access Areas, Roads, Parking Facilities, and Traffic: a. The Permittee shall be required to apply water or appropriate dust suppression chemicals to the main roads, access and parking areas to the extent necessary to prevent particulate matter from becoming airborne. b. The Permittee shall not apply any surface hardening agents, wetting or chemical agents or oils that may cause ground water or surface water contamination in violation of any applicable water pollution law. c. The Permittee shall ensure that all vehicular traffic does not exceed 10 miles per hour on the facility.
3.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Wet Suppression Systems: a. The Permittee shall operate the seasonal water spray systems anytime during operations when fugitive emissions are visible at any conveyor transfer points, stockpiling points, or other material unloading, handling or loading locations. The rate of water application shall be based on the amount of dust suppression required to significantly reduce fugitive emissions. b. In the event the operation of the water spray systems at rated capacity is insufficient to significantly reduce fugitive emissions, the Permittee shall reduce the belt feeding rate until fugitive emissions are not visible.

CONTINUED



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

4.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	c. The Permittee shall maintain a quarterly report indicating the hours each day for each quarter period in which stockpile materials were handled without the operation of the wet suppression system on the 15th day of the month following the monitored quarter. d. The Permittee shall have a mobile water truck or sprinklers available and shall maintain a quarterly report indicating the periods in which the mobile truck or sprinklers were not available on the 15th day of the month following the monitored quarter. e. Minimum Liquid flow and pressure: The Permittee shall provide sufficient flow and pressure in the wet suppression systems to provide for the operation of the wet suppression systems as designed or reduce/cease material handling operations as necessary to provide no visible emissions at the facility boundary
5.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Stockpile Maintenance and Reclaiming: a. The Permittee shall control fugitive emissions by wet suppression methods whenever feasible. b. Reclaiming of material from stockpiles, including loading trucks or railcars shall not be conducted when the steady wind velocity exceeds 30 miles per hour or when gusts exceed 45 miles per hour unless wet suppression is used.
6.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Material Handling Operations: a. The Permittee shall use storage pads FS 004, and FS 011 to unload from railcars, vessels, and trucks and shall take all reasonable measures to prevent material matter from becoming airborne. b. The Permittee shall use wet suppression systems as necessary to control particular matter from becoming airborne when loading materials.
7.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2.	Visible Emission Evaluation Certification: The Permittee shall retain one or more employees or have at least one contractor available that maintain a valid certification for EPA Method 9 visible emissions monitoring.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 003 Coal Handling

Associated Items: FS 001 Coal Unloading

FS 002 Coal Stockpiles

FS 003 Coal Loading

	NC/ CA	Type	Citation	Requirement
1.0		LIMIT	40 CFR Section 80.252 (c); Minn. R. 7011.1150	Opacity: less than or equal to 20 percent opacity
2.0		CD	Minn. R. 7011.1105, subp. A(2)	Access areas, roads or parking facilities: No person shall cause or permit the use of access areas surrounding coal stockpiles and use of all active truck haul roads and parking facilities which are located within a coal handling facility whose coal throughput by truck is less than 200,000 tons unless such areas and roads are treated with water, oils, or chemical agents.
3.0		CD	Minn. R. 7011.1105, subp. B	Coal loading stations: Control fugitive particulate emissions from the loading of trucks, haulers, and railcars by dust suppression methods so that emissions from such sources are minimized.
4.0		CD	Minn. R. 7011.1105, subp. C	Truck and hauler unloading stations: Control fugitive particulate emissions from the unloading of trucks or haulers by dust suppression methods so that emissions from such sources are minimized.
5.0		CD	Minn. R. 7011.1105, subp. E	Barge or vessel unloading station: Cranes, shovels, and conveyors shall be operated in a manner which decreases as much as practical the vertical free fall of coal. Control fugitive particulate emissions during unloading so that fugitive particulate emissions are minimized.
6.0		CD	Minn. R. 7011.1105, subp. F(1)	Stockpiles, stockpile construction, and reclaiming: Control fugitive particulate emissions by dust suppression methods on such operations so that fugitive particulate emissions are minimized.
7.0		CD	Minn. R. 7011.1105, subp. H	Railcar unloading: control fugitive particulate emissions during unloading so that fugitive particulate emissions are minimized.
8.0		CD	Minn. R. 7011.1105, subp. I	Operating practices: Clean up all coal spilled on roads or access areas as soon as practicable using methods that minimize the amount of dust suspended. Maintain air pollution control equipment in proper operating condition and utilize air pollution control systems as designed.
9.0		CD	Minn. R. 7011.1120	Exemption: During freezing temperatures, owners or operators shall not be required to apply water or dust suppressants.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

10.0		CD	Minn. R. 7011.1125	Cessation of Operations: The owner or operator of a coal handling facility shall not conduct any nonessential coal handling operations that are not shielded from the wind or enclosed in a building when steady wind speeds exceed 30 miles per hour as determined at the nearest official station of the United States Weather Bureau or by wind speed instruments on or adjacent to the site.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 004 Engines

Associated Items: EU 002 Miller Welder

EU 003 Pacer Water Pump 5.5 hp

EU 004 Brigs Water Pump 11hp

EU 005 Brigs Water Pump 5.5 hp

EU 006 Brigs Water Pump 9 hp

EU 008 Norberg Track Drill 3 hp

	NC/ CA	Type	Citation	Requirement
1.0		CD	hdr	EMISSION LIMITS
2.0		LIMIT	Minn. R. 7011.2300, subp. 1	Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained. This limit applies to each unit individually.
3.0		LIMIT	Minn. R. 7011.2300, subp. 2	Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input using 3-hour Rolling Average. The potential to emit from each unit is due to equipment design and allowable fuels. This limit applies to each unit individually.
4.0		CD	hdr	OPERATING REQUIREMENTS
5.0		CD	Minn. Stat. 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2	Fuel type: The Permittee shall only combust gasoline in these engines.
6.0		CD	Minn. R. 7007.0800, subp. 5	The Permittee shall keep records of fuel use on a monthly basis.



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: GP 005 Salt Handling

Associated Items: FS 014 Salt Unloading

FS 015 Salt Storage Piles

FS 016 Salt Loading

	NC/ CA	Type	Citation	Requirement
1.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Stockpile Construction: a. The Permittee shall not operate the stacker equipment unless the free fall height from the conveyor belt to the stockpile is ten feet or less after stockpile is established. b. The Permittee shall not operate the stacker equipment when steady wind speeds exceed 30 miles per hour or when wind gusts exceed 45 miles per hour unless vessel is being unloaded.
2.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Stockpile Maintenance and Reclaiming: Reclaiming of material from stockpiles, including loading trucks or railcars shall not be conducted when the steady wind velocity exceeds 30 miles per hour or when gusts exceed 45 miles per hour.
3.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150	Unloading Operations: a. The Permittee shall use storage pads FS 014 to unload from railcars, vessels, and trucks and shall take all reasonable measures to prevent material matter from becoming airborne.
4.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2;	Salt Operations: the Permittee shall cover salt stockpiles within 15 days of unloading. Stockpiles shall remain covered except for the working face of the stockpiles which can be uncovered for loading trucks.
5.0		CD	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2.	Visible Emission Evaluation Certification: The Permittee shall retain one or more employees or have at least one contractor available that maintain a valid certification for EPA Method 9 visible emissions monitoring.

KM00000112



COMPLIANCE PLAN CD-01

Facility Name: The C Reiss Coal Co - Duluth Dock

Permit Number: 13700071 - 001

Subject Item: EU 007 Air Compressor

	NC/ CA	Type	Citation	Requirement
1.0		CD	hdr	EMISSION LIMITS
2.0		LIMIT	Minn. R. 7011.2300, subp. 1	Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.
3.0		LIMIT	Minn. R. 7011.2300, subp. 2	Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input using 3-hour Rolling Average. The potential to emit from the unit is 0.23-lb/MMBtu due to equipment design and allowable fuel.
4.0		CD	hdr	OPERATING REQUIREMENTS
5.0		CD	Minn. Stat. 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2	Fuel type: The Permittee shall only combust diesel in this engine.
6.0		CD	Minn. R. 7007.0800, subp. 5	The Permittee shall keep records of fuel type on a monthly basis.
7.0		CD	Minn. R. 7007.0800, subps. 4 & 5	Fuel Supplier Certification: The Permittee shall obtain and maintain a fuel supplier certification for each shipment of diesel, certifying that the sulfur content does not exceed 0.50% by weight.

KM00000113

Attachment No. 3

USEPA Letter from Cheryl Newton, Acting Director Air and Radiation Division to Janet McCabe, Assistant Commissioner, Office of Air Quality, Indiana Department of Environmental Management
(Paper Copy Only)

March 6, 2003

(A-18J)

Janet McCabe, Assistant Commissioner
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Dear Ms. McCabe:

In discussions with United States Environmental Protection Agency (EPA) Region 5, State permitting authorities have requested clarification on our fugitive emissions policy. Specifically, the States have asked EPA to clarify to what extent, and from which emission units, are fugitive emissions counted towards major source applicability for Title V, nonattainment new source review (NSR), and prevention of significant deterioration (PSD). Various EPA letters and memoranda provide guidance on when you count fugitive emissions to determine whether a source is a major stationary source subject to Title V, NSR, or PSD, but there is no one guidance document which addresses the various scenarios which arise.

In the enclosed analysis, we are providing some examples that should help you understand when to include fugitive emissions in determining whether a source is major for purposes of Title V, NSR, or PSD. However, no part of this document, including the following examples, create any new legally binding obligations. Rather, the purpose of this document is to help you understand the statutory provisions and regulations which govern when fugitive emissions are included in major source determinations and EPA's interpretation of these provisions and regulations.

KM00000116

This response has been coordinated with staff in EPA's Office of Air Quality Planning and Standards, Office of Enforcement and Compliance Assurance, and Office of General Counsel in order to help assure completeness and accuracy.

If you have any questions regarding this letter, please contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely yours,

/s/ (Stephen Rothblatt for)

Cheryl L. Newton, Acting Director
Air and Radiation Division

Enclosure

ANALYSIS

What Effect Did the November 27, 2001, Title V Rulemaking Have on the Counting of Fugitive Emissions?

On November 27, 2001 (66 FR 59161), EPA published a rule, "Change to Definition of Major Source," that requires or clarifies the following for Title V:

- An owner or operator of a source must include the fugitive emissions of all pollutants regulated under the Clean Air Act in determining whether the source is a major stationary source under Title V if the source falls within one of the source categories listed through a rulemaking pursuant to section 302(j) of the Act ("listed source categories").¹ Included as listed source categories are source categories regulated by a section 111 or 112 standard on or before August 7, 1980.
- An owner or operator of a source that falls within a listed source category that was regulated by a section 111 or 112 standard on or before August 7, 1980, must include the fugitive emissions of all air pollutants regulated under the Act, not just those pollutants regulated by the section 111 or 112 standard, in determining whether the source is a major stationary source under Title V.
- An owner or operator of a source must include the fugitive emissions of all hazardous air pollutants ("HAPs") listed under section 112(b) of the Act in determining whether the source is a major source for purposes of section 112 and Title V, regardless of whether the source falls within a listed source category. See National Mining Ass'n v. EPA, 59 F.3d 1351 (D.C. Cir. 1995).

What Are Some Examples of When You Count Fugitive Emissions to Determine Whether Your Source is Major?

Below are several scenarios that illustrate how to consider fugitive emissions in determining whether a source is a major stationary source.² You should note that the examples below rely

¹ For the purposes of this document, "listed source categories" refer to the source categories identified in 40 CFR §§ 51.165(a)(1)(iv)(C), 51.166(b)(1)(iii), 52.21(b)(1)(iii), 52.24(f)(4)(iii), and the second definition of "major source" in 40 CFR 70.2 and 71.2.

² Consistent with a voluntary remand in a case regarding the question of when is a source of fugitive emissions major for purposes of Title V, EPA has rescinded its interpretation of what the collocation language of 40 CFR part 70 requires with respect to unlisted sources of fugitive emissions. As explained in a memorandum from

07/24/76

On 07/24/76, 10:00 AM, the following information was received from the EPA:

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on certain assumptions regarding the complex industrial facilities described. The question of what is the primary activity at such a source or what emission units are properly considered to be a part of the source can be difficult to answer in any given case. The assumptions underlying these examples are not intended to shortcut the very fact intensive inquiry that such questions may require.

Scenarios

The first 3 scenarios below apply to the counting of fugitive emissions of regulated pollutants. The last scenario applies to the counting of fugitive emissions of any HAP listed under section 112(b) of the Act.

1. A stationary source in a listed source category. If the primary activity of a stationary source falls within a listed source category, then fugitive emissions are included from all emissions units at the source. The stationary source encompasses not only all emission units within the same SIC code at the facility, but also emission units at support facilities that are part of the source.

Examples:

- A petroleum refinery. Petroleum refineries are a listed source category. You include fugitive emissions from the refinery to determine whether it is a major stationary source.
- A steel mill with an onsite slag handling operation. The primary activity of the source, in this case, is the production of steel, and steel mills are a listed source category. Although slag handling is not a listed source category, the onsite slag handling operation here is a support facility for the steel mill. You include fugitive emissions from the steel mill (a listed source category and the primary activity at this source) as well as the fugitive emissions from the slag handling operation (an unlisted source category, but one which supports the primary activity here) to determine if the source is a major stationary

EPA, States have discretion in interpreting what the part 70 rule's collocation language requires with respect to unlisted sources of fugitive emissions. Memorandum from Lydia Wegman to Regional Air Director (June 2, 1995) (<http://www.epa.gov/Region7/programs/artd/air/title5/t5memos/amcguide.pdf>). Please refer to this memorandum for an explanation of the scope of the voluntary remand. As a result of this voluntary remand, the first two scenarios discussed below may, or may not, be applicable to the implementation of part 70 in your State, depending on your State's exercise of its discretion.

1. The first of these is the fact that the Commission has not yet received any information from the Government of the United States regarding the activities of the Committee for the Liberation of the People of the East (CLPE) in the United States. This is a serious matter, as the CLPE is a known and active organization which has been operating in the United States for many years. It is a member of the National Front for the Liberation of China (NFLC) and has been active in recruiting and training Chinese agents for operations in the United States. The Commission is therefore very concerned that the Government of the United States is not providing it with the information it needs to carry out its duties.

[illegible][illegible]

1. The first group of people who are interested in the study of the history of the United States are the people who are interested in the history of the United States. They are interested in the history of the United States because they want to know more about the United States. They want to know more about the United States because they want to know more about the United States.

This document is a copy of a letter from the
 American Red Cross to the British Red Cross
 Society, dated 1945. The letter discusses the
 work of the American Red Cross in the United States
 and the British Red Cross Society in the United Kingdom.
 The letter is signed by the President of the American
 Red Cross, and is addressed to the Secretary of the
 British Red Cross Society.

1. The first step in the process of identifying a problem is to determine the nature of the problem. This involves a thorough understanding of the situation and the factors that are contributing to the problem. Once the nature of the problem is understood, the next step is to identify the causes of the problem. This involves a detailed analysis of the situation and the factors that are contributing to the problem. Once the causes of the problem are identified, the next step is to develop a plan of action. This involves determining the steps that need to be taken to solve the problem. Once a plan of action is developed, the next step is to implement the plan. This involves carrying out the steps that have been determined in the plan of action. Finally, the last step in the process is to evaluate the results of the plan. This involves determining whether the plan has been successful in solving the problem and whether any further action is needed.

source.

- A fossil-fuel-fired steam electric plant of more than 250 million BTUs per hour heat input located a short distance away from a coal mine that supplies all of its coal to the steam electric plant. The primary activity of the source, in this case, is the generation of steam and electricity, and steam electric plants as described above are a listed source category. You include fugitive emissions from the steam electric plant (a listed source category and the primary activity at this source) as well as the fugitive emissions from the coal mine (an unlisted source category and the support facility at this source) to determine if the source is a major stationary source.

2. A stationary source in an unlisted source category. If the primary activity of a stationary source falls within a source category that is not listed, then as a general matter fugitive emissions from the emissions units at the source are not included in determining whether the source is a major stationary source. However, if the source also contains emission units which do fall within a listed source category (or categories), then you include fugitive emissions from these listed emissions units to determine if the source is a major stationary source.

Examples:

- A food processing plant that has several petroleum liquid storage tanks subject to the NSPS in 40 CFR part 60, subpart Ka. The primary activity of the source, in this case, is the processing of food, and food processing plants are not a listed source category. The storage tanks, however, fall within a listed source category as this source category was regulated by subpart Ka as of August 7, 1980. You include fugitive emissions only from the storage tanks to determine if the source is a major stationary source.
- A coal mine with an onsite coal cleaning plant with a thermal dryer. The primary activity of the source, in this example, is the mining of coal, and coal mines are not a listed source category. The coal cleaning plant, however, does fall within a listed source category. You include fugitive emissions only from the coal cleaning plant to determine if the source is a major stationary source.

3. A stationary source in one of the source categories regulated by a section 111 new source performance standard (NSPS) on or

1. The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land owned by the United States in the State of Nevada:

1. $\mathcal{H}^1(\mathbb{R}^n) \subset \mathcal{H}^2(\mathbb{R}^n)$ and $\mathcal{H}^2(\mathbb{R}^n) \subset \mathcal{H}^1(\mathbb{R}^n)$ if and only if $n=1$.
 2. $\mathcal{H}^1(\mathbb{R}^n) \subset \mathcal{H}^2(\mathbb{R}^n)$ and $\mathcal{H}^2(\mathbb{R}^n) \subset \mathcal{H}^1(\mathbb{R}^n)$ if and only if $n=1$.

before August 7, 1980, that contains emissions units that are grandfathered from the NSPS requirements (e.g., constructed before the applicability date of the NSPS) or that are not regulated as "affected facilities" under the NSPS. You include fugitive emissions from all emission units at the source to determine if it is a major stationary source because the source falls within a listed source category. The decision to include fugitive emissions from a stationary source is not influenced by whether specific emissions units are subject to regulation.

Examples:

- A grain elevator of the type covered by the NSPS in 40 CFR part 60, subpart DD, but which is grandfathered from the requirements of this NSPS. Since subpart DD was promulgated prior to August 7, 1980, the grain elevator falls within a listed source category. You include fugitive emissions from the grain elevator to determine if the source is a major stationary source.
- A coal prep plant of the type covered by the NSPS in 40 CFR part 60, subpart Y. The coal prep plant falls within a listed source category as this source category was regulated by subpart Y as of August 7, 1980. The coal prep plant includes emissions units that are not regulated as "affected facilities" under the NSPS. You include fugitive emissions from all emission units at the coal prep plant to determine if the source is a major stationary source, including fugitive emissions from the units that are not regulated as "affected facilities" under the NSPS.

4. A source which emits fugitive emissions of any HAP listed under section 112(b) of the Act.³ You include fugitive HAP emissions from all emissions units at a source to determine if the source is a major source without regard to whether the source falls within a listed source category. Although most emissions of HAPs are nonfugitive due to advancing technology, some likely emitters of fugitive HAPs as of the date of this letter are pumps, valves, compressors, or flanges found at petroleum refineries, chemical processing plants, tank farms (i.e., facilities which have a collection of storage tanks), and crude oil and natural gas production facilities.

³ This scenario is relevant for determining whether a source is a major source for purposes of section 112 and therefore Title V. (See first definition of "major source" in 40 CFR 70.2 and 71.2). The inclusion of fugitive emissions of HAPs in major source determinations is generally not relevant for PSD. The requirements of the PSD program do not apply to pollutants listed as HAPs under section 112(b) of the Act. See 42 U.S.C. § 7412(b)(6).

In reading this document, please remember that it is not a regulation and does not substitute for the applicable regulations. The Clean Air Act and EPA's regulations governing NSR, PSD, and Title V contain legally binding requirements. In contrast, the statements made in this document do not create legal rights or impose legally binding requirements on EPA, the States, or the regulated community. Rather, the purpose of this document, including the scenarios above, is to help you understand the statutory provisions and regulations which govern when fugitive emissions are included in major source determinations and EPA's interpretation of these provisions and regulations. It is important to note that any decisions regarding a particular facility will be made based on the statute and regulations.

This discussion of various possible scenarios is not exhaustive. In deciding whether to include fugitive emissions from a stationary source in determining major source applicability, you may find the following sources of information useful in addition to those mentioned above:

- "Requirements for Preparation, Adoption, and Submittal of Implementation Plans; Approval and Promulgation of Implementation Plans," 45 Fed. Reg. 52676, 52695 (August 7, 1980)
- "Requirements for Implementation Plans: Surface Coal Mines and Fugitive Emissions; Approval and Promulgation of Implementation Plans," 54 Fed. Reg. 48870, 48881-48882 (Nov. 28, 1989)
- "New Source Performance Standards (NSPS) - Applicability of Standards of Performance for Coal Preparation Plants to Coal Unloading Operations," 63 Fed. Reg. 53288, 53290 (October 5, 1998)
- Letter from Edward J. Lillis to Thomas C. O'Connor (Oct. 14, 1994) (<http://www.epa.gov/rgytgrnj/programs/artd/air/title5/t5memos/fugitive.pdf>)
- Letter from Robert G. Kellam to Donald P. Gabrielson (March 1, 1996) (<http://www.epa.gov/rgytgrnj/programs/artd/air/title5/t5memos/donaldpg.pdf>)



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

EXP-01

Expedited Project Review Request

Air Quality Permit Program

Doc Type: Permit Application

Instructions: Use this form to indicate your desire to participate in the Expedited Permit Program. Please e-mail this completed form to the Program Coordinator at exp-air-permits.pca@state.mn.us

Reimbursements to the Minnesota Pollution Control Agency (MPCA) for all outstanding costs incurred under the program must precede issuance of the permit. The applicant is obligated to pay for all work completed if the project is withdrawn/denied. Payment for the total cost is required within three (3) weeks of receipt of an income agreement.

1) Contact Person for this Expedited Project Review Request:

Mr./Ms. Mr. Terry Steinert Phone: 316.828.7847 Fax: 316.828.9108
Title: Environmental Compliance Manager E-mail: steine3t@kochind.com

Authorized Representative (authorized to enter into contract and make payment, if different from Contact):

Mr./Ms. Mr. Robert Valley Phone: 906.786.2793 Fax: 906.786.2797
Title: Plant Manager E-mail: ValleyB@kochind.com

Facility name: The C. Reiss Coal Company - Duluth Dock

Street address: 50th Avenue West & LeSurre St.

City: Duluth County: St. Louis

Mailing address: P.O. Box 16718

City: Duluth State: MN Zip code: 55816

Company/Organization name: The C. Reiss Coal Company

Federal employer ID number: 39-0564390

Minnesota Tax I.D. Number: 2202

AQ permit number, if known: 13700071

Date of application submittal: December 8, 2011 and supplemented February 20, 2012

Please enter the date by which you need your permit action to be issued: December 31, 2013

Please note: Some permit actions require a public notice period, which adds 30 days to the timeframe needed to process your request, and some permit actions also require a 45-day notice period with the U.S. Environmental Protection Agency (EPA). When a public notice is required, the applicant will be sent a copy of the public notice and will be required to arrange for the publication of the notice in the appropriate newspaper. Please refer to Minn. R. 7007.0850-.0950 for the required public notice period(s) for your permit action and include this timeframe in the date listed above.

2) What type of action do you anticipate needing for your project?

☐ New Source Review Permit	☒ Major Amendment
☐ Part 70 Total Facility Permit	☐ Moderate Amendment
☐ State Total Facility Permit	☐ Minor Amendment
☐ Applicability Request	☐ Administrative Amendment

3) Description of the project:

This is a major amendment as determined on Form CH-03 of the application. The C. Reiss Coal Company is seeking to remove limits on CO emission because the facility does not need such limits to be a true minor source. This request results from a change that USEPA made to the CO emission factor in AP-42. When the correct emission factor is used, the facility no longer needs limits to avoid Part 70 for CO and the potential to emit all other criteria pollutants is less than the major source thresholds.

4) The permit action is likely to require the following review elements:

☐ Completion of an EAW or EIS ¹	☐ NSPS review ²
☐ Dispersion Modeling Analysis review.	Which Subpart(s) _____
☐ PSD or NAA ³ review.	☐ NESHAP ⁴ review.
Which pollutant(s)? _____	Which Subpart(s) _____
☐ Amendments to Minnesota's SIP ⁵	☐ Case-by-Case MACT ⁶ determination
☐ Changes to an ethanol manufacturing plant	☐ Unresolved compliance and/or enforcement issues
☐ A facility that is potentially controversial	☐ Confidentiality Request

Please note: Checking any of the above boxes in the left column may not allow the project to be processed using the Expedited Permit Program, except in rare cases where staff are available to work overtime and not have the project interfere with the MPCA's regular work.

5) Desired level of involvement:

Please note your level of interest in participating in this program. This selection is preliminary, and you may change your selection or withdraw from the program at any time prior to submitting any estimated reimbursement requested by the MPCA. By submitting this form, you are indicating a willingness to reimburse the MPCA for costs incurred in processing your application through the expedited permit program.

Select one or both of the following options based on your desired level of interest:

- ☒ I am willing to reimburse the MPCA for staff costs incurred relating to my permit application.
- ☒ I am willing to reimburse the MPCA for the costs of hiring a contractor to process my permit application.

Please note: The staff overtime option is used when there is a staff volunteer available to work on a project on overtime. The contractor option is used when no staff overtime volunteer is available or when the magnitude/complexity of the project will likely require a contractor to be hired. Projects assigned to contractors typically are assigned in the order in which the request was received, incur higher costs than the staff overtime option, and tend to take less time for completion of the project from when it begins.

6) Conflict of interest:

Complete this item only if you have indicated a willingness to incur the expense of the MPCA hiring a contractor to process your permit application. The firms listed below are currently enrolled in a level-of-effort contract with the MPCA to work on projects under the Expedited Permit Program. If you believe that there would exist a conflict of interest if any of the firms listed below were assigned to your project, please indicate that by checking the appropriate box and supply your reasoning. The MPCA reserves the right to make the final contractor selection, but will consider any real or perceived conflicts of interest from both your perspective and a potential contractor's perspective.

Firm Name	Reason for Conflict of Interest
☐ Reinertsen Environmental Services LLC.	_____
☐ U.S. Compliance Corporation	_____

¹ EAW – Environmental Assessment Worksheet. EIS – Environmental Impact Statement.

² NSPS – New Source Performance Standard, 40 CFR part 60.

³ PSD – Prevention of Significant Deterioration, 40 CFR 52.21. NAA – Non-Attainment Area.

⁴ NESHAP – National Emission Standards for Hazardous Air Pollutants, 40 CFR part 63.

⁵ SIP – State Implementation Plan.

⁶ MACT – Maximum Achievable Control Technology

THE C. REISS COAL COMPANY



August 16, 2013

Submitted via Electronic Mail (exp-air-permits.pca@state.mn.us)

Minnesota Pollution Control Agency
Air Quality Permit Program
520 Lafayette Road North
St. Paul, MN 55155-4194

Re: The C. Reiss Coal Co., Duluth, St. Louis County, MN, Permit Amendment
Air Emission Permit No. 13700071-001
Tracking No. 3793

To Whom It May Concern:

I am writing to follow-up on a telephone conversation of August 14, 2013 between Mr. Terry Steinert, Environmental Compliance Manager of The C. Reiss Coal Company ("Reiss Coal") and Mr. Jeff Hedman of the Minnesota Pollution Control Agency (the "Agency"). They discussed the process for expedited review of a pending permit application that was submitted by Reiss Coal on December 8, 2011 and supplemented on February 20, 2012. After reviewing the options provided by Mr. Hedman, Reiss Coal has decided to submit form EXP-01 to expedite review of the permit. Per the instructions on the form, this form is being submitted electronically to the e-mail address listed above.

As Reiss Coal understands the process, the Agency will determine whether this application is eligible for expedited review, whether personnel are available to conduct this review, and an estimated cost. We further understand that after this initial screening is completed by the Agency, Reiss Coal will have the option to pursue or decline expedited review.

If you have any questions, please contact Mr. Terry Steinert at 316-828-7847.

Respectfully Submitted,
The C. Reiss Coal Company – Escanaba Docks

Robert Valley, Operations Manager

cc: Terry Steinert

THE C. REISS COAL COMPANY



August 16, 2013

Submitted via Electronic Mail (exp-air-permits.pca@state.mn.us)

Minnesota Pollution Control Agency
Air Quality Permit Program
520 Lafayette Road North
St. Paul, MN 55155-4194

Re: The C. Reiss Coal Co., Duluth, St. Louis County, MN, Permit Amendment
Air Emission Permit No. 13700071-001
Tracking No. 3793

To Whom It May Concern;

I am writing to follow-up on a telephone conversation of August 14, 2013 between Mr. Terry Steinert, Environmental Compliance Manager of The C. Reiss Coal Company ("Reiss Coal") and Mr. Jeff Hedman of the Minnesota Pollution Control Agency (the "Agency"). They discussed the process for expedited review of a pending permit application that was submitted by Reiss Coal on December 8, 2011 and supplemented on February 20, 2012. After reviewing the options provided by Mr. Hedman, Reiss Coal has decided to submit form EXP-01 to expedite review of the permit. Per the instructions on the form, this form is being submitted electronically to the e-mail address listed above.

As Reiss Coal understands the process, the Agency will determine whether this application is eligible for expedited review, whether personnel are available to conduct this review, and an estimated cost. We further understand that after this initial screening is completed by the Agency, Reiss Coal will have the option to pursue or decline expedited review.

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Respectfully Submitted,
The C. Reiss Coal Company – Escanaba Docks

Robert Valley, Operations Manager

cc: Terry Steinert

KM00000133

US EPA ARCHIVE DOCUMENT



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

EXP-01

Expedited Project Review Request

Air Quality Permit Program

Doc Type: Permit Application

Instructions: Use this form to indicate your desire to participate in the Expedited Permit Program. Please e-mail this completed form to the Program Coordinator at exp-air-permits.pca@state.mn.us

Reimbursements to the Minnesota Pollution Control Agency (MPCA) for all outstanding costs incurred under the program must precede issuance of the permit. The applicant is obligated to pay for all work completed if the project is withdrawn/denied. Payment for the total cost is required within three (3) weeks of receipt of an income agreement.

1) Contact Person for this Expedited Project Review Request:

Mr./Ms. Mr. Terry Steinert Phone: 316.828.7847 Fax: 316.828.9108
Title: Environmental Compliance Manager E-mail: steine3t@kochind.com

Authorized Representative (authorized to enter into contract and make payment, if different from Contact):

Mr./Ms. Mr. Robert Valley Phone: 906.786.2793 Fax: 906.786.2797
Title: Plant Manager E-mail: ValleyB@kochind.com

Facility name: The C. Reiss Coal Company - Duluth Dock

Street address: 50th Avenue West & LeSure St.

City: Duluth County: St. Louis

Mailing address: P.O. Box 16718

City: Duluth State: MN Zip code: 55816

Company/Organization name: The C. Reiss Coal Company

Federal employer ID number: 39-0564390 Minnesota Tax I.D. Number: 2202

AQ permit number, if known: 13700071

Date of application submittal: December 8, 2011 and supplemented February 20, 2012

Please enter the date by which you need your permit action to be issued: December 31, 2013

Please note: Some permit actions require a public notice period, which adds 30 days to the timeframe needed to process your request, and some permit actions also require a 45-day notice period with the U.S. Environmental Protection Agency (EPA). When a public notice is required, the applicant will be sent a copy of the public notice and will be required to arrange for the publication of the notice in the appropriate newspaper. Please refer to Minn. R. 7007.0850-.0950 for the required public notice period(s) for your permit action and include this timeframe in the date listed above.

2) What type of action do you anticipate needing for your project?

☐ New Source Review Permit	☒ Major Amendment
☐ Part 70 Total Facility Permit	☐ Moderate Amendment
☐ State Total Facility Permit	☐ Minor Amendment
☐ Applicability Request	☐ Administrative Amendment

3) Description of the project:

This is a major amendment as determined on Form CH-03 of the application. The C. Reiss Coal Company is seeking to remove limits on CO emission because the facility does not need such limits to be a true minor source. This request results from a change that USEPA made to the CO emission factor in AP-42. When the correct emission factor is used, the facility no longer needs limits to avoid Part 70 for CO and the potential to emit all other criteria pollutants is less than the major source thresholds.

KM00000134

4) The permit action is likely to require the following review elements:

☐ Completion of an EAW or EIS ¹	☐ NSPS review ²
☐ Dispersion Modeling Analysis review.	Which Subpart(s) _____
☐ PSD or NAA ³ review.	☐ NESHAP ⁴ review.
Which pollutant(s)? _____	Which Subpart(s) _____
☐ Amendments to Minnesota's SIP ⁵	☐ Case-by-Case MACT ⁶ determination
☐ Changes to an ethanol manufacturing plant	☐ Unresolved compliance and/or enforcement issues
☐ A facility that is potentially controversial	☐ Confidentiality Request

Please note: Checking any of the above boxes in the left column may not allow the project to be processed using the Expedited Permit Program, except in rare cases where staff are available to work overtime and not have the project interfere with the MPCA's regular work.

5) Desired level of involvement:

Please note your level of interest in participating in this program. This selection is preliminary, and you may change your selection or withdraw from the program at any time prior to submitting any estimated reimbursement requested by the MPCA. By submitting this form, you are indicating a willingness to reimburse the MPCA for costs incurred in processing your application through the expedited permit program.

Select one or both of the following options based on your desired level of interest:

- ☒ I am willing to reimburse the MPCA for staff costs incurred relating to my permit application.
- ☒ I am willing to reimburse the MPCA for the costs of hiring a contractor to process my permit application.

Please note: The staff overtime option is used when there is a staff volunteer available to work on a project on overtime. The contractor option is used when no staff overtime volunteer is available or when the magnitude/complexity of the project will likely require a contractor to be hired. Projects assigned to contractors typically are assigned in the order in which the request was received, incur higher costs than the staff overtime option, and tend to take less time for completion of the project from when it begins.

6) Conflict of interest:

Complete this item only if you have indicated a willingness to incur the expense of the MPCA hiring a contractor to process your permit application. The firms listed below are currently enrolled in a level-of-effort contract with the MPCA to work on projects under the Expedited Permit Program. If you believe that there would exist a conflict of interest if any of the firms listed below were assigned to your project, please indicate that by checking the appropriate box and supply your reasoning. The MPCA reserves the right to make the final contractor selection, but will consider any real or perceived conflicts of interest from both your perspective and a potential contractor's perspective.

Firm Name	Reason for Conflict of Interest
☐ Reinertsen Environmental Services LLC.	_____
☐ U.S. Compliance Corporation	_____

¹ EAW – Environmental Assessment Worksheet. EIS – Environmental Impact Statement.

² NSPS – New Source Performance Standard, 40 CFR part 60.

³ PSD – Prevention of Significant Deterioration, 40 CFR 52.21. NAA – Non-Attainment Area.

⁴ NESHAP – National Emission Standards for Hazardous Air Pollutants, 40 CFR part 63.

⁵ SIP – State Implementation Plan.

⁶ MACT – Maximum Achievable Control Technology

COMPLIANCE DOCUMENT QUALITY ASSURANCE REVIEW FORM

1	Document Name: <u>Permit Expedition Request - Duluth</u> Affected Agency: <u>MPCA</u> Document Level: ☒ A ☐ B ☐ C Reason for Submittal: <u>Accelerate review of Duluth request to convert synthetic minor air permit to true minor state operating permit</u> Due Date: <u>8/19/2013</u> Submitted: ☒ Electronically ☐ Hardcopy/Paper ☐ N/A																																
2	Responsible Official: <u>Bob Valley</u> R.O. Authorized: ☒ Yes ☐ No By: <u>Operations VP</u> Date: <u>6/21/2005</u>																																
3	Document Preparer: <u>Terry Steiner</u> Sign: <u>[Signature]</u> Date: <u>2013-08-16</u> Document Owner: <u>Bob Valley</u> Sign: <u>[Signature]</u> Date: <u>2013-08-22</u> (Owner signs if different from Preparer) Qualified Reviewers (check all that apply): <table border="0"> <tr> <td>☒ Legal (A)</td> <td>Name: <u>Jeff Culver</u></td> <td>Sign: <u>[Signature]</u></td> <td>Date: <u>2013-08-22</u></td> </tr> <tr> <td>☐ Compliance Director (A)</td> <td>Name: _____</td> <td>Sign: _____</td> <td>Date: _____</td> </tr> <tr> <td>☒ Compliance Manager (A, B)</td> <td>Name: <u>Terry Steiner</u></td> <td>Sign: <u>[Signature]</u></td> <td>Date: <u>2013-08-16</u></td> </tr> <tr> <td>☐ Operations VP</td> <td>Name: _____</td> <td>Sign: _____</td> <td>Date: _____</td> </tr> <tr> <td>☐ Lead Engineer</td> <td>Name: _____</td> <td>Sign: _____</td> <td>Date: _____</td> </tr> <tr> <td>☐ Other Employee (C)</td> <td>Name: _____</td> <td>Sign: _____</td> <td>Date: _____</td> </tr> <tr> <td>☐ Third Party</td> <td>Name: _____</td> <td>Sign: _____</td> <td>Date: _____</td> </tr> <tr> <td>☐ Business Leader / VP</td> <td>Name: _____</td> <td>Sign: _____</td> <td>Date: _____</td> </tr> </table>	☒ Legal (A)	Name: <u>Jeff Culver</u>	Sign: <u>[Signature]</u>	Date: <u>2013-08-22</u>	☐ Compliance Director (A)	Name: _____	Sign: _____	Date: _____	☒ Compliance Manager (A, B)	Name: <u>Terry Steiner</u>	Sign: <u>[Signature]</u>	Date: <u>2013-08-16</u>	☐ Operations VP	Name: _____	Sign: _____	Date: _____	☐ Lead Engineer	Name: _____	Sign: _____	Date: _____	☐ Other Employee (C)	Name: _____	Sign: _____	Date: _____	☐ Third Party	Name: _____	Sign: _____	Date: _____	☐ Business Leader / VP	Name: _____	Sign: _____	Date: _____
☒ Legal (A)	Name: <u>Jeff Culver</u>	Sign: <u>[Signature]</u>	Date: <u>2013-08-22</u>																														
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☐ Business Leader / VP	Name: _____	Sign: _____	Date: _____																														
4	Non-compliance, reportable condition or anomaly: ☐ Yes ☐ No If no, then skip to Section 5 Agency Notified: ☐ Yes ☐ No Agency: _____ Describe: _____ LYNX Tracking No. _____																																
5	Document, supporting information and QA Form filed to: Facility File: ☒ Yes ☐ No Share Drive: ☒ Yes ☐ No Retention Code: <u>EHS92</u>																																
6	Remarks: _____ _____ _____ _____ _____																																

COMPLIANCE DOCUMENT QUALITY ASSURANCE REVIEW FORM

1			
Document Name: <u>Permit Exemption Request - Death</u>		Document Level: ☒ A ☐ B ☐ C	
Affected Agency: <u>MPCA</u>		Reason for Submit: <u>Accelerate review of Death request to convert synthetic minor air permit to true minor state operating permit</u>	
Due Date: <u>8/19/2013</u>		Submitted: ☒ Electronically ☐ Hardcopy/Paper ☐ N/A	
2			
Responsible Official: <u>Bob Valley</u>		Date: <u>6/21/2013</u>	
R.O. Authorized: ☒ Yes ☐ No By: <u>Operations VP</u>		Date: <u>6/21/2013</u>	
3			
Document Preparer: <u>Terry Stienert</u>	Sign: <u>[Signature]</u>	Date: <u>2013-08-16</u>	
Document Owner: <u>Bob Valley</u>	Sign: <u>[Signature]</u>	Date: <u>8-16-13</u>	
(Owner signs if different from Preparer)			
Qualified Reviewers (check all that apply):			
☒ Legal (A)	Name: <u>Jeff Colver</u>	Sign: <u>[Signature]</u>	Date: <u>2013-8-22</u>
☐ Compliance Director (A)	Name: _____	Sign: _____	Date: _____
☒ Compliance Manager (A, B)	Name: <u>Terry Stienert</u>	Sign: <u>[Signature]</u>	Date: <u>2013-08-16</u>
☐ Operations VP	Name: _____	Sign: _____	Date: _____
☐ Lead Engineer	Name: _____	Sign: _____	Date: _____
☐ Other Employee (C)	Name: _____	Sign: _____	Date: _____
☐ Third Party	Name: _____	Sign: _____	Date: _____
☐ Business Leader / VP	Name: _____	Sign: _____	Date: _____
4			
Non-compliance, reportable condition or anomaly: ☐ Yes ☐ No If no, then skip to Section 5			
Agency Notified: ☐ Yes ☐ No Agency: _____			
Describe: _____			
LYNX Tracking No. _____			
5			
Document, supporting information and QA Form filed to:			
Facility File: ☒ Yes ☐ No		Retention Code: <u>EHS92</u>	
Share Drive: ☒ Yes ☐ No			
6			
Remarks: _____			



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

January 9, 2013

Mr. Robert Valley, Plant Manager
The C. Reiss Coal Company
1010 3rd Avenue North
Escanaba, Michigan 49829

Dear Mr. Valley:

This letter is in reference to your Permit to Install application for changes in conditions related to federal regulations for the bulk solid materials marine transloading facility (State Registration Number N2984) located on Power Plant Road, Escanaba, Michigan. This application, identified as No. 710-91C, has been evaluated and approved by the Air Quality Division (AQD), pursuant to the delegation of authority from the Michigan Department of Environmental Quality (DEQ).

This approval is based upon and subject to compliance with all administrative rules promulgated pursuant to Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and conditions stipulated in the attached supplement. Please review these conditions thoroughly so that you may take the actions necessary to ensure compliance with all of these conditions.

Also, Permit to Install No. 710-91B has been voided because the equipment is now covered by Permit to Install No. 710-91C.

To help us improve the service we provide our customers, we encourage you to complete a *Permit to Install Customer Service Survey* on the following Web page:

http://www.michigan.gov/documents/deq/DEQEval_29-pti-customerservice_287285_7.html

Please contact me if you have any questions regarding this permit.

Sincerely,

Catherine Asselin, Environmental Engineer
Thermal/Chemical Processing Unit
Permit Section, Air Quality Division
517-335-6345
AsselinC@michigan.gov

Attachment

cc/att: Mr. Terry Steinert, The C. Reiss Coal Company
Mr. Chris Hare, DEQ

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

December 21, 2012

**PERMIT TO INSTALL
710-91C****ISSUED TO
The C. Reiss Coal Company****LOCATED AT
Power Plant Road
Escanaba Michigan****IN THE COUNTY OF
Delta****STATE REGISTRATION NUMBER
N2984**

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

December 12, 2012

DATE PERMIT TO INSTALL APPROVED:

December 21, 2012

SIGNATURE:

Maureen Dolan

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 1 of 13

PERMIT TO INSTALL

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The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 2 of 13

Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM less than 10 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM less than 2.5 microns diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 3 of 13

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 4 of 13

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 5 of 13

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-MATERIALS	Transfer and storage of two groups of materials as defined below: No dust group: logs, cut lumber, plywood, railroad ties, steel and steel product, and pig iron Potential dust group: limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, slag and slag products, coal, lump and pelletized iron ore & copper ore	July 2, 2012	N/A
EU-BARGELOADING	Self-loading barges and/or temporary box hopper and stacking conveyor (with diesel engine/generator <100 hp combined) loading material from stockpiles onto barges for transfer to off-site locations.	July 2, 2012	N/A
EU-WATERPUMP	Diesel water pump (77.5 hp) to supply water to dust control portable spray towers and also to a dust control water truck. The portable towers and/or truck are used on an "as needed" basis as dictated by weather conditions, amount of materials in storage, and vehicular activity.	July 2, 2012	N/A
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 6 of 13

The following conditions apply to: EU-MATERIALS

DESCRIPTION: Transfer and storage of two groups of materials as defined below:

No dust group: logs, cut lumber, plywood, railroad ties, steel and steel product, and pig iron

Potential dust group: limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, slag and slag products, coal, lump and pelletized iron ore & copper ore

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: Control of fugitive dust emissions through work practices

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	10 percent opacity at wind speeds <25 mph	Test protocol*	EU-MATERIALS	GC 13	R 336.1301(1)(c)
2. Visible Emissions	20 percent opacity at wind speeds ≥25 mph	Test protocol*	EU-MATERIALS	GC 13	R 336.1301(1)(c)

* Test protocol shall specify averaging time

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall operate and maintain EU-MATERIALS according to a *Fugitive Dust Control Plan for the Material Handling Operations at The C. Reiss Coal Company Dock 1 in Escanaba, Michigan*, for all material handling operations and material storage areas, all plant roadways, and the plant yard. The permittee shall keep a copy of the *Fugitive Dust Control Plan* at the Reiss Coal Company offices in Escanaba and make it available to the AQD District Supervisor upon request. (R 336.1201, R 336.1901)
2. The permittee shall minimize the drop distance when unloading limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, slag and slag products, coal, or lump and pelletized iron ore & copper ore to EU-MATERIALS storage piles throughout the entire unloading process. The drop distance shall be specified in the *Fugitive Dust Control Plan*. (R 336.1201, R 336.1901)
3. The permittee shall not operate the storage piles of EU-MATERIALS unless fugitive emissions from the storage piles are controlled as described in the *Fugitive Dust Control Plan*. (R 336.1201, R 336.1301, R 336.1901)

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 7 of 13

IV. DESIGN/EQUIPMENT PARAMETERS

N/A

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, records and information associated with the *Fugitive Dust Control Plan* as required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1201, R336.1901)
2. The permittee shall keep, in a satisfactory manner, records and information associated with the activity and control for each storage pile in EU-MATERIALS as required by SC III.3. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1201, R 336.1901)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

N/A

IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 6 of 13

The following conditions apply to: EU-BARGELOADING

DESCRIPTION: Self-loading barges and/or temporary box hopper and stacking conveyor (with diesel engine/generator <100 hp combined) loading material from stockpiles onto barges for transfer to off-site locations.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: Control of fugitive dust emissions through work practices.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	10 percent opacity at wind speeds <25 mph	Test protocol*	EU-BARGELOADING	GC 13	R 336.1301(1)(c)
2. Visible Emissions	20 percent opacity at wind speeds ≥25 mph	Test protocol*	EU-BARGELOADING	GC 13	R 336.1301(1)(c)
* Test protocol shall specify averaging time					

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

- The permittee shall not retain the diesel powered portable box hopper and stacking conveyor in EU-BARGELOADING at the site for more than 12 consecutive months. (40 CFR Part 60 Subpart IIII, 40 CFR Part 63 Subpart ZZZZ)
- The permittee shall operate and maintain the portable box hopper and stacking conveyor in EU-BARGELOADING according to a *Fugitive Dust Control Plan for the Material Handling Operations at The C. Reiss Coal Company Dock 1 in Escanaba, Michigan*, for all material handling operations and material storage areas, all plant roadways, and the plant yard. The permittee shall keep a copy of the *Fugitive Dust Control Plan* at the C. Reiss Coal Company offices in Escanaba and make it available to the AQD District Supervisor upon request. (R 336.1201, R 336.1901)
- The permittee shall minimize the drop distance from the portable box hopper and stacking conveyor or self-loading barge equipment when loading limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, slag and slag products, coal, or lump and pelletized iron ore & copper ore throughout the entire barge loading process. The drop distance shall be specified in the *Fugitive Dust Control Plan*. (R 336.1201, R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETERS

N/A

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 9 of 13

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, records and information associated with the *Fugitive Dust Control Plan* as required by SC III.2. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1205, R 336.1901)
2. The permittee shall keep, in a satisfactory manner, records and information associated with the presence on site of the portable box hopper and stacking conveyor in EU-BARGELOADING as required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1205, 40 CFR Part 60 Subpart III, 40 CFR Part 63 Subpart ZZZZ)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

N/A

IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
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The following conditions apply to: EU-WATERPUMP

DESCRIPTION: Diesel water pump (77.5 hp) to supply water to dust control portable spray towers and also to a dust control water truck. The portable towers and/or truck are used on an "as needed" basis as dictated by weather conditions, amount of materials in storage, and vehicular activity.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: N/A

I. EMISSION LIMITS

N/A

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not retain the diesel powered portable water pump in EU-WATERPUMP at the site for more than 12 consecutive months. (40 CFR Part 63 Subpart ZZZZ)

IV. DESIGN/EQUIPMENT PARAMETERS

N/A

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, records and information associated with the presence on site of the portable water pump in EU-WATERPUMP as required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1201, 40 CFR Part 63 Subpart ZZZZ)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

N/A

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
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IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
Page 12 of 13

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

N/A

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

N/A

IV. DESIGN/EQUIPMENT PARAMETERS

1. Within two weeks of any activity at this site (i.e. barge loading, barge unloading, or storage pile creation), the permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the wind speed on site at the facility on a continuous basis. (R 336.1201, R 336.1301, R 336.1901)

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. Within two weeks of any activity at this site (i.e. barge loading, barge unloading, or storage pile creation), the permittee shall continuously monitor and record, in a satisfactory manner, the wind speeds on site at the facility. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1201, R 336.1301, R 336.1901)
2. Within two weeks of any activity at this site (i.e. barge loading, barge unloading, or storage pile creation), the permittee shall keep, in a satisfactory manner, a log of the downtime of the wind speed monitoring device. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1201, R 336.1301, R 336.1901)
3. The permittee may cease to monitor and record the wind speeds on site at the facility during periods of extended non-activity at the facility. Extended non-activity constitutes at least two weeks of no barge loading or unloading and/or no storage piles or related material handling. (R 336.1201, R 336.1301, R 336.1901)

VII. REPORTING

1. The permittee shall notify the AQD District Supervisor, in writing, of the date on which the facility resumed activity at the site, no later than 60 days after such date. (R 336.1201, R 336.1301, R 336.1901)

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The C. Reiss Coal Company (N2984) Dock #1
Permit No. 710-91C

December 21, 2012
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2. Within 30 days after completion of the installation of the wind speed monitor, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation is considered to occur not later than the commencement of wind speed recordkeeping. (R 336.1201(7)(a))
3. The permittee shall notify the AQD District Supervisor, in writing, of the intent to cease monitoring and recording the wind speeds on site at the facility seven days prior to ceasing said activity. (R 336.1201, R 336.1301, R 336.1901)
4. The permittee shall notify the AQD District Supervisor, in writing, of the intent to resume monitoring and recording the wind speeds on site at the facility seven days prior to resuming said activity. (R 336.1201, R 336.1301, R 336.1901)

VIII. STACK/VENT RESTRICTIONS

N/A

IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

155-012
(R-111)

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY - AIR QUALITY DIVISION

PERMIT TO INSTALL APPLICATION

For authority to install, construct, reconstruct, relocate, or modify process, fuel-burning or refuse burning equipment and/or control equipment. Permits to install are required by administrative rules pursuant to Section 5505 of 1994 PA 451, as amended.

FOR DEQ USE ONLY APPLICATION NUMBER 710-91C

Please type or print clearly. The "Application Instructions" and "Information Required for an Administratively Complete Permit to Install Application" are available on the Air Quality Division (AQD) Permit Web Page at <http://www.deq.state.mi.us/aps>. Please call the AQD at 517-373-7023 if you have not been contacted within 15 days of your application submittal.

RECEIVED

OCT 20 2012

AIR QUALITY DIV.

1. FACILITY CODES: State Registration Number (SRN) and North American Industry Classification System (NAICS)												
SRN	N	2	9	8	4	NAICS	4	2	3	5	2	0
2. APPLICANT NAME: (Business License Name of Corporation, Partnership, Individual Owner, Government Agency) The C. Reiss Coal Company												
3. APPLICANT ADDRESS: (Number and Street) 1010 3 rd Avenue North										MAIL CODE:		
CITY: (City, Village or Township) Escanaba						STATE: MI		ZIP CODE: 49829		COUNTY: Delta		
4. EQUIPMENT OR PROCESS LOCATION: (Number and Street -- If different than Item 3) Power Plant Road												
CITY: (City, Village or Township) Escanaba						ZIP CODE: 49829		COUNTY: Delta				
5. GENERAL NATURE OF BUSINESS: Bulk Solid Materials Marine Transloading												
6. EQUIPMENT OR PROCESS DESCRIPTION: (A Description MUST Be Provided Here. Include Emission Unit IDs. Attach additional sheets if necessary; number and date each page of the submittal.) Applicant requests authorization to revise Permit to Install 710-91B by removing references to 40 CFR Part 60 Subpart IIII because the model year of the 77.5 horsepower diesel-powered water pump authorized by Permit to Install 710-91B predates the earliest applicability date of July 11, 2005 in Subpart IIII. Hence, the diesel-powered water pump is not subject to Subpart IIII. All other bulk solid material transloading operations remain as described in the March 8, 2012 application.												
7. REASON FOR APPLICATION: (Check all that apply.) ☐ INSTALLATION / CONSTRUCTION OF NEW EQUIPMENT OR PROCESS ☐ RECONSTRUCTION / MODIFICATION / RELOCATION OF EXISTING EQUIPMENT OR PROCESS - DATE INSTALLED: ☒ OTHER - DESCRIBE REMOVE REQUIREMENTS ASSOCIATED WITH 40 CFR SUBPART IIII												
8. IF THE EQUIPMENT OR PROCESS THAT WILL BE COVERED BY THIS PERMIT TO INSTALL (PTI) IS CURRENTLY COVERED BY ANY ACTIVE PERMITS, LIST THE PTI NUMBER(S): 710-91B												
9. DOES THIS FACILITY HAVE AN EXISTING RENEWABLE OPERATING PERMIT (ROP)? ☒ NOT APPLICABLE ☐ PENDING APPLICATION ☐ YES PENDING APPLICATION OR ROP NUMBER:												
10. AUTHORIZED EMPLOYEE: Robert Valley						TITLE: Plant Manager			PHONE NUMBER: (Include Area Code) 906-786-2793			
SIGNATURE: <i>Robert Valley</i>						DATE: 10-8-12			E-MAIL ADDRESS: ValleyB@kochind.com			
11. CONTACT: (If different than Authorized Employee. The person to contact with questions regarding this application) Terry Steinert						E-MAIL ADDRESS: Steine3T@kochind.com			PHONE NUMBER: (Include Area Code) 316-828-7847			
12. IS THE CONTACT PERSON AUTHORIZED TO NEGOTIATE THE TERMS AND CONDITIONS OF THE PERMIT TO INSTALL? ☒ YES ☐ NO												
FOR DEQ USE ONLY - DO NOT WRITE BELOW												
DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: 12/12/12												
DATE PERMIT TO INSTALL APPROVED: 12/12/12						SIGNATURE: <i>Maughan Doherty</i>						
DATE APPLICATION / PTI VOIDED:						SIGNATURE:						
DATE APPLICATION DENIED:						SIGNATURE:						
A PERMIT CERTIFICATE WILL BE ISSUED UPON APPROVAL OF A PERMIT TO INSTALL.												

EQP 5515E (Rev. 09/2006)

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US EPA ARCHIVE DOCUMENT

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(11-1)

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY - AIR QUALITY DIVISION

PERMIT TO INSTALL APPLICATION

For authority to install, construct, reconstruct, relocate, or modify process, fuel-burning or refuse burning equipment and/or control equipment. Permits to install are required by administrative rules pursuant to Section 5605 of 1994 PA 451, as amended.

FOR DEQ USE ONLY APPLICATION NUMBER 710-918

Please type or print clearly. The "Application Instructions" and "Information Required for an Administratively Complete Permit to Install Application" are available on the Air Quality Division (AQD) Permit Web Page at <http://www.deq.state.mi.us/aps>. Please call the AQD at 517-373-7023 if you have not been contacted within 15 days of your application submittal.

RECEIVED

MAR 12 2012

AIR QUALITY DIV

1. FACILITY CODES: State Registration Number (SRN) and North American Industry Classification System (NAICS)												
SRN	N	2	9	8	4	NAICS	4	2	3	5	2	0
2. APPLICANT NAME: (Business License Name of Corporation, Partnership, Individual Owner, Government Agency) The C. Reiss Coal Company												
3. APPLICANT ADDRESS: (Number and Street) 1010 3rd Avenue North										MAIL CODE:		
CITY: (City, Village or Township) Escanaba						STATE: MI		ZIP CODE: 49829		COUNTY: Delta		
4. EQUIPMENT OR PROCESS LOCATION: (Number and Street - If different than Item 3) Power Plant Road												
CITY: (City, Village or Township) Escanaba						ZIP CODE: 49829		COUNTY: Delta				
5. GENERAL NATURE OF BUSINESS: Bulk Solid Materials Marine Transloading - Dock 1												
6. EQUIPMENT OR PROCESS DESCRIPTION: (A Description MUST Be Provided Here. Include Emission Unit IDs. Attach additional sheets if necessary; number and date each page of the submittal.) Facility requests authorization to receive wood logs, wood chips, wood pulp, cut lumber, plywood, railroad ties, trap rock, armor rock, railroad ballast, washed sand, steel and steel products and pig iron. Additionally, with portable water application systems available, the facility requests authorization to receive sawdust, biomass fuel, metallurgical coke, petroleum coke, slag and slag products, aggregate unwashed sand, pelletized iron ore, clay, agricultural lime, gypsum, and synthetic gypsum. Finally, the facility requests authorization to load barges using either self-loading barges where a clamshell crane is mounted on the barge, or using a portable conveying stacker that is temporarily brought on site for barge loading.												
7. REASON FOR APPLICATION: (Check all that apply.) ☒ INSTALLATION / CONSTRUCTION OF NEW EQUIPMENT OR PROCESS ☐ RECONSTRUCTION / MODIFICATION / RELOCATION OF EXISTING EQUIPMENT OR PROCESS - DATE INSTALLED: ☒ OTHER - DESCRIBE AUTHORIZED ADDITIONAL BULK SOLID PRODUCTS												
8. IF THE EQUIPMENT OR PROCESS THAT WILL BE COVERED BY THIS PERMIT TO INSTALL (PTI) IS CURRENTLY COVERED BY ANY ACTIVE PERMITS, LIST THE PTI NUMBER(S): 710-91A												
9. DOES THIS FACILITY HAVE AN EXISTING RENEWABLE OPERATING PERMIT (ROP)? ☒ NOT APPLICABLE ☐ PENDING APPLICATION ☐ YES PENDING APPLICATION OR ROP NUMBER:												
10. AUTHORIZED EMPLOYEE: Robert Valley						TITLE: Plant Manager			PHONE NUMBER: (Include Area Code) 906-786-2793			
SIGNATURE: <i>Robert Valley</i>						DATE: 3-8-12			E-MAIL ADDRESS: valley@kechind.com			
11. CONTACT: (If different than Authorized Employee. The person to contact with questions regarding this application) Terry Steinert						PHONE NUMBER: (Include Area Code) 316-828-7847						
CONTACT AFFILIATION: Corporate Environmental Compliance Mgr						E-MAIL ADDRESS: Steine3t@kechind.com						
12. IS THE CONTACT PERSON AUTHORIZED TO NEGOTIATE THE TERMS AND CONDITIONS OF THE PERMIT TO INSTALL? ☒ YES ☐ NO												
FOR DEQ USE ONLY - DO NOT WRITE BELOW												
DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: 5/31/12												
DATE PERMIT TO INSTALL APPROVED: 7/2/12						SIGNATURE: <i>Maughan Quabarty</i>						
DATE APPLICATION / PTI VOIDED: 12/21/12						SIGNATURE: <i>Maughan Quabarty</i>						
DATE APPLICATION DENIED:						SIGNATURE:						

A PERMIT CERTIFICATE WILL BE ISSUED UPON APPROVAL OF A PERMIT TO INSTALL

EQP 5615E (Rev. 09/2006)

Craig

KM00000154

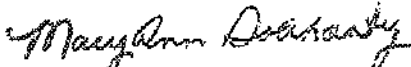
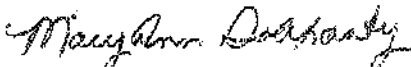
US EPA ARCHIVE DOCUMENT

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

July 2, 2012

PERMIT TO INSTALL
710-91BISSUED TO
The C. Reiss Coal CompanyLOCATED AT
Dock 1
1010 3rd Avenue
Escanaba, MichiganIN THE COUNTY OF
DeltaSTATE REGISTRATION NUMBER
N2984

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: May 31, 2012	
DATE PERMIT TO INSTALL APPROVED: July 2, 2012	SIGNATURE: 
DATE PERMIT VOIDED: December 21, 2012	SIGNATURE: 
DATE PERMIT REVOKED:	SIGNATURE:

KM00000155

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

December 18, 2012

PERMIT TO INSTALL
85-84D

ISSUED TO
The C. Reiss Coal Company

LOCATED AT
1010 3rd Avenue North
Escanaba, Michigan

IN THE COUNTY OF
Delta

STATE REGISTRATION NUMBER
D0053

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: December 12, 2012	
DATE PERMIT TO INSTALL APPROVED: December 18, 2012	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM less than 10 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM less than 2.5 microns diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-COALSCREENING	Coal screening plant with loading hopper and associated storage piles including conveyors and loading systems subject to New Source Performance Standards in 40 CFR Part 60 Subpart Y.	July 2, 2012	N/A
EU-MATERIALS	Transfer and storage of two groups of materials as defined below: No dust group: logs, cut lumber, plywood, railroad ties, steel and steel products, and pig iron Potential dust group: limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, unscreened coal, slag and slag products, lump and pelletized iron ore & copper ore	July 2, 2012	N/A
EU-BARGELOADING	Self-loading barges and/or temporary box hopper and stacking conveyor (with diesel engine/generator <100 hp combined) loading material from stockpiles onto barges for transfer to off-site locations.	July 2, 2012	N/A
EU-WATERPUMP	Diesel water pump (77.5 hp) for use as a backup to an electric water pump that supplies water to dust control portable spray towers and also to a dust control water truck. The portable towers and/or truck are used on an "as needed" basis as dictated by weather conditions, amount of materials in storage, and vehicular activity.	July 2, 2012	N/A
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

The following conditions apply to: EU-COALSCREENING

DESCRIPTION: Coal screening plant with loading hopper and associated storage piles including conveyors and loading systems subject to New Source Performance Standards in 40 CFR Part 60 Subpart Y.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: Control of fugitive dust emissions through work practices, enclosure, and conveyor discharge chute.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	20 percent opacity	Test protocol*	EU- COALSCREENING	SC V.1	40 CFR 60.254(a)
*Test protocol shall specify averaging time.					

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall operate and maintain EU-COALSCREENING according to a *Fugitive Dust Control Plan for the Material Handling Operations at The C. Reiss Coal Company Dock 2 in Escanaba, Michigan*, for all coal screening and associated handling operations and screened coal storage areas. The permittee shall keep a copy of the *Fugitive Dust Control Plan* at the facility and make it available to the AQD District Supervisor upon request. (R 336.1201, R 336.1901)
2. The permittee shall not operate the coal screening plant in EU-COALSCREENING unless the wind speed is under 35 miles per hour. (R 336.1201, R 336.1901)
3. The permittee shall minimize the drop distance when unloading to EU-COALSCREENING storage piles throughout the entire unloading process. The drop distance shall be specified in the *Fugitive Dust Control Plan*. (R 336.1201, R 336.1901)
4. The permittee shall not operate the storage piles of EU-COALSCREENING unless fugitive emissions from the storage piles are controlled as described in the *Fugitive Dust Control Plan*. (R 336.1201, R 336.1301, R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain the hopper portion of the coal screening plant in EU-COALSCREENING with a three sided enclosure to limit emissions of fugitive dust. (R 336.1201, R 336.1301, R 336.1901)
2. The permittee shall equip and maintain a chute on the discharge portion of the coal screening plant of EU-COALSCREENING to limit emissions of fugitive dust. (R 336.1201, R 336.1301, R 336.1901)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee has provided an initial performance test for an affected facility regulated under Standards of Performance for New Stationary Sources, 40 CFR Subparts A and Y. Until the affected facility is reconstructed or modified, additional performance tests are not required unless requested by the AQD. Visible emission observation procedures must have prior approval by the AQD. Verification of visible emissions includes the submittal of a complete report of opacity observations to the AQD within 60 days following the last date of the evaluation. (40 CFR 60.250(b), 40 CFR 60.255(a), 40 CFR 60.257)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, records and information associated with the *Fugitive Dust Control Plan* as required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1201, R 336.1901)
2. The permittee shall keep, in a satisfactory manner, records and information associated with the activity and control for each storage pile in EU-COALSCREENING as required by SC III.4. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1201, R 336.1901)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

N/A

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Y, as they apply to EU-COALSCREENING. (40 CFR Part 60 Subparts A & Y)

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply to: EU-MATERIALS

DESCRIPTION: Transfer and storage of two groups of materials as defined below:

No dust group: logs, cut lumber, plywood, railroad ties, steel and steel products, and pig iron

Potential dust group: limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, unscreened coal, slag and slag products, lump and pelletized iron ore & copper ore

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: Control of fugitive dust emissions through work practices.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	10 percent opacity at wind speed <25 mph	Test protocol*	EU-MATERIALS	GC 13	R 336.1301(1)(c)
2. Visible Emissions	20 percent opacity at wind speed ≥25 mph	Test protocol*	EU-MATERIALS	GC 13	R 336.1301(1)(c)

*Test protocol shall specify averaging time.

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall operate and maintain EU-MATERIALS according to a *Fugitive Dust Control Plan for the Material Handling Operations at The C. Reiss Coal Company Dock 2 in Escanaba, Michigan*, for all material handling operations and material storage areas, all plant roadways, and the plant yard. The permittee shall keep a copy of the *Fugitive Dust Control Plan* at the facility and make it available to the AQD District Supervisor upon request. (R 336.1201, R 336.1901)
2. The permittee shall minimize the drop distance when unloading limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, unscreened coal, slag and slag products, or lump and pelletized iron ore & copper ore to EU-MATERIALS storage piles throughout the entire unloading process. The drop distance shall be specified in the *Fugitive Dust Control Plan*. (R 336.1201, R 336.1901)
3. The permittee shall not operate the storage piles of EU-MATERIALS unless fugitive emissions from the storage piles are controlled as described in the *Fugitive Dust Control Plan*. (R 336.1201, R 336.1301, R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETERS

N/A

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, records and information associated with the *Fugitive Dust Control Plan* as required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1201, R336.1901)
2. The permittee shall keep, in a satisfactory manner, records and information associated with the activity and control for each storage pile in EU-MATERIALS as required by SC III.3. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1201, R 336.1901)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

N/A

IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply to: EU-BARGELOADING

DESCRIPTION: Self-loading barges and/or temporary box hopper and stacking conveyor (with diesel engine/generator <100 hp combined) loading material from stockpiles onto barges for transfer to off-site locations.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: Control of fugitive dust emissions through work practices.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	10 percent opacity at wind speed <25 mph	Test protocol*	EU-BARGELOADING	GC 13	R 336.1301(1)(c)
2. Visible Emissions	20 percent opacity at wind speed ≥25 mph	Test protocol*	EU-BARGELOADING	GC 13	R 336.1301(1)(c)

*Test protocol shall specify averaging time.

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not retain the diesel powered portable box hopper and stacking conveyor in EU-BARGELOADING at the site for more than 12 consecutive months. **(40 CFR Part 60 Subpart IIII, 40 CFR Part 63 Subpart ZZZZ)**
2. The permittee shall operate and maintain the portable box hopper and stacking conveyor in EU-BARGELOADING according to a *Fugitive Dust Control Plan for the Material Handling Operations at The C. Reiss Coal Company Dock 2 in Escanaba, Michigan*, for all material handling operations and material storage areas, all plant roadways, and the plant yard. The permittee shall keep a copy of the *Fugitive Dust Control Plan* at the facility and make it available to the AQD District Supervisor upon request. **(R 336.1201, R 336.1901)**
3. The permittee shall minimize the drop distance from the portable box hopper and stacking conveyor or self-loading barge equipment when loading limestone, rock salt, wood chips, wood pulp, sawdust, pelletized or solidified biomass fuel, trap rock, armor rock, railroad ballast, aggregate, washed or unwashed sand & gravel, metallurgical coke, petroleum coke, unscreened coal, slag and slag products, or lump and pelletized iron ore & copper ore throughout the entire barge loading process. The drop distance shall be specified in the *Fugitive Dust Control Plan*. **(R 336.1201, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

N/A

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, records and information associated with the *Fugitive Dust Control Plan* as required by SC III.2. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1205, R 336.1901)
2. The permittee shall keep, in a satisfactory manner, records and information associated with the presence on site of the portable box hopper and stacking conveyor in EU-BARGELOADING as required by SC III.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1205, 40 CFR Part 60 Subpart IIII, 40 CFR Part 63 Subpart ZZZZ)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

N/A

IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply to: EU-WATERPUMP

DESCRIPTION: Diesel water pump (77.5 hp) for use as a backup to an electric water pump that supplies water to dust control portable spray towers and also to a dust control water truck. The portable towers and/or truck are used on an "as needed" basis as dictated by weather conditions, amount of materials in storage, and vehicular activity.

Flexible Group ID: N/A

POLLUTION CONTROL EQUIPMENT: N/A

I. EMISSION LIMITS

N/A

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

N/A

IV. DESIGN/EQUIPMENT PARAMETERS

N/A

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

N/A

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

N/A

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and ZZZZ, as they apply to EU-WATERPUMP.
(40 CFR Part 63 Subparts A & ZZZZ)

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

N/A

II. MATERIAL LIMITS

N/A

III. PROCESS/OPERATIONAL RESTRICTIONS

N/A

IV. DESIGN/EQUIPMENT PARAMETERS

1. On and after February 1, 2013, the permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the wind speed on site at the facility on a continuous basis. (R 336.1201, R 336.1301, R 336.1901)

V. TESTING/SAMPLING

N/A

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall continuously monitor and record, in a satisfactory manner, the wind speeds on site at the facility. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1201, R 336.1301, R 336.1901)
2. The permittee shall keep, in a satisfactory manner, a log of the downtime of the wind speed monitoring device. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1201, R 336.1301, R 336.1901)

VII. REPORTING

N/A

VIII. STACK/VENT RESTRICTIONS

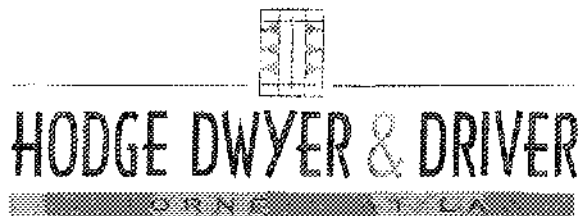
N/A

IX. OTHER REQUIREMENTS

N/A

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).



KATHERINE D. HODGE
E-mail: khodge@hddattorneys.com

January 18, 2013

VIA HAND DELIVERY

Edwin C. Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, Illinois 62794-9276

Re: Supplement to and Clarification of
CAAPP Application for KCBX Terminals Company
Facility I.D. No. 031600AHI (3259 East 100th Street, Chicago, IL 60617)

Dear Mr. Bakowski:

On December 20, 2012, KCBX Terminals Company ("KCBX") submitted a Clean Air Act Permit Program ("CAAPP") application for its facility located at 3259 East 100th Street, Chicago, IL 60617 (Facility I.D. No. 031600AHI) ("KCBX Facility"). The KCBX Facility is currently operated pursuant to a Federally Enforceable State Operating Permit ("FESOP"), which was issued to KCBX by the Illinois Environmental Protection Agency ("Illinois EPA") on April 5, 2012.

This supplement clarifies that the December 20, 2012 submittal was intended as a protective application for a CAAPP permit for KCBX operations at the above-referenced address and a nearby site, should the combined operations of the KCBX Facility and the newly acquired KCBX South Facility located at 10730 South Burley Avenue, Chicago (Facility I.D. No. 031600GSF) be considered a "new CAAPP source." As described in the cover letter to the December 20, 2012 application, efforts are underway to evaluate the possibility of preserving FESOP status for both facilities, either combined or under separate permits. However, should FESOP status not be possible, circumstances may require a CAAPP permit be obtained. The aforementioned CAAPP application would thus facilitate such a contingency.

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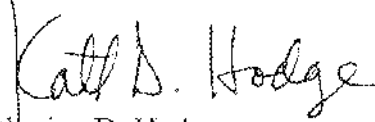
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Edwin C. Bakowski, P.E.
January 18, 2013
Page 2

It is our understanding that the December 20, 2012 submittal in concert with this supplement is considered a CAAPP application and is subject to a sixty day completeness review by Illinois EPA. If you have any questions regarding the enclosed, please do not hesitate to contact Terry Steinert at (316) 828-7847.

Sincerely,

A handwritten signature in black ink that reads "Kath D. Hodge". The signature is written in a cursive, flowing style.

Katherine D. Hodge

pc: Jeff Culver, Esq. (via electronic mail)
Robb H. Layman, Esq. (via hand delivery)

US EPA ARCHIVE DOCUMENT

KM00000203



HODGE DWYER & DRIVER

KATHERINE D. HODGE
E-mail: khodge@hddattorneys.com

December 20, 2012

VIA HAND DELIVERY

Edwin C. Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, Illinois 62794-9276

Re: CAAPP Application for KCBX Terminals Company
Facility I.D. No. 031600AHI (3259 East 100th Street, Chicago, IL 60617)

Dear Mr. Bakowski:

This letter is written on behalf of KCBX Terminals Company ("KCBX") for the purpose of submitting a Clean Air Act Permit Program ("CAAPP") application for its facility located at 3259 East 100th Street, Chicago, IL 60617 (Facility I.D. No. 031600AHI) ("KCBX Facility"). The KCBX Facility is currently operated pursuant to a Federally Enforceable State Operating Permit ("FESOP"), which was issued to KCBX by the Illinois Environmental Protection Agency ("Illinois EPA") on April 5, 2012.

On December 20, 2012, KM Railways, LLC ("KMR") acquired the nearby DTE Chicago Fuels Terminal, LLC ("DTE") bulk solid materials transloading facility located at 10730 South Burley Avenue, Chicago, IL 60617 (Facility I.D. No. 031600GSF) ("Burley Facility"), including the real property and all buildings, fixtures and equipment located thereon. The Burley Facility was operated by DTE pursuant to a Joint Construction and Operating Permit (Application No. 07050082, issued on May 21, 2009), which we understand was recently revised and reissued on December 18, 2012, as well as a pending application for a FESOP (deemed complete by Illinois EPA on May 21, 2009). KMR is the new owner of the Burley Facility, but KCBX will be the operator. On December 20, 2012, all permit responsibility, coverage, and liability was transferred to KCBX, the new operator of the Burley Facility, pursuant to an

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October 4, 2012 Request for Ownership Change for a CAAPP Permit¹ submitted by KCBX (and DTE).

Together, the KCBX Facility and the Burley Facility could be considered a single source based on the definition of "source" in Section 39.5(l) of the Illinois Environmental Protection Act ("Act"), which is based upon the following criteria: 1) whether the facilities share the same two digit SIC code; 2) whether the facilities are located on one or more contiguous or adjacent properties; and 3) whether the facilities are under common control. Further, without federally enforceable limits on emissions, the combined facilities could result in a new CAAPP source. KCBX will rely on the pending FESOP application for protection with regard to the Burley Facility and, although KCBX does not intend to operate KCBX Facility, the Burley Facility or the facilities combined, pursuant to a CAAPP permit, KCBX is submitting this CAAPP application to Illinois EPA as a protective measure.

KCBX intends to operate the facilities as a single source, pursuant to either a single FESOP or separate FESOPs. KCBX is, therefore, requesting a FESOP(s) constraining the emissions and production or operation of this new source such that potential emissions would not exceed major source applicability levels and, thereby, exclude the new source from requiring a CAAPP permit.

This application for a new CAAPP source is submitted timely, i.e., within 12 months after commencing operation. As you know, Section 39.5(5)(x) of the Act provides as follows:

The owner or operator of a new CAAPP source shall submit its complete CAAPP application consistent with this subsection within 12 months after commencing operation of such source. The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

415 ILCS 5/39.5(5)(x). (Emphasis added.)

When KCBX begins operation of the combined facilities, the combined facilities may be, for the first time, considered a single source and, thus, could be considered a "new CAAPP source" until such time as a FESOP(s) with new federally enforceable limitations on potential emissions would exclude the source from requiring a CAAPP permit.

As stated above, the KCBX Facility is currently operated pursuant to a FESOP (issued by Illinois EPA on April 5, 2012). The enclosed CAAPP Application Forms include incorporations

¹ The Request for Ownership Change covered the pending FESOP application, as well as the Joint Construction and Operating Permit and the pending Construction Permit applications.

Edwin C. Bakowski, P.E.
December 20, 2012
Page 3

by reference to the FESOP (and related Construction Permits), as well as the supporting applications.

If you have any questions regarding the enclosed, please do not hesitate to contact Terry Steinert at (316) 828-7847.

Sincerely,


Katherine D. Hodge

KDH:MTR:kjg

enclosure

pc: Jeff Culver, Esq. (via electronic mail; w/attachments)

KCBX:004/Corr/Illinois EPA cover 2012-10-CAAPP Application

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KM00000206



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

APPLICATION FOR CAAPP PERMIT (CHECK ONLY ONE) ☒ INITIAL APPLICATION ☐ RENEWAL APPLICATION	FOR AGENCY USE ONLY	
	ID NO.:	
	PERMIT NO.:	
	DATE:	

SECTION ONE SOURCE INFORMATION		
1) SOURCE NAME: KCBX Terminals Company		
2) SOURCE ID NO.: 031600AHI	3) DATE FORM PREPARED: 12 / 5 / 2012	

SECTION TWO INSTRUCTIONS IN BRIEF	
1) COMPLETE THE FOLLOWING FORM WHEN APPLYING FOR AN INITIAL OR RENEWAL CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT.	
2) A REQUEST TO MODIFY A CAAPP PERMIT SHOULD BE COMPLETED USING FORM 271-CAAPP "APPLICATION FOR MODIFICATION TO A CAAPP PERMIT".	
3) THIS FORM PROVIDES APPLICATION AND SOURCE CONTACT INFORMATION TO THE AGENCY AS WELL AS ACTS AS A WORKSHEET FOR QUICKLY ASSESSING WHETHER THE CAAPP APPLICATION IS ADMINISTRATIVELY AND TECHNICALLY COMPLETE.	
4) FESOP REQUESTS SHOULD COMPLETE THIS FORM, MARKING SECTION FOUR APPROPRIATELY.	
5) REFER TO CAAPP 200 INSTRUCTIONS FOR FURTHER GUIDANCE ON COMPLETING THIS FORM.	

SECTION THREE SOURCE AND CONTACT INFORMATION		
SOURCE INFORMATION		
1) SOURCE NAME: KCBX Terminals Company		2) DATE FORM COMPLETED: 12/5/2012
3) SOURCE STREET ADDRESS: 3259 East 100th Street		
4) CITY: Chicago		5) ZIP: 60617
6) IS THE SOURCE LOCATED WITHIN CITY LIMITS? ☒ YES ☐ NO		
7) TOWNSHIP NAME:	8) COUNTY: Cook	9) TYPICAL NO. OF EMPLOYEES AT THE SOURCE: 41
10) ILLINOIS AIR POLLUTION SOURCE ID NO. (IF KNOWN): 031600AHI		11) FEDERAL EMPLOYER IDENTIFICATION NO. (FEIN): 48-1082551
12) TYPE OF SOURCE AND PRODUCTS PRODUCED: Handling of coal and pet coke		

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE _____

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200-CAAPP

FOR APPLICANT'S USE

13) PRIMARY STANDARD INDUSTRIAL CLASSIFICATION (SIC) CATEGORY: Marine Cargo Handling		14) PRIMARY SIC NO.: 4491
15a) LATITUDE (DD:MM:SS): 41:42:46.165 N		b) LONGITUDE (DD:MM:SS): 87:32:36.823 W
16a) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):
17a) COORDINATE METHOD:	b) REFERENCE LOCATION:	c) COORDINATE ACCURACY:
18) SOURCE ENVIRONMENTAL CONTACT PERSON: Terry Steinert		19a) CONTACT PERSON'S TELEPHONE NO.: 316-828-7847
19b) CONTACT PERSON'S E-MAIL ADDRESS: STEINE3T@KOCHIND.COM		

OWNER INFORMATION		
20) NAME: KCBX Terminals Company		
21) ADDRESS: 3259 East 100th Street		
22) CITY: Chicago	23) STATE: Illinois	24) ZIP: 60617
25) OWNER'S AGENT (IF APPLICABLE):		

OPERATOR INFORMATION		
26) NAME: KCBX Terminals Company		
27) ADDRESS: 3259 East 100th Street		
28) CITY: Chicago	29) STATE: Illinois	30) ZIP: 60617

BILLING INFORMATION		
31) NAME: KCBX Terminals Company		
32) ADDRESS: 3259 East 100th Street		
33) CITY: Chicago	34) STATE: Illinois	35) ZIP: 60617

APPLICATION PAGEPrinted on Recycled Paper
200-CAAPP

36) CONTACT PERSON:	37) CONTACT PERSON'S TELEPHONE NO.:
Brandon Walker	773-978-8518
38) CONTACT PERSON'S E-MAIL ADDRESS:	
Brandon.Walker@kochind.com	

APPLICANT INFORMATION			
39) WHO IS THE PERMIT APPLICANT? (CHECK ONE):	☒ OWNER ☐ OPERATOR	40) ALL CORRESPONDENCE TO: (CHECK ONE)	☒ OWNER ☐ OPERATOR ☐ SOURCE
41) ATTENTION NAME AND/OR TITLE FOR WRITTEN CORRESPONDENCE:			
Jim Simmons, Terminal Manager			
42) TECHNICAL CONTACT PERSON FOR APPLICATION:		43) CONTACT PERSON'S TELEPHONE NO.:	
Terry Steinert		316-828-7847	
44) CONTACT PERSON'S E-MAIL ADDRESS:			
STEINE3T@KOCHIND.COM			

SECTION FOUR		PERMIT STATUS	
WHY IS THE APPLICANT APPLYING FOR A CAAPP PERMIT?			
1	THE POTENTIAL TO EMIT ONE OR MORE CRITERIA AIR POLLUTANT FOR THE SOURCE IS 100 TONS/YEAR OR GREATER? THE POTENTIAL TO EMIT HAZARDOUS AIR POLLUTANTS FOR THE SOURCE IS MORE THAN 10 TONS OF A SINGLE HAZARDOUS AIR POLLUTANT OR 25 TONS OF COMBINED HAZARDOUS AIR POLLUTANTS? CHECK ALL THAT APPLY.		
	☐ CARBON MONOXIDE (CO) ☐ PARTICULATE 10 MICROMETERS (PM10) ☐ PARTICULATE 2.5 MICROMETERS (PM2.5) ☐ VOLATILE ORGANIC MATERIAL (VOM) ☐ COMBINED HAZARDOUS AIR POLLUTANT	☒ NITROGEN OXIDES (NOx) ☒ PARTICULATE MATTER (PART) ☐ SULFUR DIOXIDE (SO2) ☐ SINGLE HAZARDOUS AIR POLLUTANT ☒ OTHER (SPECIFY): <u>Request for FESOP</u>	
		YES	NO
2	THE SOURCE IS AN AFFECTED SOURCE FOR ACID RAIN DEPOSITION.	☐	☒
3	THE POTENTIAL TO EMIT AN INDIVIDUAL HAZARDOUS AIR POLLUTANT IS 10 TONS/YEAR OR MORE OF ANY SINGLE HAZARDOUS AIR POLLUTANT.	☐	☒
4	THE POTENTIAL TO EMIT ALL SOURCE WIDE HAZARDOUS AIR POLLUTANTS IS 25 TONS/YEAR OR MORE OF COMBINED HAZARDOUS AIR POLLUTANTS.	☐	☒
5	THE POTENTIAL TO EMIT A HAZARDOUS AIR POLLUTANT IS MORE THAN AN APPLICABLE LOWER THRESHOLD.	☐	☒
6	THE SOURCE IS AN AFFECTED SOURCE FOR OZONE DEPLETING SUBSTANCES REGULATED UNDER TITLE 6 OF THE CLEAN AIR ACT.	☒	☐
7	THE SOURCE CONTAINS EQUIPMENT OR OPERATIONS SUBJECT TO CERTAIN USEPA EMISSION STANDARDS (NSPS AND NESHAP) FOR WHICH USEPA REQUIRES A CAAPP PERMIT.	☐	☒
8	ARE ACTUAL EMISSIONS OF THE SOURCE BELOW THE APPLICABILITY LEVELS FOR A CAAPP PERMIT?	☒	☐
9	DOES THE APPLICATION CONTAIN PROPOSED PERMIT LIMITATIONS THAT WILL CONSTRAIN THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS OF THE SOURCE WILL FALL BELOW THE LEVELS FOR WHICH A CAAPP PERMIT IS REQUIRED?	☒	☐
10	DOES THE APPLICANT HEREBY REQUEST A FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CONSTRAINING THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS WOULD FALL BELOW APPLICABILITY LEVELS AND THEREBY EXCLUDE THE SOURCE FROM REQUIRING A CAAPP PERMIT?	☒	☐

APPLICATION PAGE _____

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200-CAAPP

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KM00000209

SECTION FIVE		SUMMARY OF APPLICATION CONTENT CHECKLIST			
COMPLETE THE FOLLOWING TABLE, ANSWERING YES, NO, OR N/A AS APPROPRIATE. ANSWERING "NO" TO ANY OF THE BELOW, EXCEPT ITEM 33 OR 34, MAY RESULT IN THE ILLINOIS EPA REQUESTING ADDITIONAL INFORMATION, OR POSSIBLY DEEMING THE APPLICATION TO BE INCOMPLETE. IF THE APPLICANT CHOOSES TO INCORPORATE BY REFERENCE DATA PREVIOUSLY SUBMITTED, SELECT THAT COLUMN APPROPRIATELY AND INCLUDE A COMPLETED "INCORPORATION BY REFERENCE" FORM 287-CAAPP.		INFORMATION PROVIDED			INCORPORATE BY REFERENCE
		YES	NO	N/A	
1)	DOES THE APPLICATION INCLUDE A TABLE OF CONTENTS?	☐	☐	☐	☒
2)	DOES THE APPLICATION INCLUDE A COMPLETE PROCESS DESCRIPTION FOR THE SOURCE?	☐	☐	☐	☒
3)	DOES THE APPLICATION INCLUDE A PLOT PLAN AND/OR MAP DEPICTING THE AREA WITHIN ONE-QUARTER MILE OF THE SOURCE?	☐	☐	☐	☒
4)	DOES THE APPLICATION INCLUDE A PROCESS FLOW DIAGRAM(S) SHOWING ALL EMISSION UNITS AND CONTROL EQUIPMENT, AND THEIR RELATIONSHIP?	☐	☐	☐	☒
5)	DOES THE APPLICATION INCLUDE THE APPROPRIATE, COMPLETED FORMS FOR ALL INDIVIDUAL EMISSION UNITS AND AIR POLLUTION CONTROL EQUIPMENT, LISTING ALL APPLICABLE REQUIREMENTS AND PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS?	☐	☐	☐	☒
6)	DOES THE APPLICATION INCLUDE CALCULATIONS TO THE EXTENT THEY ARE RELATED TO AIR EMISSIONS (E.G., FOR POLLUTANT EMISSION RATES, FUELS, RAW MATERIALS USAGE, OR CONTROL EQUIPMENT EFFICIENCY)?	☐	☐	☐	☒
7)	DOES THE APPLICATION INCLUDE A COMPLETED "LISTING OF SIGNIFICANT ACTIVITIES" FORM 289-CAAPP?	☐	☐	☐	☒
8)	DOES THE APPLICATION INCLUDE A COMPLETED "INCORPORATION BY REFERENCE" FORM 287-CAAPP.	☐	☐	☐	☒
9)	DOES THE APPLICATION INCLUDE A COMPLETED "HAZARDOUS AIR POLLUTANT EMISSION SUMMARY" FORM 215-CAAPP?	☐	☐	☐	☒
10)	DOES THE APPLICATION INCLUDE A COMPLETED "FEE DETERMINATION FOR CAAPP PERMIT" FORM 292-CAAPP? (NOTE: ANNUAL FEES WILL BE BASED UPON INFORMATION CONTAINED IN THIS FORM.)	☐	☐	☐	☒
11)	DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT" FORM 293-CAAPP?	☐	☐	☒	☐
12)	DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE-ADDENDUM FOR NONCOMPLYING EMISSION UNITS" FORM 294-CAAPP FOR ONE OR MORE NONCOMPLIANT EMISSION UNITS FOR WHICH ISSUANCE OF A CAAPP PERMIT IS REQUESTED?	☐	☐	☒	☐
13)	DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE CERTIFICATION" FORM 296-CAAPP?	☐	☐	☐	☒
14)	DOES THE APPLICATION INCLUDE A COMPLETED "LISTING OF INSIGNIFICANT ACTIVITIES" FORM 287-CAAPP?	☐	☐	☐	☒
15)	DOES THE APPLICATION INCLUDE A COMPLETED "FUGITIVE EMISSION" FORM 391-CAAPP?	☐	☐	☐	☒
16)	DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64?	☐	☐	☒	☐
17)	HAS THE APPLICANT REGISTERED A RISK MANAGEMENT PROGRAM FOR ACCIDENTAL RELEASES PURSUANT TO SECTION 112(R) OF THE CLEAN AIR ACT AS AMENDED IN 1990 OR INTENDS TO COMPLY WITH THIS REQUIREMENT IN ACCORDANCE WITH ITS COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE?	☐	☐	☒	☐
18)	HAS THE APPLICANT SUBMITTED A FUGITIVE PARTICULATE MATTER OPERATING PROGRAM PURSUANT TO 35 IAC 212.309?	☐	☐	☐	☒
19)	HAS THE APPLICANT SUBMITTED A PM10 CONTINGENCY MEASURE PLAN PURSUANT TO 35 IAC 212.700?	☐	☐	☐	☒
20)	HAS THE APPLICANT SUBMITTED AN EPISODE ACTION PLAN PURSUANT TO 35 IAC 244.141 FOR THE FACILITIES FOR WHICH ACTION PLANS ARE REQUIRED (SEE 35 IAC 244.142)?	☐	☐	☐	☒
21a)	HAS THE APPLICANT SUBMIT A REQUEST FOR A PERMIT SHIELD FOR THE ENTIRE SOURCE?	☐	☐	☒	☐
21b)	IF NO, DOES THE APPLICATION CONTAIN A REQUEST FOR A PERMIT SHIELD FOR SPECIFIC ITEMS ONLY, IN ACCORDANCE WITH THE INSTRUCTIONS FOR A CAAPP PERMIT?	☐	☐	☒	☐
22)	IF THIS IS A RENEWAL APPLICATION, WAS THE APPLICATION SUBMITTED IN A TIMELY MANNER, I.E., NOT LATER THAN 6 MONTHS BEFORE THE EXPIRATION DATE OF THE EXISTING CAAPP PERMIT PURSUANT TO SECTION 39.5(5)(N) OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT AND 35 IAC 270.301(D).	☐	☐	☒	☐

APPLICATION PAGE _____

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200-CAAPP

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KM00000210

SECTION FIVE		SUMMARY OF APPLICATION CONTENT CHECKLIST - CONTINUED			
COMPLETE THE FOLLOWING TABLE, ANSWERING YES, NO, OR N/A AS APPROPRIATE. ANSWERING "NO" TO ANY OF THE BELOW, EXCEPT ITEM 34 OR 35, MAY RESULT IN THE ILLINOIS EPA REQUESTING ADDITIONAL INFORMATION, OR POSSIBLY DEEMING THE APPLICATION TO BE INCOMPLETE. IF THE APPLICANT CHOOSES TO INCORPORATE BY REFERENCE DATA PREVIOUSLY SUBMITTED, SELECT THAT COLUMN APPROPRIATELY AND INCLUDE A COMPLETED "INCORPORATION BY REFERENCE" FORM 287-CAAPP.		INFORMATION PROVIDED			INCORPORATE BY REFERENCE
		YES	NO	N/A	
23)	DOES THE APPLICATION INCLUDE AN EARLY REDUCTION DEMONSTRATION FOR HAZARDOUS AIR POLLUTANTS (HAP) PURSUANT TO SECTION 112(I)(5) OF THE CLEAN AIR ACT AS AMENDED IN 1990?	☐	☐	☒	☐
24)	DOES THE APPLICATION REQUEST TO UTILIZE THE OPERATIONAL FLEXIBILITY PROVISIONS AND INCLUDE THE INFORMATION REQUIRED FOR SUCH USE?	☐	☐	☐	☒
25)	DOES THE APPLICATION ADDRESS OTHER MODES OF OPERATION FOR WHICH A PERMIT IS BEING SOUGHT?	☐	☐	☐	☒
26)	DOES THE APPLICATION INCLUDE ALL REASONABLY ANTICIPATED OPERATING SCENARIOS FOR WHICH A PERMIT IS BEING SOUGHT?	☐	☐	☐	☒
27a)	DOES THE APPLICATION CONTAIN TRADE SECRET INFORMATION?	☐	☒	☐	☐
27b)	IF YES, HAS SUCH INFORMATION BEEN MARKED AND CLAIMED, AND TWO SEPARATE COPIES OF THE APPLICATION SUITABLE FOR PUBLIC INSPECTION BEEN SUBMITTED IN ACCORDANCE WITH APPLICABLE REGULATIONS?	☐	☐	☒	☐
28a)	DOES THE APPLICANT HEREBY REQUEST OPERATION DURING A MALFUNCTION, CONSISTENT WITH 35 IAC 201.149?	☐	☐	☐	☒
28b)	DOES THE APPLICANT HEREBY REQUEST OPERATION DURING A BREAKDOWN, CONSISTENT WITH 35 IAC 201.149?	☐	☐	☐	☒
28c)	DOES THE APPLICANT HEREBY REQUEST OPERATION DURING A STARTUP, CONSISTENT WITH 35 IAC 201.149?	☐	☐	☐	☒
28d)	IF YES TO ANY OF 28a-c, DOES THE APPLICATION INCLUDE INFORMATION SPECIFIED IN 35 IAC 201.261 (CONTENTS OF REQUEST FOR PERMISSION TO OPERATE DURING A MALFUNCTION, BREAKDOWN OR STARTUP)?	☐	☐	☐	☒
29)	DOES THE APPLICATION INCLUDE A PROPOSED DETERMINATION OF MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) FOR HAZARDOUS AIR POLLUTANTS PURSUANT TO SECTION 112(G) OR (J) OF THE CLEAN AIR ACT AS AMENDED IN 1990?	☐	☐	☒	☐
30)	DOES THE APPLICATION ADDRESS APPLICABLE RULES AND STANDARDS OF 40 CFR 60 NEW SOURCE PERFORMANCE STANDARD (NSPS)?	☐	☐	☐	☒
32)	DOES THE APPLICATION ADDRESS APPLICABLE RULES AND STANDARDS OF 40 CFR 61 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS (NESHAP)?	☐	☐	☐	☒
33)	DOES THE APPLICATION ADDRESS APPLICABLE RULES AND STANDARDS OF 40 CFR 63 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR SOURCE CATEGORIES?	☐	☐	☐	☒
34)	HAS THE APPLICANT RETAINED A COPY OF THIS APPLICATION AT THE SOURCE? (NOTE: IF TRADE SECRET INFORMATION IS NOT BEING SUBMITTED, THEN ONLY THE ORIGINAL APPLICATION NEED BE INITIALLY SUBMITTED, HOWEVER, THE ILLINOIS EPA MAY REQUEST UP TO 4 COPIES OF THE FINAL APPLICATION PRIOR TO PUBLIC NOTICE.)	☒	☐	☐	☐
35)	DOES THE APPLICATION INCLUDE AN ELECTRONIC FILE OF THE APPLICATION (E.G., CD, DVD, ETC.)?	☐	☒	☐	☐

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.	
AUTHORIZED SIGNATURE:	
BY:	
	President, KCBX Terminals Company
AUTHORIZED SIGNATURE <i>JA JAL</i>	TITLE OF SIGNATORY
David Severson	
TYPED OR PRINTED NAME OF SIGNATORY	DATE 12 / 18 / 12

APPLICATION PAGE

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200-CAAPP



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

**CAAPP APPLICATION
INCORPORATION BY REFERENCE**

FOR AGENCY USE ONLY

ID NO.:

PERMIT NO.:

DATE:

SECTION ONE

SOURCE INFORMATION

- 1) SOURCE NAME: KCBX Terminals Company
- 2) SOURCE ID NO.: 031600AHI
- 3) DATE FORM PREPARED: 12 / 5 / 2012

SECTION TWO

INSTRUCTIONS IN BRIEF

- 1) COMPLETE THIS FORM IF THE APPLICANT REQUESTS TO UTILIZE INFORMATION PROVIDED IN A PRIOR CAAPP APPLICATION. INCORPORATION BY REFERENCE MAY BE IN FULL OR IN PART OF THE APPLICATION. THE MATERIAL INCORPORATED MUST REMAIN CORRECT, CURRENT, AND COMPLETE.
- 2) COMPLETE SECTION THREE IF THE APPLICANT REQUESTS TO INCORPORATE AN ENTIRE APPLICATION. COMPLETE SECTION FOUR IF THE APPLICANT REQUESTS TO INCORPORATE ONLY PORTIONS OF AN APPLICATION. IN EITHER CASE, IDENTIFY AND DESCRIBE THE ITEM TO BE INCORPORATED (E.G., STEAM PLANT, NOX CONTROL SYSTEM, TANKS 32-38, ETC.) AND THE PAGE NUMBERS IN THIS APPLICATION WHERE THE INCORPORATED PAGES WILL BE PLACED, AND FOR PARTIAL INCORPORATIONS THE PAGE NUMBERS FROM THE APPLICATION TO INCORPORATE FROM.
- 3) UTILIZE A PLACEHOLDER IN THE APPLICATION NOTING THE INCORPORATION BY REFERENCE.
- 4) BE SURE THE PORTIONS OF THE 200-CAAPP WHICH ADDRESS INCORPORATIONS BY REFERENCE CORRECTLY REFLECT THE INFORMATION CONTAINED ON THIS FORM.
- 5) THE ILLINOIS EPA ENCOURAGES APPROPRIATE USE OF INCORPORATION BY REFERENCE, WHICH GENERALLY INCLUDES THOUGHTFULLY INCORPORATING LARGE GROUPS OF INFORMATION (E.G., STEAM PLANT) TO FACILITATE THE PERMITTING PROCESS FOR THE PERMITTEE AND THE ILLINOIS EPA.
- 6) REFER TO 287-CAAPP INSTRUCTIONS FOR FURTHER GUIDANCE ON COMPLETING THIS FORM.

SECTION THREE

INCORPORATE ALL MATERIAL FROM A PRIOR APPLICATION

IS THE APPLICANT REQUESTING TO INCORPORATE AN ENTIRE APPLICATION(S)?

☒ YES ☐ NO

IF YES, COMPLETE THE FOLLOWING:

	DESCRIPTION OF MATERIAL TO BE INCORPORATED	APPLICATION	PAGE NOs IN THIS APPLICATION
1	FESOP Application (KCBX) (FESOP issued 4/5/12)	NO.: 95050167 DATE: 7/14/11	
2	Construction Permit Application (KCBX) (Permit issued 5/25/10)	NO.: 07100090 DATE:	
3	Two Electric Conveyor Permit Application (and updates 6/5/08 and 2/16/10)	NO.: 00710090 DATE: 10/14/07	
4	DTE Joint Construction and Operating Permit Application (and update/supplement dated May 1, 2009)	NO.: 07050082 DATE: 2/3/09	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER 39.5 OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, 415 ILCS 5/39.5. FURTHER DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION, MOREOVER AS ALSO PROVIDED IN THAT SECTION, FAILURE TO PROVIDE THIS INFORMATION MAY PREVENT THIS APPLICATION FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED.

APPLICATION PAGE

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287-CAAPP

FOR APPLICANT'S USE

5	DTE Application to Construct Additional Equipment	NO.: 07050082	
		DATE: 9/20/12	
6		NO.:	
		DATE:	
7		NO.:	
		DATE:	
8		NO.:	
		DATE:	

SECTION FOUR INCORPORATE A PRIOR PARTIAL APPLICATION

IS THE APPLICANT REQUESTING TO INCORPORATE A PARTIAL APPLICATION(S)?

☐ YES ☐ NO

IF YES, COMPLETE THE FOLLOWING:

	DESCRIPTION OF ITEM TO BE INCORPORATED	APPLICATION	PAGE NOs TO INCORPORATE	PAGE NOs IN THIS APPLICATION
1		NO.:		
		DATE:		
2		NO.:		
		DATE:		
3		NO.:		
		DATE:		
4		NO.:		
		DATE:		
5		NO.:		
		DATE:		
6		NO.:		
		DATE:		
7		NO.:		
		DATE:		
8		NO.:		
		DATE:		

SECTION FIVE SIGNATURE BLOCK

I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION, INCLUDING THOSE MATERIALS INCORPORATED BY REFERENCE, ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE

BY:

JS
JAC

AUTHORIZED SIGNATURE

President, KCBX Terminals Company

TITLE OF SIGNATORY

David Severson

TYPED OR PRINTED NAME OF SIGNATORY

12 / 18 / 12

DATE

APPLICATION PAGE

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287-CAAPP

Page 2 of 2

KM00000213



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

**FEE DETERMINATION FOR
CAAPP SOURCE**

FOR AGENCY USE ONLY

ID NO.:

PERMIT NO.:

DATE:

SECTION ONE

SOURCE INFORMATION

1) SOURCE NAME: KCBX Terminals Company

2) SOURCE ID NO.: 031600AH1

3) DATE FORM PREPARED: 12 / 5 / 2012

SECTION TWO

INSTRUCTIONS IN BRIEF

- 1) COMPLETE THIS FORM TO DETERMINE THE PERMIT FEE ESTABLISHED BY THE CAAPP PERMIT.
- 2) THE EMISSION LEVELS STATED IN SECTION FOUR, WHICH ARE ONLY USED FOR THE PURPOSE OF PERMIT FEE DETERMINATION, WILL BECOME PERMIT SPECIAL CONDITIONS IN THE CAAPP PERMIT.
- 3) THE ILLINOIS EPA DOES NOT REQUIRE PAYMENT WITH THIS APPLICATION. WHEN YOU ARE BILLED MAKE CHECK OR MONEY ORDER PAYABLE TO THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY. SEND TO THE ADDRESS AT THE TOP OF THIS FORM. **DO NOT SEND CASH.** ON THE CHECK MEMO LINE, PLEASE LIST "CAAPP OPERATING PERMIT FEE: ID NO. XXXXXXXXX", REPLACE THE Xs WITH YOUR SOURCE ID NUMBER.

SECTION THREE

FEE RATIONALE

WHAT IS THE PERMIT STATUS AT THE TIME OF THIS REQUEST? CHECK ONLY ONE BELOW.

- 1) ☒ INITIAL CAAPP PERMIT ☐ RENEWAL CAAPP PERMIT ☐ FESOP INITIAL/RENEWAL
☐ SIGNIFICANT MODIFICATION ☐ MINOR MODIFICATION ☐ ADMINISTRATIVE AMENDMENT

- 2) COMPLETE THE BELOW TABLE FOR A NON-INITIAL CAAPP PERMIT. IF THERE IS AN INCREASE/DECREASE IN EMISSIONS, ENTER THE NUMBER(S) FOR THE EMISSIONS CHANGE RATIONALE AS APPROPRIATE.

POLLUTANT	INCREASE	DECREASE	NO CHANGE	EMISSIONS CHANGE RATIONALE(S)
NITROGEN OXIDES (NO _x)	☐	☐	☐	
PARTICULATE MATTER (PART)	☐	☐	☐	
SULFUR DIOXIDE (SO ₂)	☐	☐	☐	
VOLATILE ORGANIC MATERIAL (VOM)	☐	☐	☐	
OTHER (SPECIFY)	☐	☐	☐	
OTHER (SPECIFY)	☐	☐	☐	

CHANGE RATIONALE:

- 1 BUSINESS DECISION (E.G., OPERATING NEEDS, BANKRUPTCY, ETC.).
- 2 REMOVAL OR ADDITION OF PROCESSES AT THE SOURCE.
- 3 INCLUSION OR REMOVAL OF A CONTROL DEVICE.
- 4 CHEMICAL REFORMULATION (E.G., REFORMULATING A COATING FROM HIGH VOM TO A LOW VOM).
- 5 FUEL SWITCHING (E.G., COAL TO NATURAL GAS, ETC.).
- 6 METHODOLOGY CHANGE (E.G., SWITCHING A PETROLEUM SOLVENT TO AQUEOUS SOLUTION).
- 7 CHANGES IN METHOD USED FOR CALCULATIONS (E.G., EMISSION FACTOR CHANGE).
- 8 OTHER (DESCRIBE): _____
- 9 OTHER (DESCRIBE): _____

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER 39.5 OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, 415 ILCS 5/39.5. FURTHER DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION, MOREOVER AS ALSO PROVIDED IN THAT SECTION, FAILURE TO PROVIDE THIS INFORMATION MAY PREVENT THIS APPLICATION FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED.

FOR APPLICANT'S USE

APPLICATION PAGE

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292-CAAPP

SECTION FOUR					FEE DATA	
1) WILL THE SOURCE PAY THE CURRENT MAXIMUM FEE OF \$250,000.00 PER YEAR?					☐	YES
IF YES, THE REMAINDER OF THIS FORM DOES NOT NEED TO BE COMPLETED.					☒	NO
2) EMISSION UNIT ^A	NITROGEN OXIDES (NO _x) (TONS/YR)	PARTICULATE MATTER ¹⁰ (PART) (TONS/YR)	SULFUR DIOXIDE (SO ₂) (TONS/YR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER ^B SPECIFY (TONS/YR)	
All	92	92	18	20		
3) SUBTOTAL	92	92	18	20		
4) FUGITIVE						
5) TOTAL	92	92	18	20		
6) GRAND TOTAL ACROSS POLLUTANTS (TONS/YR):					222	
7) CALCULATED PERMIT FEE: IF GRAND TOTAL IN ITEM 6 ABOVE IS > 100 TONS/YR THEN MULTIPLY GRAND TOTAL BY \$18.00 AND ENTER, OTHERWISE ENTER \$1,800.00:						
8) MINIMUM PERMIT FEE IS \$1,800.00 PER YEAR. MAXIMUM PERMIT FEE IS \$250,000.00 PER YEAR. IF THE CALCULATED PERMIT FEE IN ITEM 7 ABOVE IS BETWEEN THESE TWO FEE AMOUNTS THEN ENTER HERE, OTHERWISE ENTER THE MINIMUM OR MAXIMUM PERMIT FEE, WHICHEVER IS APPLICABLE. <u>THIS IS THE ACTUAL ANNUAL PERMIT FEE:</u>					\$4773	

- A EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND INFORMATION FORM.
- B OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCl, ETC.

APPLICATION PAGE

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292-CAAPP



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

**DELEGATION OF AUTHORITY
FOR RESPONSIBLE OFFICIAL
TO A REPRESENTATIVE**

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

THIS FORM SHALL BE USED BY A RESPONSIBLE OFFICIAL TO DELEGATE AUTHORITY TO A REPRESENTATIVE OF SUCH PERSON FOR SIGNATURE ON APPLICATIONS OR CERTIFICATION OF REPORTS TO BE SUBMITTED PURSUANT TO THE CLEAN AIR ACT.

THIS FORM SHALL ONLY BE USED FOR A CORPORATION AT WHICH A PRESIDENT, SECRETARY, TREASURER, OR VICE-PRESIDENT OF THE CORPORATION IN CHARGE OF BUSINESS FUNCTION, OR ANY OTHER PERSON WHO PERFORMS SIMILAR POLICY OR DECISION MAKING FUNCTIONS FOR THE CORPORATION TO TRANSFER THE AUTHORITY AS A RESPONSIBLE OFFICIAL TO A REPRESENTATIVE OF SUCH PERSON. THE REPRESENTATIVE OF SUCH PERSON MUST BE RESPONSIBLE FOR THE OVERALL OPERATION OF ONE OR MORE MANUFACTURING, PRODUCTION, OR OPERATING FACILITIES APPLYING FOR OR SUBJECT TO A PERMIT.

NOTE: THIS TRANSFER OF DELEGATION OF AUTHORITY IS APPLICABLE ONLY IF THE FACILITY EMPLOYS MORE THAN 250 PERSONS OR HAS A GROSS ANNUAL SALES OR EXPENDITURES EXCEEDING \$25 MILLION (IN SECOND QUARTER 1980 DOLLARS).

SOURCE INFORMATION

1) SOURCE NAME: KCBX Terminals Company

2) DATE FORM
PREPARED: 12/5/12

3) SOURCE ID NO.
(IF KNOWN): 031600AHI

TRANSFER OF AUTHORITY

4) I, THE UNDERSIGNED, BEING A PRESIDENT, SECRETARY, TREASURER, OR VICE-PRESIDENT OF THE CORPORATION IN CHARGE OF BUSINESS FUNCTION, OR OTHER PERSON WHO PERFORMS SIMILAR POLICY OR DECISION MAKING FUNCTIONS FOR THE CORPORATION, HEREBY TRANSFER THE AUTHORITY AS A RESPONSIBLE OFFICIAL TO Jim Simmons, THEY BEING A REPRESENTATIVE AND RESPONSIBLE FOR THE OVERALL OPERATION OF ONE OR MORE MANUFACTURING, PRODUCTION, OR OPERATING FACILITIES APPLYING FOR OR SUBJECT TO A PERMIT.

AUTHORIZED SIGNATURE

President, KCBX Terminals Company

TITLE OF SIGNATORY

David Severson

TYPED OR PRINTED NAME OF SIGNATORY

12 / 1 / 12

DATE

Jim Simmons

DELEGATED REPRESENTATIVE

Terminal Manager

TITLE OF DESIGNATED REPRESENTATIVE

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE

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500-CAAPP

FOR APPLICANT'S USE

217/785 1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT NSPS SOURCE RENEWAL

PERMITTEE

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

Application No.: 95050167

I.D. No.: 031600AHI

Applicant's Designation: RMV10/07

Date Received: July 14, 2011

Subject: Bulk Solid Materials Terminal

Date Issued: April 5, 2012

Expiration Date: April 5, 2022

Location: 3259 East 100th Street, Chicago, Cook County, 60617

This permit is hereby granted to the above designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a bulk solid materials terminal, including unloading of materials from railcars, trucks and barges, conveying and transferring materials to/from storage piles, storage piles, loading to ships/barges, railcars, and trucks, and associated dust suppression systems as described in the above referenced application as follows:

Toxmark Box Hopper;
555' Barge Line Conveyor;
35' Box Hopper;
300' Conveyor;
Shaker Building with Receiving Hoppers for Railcars and 300' Conveyor;
South Collector Belt #1;
South Incline Belt #2;
30' Shuttle Conveyor;
Crossover Conveyor and Rock Chute;
South Highline Belt #3;
South Shiploader Tripper and Belt #4;
South Shiploader Pan, Spout and Trimmer;
Carter Box Hopper (portable);
Ten (10) Portable Conveyors;
Stacker - American Bin;
Kolberg Screen Plant;
Stacker/Conveyor on Screen Plant;
760 hp Diesel Powered Generator;
750 hp Diesel Powered Generator;
Thirteen (13) Gasoline/Diesel-Powered Engines (each less than 35 hp);
and
Nineteen (19) Diesel/Kerosene-Fired Heaters (each less than or equal to 0.6 mmBtu/hour)

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

KM00000217

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Nitrogen Oxides (NO_x) and Particulate Matter with an aerodynamic diameter less than or equal to 10 micrometers (PM₁₀)). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- d. This permit is effective only upon the withdrawal of Consolidated Permit Appeal PCB Nos. 2010 110 and 2011 043.
- 2a. The Kolberg Screen Plant and Stacker/Conveyor on the Screen Plant are subject to the New Source Performance Standard (NSPS) for Coal Preparation and Processing Plants, 40 CFR 60, Subparts A and Y. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.250(b), the provisions in 40 CFR 60.251, 40 CFR 60.252(a), 40 CFR 60.253(a), 40 CFR 60.254(a), 40 CFR 60.255(a), and 40 CFR 60.256(a) are applicable to any of the following affected facilities that commenced construction, reconstruction or modification after October 27, 1974, and on or before April 28, 2008: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), and coal storage systems, transfer and loading systems.
- b. Pursuant to 40 CFR 60.254(a), on and after the date on which the performance test is conducted or required to be completed under 40 CFR 60.8, whichever date comes first, an owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified on or before April 28, 2008, gases which exhibit 20 percent opacity or greater.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a

305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.304(a), all storage piles of materials with uncontrolled emissions of fugitive particulate matter in excess of 45.4 Mg per year (50 T/year) which are located within a source whose potential particulate emissions from all emission units exceeds 90.8 Mg/year (100 T/year) shall be protected by a cover or sprayed with a surfactant solution or water on a regular basis, as needed, or treated by an equivalent method, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310, and 212.312.
- e. Pursuant to 35 Ill. Adm. Code 212.305, all conveyor loading operations to storage piles specified in 35 Ill. Adm. Code 212.304 shall utilize spray systems, telescopic chutes, stone ladders or equivalent methods in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310, and 212.312.
- f. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310, and 212.312.
- g. Pursuant to 35 Ill. Adm. Code 212.308, crushers, grinding mills, screening operations, bagging operations, bucket elevators, conveyor transfer points, conveyors, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke feeding or be treated by an equivalent method in accordance with an operating program.
 - i. Conveyor loadout to trucks and railcars shall be conducted with sleeves extending to at least 6 inches below the sides and the receiving vehicle, except for topping off.
 - ii. Conveyor loadout sleeves shall be inspected for proper operation while such loadout to trucks or railcars is occurring, at least once each week when such loadout to trucks or railcars is performed.

- h. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- i. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- j. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- k. Pursuant to 35 Ill. Adm. Code 212.316(b), no person shall cause or allow fugitive particulate matter emissions generated by the crushing or screening of slag, stone, coke or coal to exceed an opacity of 10 percent.
- l. Pursuant to 35 Ill. Adm. Code 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent, except that the opacity shall not exceed 5 percent at quarries with a capacity to produce more than 1 million tons/year of aggregate.

- m. Pursuant to 35 Ill. Adm. Code 212.316(d), no person shall cause or allow fugitive particulate matter emissions from any storage pile to exceed an opacity of 10 percent, to be measured four feet from the pile surface.
- n. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM₁₀, or fugitive particulate matter emissions limitation elsewhere in 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code Part 212 Subparts B or S, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.
- o. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- p. Pursuant to 35 Ill. Adm. Code 212.321(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.321(c) shall be determined by using the equation:

$$E = A(P)^B$$

where

P = Process weight rate; and

E = Allowable emission rate; and,

- i. Up to process weight rates of 408 MG/hour (450 T/hour):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hour (450 T/hour):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- q. The affected emission units subject 35 Ill. Adm. Code 212.322 include the Shaker Building with Receiving Hoppers for Railcars and 300' Conveyor; South Collector Belt #1; South Incline Belt #2; South

Highline Belt #3; South Shiploader Tripper and Belt #4; and South Shiploader Pan, Spout and Trimmer. Pursuant to 35 Ill. Adm. Code 212.322(a) and except as further provided in 35 Ill. Adm. Code 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.322(c).

- r. Pursuant to 35 Ill. Adm. Code 212.322(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.322(c) shall be determined by using the equation:

$$E = C + A(P)$$

where

P = Process weight rate; and

E = Allowable emission rate; and,

- i. Up to process weight rates of 27.2 MG/hour (30 T/hour):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rate greater than or equal to 27.2 Mg/hour (30 T/hour):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

- s. Pursuant to 35 Ill. Adm. Code 212.700(a), 35 Ill. Adm. Code 212 Subpart U (Additional Control Measures) shall apply to those sources in the areas designated in and subject to 35 Ill. Adm. Code 212.324(a)(1) or 212.423(a) and that have actual annual source-wide emissions of PM₁₀ of at least fifteen (15) tons per year.
- 4a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid

fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW hour of actual heat input when distillate fuel oil is burned (0.3 lbs/MMBtu).

- b. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- c. Pursuant to 35 Ill. Adm. Code 214.304, the emissions from the burning of fuel at process emission sources located in the Chicago or St. Louis (Illinois) major metropolitan areas shall comply with applicable Subparts B through F (i.e., 35 Ill. Adm. Code 214.122(b)).
- 5. This permit is issued based on the coal storage systems (as defined in 40 CFR 60.251(h) to be any facility used to store coal except for open storage piles) and the open coal storage piles (as defined in 40 CFR 60.251(m) to be any facility, including storage area, that is not enclosed that is used to store coal, including the equipment used in the loading, unloading, and conveying operations of the facility) associated with the Kolberg Screen Plant and Stack/Conveyor on the Screen Plant not being subject to the requirements of 40 CFR 60.254(c) because the Kolberg Screen Plant and Stack/Conveyor on the Screen Plant and the associated coal storage systems and open coal storage piles were constructed prior to the applicability date of May 27, 2009 and have not been reconstructed or modified since installation.
- 6a. Pursuant to 35 Ill. Adm. Code 212.304(b), 35 Ill. Adm. Code 212.304(a) shall not apply to a specific storage pile if the owner or operator of that pile proves to the Illinois EPA that fugitive particulate emissions from that pile do not cross the property line either by direct wind action or reentrainment.
- b. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on site wind speed instrument measurements.
- c. Pursuant to 35 Ill. Adm. Code 212.323, 35 Ill. Adm. Code 212.321 and 212.322 shall not apply to emission units, such as stockpiles of particulate matter, to which, because of the disperse nature of such emission units, such rules cannot reasonably be applied.
- d. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, 35 Ill. Adm.

Code 212.324(d) is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).

- 7a. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.
- b. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 8a. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 Ill. Adm. Code 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 Ill. Adm. Code 212.324 shall be met at all times. 35 Ill. Adm. Code 212.324 shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:
 - i. Visual inspections of air pollution control equipment;
 - ii. Maintenance of an adequate inventory of spare parts; and
 - iii. Expeditionous repairs, unless the emission unit is shutdown.
- b. Pursuant to 35 Ill. Adm. Code 212.701(a), those sources subject to 35 Ill. Adm. Code 212 Subpart U shall prepare contingency measure plans reflecting the PM₁₀ emission reductions set forth in 35 Ill. Adm. Code 212.703. These plans shall become federally enforceable permit conditions. Such plans shall be submitted to the Illinois EPA by November 15, 1994. Notwithstanding the foregoing, sources that become subject to the provisions of 35 Ill. Adm. Code 212 Subpart U after July 1, 1994, shall submit a contingency measure plan to the Illinois EPA for review and approval within ninety (90) days after the date such source or sources became subject to the provisions of 35 Ill. Adm. Code 212 Subpart U or by November 15, 1994, whichever is later. The Illinois EPA shall notify those sources requiring contingency measure plans, based on the Illinois EPA's current information; however, the Illinois EPA's failure to notify any source of its requirement to submit contingency measure plans shall not be a defense to a violation of 35 Ill. Adm. Code 212 Subpart U and shall not relieve the source of its obligation to timely submit a contingency measure plan.

- c. Pursuant to 35 Ill. Adm. Code 212.703(a), all sources subject to 35 Ill. Adm. Code 212 Subpart C shall submit a contingency measure plan. The contingency measure plan shall contain two levels of control measures:
 - i. Level I measures are measures that will reduce total actual annual source-wide fugitive emissions of PM₁₀ subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (c), 212.424 or 212.464 by at least 15%.
 - ii. Level II measures are measures that will reduce total actual annual source-wide fugitive emissions of PM₁₀ subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (c), 212.424 or 212.464 by at least 25%.
- d. Pursuant to 35 Ill. Adm. Code 212.703(b), a source may comply with 35 Ill. Adm. Code 212 Subpart C through an alternative compliance plan that provides for reductions in emissions equal to the level of reduction of fugitive emissions as required at 35 Ill. Adm. Code 212.703(a) and which has been approved by the Illinois EPA and USEPA as federally enforceable permit conditions. If a source elects to include controls on process emission units, fuel combustion emission units, or other fugitive emissions of PM₁₀ not subject to 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (c), 212.424 or 212.464 at the source in its alternative control plan, the plan must include a reasonable schedule for implementation of such controls, not to exceed two (2) years. This implementation schedule is subject to Illinois EPA review and approval.
- e. Pursuant to 35 Ill. Adm. Code 212.704(b), if there is a violation of the ambient air quality standard for PM₁₀ as determined in accordance with 40 CFR Part 50, Appendix K, the Illinois EPA shall notify the source or sources the Illinois EPA has identified as likely to be causing or contributing to one or more of the exceedences leading to such violation, and such source or sources shall implement Level I or Level II measures, as determined pursuant to 35 Ill. Adm. Code 212.704(e). The source or sources so identified shall implement such measures corresponding to fugitive emissions within ninety (90) days after receipt of a notification and shall implement such measures corresponding to any nonfugitive emissions according to the approved schedule set forth in such source's alternative control plan. Any source identified as causing or contributing to a violation of the ambient air quality standard for PM₁₀ may appeal any finding of culpability by the Illinois EPA to the Illinois Pollution Control Board pursuant to 35 Ill. Adm. Code 106 Subpart C.
- f. Pursuant to 35 Ill. Adm. Code 212.704(e), the Illinois EPA shall require that sources comply with the Level I or Level II measures of their contingency measure plans, pursuant 35 Ill. Adm. Code 212.704(b), as follows:

- i. Level I measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, is less than or equal to 170 ug/m³.
 - ii. Level II measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, exceeds 170 ug/m³.
- 9a. Except as provided in Condition 9(b), the moisture content of the bulk solid material handled by the source shall be at least 1.3% by weight. The Permittee shall show compliance with this requirement by recording the moisture content of each lot of bulk solid material received at the source as provided by the supplier of the bulk solid material. If the moisture content of a bulk solid material received at the source is below 3.0% by weight as documented by the supplier, then the Permittee shall:
- i. Utilize wet suppression on the material handling operations (e.g., material transfer and screening) associated with bulk solid materials having a moisture content below 3.0% by weight to reduce particulate matter emissions and to maintain compliance with the applicable visible emissions standards for each affected material handling operation; or
 - ii. Follow the testing requirements of Condition 9(d).
- b. Notwithstanding the requirements in Condition 9(a), the Permittee may receive and off load bulk solid material with a moisture content of less than 1.3% by weight (i.e., low-moisture material), so long as the Permittee:
- i. Receives the low moisture material by rail car and off loads the low moisture material in the Shaker Building;
 - ii. Applies water or dust suppressant to the low moisture material during non-freezing conditions before the material is stockpiled or discharged from the initial receiving conveyor; and
 - iii. Blends the low-moisture material with a higher-moisture bulk solid material before the material is stockpiled or discharged from the initial receiving conveyor.
- c. If the Permittee relies on Condition 9(a)(i) to demonstrate compliance with Condition 9(a) with regard to bulk solid material with a moisture content below 3.0% by weight as documented by the supplier, the Permittee shall monitor the equipment used for wet suppression as follows during non freezing conditions:
- i. The water supply to the equipment used for wet suppression shall be equipped with a master metering device used to determine water usage for the control of particulate matter emissions.

- ii. The equipment used for wet suppression shall be inspected at least once per week for proper operation (i.e., maintaining adequate flow, clogging of flow lines, etc.) when this equipment is being utilized.
- d. If the Permittee relies on Condition 9(a)(ii) to demonstrate compliance with Condition 9(a) with regard to bulk solid material with a moisture content below 3.0% by weight as documented by the supplier or by testing conducted by the Permittee, the Permittee shall measure the moisture content of a representative sample of such bulk solid material at least once per week using ASTM Procedure D 3302 for coal and ASTM Procedure D 3172 and D 4931 for petroleum coke. Samples shall be collected when wet suppression systems covering the affected bulk solid material are not active. The Permittee may utilize wet suppression on such bulk solid material as needed until three consecutive tests at the source, taken at least 24 hours apart, show moisture contents of 3.0% or greater by weight, after which this testing shall no longer be required for the subject bulk solid material.
- e. The Permittee may test the moisture content of any lot of bulk solid material at any time. For purposes of calculating monthly PM and PM₁₀ emissions using the formula in Condition 10(a)(i), the moisture content from the most recent analysis of each bulk solid material, either as documented by the supplier or as determined from testing by the Permittee, shall be used to calculate the monthly average moisture content, except as provided in Condition 9(f).
- f. The Permittee shall separately calculate the PM and PM₁₀ emissions from receiving bulk solid material with a moisture content below 1.3 percent by weight as documented by the supplier, for the initial transfer (material drop) associated with off-loading. Such separately calculated emissions shall be added to the monthly PM and PM₁₀ emissions calculated using the formula of Condition 10(a)(i).
- g. The above limitations contain revisions to previously issued Construction permit 07100090. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the aforementioned permit.
- h. The engines, generators and heaters shall only be operated with distillate fuel oil, gasoline or kerosene as the fuel. The use of any other fuel in the engines, generators or heaters requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- i. The Permittee shall not keep, store or use distillate fuel oil (Grades No. 1 and 2) at this source with a sulfur content greater than the larger of the following two values:
 1. 0.28 weight percent, or

- ii. The wt. percent given by the formula: Maximum wt. percent sulfur = (0.00015) x (Gross heating value of oil, Btu/lb).
- j. Organic liquid by-products or waste materials shall not be used in any emission unit at this source without written approval from the Illinois EPA.
- k. The Illinois EPA shall be allowed to sample all fuels stored at the source.
- 10a. The emissions from and the operation of all activities at source shall not exceed the following limits:

PM Emission		PM emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
9.2	92.0	22.5	225.0

These limits are based on the amount of bulk solid material transferred and screened; operation of generators, engine and heaters; and standard emission factors (Tables 1.3.1 and 1.3.3, AP-42, Fifth Edition, Volume I, Supplement E September 1999, corrected May 2010; Table 3.3-1, AP-42, Fifth Edition, Volume I, Supplement B, October 1996; Table 3.4.1, AP-42, Fifth Edition, Volume I, Supplement B, October 1996; Table 11.9.1, AP-42, Volume I, Fifth Edition, Supplement E, October 1998; Table 11.19.2.2, AP-42, Volume I, Fifth Edition, Update 2004, August 2004; Section 13.2.2, AP-42, Volume I, Fifth Edition, November 2006; and Section 13.2.4, AP-42, Volume I, Fifth Edition, November 2006).

- i. PM₁₀ and PM emissions shall be calculated and recorded using the equation:

$$E = [(T \times E_1) + (T \times N \times E_2) + (S \times E_3) + (A_1 \times E_4) + (I \times D \times E_5) + \sum(E_6 \times Z_1 \times E_7) + \sum(R \times E_8)]/2000$$

Where:

E = Total PM₁₀ or PM emissions, (tons);

T = Amount of bulk solid material transferred in unenclosed area, (tons);

E₂ = $(k * 0.0032 * N) * [((U/5)^{0.75}) / ((M/2)^{0.75})]$;

Where:

k = 0.35 for PM₁₀;
= 0.74 for PM;

N = Number of bulk solid material transfers (drop points);

U = mean wind speed, (miles/hour);

M = material moisture content, (%);

T = Amount of bulk solid material transferred in enclosed areas, (tons);

E = 0.00055 lb PM₁₀/Ton for bulk solid material with < 1.3% moisture;
 - 0.00023 lb PM₁₀/Ton for bulk solid material with $\geq$ 1.3% moisture;
 - 0.0015 lb PM_{2.5}/Ton for bulk solid material with < 1.3% moisture;
 - 0.00007 lb PM_{2.5}/Ton for bulk solid material with $\geq$ 1.3% moisture;

The above emission factors are reduced by 50% due to enclosures.

N = Number of enclosed bulk solid material transfers (drop points);

S = Amount of bulk solid material screened, (tons);

E₁ = 0.0022 lb PM₁₀/Ton;
 - 0.00074 lb PM_{2.5}/ton;

A₁ = Area of Screening Active Storage Pile (Acres);

E₂ = 2,201 lb PM₁₀/acre - month;
 - 1,041 lb PM_{2.5}/acre - month;

T = Number of Vehicle Trips Associated with Screening;

D = Trip Distance Associated with Screening (mile/trip);

E₃ = 3.7 lb PM₁₀/VMT;
 - 1.0 lb PM_{2.5}/VMT;

H₁ = Hours of operation of each engine > 600 hp, (hours);

N₁ = Size of each engine > 600 hp operated (hp);

E₄ = 0.0007 lb/(hp hour) for diesel engines > 600 hp;

R = Diesel, gasoline or kerosene usage in heaters and engines $\leq$ 600 hp (gallons); and

E₅ = 0.002 lb PM₁₀ or PM_{2.5}/gallon for diesel and kerosene;
 - 0.0013 lb PM₁₀ or PM_{2.5}/gallon for gasoline.

- ii. The above limitations contain revisions to previously issued Permit 07100890. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit.
- b. Emissions and operation of the two diesel powered generators, and miscellaneous diesel powered engines at the source shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	4.29	42.9
Nitrogen Oxides (NO _x)	9.20	92.0
Sulfur Dioxide (SO ₂)	1.71	17.1
Volatile Organic Material (VOM)	1.84	18.4

These emission limits are based on standard emission factors (Tables 1.3.1 and 1.3.3, AP 42, Fifth Edition, Volume I, Supplement E, September 1999, corrected May 2010 (for the heaters), Tables 3.3-1 AP-42, Fifth Edition, Volume I, Supplement B, October 1996 (for the small gasoline and diesel powered engines < 600 hp), and Table 3.4.1, AP 42, Fifth Edition, Volume I, Supplement B, October 1996 (for the diesel-powered generators > 600 hp). Emissions from the generators shall be calculated as follows:

$$E = [(H \times Z \times F) + (R \times F)] / 2,000$$

Where:

- E - Total emissions of pollutant, (tons);
- H - Hours of operation of each generator > 600 hp (hours);
- Z - Size of each generator > 600 hp (hp);
- R - Diesel, gasoline or kerosene usage in heaters and engines < 600 hp (gallons); and
- F - Emission Factor as follows:

<u>Pollutant</u>	<u>Emission Factors</u>				
	<u>Gasoline Engines</u>	<u>Heaters</u>		<u>Diesel Engines</u>	
	<u>< 250 Hp</u> <u>(lbs/gal)</u>	<u>Kerosene</u> <u>(lbs/gal)</u>	<u>Diesel</u> <u>(lbs/gal)</u>	<u>< 600 hp</u> <u>(lbs/gal)</u>	<u>Engines > 600 hp</u> <u>(lbs/Hp-Hr)</u>
Carbon Monoxide (CO)	0.13	0.005	0.005	0.13	0.0055
Nitrogen Oxides (NO _x)	0.21	0.02	0.02	0.60	0.024
Sulfur Dioxide (SO ₂)	0.011	0.137 x S'	0.139 x S'	0.040	0.00809 x S'
Volatile Organic Material (VOM)	0.39	0.00033	0.00033	0.049	0.000642

S₁ = WL₁ = sulfur in fuel

- c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 11a. Pursuant to 40 CFR 60.8(a), at such other times as may be required by the Illinois EPA or USEPA under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Illinois EPA or USEPA a written report of the results of such performance test(s).
- b. Pursuant to 40 CFR 60.8(b), performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart of 40 CFR Part 60 unless the Illinois EPA or USEPA:
 - i. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;
 - ii. Approves the use of an equivalent method;
 - iii. Approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific source is in compliance;
 - iv. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected facility is in compliance with the standard; or
 - v. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under section 114 of the Clean Air Act.
- c. Pursuant to 40 CFR 60.8(c), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.
- d. Pursuant to 40 CFR 60.8(d), the owner or operator of an affected facility shall provide the Illinois EPA or USEPA at least 30 days prior

notice of any performance test, except as specified under other subparts, to afford the Illinois EPA or USEPA the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Illinois EPA or USEPA as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Illinois EPA or USEPA by mutual agreement.

- e. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
 - i. Sampling ports adequate for test methods applicable to such facility. This includes:
 - A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures; and
 - B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
 - ii. Safe sampling platform(s).
 - iii. Safe access to sampling platform(s).
 - iv. Utilities for sampling and testing equipment.
 - f. Pursuant to 40 CFR 60.8(f), unless otherwise specified in the applicable subpart of 40 CFR Part 60, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard under 40 CFR Part 60. For the purpose of determining compliance with an applicable standard under 40 CFR Part 60, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Illinois EPA's or USEPA's approval, be determined using the arithmetic mean of the results of the two other runs.
12. Pursuant to 40 CFR 60.11(e)(2), except as provided in 40 CFR 60.11(e)(3), the owner or operator of an affected facility to which an opacity standard in 40 CFR Part 60 applies shall conduct opacity observations in accordance with 40 CFR 60.11(b), shall record the

opacity of emissions, and shall report to the Illinois EPA or USEPA the opacity results along with the results of the initial performance test required under 40 CFR 60.8. The inability of an owner or operator to secure a visible emissions observer shall not be considered a reason for not conducting the opacity observations concurrent with the initial performance test.

- 13a. Pursuant to 40 CFR 60.255(a), an owner or operator of each affected facility that commenced construction, reconstruction, or modification on or before April 28, 2008, must conduct all performance tests required by 40 CFR 60.8 to demonstrate compliance with the applicable emission standards using the methods identified in 40 CFR 60.257.
- b. Pursuant to 40 CFR 60.257(a), the owner or operator must determine compliance with the applicable opacity standards as specified in 40 CFR 60.257(a)(1) through (3).
 - i. Method 9 of Appendix A-4 of this part and the procedures in 40 CFR 60.11 must be used to determine opacity, with the exceptions specified in 40 CFR 60.257(a)(1)(i) and (ii).
 - A. The duration of the Method 9 of Appendix A-4 of 40 CFR Part 60 performance test shall be 1 hour (ten 6 minute averages).
 - B. If, during the initial 30 minutes of the observation of a Method 9 of Appendix A-4 of 40 CFR Part 60 performance test, all of the 6 minute average opacity readings are less than or equal to half the applicable opacity limit, then the observation period may be reduced from 1 hour to 30 minutes.
 - ii. To determine opacity for fugitive coal dust emissions sources, the additional requirements specified in 40 CFR 60.257(a)(2)(i) through (iii) must be used.
 - A. The minimum distance between the observer and the emission source shall be 5.0 meters (16 feet), and the sun shall be oriented in the 140 degree sector of the back.
 - B. The observer shall select a position that minimizes interference from other fugitive coal dust emissions sources and make observations such that the line of vision is approximately perpendicular to the plume and wind direction.
 - C. The observer shall make opacity observations at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. Water vapor is not considered a visible emission.

- iii. A visible emissions observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15 second interval if the following conditions specified in 40 CFR 60.257(a)(3)(i) through (iii) are met.
 - A. No more than three emissions points may be read concurrently.
 - B. All three emissions points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.
 - C. If an opacity reading for any one of the three emissions points is within 5 percent opacity from the applicable standard (excluding readings of zero opacity), then the observer must stop taking readings for the other two points and continue reading just that single point.
- 14a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

- b. Testing required by Condition 15 shall be performed upon a written request from the Illinois EPA by a qualified individual or independent testing service.
- 15. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 16a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 17a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- b. i. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code 212.316 and shall submit to the Illinois EPA an annual report containing a summary of such information.
- ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(2), the records required under 35 Ill. Adm. Code 212.316(g) shall include at least the following:
 - A. The name and address of the source;

- B. The name and address of the owner and/or operator of the source;
 - C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;
 - D. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical;
 - E. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day; and
 - F. A log recording incidents when control measures were not used and a statement of explanation.
- iii. Pursuant to 35 Ill. Adm. Code 212.316(g)(4), the records required under 35 Ill. Adm. Code 212.316(g) shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- c. i. Pursuant to 35 Ill. Adm. Code 212.324(g)(1), written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).
 - ii. Pursuant to 35 Ill. Adm. Code 212.324(g)(2), the owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.
 - iii. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
 - iv. Pursuant to 35 Ill. Adm. Code 212.324(g)(5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.

18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

- i. If the Permittee is relying on Conditions 9(a)(i) and 9(c) to demonstrate compliance with Condition 9(a), the Permittee shall maintain records for the master metering device on the equipment used for wet suppression, including:
 - A. Dates and hours of usage;
 - B. Total amount of water applied each month;
 - C. Malfunctions (type, dates, and measures to correct);
 - D. Records of each inspection conducted in accordance with Condition 9(c)(ii);
 - E. Dates of rainfall during the preceding 24 hours; and
 - F. Daily observations of bulk solid material conditions (wet or dry) and/or other controls as may be present (e.g., coverage by snow or ice);
- ii. Records of the moisture content of bulk solid materials as provided by the suppliers of bulk solid materials, unless such records are superseded by moisture analysis from samples collected at this source;
- iii. Records of moisture analysis from samples collected at this source including date, time, individual or laboratory performing test, and location of sample (e.g., prior to screening, stockpiles, etc.);
- iv. Name and total amount of each bulk solid material (e.g., coal, petroleum coke, etc.) transferred in unenclosed areas, (tons/month and tons/year);
- v. Name and total amount of each bulk solid material (e.g., coal, petroleum coke, etc.) material transferred in enclosed areas, (tons/month and tons/year);
- vi. Name and total amount of each bulk solid material (e.g., coal, petroleum coke, etc.) screened, (tons/month and tons/year);
- vii. Area of Screening Active Storage Pile (Acres);
- viii. Number of Vehicle Trips Associated with Screening, Trip Distance Associated with Screening (mile/trip), and total vehicle miles travelled (VMI/month and VMI/year);
- ix. Operating hours of the 760 hp Diesel Powered Generator and the 750 hp Diesel-Powered Generator, (hours/month and hours/year);

- x. Fuel use for all other engines, generators and heaters, except those generators identified in Condition 18(a)(v). The fuel use may be taken from purchase invoices or other similar records, (gallons/month and gallons/year); and
 - xi. Monthly and annual emissions of CO, NO, PM, PM₁₀, SO₂, and VOC from this source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by Condition 18(a) shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
19. Pursuant to 40 CFR 60.258(b), for the purpose of reports required under 40 CFR 60.7(c), any owner/operator subject to the provisions of 40 CFR 60 Subpart V also shall report semiannually periods of excess emissions as follow:
- All 6-minute average capacities that exceed the applicable standard.
- 20a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- b. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of 35 Ill. Adm. Code 212.316. This report shall be submitted to the Illinois EPA thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.
- c. 1. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.

- ii. Pursuant to 35 Ill. Adm. Code 212.324(g)(6), upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

21a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794 9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please call Robert Bernoteit at 217/785-1705.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:RWB:psj

cc: Illinois EPA, FOS Region I
Lotus Notes

Attachment A Emission Summary

This attachment provides a summary of the maximum emissions from the source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from the source. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for NO and PM) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Fugitive PM₁₀ emissions from storage piles and vehicle traffic at the source are not considered for purposes of applicability of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that control measures are more effective than required in this permit.

<u>Emission Unit</u>	<u>E M I S S I O N S (Tons/Year)</u>					
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>PM₁₀</u>	<u>SO_x</u>	<u>VOM</u>
Material Handling Activities and Screening Activities			225.0	92.0		
Diesel-Powered Generators and Miscellaneous Engines and Heaters ¹	42.9	92.0	-----	-----	17.1	18.4
Totals	42.9	92.0	225.0	92.0	17.1	18.4

¹ PM and PM₁₀ emissions including with Material Handling Activities and Screening Activities.



JOINT CONSTRUCTION AND OPERATING PERMIT APPLICATION

DTE CHICAGO FUELS TERMINAL, LLC
10730 SOUTH BURLEY AVENUE
CHICAGO, ILLINOIS



JOINT CONSTRUCTION AND OPERATING PERMIT APPLICATION

DTE CHICAGO FUELS TERMINAL, LLC
10730 SOUTH BURLEY AVENUE
CHICAGO, ILLINOIS

JANUARY 2009

REF. NO. 052450 (1)

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1.0 PROJECT NARRATIVE

On February 13, 2008, the Illinois Environmental Protection Agency (IEPA) Bureau of Air (Agency) issued a Joint Construction and Operating Permit to DTE Chicago Fuels Terminal, LLC (DTE), Permit #07050082, ID# 031600GSF. In this permit, the Agency determined that this facility has potential to emit more than 100 tons/year of particulate matter of less than ten microns (PM₁₀).

In the permit application received by the IEPA on August 15, 2008 we noted that, upon review of Section 39.5 (2)(c)(ii) of the Illinois Environmental Protection Act (Act), the facility is not one of the 28 categories of stationary source listed there and is not subject to a standards promulgated under Section 111 or 112 of the Clean Air Act which would require them to include fugitive emissions. Therefore, the potential to emit does not include fugitive emissions.

A Notice of Incompleteness (NOI) was issued for the permit application on September 11, 2008. Since the issuance of the NOI, DTE has decided to install additional equipment at the facility resulting in a higher overall emission rate from the facility. A listing of all emission units, including existing and proposed emission units, is provided in Table 13 of the attached application.

The diesel fuel-fired engines are subject to 40 CFR Part 60 Subpart IIII. The source will comply with the requirements through the following:

40 CFR 60.4204 - Emission Standards For Non-Emergency Engines
Manufacturer's certification.

40 CFR 60.4207 - Fuel Requirements For Non-Emergency Engines
DTE will only use compliant fuels in the engines.

40 CFR 60.4209 - Monitoring Requirements For Non-Emergency Engines
The use of a non-resettable hour meter.

40 CFR 60.4211 - Compliance Requirements For Non-Emergency Engines
Manufacturer's certification.

40 CFR 60.4212 - Test Method Requirements For Non-Emergency Engines
DTE will test the engines in a manner consistent with the requirements set forth in this regulation.

40 CFR 60.4214 - Notification, Reporting, and Recordkeeping Requirements For Non-Emergency Engines

DTE will track hour usage on a rolling monthly basis and track fuel quality by purchase receipts and will record routine maintenance activities.

The crushers and screeners located at the facility are not subject to the requirements set forth in 40 CFR 60 Subpart OOO because the units are rated at a maximum throughput of 140 tons per hour.

The "Potential to Emit" (PTE) calculations in Table 1 indicates that the source is major, but the limitations set forth in Table 8A support the fact that this source is a synthetic minor source. Therefore, DTE requests that a Federally Enforceable State Operating Permit be issued for this source.

The emissions contained in Table 8A are based on the maximum facility throughput level of 11,250,000 tons of coal and petroleum coke and 250,000 tons per year of salt.

Therefore, please use the emissions listed in the tables below to establish the allowable emissions for fee purposes.

Transfer and Conveying, and Loadout

Material Handled	Throughput		Emission Factor (lb/ton)		PM Emissions		PM10 Emissions	
	tons/month	tons/yr	PM	PM10	tons/month	tons/yr	tons/month	tons/yr
Coal & Coke	1,100,000	11,000,000	5.34E-05	2.53E-06	5.87	58.7	2.78	27.8
Salt	25,000	250,000	4.40E-05	2.00E-06	0.11	1.1	0.05	0.5
Incidental Soil Crushing/Screening	122,640	1,226,400	2.45E-06	8.15E-08	0.03	0.3	0.01	0.1

The emission factors are based on material unloading, all possible transfer points located at the facility, and loadout.

The emission factors take into account a 50% control efficiency for the inherent moisture content of the materials being processed.

300 HP Diesel Engine Emissions (Portable Conveyors 1-5 & Portable Feed Hopper)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO _x	0.015	1.77	1.86	18.59
CO	0.0187	2.21	2.32	23.21
SO ₂	0.00205	0.24	0.25	2.52
PM	0.0009	0.1	0.11	1.05
PM ₁₀	0.0009	0.1	0.11	1.05
VOM	0.00247	0.29	0.30	3.05

This Table provides the emissions for DG-(1-6).

Emissions are based on 3,500 hours of operation per year for each unit, or 21,000 hr/yr total. (six units)

400 HP Diesel Engine Emissions (Portable Diesel Feeder)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO _x	0.015	6	1.05	10.50
CO	0.0187	7.48	1.31	13.09
SO ₂	0.00205	0.82	0.14	1.44
PM	0.0009	0.35	0.06	0.61
PM ₁₀	0.0009	0.35	0.06	0.61
VOM	0.00247	0.99	0.17	1.73

This Table provides the emissions for DG-7.

Emissions are based on 3,500 hours of operation per year.

375 HP Diesel Engine Emissions (Portable Conveyor 6)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO _x	0.015	5.63	0.99	9.85
CO	0.0187	7.01	1.23	12.27
SO ₂	0.00205	0.77	0.13	1.35
PM	0.0009	0.33	0.06	0.58
PM ₁₀	0.0009	0.33	0.06	0.58
VOM	0.00247	0.93	0.16	1.63

This Table provides the emissions for DG-8.

Emissions are based on 3,500 hours of operation per year.

40 HP Diesel Engine Emissions (Rental Portable Screen)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO _x	0.015	0.6	0.11	1.05
CO	0.0187	0.75	0.13	1.31
SO ₂	0.00205	0.08	0.01	0.14
PM	0.0009	0.04	0.01	0.07
PM ₁₀	0.0009	0.04	0.01	0.07
VOM	0.00247	0.1	0.02	0.18

This Table provides the emissions for DG-9.

Emissions are based on 3,500 hours of operation per year.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Construction Permit Application for a Proposed Project at a CAAPP Source	For Illinois EPA use only
	ID No.:
	Appl. No.:
	Date Rec'd:
Chk No./Amt:	

This form is to be used to supply general information to obtain a construction permit for a proposed project involving a Clean Air Act Permit Program (CAAPP) source, including construction of a new CAAPP source. Detailed information about the project must also be included in a construction permit application, as addressed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project
1. Working Name of Proposed Project: Operating Permit
2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)? ☐ No ☒ Yes If Yes, provide BOA ID Number: <u>031600GSF</u>
3. Does this application request a revision to an existing construction permit issued by the BOA? ☐ No ☒ Yes If Yes, provide Permit Number: <u>07050082</u>
4. Brief Description of Proposed Project: See Section 1.0, Project Narrative.

Source Information		
1. Source name:* DTE Chicago Fuels Terminal, LLC		
2. Source street address:* 10730 South Burley Avenue		
3. City: Chicago	4. County: Cook	5. Zip code:* 60617
ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.		
6. Is the source located within city limits? ☐ Yes ☐ No If no, provide Township Name:		
7. Description of source and product(s) produced:		8. Primary Classification Code of source: SIC: _____ or NAICS: _____
9. Latitude (DD:MM:SS.SSSS):		10. Longitude (DD:MM:SS.SSSS):

* Is information different than previous information? ☐ Yes ☒ No
If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Identification of Permit Applicant	
1. Who is the applicant? ☒ Owner ☐ Operator	2. All correspondence to: (check one) ☐ Source ☒ Owner ☐ Operator
3. Applicant's FEIN: 204570538	4. Attention name and/or title for written correspondence: Kim Bradford

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

300 HP Diesel Engine Emissions (Portable Conveyors 7-8 & Portable Crusher/Screeners)

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO _x	0.015	4.5	2.36	23.63
CO	0.0187	5.61	2.95	29.45
SO ₂	0.00205	0.62	0.33	3.26
PM	0.0009	0.26	0.14	1.37
PM ₁₀	0.0009	0.26	0.14	1.37
VOM	0.00247	0.74	0.39	3.89

This Table provides the emissions for DG-(10-12).

Emissions are based on 3,500 hours of operation per year for each unit, 10,500 hr/yr total. (three units)

20 HP Diesel Engine Emissions (Emergency Water Pump)

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO _x	0.015	0.3	0.01	0.08
CO	0.0187	0.37	0.01	0.09
SO ₂	0.00205	0.04	0.001	0.01
PM	0.0009	0.02	0.001	0.01
PM ₁₀	0.0009	0.02	0.001	0.01
VOM	0.00247	0.05	0.001	0.01

This Table provides the emissions for DWP-1.

Emissions are based on 500 hours of operation per year.

Owner Information*		
1. Name: DTE Chicago Fuels Terminal, LLC		
2. Address: 414 South Main Street		
3. City: Ann Arbor	4. State: Michigan	5. Zip code: 48104

* Is this information different than previous information? ☐ Yes ☒ No
 If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Operator Information (if different from owner)*		
1. Name DTE Chicago Fuels Terminal, LLC		
2. Address: 10730 South Burley Avenue		
3. City: Chicago	4. State: Illinois	5. Zip code: 60617

* Is this information different than previous information? ☐ Yes ☒ No
 If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Technical Contacts for Application	
1. Preferred technical contact: (check one) ☒ Applicant's contact ☐ Consultant	
2. Applicant's technical contact person for application: Kim Bradford	
3. Contact person's telephone number(s): 734-302-8206	4. Contact person's e-mail address: bradfordkj@dteenergy.com
5. Consultant for application: Don Sutton, Conestoga-Rovers & Associates	
6. Consultant's telephone number(s): 217-717-9009	7. Consultant's e-mail address: dsutton@craworld.com

Other Addresses for the Permit Applicant	
ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.	
1. Address for billing Site Fees for the source: ☐ Source ☒ Other (provide below): 414 South Main Street Ann Arbor, Michigan 48104	
2. Contact person for Site Fees: Kim Bradford	3. Contact person's telephone number: 734-913-2082
4. Address for Annual Emission Report for the source: ☒ Source ☐ Other (provide below):	
5. Contact person for Annual Emission Report: Kim Bradford	6. Contact person's telephone number: 734-302-8206

Review Of Contents of the Application	
NOTE: ANSWERING "NO" TO THESE ITEMS MAY RESULT IN THE APPLICATION BEING DEEMED INCOMPLETE	
1. Does the application include a narrative description of the proposed project?	☒ Yes ☐ No
2. Does the application clearly identify the emission units and air pollution control equipment that are part of the project?	☒ Yes ☐ No
3. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment, along with associated existing equipment and their relationships?	☒ Yes ☐ No
4. Does the application include a general description of the source, a plot plan for the source and a site map for its location?	☒ Yes ☐ No ☐ N/A* * Material previously provided
5. Does the application include relevant technical information for the proposed project as requested on CAAPP application forms (or otherwise contain all relevant technical information)?	☒ Yes ☐ No
6. Does the application include relevant supporting data and information for the proposed project as provided on CAAPP forms?	☒ Yes ☐ No
7. Does the application identify and address all applicable emission standards for the proposed project, including: State emission standards (35 IAC Chapter I, Subtitle B); Federal New Source Performance Standards (40 CFR Part 60)?	☒ Yes ☐ No
8. Does the application address whether the project would be a major project for Prevention of Significant Deterioration, 40 CFR 52.21?	☐ Yes ☐ No ☒ N/A
9. Does the application address whether the project would be a major project for "Nonattainment New Source Review," 35 IAC Part 203?	☐ Yes ☐ No ☒ N/A
10. Does the application address whether the proposed project would potentially be subject to federal regulations for Hazardous Air Pollutants (40 CFR Part 63) and address any emissions standards for hazardous air pollutants that would be applicable?	☐ Yes ☐ No ☒ N/A* * Source not major ☒ Project not major ☒
11. Does the application include a summary of annual emission data for different pollutants for the proposed project (tons/year), including: 1) The requested permitted emissions for individual new, modified and affected existing units*, 2) The past actual emissions and change in emissions for individual modified units* and affected existing units*, and 3) Total emissions consequences of the proposed project? (* Or groups of related units)	☒ Yes ☐ No ☐ N/A * The project does not involve an increase in emissions from new or modified emission units.
12. Does the application include a summary of the current and requested potential emissions of the source (tons/year)?	☒ Yes ☐ No ☐ N/A* * Applicability of PSD, NA NSR or 40 CFR 63 to the project is not related to the source's emissions.
13. Does the application address the relationships and implications of the proposed project on the CAAPP Permit for the source?	☐ Yes ☐ No ☒ N/A* * CAAPP Permit not issued
14. If the application contains information that is considered a TRADE SECRET, has it been properly marked and claimed and all requirements to properly support the claim pursuant to 35 IAC Part 130 been met? Note: "Claimed" information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information.	☐ Yes ☐ No ☒ N/A* * No information in the application is claimed to be a TRADE SECRET
15. Are the correct number of copies of the application provided? (See Instructions for Permit Applications, Form 201)	☒ Yes ☐ No
16. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, a check in the amount indicated on this form, and any supporting material needed to explain how the fee was determined?	☒ Yes ☐ No

Signature Block	
Authorized Signature:	
I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete and that I am a responsible official for the source, as defined by Section 39.5(1) of the Environmental Protection Act.	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

**FEE DETERMINATION FOR
CONSTRUCTION PERMIT
APPLICATION**

FOR AGENCY USE ONLY

ID NUMBER:

PERMIT #:

COMPLETE ☐

DATE COMPLETE:

INCOMPLETE ☐

CHECK #:

ACCOUNT NAME:

THIS FORM IS TO BE USED BY ALL SOURCES TO SUPPLY FEE INFORMATION THAT MUST ACCOMPANY ALL CONSTRUCTION PERMIT APPLICATIONS. **THIS APPLICATION MUST INCLUDE PAYMENT IN FULL TO BE DEEMED COMPLETE.** MAKE CHECK OR MONEY ORDER PAYABLE TO THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY. SEND TO THE ADDRESS ABOVE. DO NOT SEND CASH. REFER TO INSTRUCTIONS (197-INST) FOR ASSISTANCE.

SOURCE INFORMATION

1) SOURCE NAME:	DTE Chicago Fuels Terminal, LLC		
2) PROJECT NAME:	Transfer Terminal	3) SOURCE ID NO. (IF APPLICABLE):	031600GSF
4) CONTACT NAME:	Kim Bradford	5) CONTACT PHONE NUMBER:	734-302-8206

FEE DETERMINATION

6) FILL IN THE FOLLOWING THREE BOXES AS DETERMINED IN SECTIONS 1 THROUGH 4 BELOW:

\$ 5,000	+	\$ 10,000	=	\$*15,000 - 1,000 = 14,000
SECTION 1 SUBTOTAL		SECTION 2, 3 OR 4 SUBTOTAL		GRAND TOTAL

SECTION 1: STATUS OF SOURCE / PURPOSE OF SUBMITTAL

7) YOUR APPLICATION WILL FALL UNDER ONLY ONE OF THE FOLLOWING SIX CATEGORIES DESCRIBED BELOW. CHECK THE BOX THAT APPLIES, ENTER THE CORRESPONDING FEE IN THE BOX TO THE RIGHT AND COPY THIS FEE INTO THE SECTION 1 SUBTOTAL BOX ABOVE. PROCEED TO APPLICABLE SECTIONS.

FOR PURPOSES OF THIS FORM:

- **MAJOR SOURCE** IS A SOURCE THAT IS REQUIRED TO OBTAIN A CAAPP PERMIT.
- **SYNTHETIC MINOR SOURCE** IS A SOURCE THAT HAS TAKEN LIMITS ON POTENTIAL TO EMIT IN A PERMIT TO AVOID CAAPP PERMIT REQUIREMENTS (E.G., FESOP).
- **NON-MAJOR SOURCE** IS A SOURCE THAT IS NOT A MAJOR OR SYNTHETIC MINOR SOURCE.

☐ EXISTING SOURCE WITHOUT STATUS CHANGE OR WITH STATUS CHANGE FROM SYNTHETIC MINOR TO MAJOR SOURCE OR VICE VERSA. ENTER \$0 AND PROCEED TO SECTION 2.	\$ 5,000 SECTION 1 SUBTOTAL
☒ EXISTING NON-MAJOR SOURCE THAT WILL BECOME SYNTHETIC MINOR OR MAJOR SOURCE. ENTER \$5,000 AND PROCEED TO SECTION 4.	
☐ EXISTING MAJOR OR SYNTHETIC MINOR SOURCE THAT WILL BECOME NON-MAJOR SOURCE. ENTER \$4,000 AND PROCEED TO SECTION 3.	
☐ NEW MAJOR OR SYNTHETIC MINOR SOURCE. ENTER \$5,000 AND PROCEED TO SECTION 4.	
☐ NEW NON-MAJOR SOURCE. ENTER \$500 AND PROCEED TO SECTION 3.	
☐ AGENCY ERROR IF THIS IS A TIMELY REQUEST TO CORRECT AN ISSUED PERMIT THAT INVOLVES ONLY AN AGENCY ERROR AND IF THE REQUEST IS RECEIVED WITHIN THE DEADLINE FOR A PERMIT APPEAL TO THE POLLUTION CONTROL BOARD, THEN ENTER \$0. SKIP SECTIONS 2, 3 AND 4. PROCEED DIRECTLY TO SECTION 5.	

SECTION 2: SPECIAL CASE FILING FEE

8) **FILING FEE.** IF THE APPLICATION ONLY ADDRESSES ONE OR MORE OF THE FOLLOWING, CHECK THE APPROPRIATE BOXES, ENTER \$500 IN THE SECOND BOX UNDER FEE DETERMINATION ABOVE, SKIP SECTIONS 3 AND 4 AND PROCEED DIRECTLY TO SECTION 5. OTHERWISE, PROCEED TO SECTION 3 OR 4, AS APPROPRIATE.

- ☐ ADDITION OR REPLACEMENT OF CONTROL DEVICES ON PERMITTED UNITS
- ☐ PILOT PROJECTS/TRIAL BURNS BY A PERMITTED UNIT
- ☐ APPLICATIONS ONLY INVOLVING INSIGNIFICANT ACTIVITIES UNDER 35 IAC 201.210 (MAJOR SOURCES ONLY)
- ☐ LAND REMEDIATION PROJECTS
- ☐ REVISIONS RELATED TO METHODOLOGY OR TIMING FOR EMISSION TESTING
- ☐ MINOR ADMINISTRATIVE-TYPE CHANGE TO A PERMIT

THIS AGENCY IS AUTHORIZED TO REQUIRE AND YOU MUST DISCLOSE THIS INFORMATION UNDER 415 ILCS 5/39. FAILURE TO DO SO COULD RESULT IN THE APPLICATION BEING DENIED AND PENALTIES UNDER 415 ILCS 5 ET SEQ. IT IS NOT NECESSARY TO USE THIS FORM IN PROVIDING THIS INFORMATION. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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*The total includes the fees for the FESOP and the \$1,000 paid on the previous application.

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SECTION 3: FEES FOR CURRENT OR PROJECTED NON-MAJOR SOURCES	
9) IF THIS APPLICATION CONSISTS OF A SINGLE NEW EMISSION UNIT OR NO MORE THAN TWO MODIFIED EMISSION UNITS, ENTER \$500.	9)
10) IF THIS APPLICATION CONSISTS OF MORE THAN ONE NEW EMISSION UNIT OR MORE THAN TWO MODIFIED UNITS, ENTER \$1,000.	10)
11) IF THIS APPLICATION CONSISTS OF A NEW SOURCE OR EMISSION UNIT SUBJECT TO SECTION 39.2 OF THE ACT (I.E., LOCAL SITING REVIEW); A COMMERCIAL INCINERATOR OR A MUNICIPAL WASTE, HAZARDOUS WASTE, OR WASTE TIRE INCINERATOR; A COMMERCIAL POWER GENERATOR; OR AN EMISSION UNIT DESIGNATED AS A COMPLEX SOURCE BY AGENCY RULEMAKING, ENTER \$15,000.	11)
12) IF A PUBLIC HEARING IS HELD (SEE INSTRUCTIONS), ENTER \$10,000.	12)
13) SECTION 3 SUBTOTAL (ADD LINES 9 THROUGH 12) TO BE ENTERED ON PAGE 1.	13)

SECTION 4: FEES FOR CURRENT OR PROJECTED MAJOR OR SYNTHETIC MINOR SOURCES				
Application Contains Modified Emission Units Only	14) FOR THE FIRST MODIFIED EMISSION UNIT, ENTER \$2,000.	14)		
	15) NUMBER OF ADDITIONAL MODIFIED EMISSION UNITS = _____ X \$1,000.	15)		
	16) LINE 14 PLUS LINE 15, OR \$5,000, WHICHEVER IS LESS.		16)	
Application Contains New And/Or Modified Emission Units	17) FOR THE FIRST NEW EMISSION UNIT, ENTER \$4,000.	17)	\$4,000	
	18) NUMBER OF ADDITIONAL NEW AND/OR MODIFIED EMISSION UNITS = <u>13</u> X \$1,000.	18)	\$13,000	
	19) LINE 17 PLUS LINE 18, OR \$10,000, WHICHEVER IS LESS.		19)	\$10,000
Application Contains Netting Exercise	20) NUMBER OF INDIVIDUAL POLLUTANTS THAT RELY ON A NETTING EXERCISE OR CONTEMPORANEOUS EMISSIONS DECREASE TO AVOID APPLICATION OF PSD OR NONATTAINMENT NSR = _____ X \$3,000.		20)	
Additional Supplemental Fees	21) IF THE NEW SOURCE OR EMISSION UNIT IS SUBJECT TO SECTION 39.2 OF THE ACT (I.E., SITING); A COMMERCIAL INCINERATOR OR OTHER MUNICIPAL WASTE, HAZARDOUS WASTE, OR WASTE TIRE INCINERATOR; A COMMERCIAL POWER GENERATOR; OR ONE OR MORE OTHER EMISSION UNITS DESIGNATED AS A COMPLEX SOURCE BY AGENCY RULEMAKING, ENTER \$25,000.		21)	
	22) IF THE SOURCE IS A NEW MAJOR SOURCE SUBJECT TO PSD, ENTER \$12,000.		22)	
	23) IF THE PROJECT IS A MAJOR MODIFICATION SUBJECT TO PSD, ENTER \$6,000.		23)	
	24) IF THIS IS A NEW MAJOR SOURCE SUBJECT TO NONATTAINMENT (NAA) NSR, ENTER \$20,000.		24)	
	25) IF THIS IS A MAJOR MODIFICATION SUBJECT TO NAA NSR, ENTER \$12,000.		25)	
	26) IF APPLICATION INVOLVES A DETERMINATION OF CLEAN UNIT STATUS AND THEREFORE IS NOT SUBJECT TO BACT OR LAER, ENTER \$5,000 PER UNIT FOR WHICH A DETERMINATION IS REQUESTED OR OTHERWISE REQUIRED. _____ X \$5,000.		26)	
	27) IF APPLICATION INVOLVES A DETERMINATION OF MACT FOR A POLLUTANT AND THE PROJECT IS NOT SUBJECT TO BACT OR LAER FOR THE RELATED POLLUTANT UNDER PSD OR NSR (E.G., VOM FOR ORGANIC HAP), ENTER \$5,000 PER UNIT FOR WHICH A DETERMINATION IS REQUESTED OR OTHERWISE REQUIRED. _____ X \$5,000.		27)	
	28) IF A PUBLIC HEARING IS HELD (SEE INSTRUCTIONS), ENTER \$10,000.		28)	
29) SECTION 4 SUBTOTAL (ADD LINES 16 AND LINES 19 THROUGH 28) TO BE ENTERED ON PAGE 1.			29)	\$10,000

SECTION 5: CERTIFICATION	
NOTE: APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED INCOMPLETE.	
30) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE INFORMATION CONTAINED IN THIS FEE APPLICATION FORM IS TRUE, ACCURATE AND COMPLETE.	
BY: _____	_____
SIGNATURE	TITLE OF SIGNATORY
_____	_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

PROCESS EMISSION UNIT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER:
	EMISSION POINT #:
	DATE:

SOURCE INFORMATION	
1) SOURCE NAME: DTE Chicago Fuels Terminal, LLC	
2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN): 031600GSF

GENERAL INFORMATION	
4) NAME OF EMISSION UNIT: Material Handling	
5) NAME OF PROCESS: Material Handling	
6) DESCRIPTION OF PROCESS: Handling of coal, pet coke, and salt.	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Material transfer station	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT: See figures 2 & 3	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): To Be Determined	
10) MODEL NUMBER (IF KNOWN): To Be Determined	11) SERIAL NUMBER (IF KNOWN): To Be Determined
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR): Upon issuance of permit
	b) OPERATION (MONTH/YEAR): Upon issuance of permit
	c) LATEST MODIFICATION (MONTH/YEAR): N/A
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE): N/A	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

None

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? ☐ YES ☒ NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

The source has limited their material throughput per year to obtain a FESOP.

OPERATING INFORMATION

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS	HOURS/DAY: 8	DAYS/WEEK: 5	WEEKS/YEAR: 52
b) TYPICAL OPERATING HOURS	HOURS/DAY: 8	DAYS/WEEK: 5	WEEKS/YEAR: 52
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25
			SEP-NOV(%): 25

MATERIAL USAGE INFORMATION

	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
21a) RAW MATERIALS				
See Tables 5 & 6				

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR

FUEL USAGE DATA		
22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
d) FUEL TYPE: ☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER _____ ☐ COAL ☐ OTHER _____ IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.		
e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %, NA FOR NATURAL GAS):	
g) TYPICAL ASH CONTENT (WT %, NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):	
23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? ☐ YES ☐ NO IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:		

See Narrative, Section 1.0.

APPLICABLE RULES		
24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):		
REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :		
REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON-COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

See Narrative, Section 1.0.

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

See Narrative, Section 1.0.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Visible Emissions	Percent Opacity	Method 9	Once

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Throughput	Log Book		

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS?

☒ YES ☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST?

☒ YES ☐ NO

IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

N/A

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

N/A

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

N/A

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

☐ YES☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

N/A

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

☐ YES☐ NO

IF NO, EXPLAIN:

N/A

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION?

☐ YES☐ NO

IF NO, EXPLAIN:

N/A

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
	N/A			

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Emissions	Annual Emissions Report	Annually

See Tables 1-13.

(37) EMISSION INFORMATION											
REGULATED AIR POLLUTANT		☐ ¹ ACTUAL EMISSION RATE ☐ ¹ UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			² PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	³ OTHER TERMS	⁴ DM	⁵ RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						()				
	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NO _x)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER ≤ 10 MICROMETERS (PM ₁₀)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO ₂)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 (LBS/HR)	22
	TYPICAL:	4.00	16.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

¹CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.²PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)⁵RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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N/A

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION								
		☐ ¹ ACTUAL EMISSION RATE ☐ ¹ UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE		
NAME OF HAP EMITTED	² CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	⁴ DM	⁵ RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE: Benzene	71432	MAXIMUM:	10.0	12		2	98% by wt control device leak-tight trucks	CFR 61 61.302(b),(d)
		TYPICAL:	8.0	0.8		2		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.

¹ PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.

² CAS - CHEMICAL ABSTRACT SERVICE NUMBER.

³ PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GRVDSOF, ETC.).

⁴ DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).

⁵ RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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EXHAUST POINT INFORMATION		
THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.		
39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT: See figures 2 & 3.		
40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS. Emissions are fugitive.		
41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT): Emissions are fugitive.		
42) DISCHARGE HEIGHT ABOVE GRADE (FT): Emissions are fugitive.		
43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.		
45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM): N/A	b) TYPICAL (ACFM): N/A
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F): N/A	b) TYPICAL (°F): N/A
47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD): Emissions are fugitive.		
48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:		
NAME		FLOW DIAGRAM DESIGNATION
a) See Table 13		
b)		
c)		
d)		
e)		
THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.		
49a) LATITUDE:		b) LONGITUDE:
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation: _____

**STATIONARY INTERNAL
COMBUSTION ENGINE OR TURBINE
DATA AND INFORMATION**

FOR AGENCY USE ONLY

ID NUMBER: _____

EMISSION POINT #: _____

DATE: _____

SOURCE INFORMATION

1) SOURCE NAME:

DTE Chicago Fuels Terminal, LLC

2) DATE FORM
PREPARED:

3) SOURCE ID NO.
(IF KNOWN):

031600GSF

GENERAL INFORMATION

4) NAME OF EMISSION UNIT:

Diesel Fuel-Fired Engines

5) NAME OF PROCESS:

Diesel Fuel-Fired Engines

6) DESCRIPTION OF PROCESS:

Production of power from diesel fuel-fired engines

7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED:

Production of electricity and power to operate machinery

8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT:

See figures 2 & 3.

9) MANUFACTURER OF EMISSION UNIT (IF KNOWN):

To be determined

10) MODEL NUMBER (IF KNOWN):

To be determined

11) SERIAL NUMBER (IF KNOWN):

To be determined

12) DATES OF COMMENCING CONSTRUCTION,
OPERATION AND/OR MOST RECENT MODIFICATION
OF THIS EMISSION UNIT (ACTUAL OR PLANNED)

a) CONSTRUCTION (MONTH/YEAR):

To be determined

b) OPERATION (MONTH/YEAR):

To be determined

c) LATEST MODIFICATION (MONTH/YEAR):

N/A

13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION? ☐ YES ☒ NO
 IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 270-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):
 N/A

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION? ☐ YES ☒ NO
 IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):
 None

OPERATING INFORMATION				
18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 270-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.				
19a) MAXIMUM OPERATING HOURS	HOURS/DAY: 12	DAYS/WEEK: 5	WEEKS/YEAR: 52	
b) TYPICAL OPERATING HOURS	HOURS/DAY: 8	DAYS/WEEK: 5	WEEKS/YEAR: 52	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

FIRING RATE INFORMATION		
21) DESCRIPTION (CHECK AS MANY AS APPLY):	☒ INTERNAL COMBUSTION ENGINE	☐ SPARK IGNITED ENGINE ☐ RECIPROCATING ENGINE
	☐ COMBINED CYCLE TURBINE	☐ STATIONARY TURBINE ☐ SIMPLE CYCLE TURBINE
	☐ REGENERATIVE CYCLE TURBINE	☐ LARGE BORE ENGINE
22) AIR CHARGING:	☐ NATURALLY ASPIRATED ☐ BLOWER SCAVENGED ☒ TURBOCHARGED	23) NO. OF CYLINDERS PER ENGINE:
24a) RATED OR DESIGN HEAT INPUT CAPACITY (MILLION BTU/HR):		

24b) IS MORE THAN ONE FUEL FIRED AT A TIME? ☐ YES ☒ NO				
IF YES, EXPLAIN:				
	NATURAL GAS	FUEL OIL	COAL	OTHER
c) SINGLE FUEL (MAXIMUM - MILLION BTU/HOUR)				
d) SINGLE FUEL (TYPICAL - MILLION BTU/HOUR)				
e) COMBINED FUEL (TYPICAL - MILLION BTU/HOUR) (IF APPLICABLE)				
25a) BASE LOAD (KW):		b) TIME SPENT AT THIS LOAD (%):		
26a) PEAK LOAD (KW):		b) TIME SPENT AT THIS LOAD (%):		
27a) OTHER LOAD (KW):		b) TIME SPENT AT THIS LOAD (%):		

NATURAL GAS FIRING		
28a) CURRENT ORIGIN OF NATURAL GAS:		
☐ PIPELINE (FIRM CONTRACT)	☐ BY-PRODUCT, SPECIFY ORIGIN:	
☐ PIPELINE (INTERRUPTIBLE SUPPLY CONTRACT)	☐ OTHER, - SPECIFY:	
b) TYPICAL HEAT CONTENT (BTU/SCF):		
c) MAXIMUM CONSUMPTION	SCF/MONTH:	SCF/YEAR:
d) TYPICAL CONSUMPTION	SCF/MONTH:	SCF/YEAR:

OIL FIRING		
29a) OIL TYPE (CHECK ONE):		
☐ NO. 1	☒ NO. 2	☐ NO. 4
☐ NO. 5	☐ NO. 6	
☐ OTHER, SPECIFY (INCLUDE GENERATOR OR SUPPLIER):		
b) TYPICAL HEAT CONTENT: 137,000		c) IS OIL USED ONLY AS A RESERVE FUEL? ☐ YES ☒ NO
☐ BTU/LB - OR - ☒ BTU/GAL		
d) TYPICAL SULFUR CONTENT AS FIRED (WT %): Typical for diesel fuel		e) TYPICAL ASH CONTENT AS FIRED (WT %): Typical for diesel fuel
f) MAXIMUM CONSUMPTION	GAL/MONTH:	GAL/YEAR:
g) TYPICAL CONSUMPTION	GAL/MONTH:	GAL/YEAR:
h) FIRING DIRECTION:		
☐ HORIZONTAL ☐ TANGENTIAL ☐ OTHER, SPECIFY:		

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OTHER FUEL FIRING		
30a) OTHER FUEL FIRING	TYPE	SUPPLIER
a)		
b)		
b) TYPICAL HEAT CONTENT (SPECIFY UNITS):	c) TYPICAL NITROGEN CONTENT AS FIRED (WT %):	
d) TYPICAL SULFUR CONTENT AS FIRED (WT %):	e) TYPICAL ASH CONTENT AS FIRED (WT %):	
f) MAXIMUM CONSUMPTION	(SPECIFY UNITS):	(SPECIFY UNITS):
g) TYPICAL CONSUMPTION	(SPECIFY UNITS):	(SPECIFY UNITS):

COMBUSTION CONTROL INFORMATION		
31a) IS THERE ANY TYPE OF INTERNAL CONTROL USED TO REDUCE EMISSIONS ? (A 260-CAAPP FORM MUST BE COMPLETED FOR EXTERNAL CONTROLS)		
☐ YES ☐ NO IF NO, GO TO ITEM 33.		
b) TOTAL % REDUCTION IN EMISSIONS:	☐ NO _x ☐ CO ☐ VOM _____ % _____ % _____ % ☐ PM ₁₀ ☐ PM ☐ SO ₂ _____ % _____ % _____ %	
c) CHECK THE FOLLOWING THAT APPLY:	☐ WATER INJECTION WATER TO FUEL RATIO: _____ ☐ OXYGEN TRIM AIR TO FUEL RATIO: _____ ☐ REDUCED TEMPERATURE (SPECIFY DEGREES F): _____ ☐ (NON)SELECTIVE CATALYTIC REDUCTION (260-CAAPP)	☐ FLUE GAS RECIRCULATION % RECIRCULATED: _____ ☐ REDUCED RESIDENCE TIME (SPECIFY SEC): _____ ☐ FUEL INJECTION RETARD (SPECIFY DEGREES): _____ ☐ OTHER, EXPLAIN: _____
d) MAXIMUM START-UPS IN A YEAR?	e) TIME FROM START UP TO STEADY LOAD (MINUTES OR HOURS):	

See Narrative, Section 1.0.

APPLICABLE RULES		
32) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., SULFUR DIOXIDE , CFR SUBPART GG, 0.015% BY VOL. AT 15% O ₂):		
REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
33) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
34) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
35) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
36) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :		
REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)

37) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE? ☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 270-2, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

38) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON-COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

39) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:
See Narrative, Section 1.0.

40) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:
See Narrative, Section 1.0.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

41a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Operation	Hours	Hours of operation	Daily

41b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Operation	Log Book		

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS?

☐ YES ☐ NO

IF NO, EXPLAIN:
N/A

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST?

☐ YES ☐ NO

IF NO, EXPLAIN:
N/A

42a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

N/A

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., OPACITY)?
N/A

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR):

N/A

42d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

☐ YES☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

N/A

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

☐ YES☐ NO

IF NO, EXPLAIN:

N/A

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION?

☐ YES☐ NO

IF NO, EXPLAIN:

N/A

43) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
	N/A			

44) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Emissions	Annual Emissions Report	Annually

See Table 7.

(45)EMISSION INFORMATION											
REGULATED AIR POLLUTANT		☐ ¹ ACTUAL EMISSION RATE ☐ ¹ UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			² PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	³ OTHER TERMS	⁴ DM	⁵ RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						()				
	TYPICAL:						()				
LEAD	MAXIMUM:						()				
	TYPICAL:						()				
NITROGEN OXIDES (NOx)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER (PART)	MAXIMUM:						()				
	TYPICAL:						()				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						()				
	TYPICAL:						()				
SULFUR DIOXIDE (SO2)	MAXIMUM:						()				
	TYPICAL:						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						()				
	TYPICAL:						()				
OTHER, SPECIFY:	MAXIMUM:						()				
	TYPICAL:						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 270-3.

- ¹CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
²PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
⁵RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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See Table 3A.

(46) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION								
HAP INFORMATION		☐ ¹ ACTUAL EMISSION RATE ☐ ¹ UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE		
NAME OF HAP EMITTED	² CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	⁴ DM	⁵ RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE: Benzene	71432	MAXIMUM:	10.0	1.2		2	98% by wt control device: leak-tight trucks	CFR 61 61.302(b),(d)
		TYPICAL:	8.0	0.8		2		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 270-4.

¹PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.²CAS - CHEMICAL ABSTRACT SERVICE NUMBER.³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).⁵RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

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EXHAUST POINT INFORMATION		
THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.		
47) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT: See figures 2 & 3.		
48) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS. Stack		
49) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT): Various		
50) DISCHARGE HEIGHT ABOVE GRADE (FT): Various		
51) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
52) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA. Various		
53) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
54) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):
55) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD): Vertical		
56) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:		
NAME		FLOW DIAGRAM DESIGNATION
a) See Table 13		
b)		
c)		
d)		
e)		
THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.		
57a) LATITUDE:		b) LONGITUDE:
58) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation:
Chicago Fuels Terminal,

**COMPLIANCE PLAN/
SCHEDULE OF COMPLIANCE
FOR CAAPP PERMIT**

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT THE APPLICANT SUBMIT A COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR ALL EMISSION UNITS AT THE CAAPP SOURCE, REGARDLESS OF THE COMPLIANCE STATUS OF EACH INDIVIDUAL EMISSION UNIT. THIS FORM REQUIRES THAT THE COMPLIANCE STATUS BE STATED FOR EACH EMISSION UNIT. APPLICATION FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON-COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EACH EMISSION UNIT NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF SUBMITTAL.

SOURCE INFORMATION

1) SOURCE NAME:

Chicago Fuels Terminal, LLC

2) DATE FORM
PREPARED:

3) SOURCE ID NO.
(IF KNOWN):

031600GSF

SOURCE COMPLIANCE INFORMATION

4) DESCRIBE THE COMPLIANCE STATUS OF THE SOURCE WITH ALL APPLICABLE REQUIREMENTS (E.G., "SOURCE IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS");

N/A

5) IF IN COMPLIANCE, WILL THE SOURCE CONTINUE TO COMPLY WITH ALL APPLICABLE REQUIREMENTS?

☐ YES

☐ NO

IF NO, EXPLAIN:

N/A

6) WILL THE SOURCE MEET, ON A TIMELY BASIS, APPLICABLE REQUIREMENTS WHICH BECOME EFFECTIVE DURING THE PERMIT TERM?

☒ YES

☐ NO

IF NO, EXPLAIN

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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7) EMISSION UNITS IN COMPLIANCE

THE FOLLOWING EMISSION UNITS ARE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AND WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-1:

[illegible]

EMISSION UNITS COMPLIANCE INFORMATION (cntd)

[illegible]

8) EMISSION UNITS SUBJECT TO FUTURE COMPLIANCE DATES

THE FOLLOWING EMISSION UNITS, WHICH ARE CURRENTLY IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS, WILL ACHIEVE ON A TIMELY BASIS, AND MAINTAIN COMPLIANCE WITH, FUTURE COMPLIANCE DATES AS THEY BECOME APPLICABLE DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-2:

[illegible]

9a) EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE TO BE ACHIEVED PRIOR TO PERMIT ISSUANCE
 THE FOLLOWING EMISSION UNITS ARE NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT APPLICATION. HOWEVER, THESE EMISSION UNITS WILL ACHIEVE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS PRIOR TO PERMIT ISSUANCE AND WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-3:

DESIGNATION ID NUMBER	EMISSION UNIT	FUTURE COMPLIANCE DATE (MONTH/DAY/YEAR)
N/A		

b) THE FOLLOWING IS A NARRATIVE DESCRIPTION OF THE MEANS BY WHICH COMPLIANCE WILL BE ACHIEVED FOR EACH OF THE EMISSION UNITS LISTED IN 9a) ABOVE. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-4:

N/A

10) EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE WILL NOT BE ACHIEVED PRIOR TO PERMIT ISSUANCE
 THE FOLLOWING EMISSION UNITS WILL NOT BE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EMISSION UNITS NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP IS SUBMITTED FOR THE FOLLOWING EMISSION UNITS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-5:

DESIGNATION ID NUMBER	EMISSION UNIT	DATE COMPLIANCE SCHEDULED TO BE ACHIEVED (MONTH/DAY/YEAR)
N/A		



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page ____ of ____
Source Designation:
Chicago Fuels Terminal,

COMPLIANCE CERTIFICATION

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

AN APPLICATION FOR A CAAPP PERMIT MUST CONTAIN A CERTIFICATION OF COMPLIANCE SIGNED BY A RESPONSIBLE OFFICIAL. THIS FORM MUST BE SUBMITTED WITH THE ORIGINAL CAAPP PERMIT APPLICATION AND UPDATED ON AN ANNUAL BASIS.

SOURCE INFORMATION

1) SOURCE NAME: Chicago Fuels Terminal, LLC	
2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN): 031600GSF
4) CAAPP PERMIT NUMBER (IF KNOWN):	
5) IS THIS THE FIRST SUBMITTAL OF THIS FORM? ☒ YES ☐ NO IF NO, WHAT IS THE REPORTING PERIOD COVERED BY THIS FORM? ____ / ____ / ____ TO: ____ / ____ / ____	

SOURCE COMPLIANCE INFORMATION

6) DOES THE SIGNATORY OF THIS FORM HEREBY CERTIFY THAT THE SOURCE IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS? ☒ YES ☐ NO IF NO, EXPLAIN:
7) PROVIDE THE SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATION DURING THE PERMIT TERM, E.G., ONCE ANNUALLY IN JANUARY (NOTE THAT SUCH CERTIFICATION MUST BE SUBMITTED NO LESS FREQUENTLY THAN ANNUALLY): As required.
8) INDICATE THE COMPLIANCE STATUS OF THE SOURCE WITH ANY APPLICABLE ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS OF THE CLEAN AIR ACT, E.G., NO ENHANCED MONITORING REQUIRED AND IN COMPLIANCE WITH COMPLIANCE CERTIFICATION REQUIREMENTS: No enhanced monitoring required and in compliance with certification requirements.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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9a) THE FOLLOWING EMISSION UNITS ARE IN COMPLIANCE WITH APPLICABLE REQUIREMENTS SUCH AS EMISSION STANDARDS, EMISSION CONTROL REQUIREMENTS, EMISSION TESTING, COURT REQUIREMENTS, WORK PRACTICES, OR ENHANCED MONITORING, BASED ON THE COMPLIANCE METHODS SPECIFIED BELOW (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-1):

[illegible]

9b) LIST THE EMISSION UNITS THAT WERE NOT IN CONTINUOUS COMPLIANCE SINCE THE LAST REPORTING PERIOD, AND THE REASON(S) FOR NONCOMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-2.):

EMISSION UNIT	REASON(S) FOR NONCOMPLIANCE
N/A	

COMPLIANCE INFORMATION

10) SUMMARY OF METHODS USED TO DETERMINE COMPLIANCE:

a) DESCRIPTION OF TESTING METHODS USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-3.):

See Narrative, Section 1.0.

10b) DESCRIPTION OF MONITORING PROCEDURES USED TO DEMONSTRATE COMPLIANCE, INCLUDING ANY ENHANCED MONITORING REQUIREMENTS OF THE ACT (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-4.):

See Narrative, Section 1.0.

c) DESCRIPTION OF RECORDKEEPING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-5.):

See Narrative, Section 1.0.

10d) DESCRIPTION OF REPORTING USED TO DEMONSTRATE COMPLIANCE (IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 296-6.):

See Narrative, Section 1.0.

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE RETURNED AS INCOMPLETE.

11) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE:

BY:

AUTHORIZED SIGNATURE

TITLE OF SIGNATORY

TYPED OR PRINTED NAME OF SIGNATORY

DATE



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

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Revision #: _____
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Source Designation: _____

**FEE DETERMINATION FOR
CAAPP PERMIT**

FOR AGENCY USE ONLY

ID NUMBER: _____

PERMIT #: _____

DATE: _____

THE DATA PROVIDED ON THIS FORM WILL BE USED TO DETERMINE THE PERMIT FEE. THE EMISSION LEVELS STATED ON THIS FORM CAN ONLY BE USED FOR THE PURPOSE OF PERMIT FEE DETERMINATION IF THE APPLICANT IS WILLING TO ACCEPT THESE LEVELS AS PERMIT SPECIAL CONDITIONS. EMISSIONS DATA PROVIDED ON THIS FORM MUST BE IDENTICAL TO DATA IN THE "PERMITTED EMISSION RATE" COLUMNS PROVIDED ON THE DATA AND INFORMATION FORM FOR INDIVIDUAL EMISSION UNITS OR CONTROL EQUIPMENT. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS 292-1.

SOURCE INFORMATION

1) SOURCE NAME:

DTE Chicago Fuels Terminal, LLC

2) DATE FORM
PREPARED: _____

3) SOURCE ID NO.

(IF KNOWN): 031600GSF

FEE DATA

4) WILL THE SOURCE PAY THE MAXIMUM FEE OF \$250,000.00 PER YEAR? ☐ YES ☒ NO

IF YES, THE REMAINDER OF THIS FORM DOES NOT NEED TO BE COMPLETED.

5) EMISSION UNIT*	NITROGEN OXIDES (NO _x) (TONS/YR)	PARTICULATE MATTER (PART) (TONS/YR)	SULFUR DIOXIDE (SO ₂) (TONS/YR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER** SPECIFY (TONS/YR)
Material Handling		60.1			
Diesel Engines	63.68	3.74	8.70	10.49	

*EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND INFORMATION FORM.

**OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCL, ETC.

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

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5) (CONTINUED) EMISSION UNIT*	NITROGEN OXIDES (NO _x) (TONS/YR)	PARTICULATE MATTER (PART) (TONS/YR)	SULFUR DIOXIDE (SO ₂) (TONS/YR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER** SPECIFY (TONS/YR)

*EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND INFORMATION FORM.

**OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCl, ETC.

6) SUBTOTAL	63.68	63.84	8.70	10.49	0.00

7) FUGITIVE					

8) TOTAL	A 63.68	B 63.84	C 8.70	D 10.49	E 0.00

9) GRAND TOTAL - ADD BOXES A THROUGH E (TONS/YR):	146.71

10) CALCULATED PERMIT FEE - IF GRAND TOTAL IN ITEM 9 ABOVE IS > 100 TONS/YR THEN MULTIPLY GRAND TOTAL BY \$18.00 AND ENTER, OTHERWISE ENTER \$1,800.00:	\$2,640.78

11) MINIMUM PERMIT FEE IS \$1,800.00 PER YEAR - MAXIMUM PERMIT FEE IS \$250,000.00 PER YEAR. IF THE CALCULATED PERMIT FEE IN ITEM 10 ABOVE IS BETWEEN THESE TWO FEE AMOUNTS THEN ENTER HERE, OTHERWISE ENTER THE MINIMUM OR MAXIMUM PERMIT FEE, WHICHEVER IS APPLICABLE. THIS IS THE ACTUAL ANNUAL PERMIT FEE:	\$2,640.78

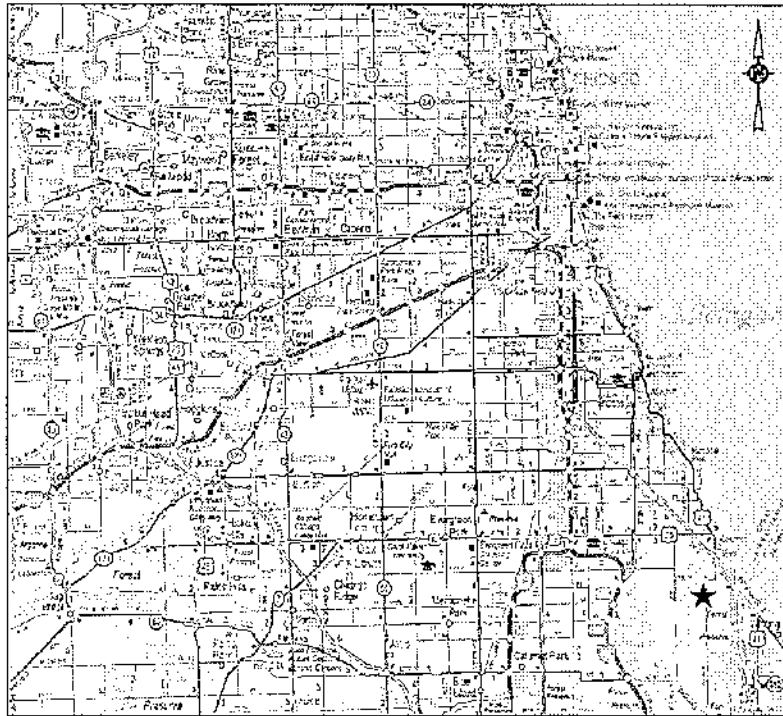
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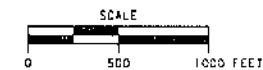
KM00000287



REGIONAL MAP



SITE MAP



ISSUE DATE
11-25-2008

figure 1



Source: DTE Chicago Fuels Terminal

SITE LOCATION MAP
OPERATING PERMIT APPLICATION
DTE Chicago Fuels Terminal, LLC

10/25/2011, Jan 20th, 11

KM00000288

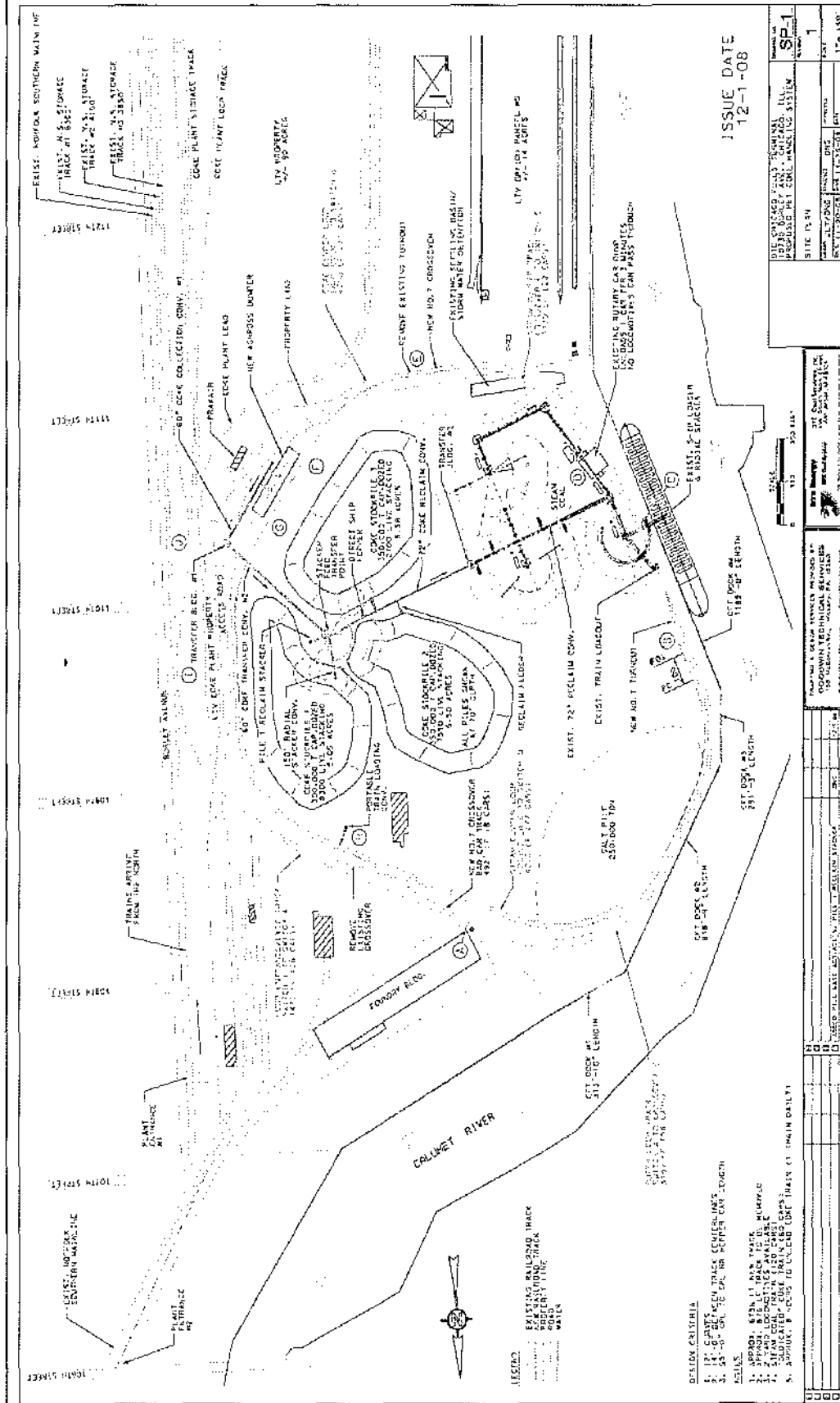


figure 2



Source: DTE Chicago Fuels Terminal

SITE LAYOUT MAP
OPERATING PERMIT APPLICATION
DTE Chicago Fuels Terminal, LLC

DTE CFT Naming Convention & Proposed Layout

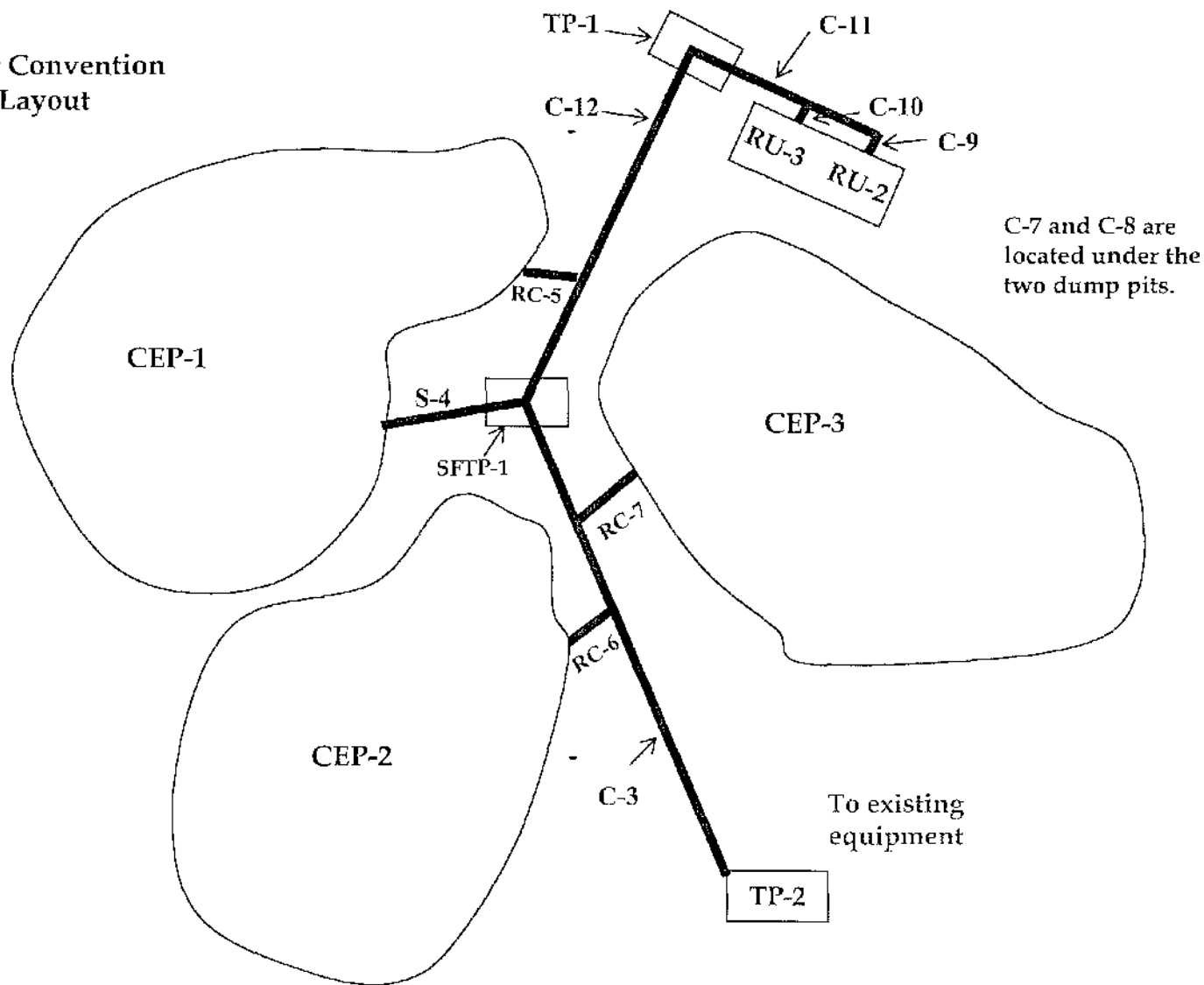
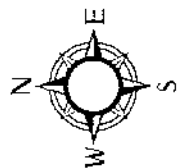


figure 4

Source: DTE Chicago Fuels Terminal, LLC



PROCESS FLOW DIAGRAM - PROPOSED
OPERATING PERMIT APPLICATION
DTE Chicago Fuels Terminal, LLC

052450 (01a), Jan 2009, F4

KM00000291

TABLE 1
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Unloading Emissions													
BU-1 to SP-1 (Salt)	3,500	30,660,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	20.94	3.82	9.90	1.81
BU-1 to C-(1-6) (Petcoke)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.59	0.29	0.73	0.14
RU-1 to C-1 (Petcoke)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.59	0.29	0.73	0.14
TU-1 to C-(1-6) (Petcoke)	252	2,207,520	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.51	0.28	0.71	0.13
RU-1 to C-1 (Coal)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Baghouse	90.0%	0.32	0.06	0.15	0.03
BU-1 to C-(1-6) (Coal)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.59	0.29	0.73	0.14
TU-1 to C-(1-6) (Coal)	252	2,207,520	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.51	0.28	0.71	0.13
RU-1 to C-7 (Coal)	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
RU-2 to C-8 (Coal)	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
Emissions From Unloading: Total>>										53.0	9.7	25.1	4.6
Conveyor Transfer Point Emissions													
C-1 to C-2	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-2 to S-1	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
C-3 to C-2	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
C-6 to S-3	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-1 to C-4	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-4 to C-5	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-5 to S-2	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
RC-1 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-2 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-3 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55

TABLE 1
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
RC-4 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
C-7 to C-9	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-8 to C-10	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-9 to C-11	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-10 to C-11	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-11 to TP-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
TP-1 to C-12	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-12 to SFTP-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
SFTP-1 to S-4	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
DSH-1 to C-13	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
RC-5 to C-13	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
RC-6 to C-13	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
RC-7 to C-13	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
C-13 to TP-2	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
Emissions From Transfer Points Total>>										344.0	62.8	162.7	29.7
Portable Equipment Emissions													
PC-1 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-2 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-3 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-4 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-5 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65

TABLE 1
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
PC-6 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-7 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-8 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PFH-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PF-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
RPS-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
RPCS-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
RPS-1	140	613,200	1.000	0.500	0.00067	0.00034	lbs/ton	Moisture Content	50.0%	1.13	0.10	0.57	0.05
RPCS-1	140	613,200	4.900	1.500	0.00330	0.00101	lbs/ton	Moisture Content	50.0%	5.55	0.51	1.70	0.15
Emissions From Portable Conveyor Transfer Points Total>>										186.2	17.0	87.2	8.0
Stacker Emissions													
S-1 to CLP-5	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
S-1 CLP-4	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
S-2 to CLP-2	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-2 CLP-3	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-3 to CLP-1	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-3 to CLP-4	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-4 to CEP-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
S-4 to CEP-2	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
S-4 to CEP-3	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
S-4 to DSH-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
Stacker Emissions: Total>>										155.5	28.4	73.6	13.4

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TABLE 1
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Loadout Emissions Emissions													
Salt Loadout to TL-1	550	4,818,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	3.20	0.60	1.56	0.28
Coal Loadout to RL-1	475	4,161,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.84	0.52	1.34	0.25
Coal Loadout to BL-1	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
Coal Loadout to TL-2	550	4,818,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	3.29	0.60	1.56	0.28
Coke Loadout to BL-1	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
Loadout Emissions: Total>>										57.3	10.5	27.1	4.9
Facility Total>>										795.9	128.3	375.6	60.6

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 24 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservative in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

Assumptions:

BACKGROUND DATA

Coal moisture content (weighted average) : 18.3%

Silt content of coal = 5.0%

Operating Schedule = 24 hours/day

Operating Schedule = 365 days/year

Operating Schedule = 8,760 hours/year

Mean wind speed = 16.4 mph

TABLE 2

FUGITIVE POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Storage Pile Emissions													
CLP-1 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-2 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-3 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-4 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-5 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-6 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-1	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-2	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-3	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
SP-1 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	33.89	6.18	16.94	3.09
Storage Pile Emissions: Total>>										1253.8	228.8	626.9	114.4
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer ⁴	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-2 Loaded by Dozer/End Loader ⁴	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-3 Loaded by Dozer ⁴	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-4 Loaded by Dozer ⁴	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
Front End Loader ⁵ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	254.65	46.47	65.69	11.99
Front End Loader ⁵ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	254.65	46.47	65.69	11.99
RC-5 Loaded by Dozer ⁴	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
RC-6 Loaded by Dozer ⁴	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
RC-7 Loaded by Dozer ⁴	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
Reclaim Belt Loading Emissions: Total>>										605.0	110.4	176.7	32.2

TABLE 2

FUGITIVE POTENTIAL TO EMIT CALCULATIONS

Roadway Emissions													
Inbound Coal Truck Traffic ⁵	N/A	N/A	4.900	1.500	0.0	0.0	lbs/VMT	Fugitive Dust Management Plan	75.0%	0.00	0.00	0.00	0.00
Outbound Coal Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	0.0	lbs/VMT	Fugitive Dust Management Plan	75.0%	1244.31	227.09	0.00	0.00
Outbound Salt Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	0.0	lbs/VMT	Fugitive Dust Management Plan	75.0%	1244.31	227.09	0.00	0.00
Roadway Emissions: Total>>										2483.6	454.2	0.0	0.0
Facility Total>>										4347.5	793.4	803.6	146.7

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 24 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Mean Wind Speed (U) (estimate).
4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
5. Emission factor for unpaved road emissions calculated per Equation AP-42 Section 13.2.2, Unpaved Roads.
6. From National Weather Service (estimate).
7. From Air Pollution Engineering Manual and References.

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TABLE 2

FUGITIVE POTENTIAL TO EMIT CALCULATIONS

Assumptions:**COAL BACKGROUND DATA**

Coal moisture content (weighted average): 18.3%

Silt content of coal = 5.0%

END LOADER/DOZER OPERATIONS

Front End Loaders/Dozer (Storage Piles) = 24 hours/day

Front End Loaders/Dozer (Reclaim) = 24 hours/day

Operating Schedule = 24 hours/day

Operating Schedule = 365 days/year

Operating Schedule = 8,760 hours/year

Front End Loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 120.0 miles

VMT of Front End Loader/Dozer (Reclaim) = 120.0 miles

Front End Loader/Dozer Average Weight (Cat 980) = 39 tons

STORAGE PILE INFORMATION

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Salt) = 10.0 acres

Days in storage pile = 365 days

Number of days⁶ with rain > 0.01 inch = 117 daysMean wind speed³ = 16.4 mphPercent of time⁷ winds > 12 mph = 34.0%**INBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility input= 35,040,000 tons/year

Maximum truck loadout= 4,415,040 tons/year

Number of coal trucks= 315,360 trucks/year

Miles per trip= 0.8 miles

Miles per day= 101.3 miles/day

Miles per year= 252,288 miles/year

OUTBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 35,040,000 tons/year

Maximum truck delivery= 4,618,000 tons/year

Number of coal trucks= 344,143 trucks/year

Miles per trip= 0.8 miles

Miles per day= 754.3 miles/day

Miles per year= 275,314 miles/year

SALT HAULING TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 4,818,000 tons/year

Maximum truck loading= 4,818,000 tons/year

Number of coal trucks= 344,143 trucks/year

Miles per trip= 0.8 miles

Miles per day= 754.3 miles/day

Miles per year= 275,314 miles/year

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
RC-4 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66
C-7 to C-9	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-8 to C-10	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-9 to C-11	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-10 to C-11	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-11 to TP-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
TP-1 to C-12	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-12 to SFTP-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
SFTP-1 to S-4	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
DSH-1 to C-13	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
RC-5 to C-13	1,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	1.40	1.41	0.66
RC-6 to C-13	1,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	1.40	1.41	0.66
RC-7 to C-13	1,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	1.40	1.41	0.66
C-13 to TP-2	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
Emissions From Transfer Points Total>>										172.0	33.7	81.3	15.9
Portable Conveyor Emissions													
PC-1 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-2 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-3 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-4 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-5 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-6 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32

TABLE 5
MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
PC-7 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-8 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PFH-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PI-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
RPS-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
RPCS-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
RPS-1	140	306,600	1.000	0.500	0.00067	0.00034	lbs/ton	Moisture Content	50.0%	0.57	0.05	0.28	0.03
RPCS-1	140	306,600	4.900	1.500	0.00330	0.00101	lbs/ton	Moisture Content	50.0%	2.77	0.25	0.85	0.08
Emissions From Portable Conveyor Transfer Points Total>>										93.1	8.5	43.6	4.0
Stacker Emissions													
S-1 to CLP-5	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
S-1 CLP-4	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
S-2 to CLP-2	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-2 CLP-3	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-3 to CLP-1	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-3 to CLP-4	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-4 to CEP-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
S-4 to CEP-2	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
S-4 to CEP-3	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
S-4 to DSM-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
Stacker Emissions: Total>>										77.8	14.0	36.8	6.6

TABLE 3
POTENTIAL TO EMIT CALCULATIONS
DIESEL GENERATORS

Unit	Prime Power (hp)	Maximum Material Handling Rate (tons/hr)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^a	PM ^a	PM ₁₀ ^d	VOM ^b
			0.015	0.01870	0.00205	0.0009	0.0009	0.00247
Emissions (lbs/hr)								
Portable Conveyor 1 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 2 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 3 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 4 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 5 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Feed Hopper ^c (Skid mounted)	118	2,500	1.77	2.21	0.24 ¹	0.10	0.10	0.29
Portable Diesel Feeder (Track Mounted)	400	2,500	6.00	7.48	0.82	0.35	0.35	0.99
Portable Conveyor (Skid Mounted)	375	2,500	5.63	7.01	0.77	0.33	0.33	0.93
Rental Portable Screen (Wheel Mounted)	40	140	0.60	0.75	0.08	0.04	0.04	0.10
Rental Portable Crusher/Screen (Track Mounted)	300	140	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Diesel Water Pump	20	N/A	0.30	0.37	0.04	0.02	0.02	0.05
Emissions (tons/yr) ^c			159.27	198.55	21.77	9.34	9.34	26.23

Maximum Emissions Assumptions:

^a Calculated using NSPS emission factors for stationary combustion sources

^b Calculated using low sulfur diesel fuel (20 ppm) and emission factor from AP-42
Section 3.3, Gasoline and Diesel Industrial Engines, Table 3.3-1.

^c Hours of operation

8,760 hr/yr

500 hr/yr

(For emergency diesel water pump only.)

^d It is assumed that PM₁₀ emissions are equal to PM.

TABLE 3A

POTENTIAL TO EMIT HAP CALCULATIONS
DIESEL GENERATORS

CAS No.	Pollutant	Diesel Engines		
		Emission Factor ^a (lb/hp-hr)	Emission Rate ^b (lb/hr)	Emission Rate ^c (ton/yr)
71-43-2	Benzene	6.56E-06	1.60E-02	7.02E-02
108-88-3	Toluene	2.88E-06	7.02E-03	3.08E-02
1330207	Xylene	2.00E-06	4.89E-03	2.14E-02
106-99-0	1,3-Butadiene	2.75E-07	6.71E-04	2.94E-03
50-00-0	Formaldehyde	8.29E-06	2.03E-02	8.88E-02
75070	Acetaldehyde	5.39E-06	1.32E-02	5.77E-02
107028	Acrolein	6.50E-07	1.59E-03	6.96E-03
91-20-3	Naphthalene	5.96E-07	1.46E-03	6.38E-03
HAP Totals:			6.51E-02	2.85E-01

^a AP-42, Fifth Edition, Volume I, Section 3.3, Gasoline and Industrial Engines (October 1996)

^b Diesel Fuel-Fired Engines maximum heat input 2443 Horsepower

^c Diesel Fuel-Fired Engines maximum hours of operation 8760 hr/yr

Emission Factor Conversion Factor 0.007

Calculated by dividing the emission factor for Nox (lb/hp-hr) into the Nox emission factor (lb/MMBtu). This provides a conversion factor for use with HAP emission calculation.

$0.031 \text{ lb/hp-hr} / 4.41 \text{ lb/MMBtu} = 0.007$

TABLE 4

PTE EMISSIONS SUMMARY

Emission Point	Emissions (tpy)					
	NO _x	CO	SO ₂	PM	PM ₁₀	VOM
Process				128.27	60.59	
Generator	159.27	198.55	21.77	9.34	9.34	26.23
Total	159.27	198.55	21.77	137.62	69.93	26.23

TABLE 5
MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Unloading Emissions													
BU-1 to SP-1 (Salt)	3,500	250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	10.47	0.03	4.95	0.01
BU-1 to C-(1-6) (Petcoke)	266	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.23	0.38	0.11
RU-1 to C-1 (Petcoke)	266	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.23	0.38	0.11
TU-1 to C-(1-6) (Petcoke)	252	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.23	0.36	0.11
RU-1 to C-1 (Coal)	266	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Baghouse	90.0%	0.16	0.05	0.08	0.02
BU-1 to C-(1-6) (Coal)	0	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.00	0.23	0.00	0.11
TU-1 to C-(1-6) (Coal)	252	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.23	0.36	0.11
RU-1 to C-7 (Coal)	2,000	1,633,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.23	2.93	0.11
RU-2 to C-8 (Coal)	2,000	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.23	2.63	0.11
Emissions From Unloading : Total >>										25.7	1.7	12.2	0.8
Conveyor Transfer Point Emissions													
C-1 to C-2	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-2 to S-1	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
C-3 to C-2	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
C-6 to S-3	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-1 to C-4	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-4 to C-5	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-5 to S-2	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
RC-1 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66
RC-2 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66
RC-3 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<i>Loadout Emissions Emissions</i>													
Salt Loadout to TL-1	550	250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.03	0.78	0.01
Coal Loadout to RL-1	475	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.42	0.34	0.67	0.16
Coal Loadout to BL-1	4,000	7,150,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.89	5.66	0.42
Coal Loadout to TL-2	550	1,100,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.14	0.78	0.06
Coke Loadout to BL-1	4,000	7,150,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.89	5.66	0.42
<i>Loadout Emissions: Total>></i>										25.6	2.3	13.5	1.1
<i>Facility Total>></i>										397.2	60.1	187.4	28.4

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 12 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservative in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

The facility throughput is limited to the amount in the construction permit.
This application requests that these limits be included in the FESOP.

Assumptions:**BACKGROUND DATA**

Coal moisture content (weighted average) : 18.3%
 Silt content of coal = 5.0%
 Operating Schedule = 12 hours/day
 Operating Schedule = 365 days/year
 Operating Schedule = 4,380 hours/year
 Mean wind speed = 16.4 mph

TABLE 6
MAXIMUM FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Storage Pile Emissions													
CLP-1 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-2 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-3 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-4 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-5 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-6 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-1	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-2	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-3	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
SP-1 ⁷	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	33.89	6.18	16.94	3.09
Storage Pile Emissions: Total>>										1253.5	228.8	626.9	114.4
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer ¹	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
RC-2 Loaded by Dozer/End Loader ¹	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
RC-3 Loaded by Dozer ¹	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
RC-4 Loaded by Dozer ¹	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
Front End Loader ³ Roadway Emissions	N/A	N/A	4.900	1.500	6.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	23.24	32.85	5.99
Front End Loader ⁵ Roadway Emissions	N/A	N/A	4.900	1.500	6.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	23.24	32.85	5.99
RC-5 Loaded by Dozer ¹	2,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.34	2.83	0.16
RC-6 Loaded by Dozer ¹	1,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.34	1.41	0.16
RC-7 Loaded by Dozer ¹	1,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.34	1.41	0.16
Reclaim Belt Loading Emissions: Total>>										302.5	48.9	89.3	13.1

Roadway Emissions													
Inbound Coal Truck Traffic ¹	N/A	N/A	4,900	1,500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	284.09	51.85	73.29	13.37
Outbound Coal Truck Traffic ²	N/A	N/A	4,900	1,500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	284.09	51.85	73.29	13.37
Outbound Salt Truck Traffic ⁵	N/A	N/A	4,900	1,500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	64.57	11.78	16.66	3.04
Roadway Emissions: Total>>										632.7	115.5	163.2	29.8
Facility Total>>										2189.1	393.2	878.5	157.3

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 12 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Mean Wind Speed (U) (estimate).
4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
5. Emission factor for unpaved road emissions calculated per Equation AP-42 Section 13.2.2, Unpaved Roads.
6. From National Weather Service (estimate).
7. From Air Pollution Engineering Manual and References.

Assumptions:

COAL BACKGROUND DATA

Coal moisture content (weighted average) = 18.3%

Silt content of coal = 5.0%

END LOADER/DOZER OPERATIONS

Front End Loaders/Dozer (Storage Piles) = 12 hours/day

Front End Loaders/Dozer (Reclaim) = 12 hours/day

Operating Schedule = 12 hours/day

Operating Schedule = 365 days/year

Operating Schedule = 4,380 hours/year

Front End Loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 60.0 miles

VMT of Front End Loader/Dozer (Reclaim) = 60.0 miles

Front End Loader/Dozer Average Weight (Cat 980) = 39 tons

STORAGE PILE INFORMATION

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Salt) = 10.0 acres

Days in storage pile = 365 days

Number of days¹ with rain > 0.01 inch = 117 days

Mean wind speed² = 16.4 mph

Percent of time³ winds > 12 mph = 34.0%

INBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility inputs= 11,000,000 tons/year

Maximum truck loadout= 1,100,000 tons/year

Number of coal trucks= 78,571 trucks/year

Miles per trip= 0.8 miles

Miles per day= 172.2 miles/day

Miles per year= 62,857 miles/year

OUTBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 11,000,000 tons/year

Maximum truck delivery= 1,100,000 tons/year

Number of coal trucks= 78,571 trucks/year

Miles per trip= 0.8 miles

Miles per day= 172.2 miles/day

Miles per year= 62,857 miles/year

SALT HAULING TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 250,000 tons/year

Maximum truck loading= 250,000 tons/year

Number of coal trucks= 17,857 trucks/year

Miles per trip= 0.8 miles

Miles per day= 39.1 miles/day

Miles per year= 14,286 miles/year

TABLE 7

MAXIMUM EMISSION CALCULATIONS
DIESEL GENERATORS

Unit	Prime Power (hp)	Maximum Material Handling Rate (tons/hr)	Emission Factor (lb/hp-hr)					
			NOx ^a	CO ^a	SO ₂ ^a	PM ^a	PM ₁₀ ^d	VOM ^b
			0.015	0.01870	0.00205	0.0009	0.0009	0.00247
Emissions (lbs/hr)								
Portable Conveyor 1 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 2 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 3 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 4 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 5 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Feed Hopper (Skid mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Diesel Feeder (Track Mounted)	400	2,500	6.00	7.48	0.82	0.35	0.35	0.99
Portable Conveyor (Skid Mounted)	375	2,500	5.63	7.01	0.77	0.33	0.33	0.93
Rental Portable Screen (Wheel Mounted)	40	140	0.60	0.75	0.08	0.04	0.04	0.10
Rental Portable Crusher/Screen (Track Mounted)	300	140	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Diesel Water Pump	20	N/A	0.30	0.37	0.04	0.02	0.02	0.05
Emissions (tons/yr) ^c			63.68	79.39	8.70	3.74	3.74	10.49

Maximum Emissions Assumptions:

^a Calculated using NSPS emission factors for stationary combustion sources

^b Calculated using low sulfur diesel fuel (20 ppm) and emission factor from AP-42
Section 3.3, Gasoline and Diesel industrial engines, Table 3.3-1.

^c Hours of operation

3,500 hr/yr

500 hr/yr

(For emergency diesel water pump only.)

^d It is assumed that PM₁₀ emissions are equal to PM.

TABLE 8

MAXIMUM EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (tpy)</i>					
	<i>NO_x</i>	<i>CO</i>	<i>SO₂</i>	<i>PM</i>	<i>PM₁₀</i>	<i>VOM</i>
Process				60.14	28.40	
Fugitive				393.17	157.33	
Generator	63.68	79.39	8.70	3.74	3.74	10.49
Total	63.68	79.39	8.70	457.05	189.46	10.49

TABLE 8A

FESOP REQUESTED LIMITATION AND
FEE ALLOWABLE EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (tpy)</i>					
	<i>NO_x</i>	<i>CO</i>	<i>SO₂</i>	<i>PM</i>	<i>PM₁₀</i>	<i>VOM</i>
Process				60.14	28.40	
Generator	63.68	79.39	8.70	3.74	3.74	10.49
Total	63.68	79.39	8.70	63.87	32.14	10.49

Based on limiting diesel engine operation to 4,000 hours per year of operation.

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Unloading Emissions													
BU-1 to SP-1 (Salt)	3,500	175,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	10.47	0.02	4.95	0.01
BU-1 to C-(1-6) (Petcoke)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.10	0.38	0.05
RU-1 to C-1 (Petcoke)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.10	0.38	0.05
TU-1 to C-(1-6) (Petcoke)	252	786,240	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.10	0.36	0.05
RU-1 to C-1 (Coal)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Baghouse	90.0%	0.16	0.02	0.08	0.01
BU-1 to C-(1-6) (Coal)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.10	0.38	0.05
TU-1 to C-(1-6) (Coal)	252	786,240	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.10	0.36	0.05
RU-1 to C-7 (Coal)	2,000	6,240,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.78	2.83	0.37
RU-2 to C-8 (Coal)	2,000	6,240,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.78	2.83	0.37
Emissions From Unloading: Total>>										26.5	2.1	12.5	1.0
Conveyor Transfer Point Emissions													
C-1 to C-2	2,500	7,800,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.97	3.54	0.46
C-2 to S-1	4,000	12,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
C-3 to C-2	4,000	12,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
C-6 to S-3	2,500	7,800,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
C-1 to C-4	2,500	7,800,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
C-4 to C-5	2,500	7,800,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
C-5 to S-2	2,500	7,800,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
RC-1 to C-3	3,000	9,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12
RC-2 to C-3	3,000	9,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12
RC-3 to C-3	3,000	9,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12

TABLE 9
TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
RC-4 to C-3	3,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12
C-7 to C-9	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-8 to C-10	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-9 to C-11	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-10 to C-11	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-11 to TP-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
TP-1 to C-12	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-12 to SFTP-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
SFTP-1 to S-4	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
DSH-1 to C-13	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
RC-5 to C-13	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
RC-6 to C-13	1,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.25	1.41	0.12
RC-7 to C-13	1,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.25	1.41	0.12
C-13 to TP-2	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
Emissions From Transfer Points Total>>										175.0	6.7	82.8	3.2
Portable Conveyor Emissions													
PC-1 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-2 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-3 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-4 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-5 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
PC-6 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-7 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-8 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PFH-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PF-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
RPS-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
RPCS-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
RPS-1	140	218,400	1.000	0.500	0.00067	0.00034	lbs/ton	Moisture Content	50.0%	0.57	0.04	0.28	0.02
RPCS-1	140	218,400	4.900	1.500	0.00330	0.00101	lbs/ton	Moisture Content	50.0%	2.77	0.18	0.85	0.06
Emissions From Portable Conveyor Transfer Points Total>>										93.1	6.0	43.6	2.8
Stacker Emissions													
S-1 to CLP-5	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
S-1 CLP-4	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
S-2 to CLP-2	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-2 CLP-3	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-3 to CLP-1	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-3 to CLP-4	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-4 to CEP-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
S-4 to CEP-2	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
S-4 to CEP-3	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
S-4 to DSH-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
Stacker Emissions: Total>>										77.8	2.5	36.8	1.2

TABLE 9

TYPICAL PROCESS UNIT'S EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Loadout Emissions Emissions													
Salt Loadout to TL-1	550	250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.03	0.78	0.01
Coal Loadout to RL-1	475	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.42	0.06	0.67	0.03
Coal Loadout to BL-1	4,000	1,300,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.16	5.66	0.08
Coal Loadout to TL-2	550	200,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.02	0.78	0.01
Coke Loadout to BL-1	4,000	1,300,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.16	5.66	0.08
Loadout Emissions: Total>>										28.6	0.4	13.5	0.2
Facility Total>>										401.0	17.8	189.2	8.4

1. The hourly rate is determined from the annual rate divided by 260 days. This number is then divided by an 8 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservative in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

Assumptions:**BACKGROUND DATA**

Coal moisture content (weighted average) : 18.3%
 Silt content of coal = 5.0%
 Operating Schedule = 12 hours/day
 Operating Schedule = 260 days/year
 Operating Schedule = 3,120 hours/year
 Mean wind speed = 16.4 mph

TABLE 10

TYPICAL FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Storage Pile Emissions													
CLP-1 ²	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-2 ²	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-3 ²	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-4 ²	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-5 ²	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-6 ²	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-1	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-2	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-3	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
SP-1 ²	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	33.89	6.18	16.94	3.09
Storage Pile Emissions: Total>>										1253.8	228.5	626.9	114.4
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer ⁴	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
RC-2 Loaded by Dozer/End Loader ⁴	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
RC-3 Loaded by Dozer ⁴	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
RC-4 Loaded by Dozer ⁴	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
Front End Loader ³ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	16.55	32.85	4.27
Front End Loader ³ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	16.55	32.85	4.27
RC-5 Loaded by Dozer ⁴	2,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.06	2.83	0.03
RC-6 Loaded by Dozer ⁴	1,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.06	1.41	0.03
RC-7 Loaded by Dozer ⁴	1,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.06	1.41	0.03
Reclaim Belt Loading Emissions: Total>>										302.5	33.5	88.3	8.7

TABLE 10

TYPICAL FUGITIVE EMISSIONS CALCULATIONS

Roadway Emissions													
Inbound Coal Truck Traffic ⁵	N/A	N/A	4,900	1,500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	72.51	9.43	18.71	2.43
Outbound Coal Truck Traffic ⁵	N/A	N/A	4,900	1,500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	72.51	9.43	18.71	2.43
Outbound Salt Truck Traffic ⁵	N/A	N/A	4,900	1,500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	63.45	8.25	16.37	2.13
Roadway Emissions: Total>>										208.5	27.1	53.8	7.0
Facility Total>>										1764.8	289.5	769.0	130.2

1. The hourly rate is determined from the annual rate divided by 260 days. This number is then divided by an 8 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Mean Wind Speed (U) (estimate).
4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
5. Emission factor for unpaved road emissions calculated per Equation AP-42 Section 13.2.2, Unpaved Roads.
6. From National Weather Service (estimate).
7. From Air Pollution Engineering Manual and References.

TABLE 10

TYPICAL FUGITIVE EMISSIONS CALCULATIONS

Assumptions:**COAL BACKGROUND DATA**

Coal moisture content (weighted average) = 18.3%

Silt content of coal = 5.0%

END LOADER/DOZER OPERATIONS

Front End Loaders/Dozer (Storage Piles) = 12 hours/day

Front End Loaders/Dozer (Reclaim) = 12 hours/day

Operating Schedule = 12 hours/day

Operating Schedule = 260 days/year

Operating Schedule = 3,120 hours/year

Front End Loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 60.0 miles

VMT of Front End Loader/Dozer (Reclaim) = 60.0 miles

Front End Loader/Dozer Average Weight (Cat 980) = 39 tons

STORAGE PILE INFORMATION

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Salt) = 10.0 acres

Days in storage pile = 365 days

Number of days⁶ with rain > 0.01 inch = 117 daysMean wind speed³ = 16.4 mphPercent of time⁷ winds > 12 mph = 34.0%**INBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility input= 2,000,000 tons/year

Maximum truck loadout= 200,000 tons/year

Number of coal trucks= 14,286 trucks/year

Miles per trip= 0.8 miles

Miles per day= 44.0 miles/day

Miles per year= 11,429 miles/year

OUTBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 2,000,000 tons/year

Maximum truck delivery= 200,000 tons/year

Number of coal trucks= 14,286 trucks/year

Miles per trip= 0.8 miles

Miles per day= 44.0 miles/day

Miles per year= 11,429 miles/year

SALT HAULING TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 175,000 tons/year

Maximum truck loading= 175,000 tons/year

Number of coal trucks= 12,500 trucks/year

Miles per trip= 0.8 miles

Miles per day= 38.5 miles/day

Miles per year= 10,000 miles/year

TABLE 11

TYPICAL EMISSION CALCULATIONS
DIESEL GENERATORS

Unit	Prime Power (hp)	Maximum Material Handling Rate (tons/hr)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^a	PM ^a	PM ₁₀ ^d	VOM ^b
			0.015	0.01870	0.00205	0.0009	0.0009	0.00247
Emissions (lbs/hr)								
Portable Conveyor 1 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 2 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 3 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 4 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 5 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Feed Hopper (Skid mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Diesel Feeder (Track Mounted)	400	2,500	6.00	7.48	0.82	0.35	0.35	0.99
Portable Conveyor (Skid Mounted)	375	2,500	5.63	7.01	0.77	0.33	0.33	0.93
Rental Portable Screen (Wheel Mounted)	40	140	0.60	0.75	0.08	0.04	0.04	0.10
Rental Portable Crusher/Screen (Track Mounted)	300	140	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Diesel Water Pump	20	N/A	0.30	0.37	0.04	0.02	0.02	0.05
Emissions (tons/yr) ^c			27.30	34.03	3.73	1.60	1.60	4.49

Maximum Emissions Assumptions:

^a Calculated using NSPS emission factors for stationary combustion sources^b Calculated using low sulfur diesel fuel (20 ppm) and emission factor from AP-42
Section 3.3, Gasoline and Diesel Industrial Engines, Table 3.3-1.^c Hours of operation

1,500 hr/yr

250 hr/yr

(For emergency diesel water pump only.)

^d It is assumed that PM₁₀ emissions are equal to PM.

TABLE 12

TYPICAL EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (tpy)</i>					
	<i>NO_x</i>	<i>CO</i>	<i>SO₂</i>	<i>PM</i>	<i>PM₁₀</i>	<i>VOM</i>
Process				17.79	8.39	
Generator	27.30	34.03	3.73	1.60	1.60	4.49
Total	27.30	34.03	3.73	19.40	9.99	4.49

TABLE 13
LISTING OF EMISSION UNITS

<i>Process Equipment</i>	<i>Unit Designation</i>	<i>DTE Designation</i>	<i>Submittal</i>
<u>Unloading Operations</u>			
Barge Unloader	BU-1		Existing
Rail Unloader 1	RU-1		Existing
Truck Unloader	TU-1		Existing
Rail Unloader 2	RU-2	Railcar 1 Unloading	Proposed
Rail Unloader 3	RU-3	Railcar 2 Unloading	Proposed
<u>Conveyor Operations</u>			
Conveyor 1	C-1		Existing
Conveyor 2	C-2		Existing
Conveyor 3	C-3		Existing
Conveyor 4	C-4		Existing
Conveyor 5	C-5		Existing
Conveyor 6	C-6		Existing
Conveyor 7	C-7	Railcar 1 Conveyor Belt	Proposed
Conveyor 8	C-8	Railcar 2 Conveyor Belt	Proposed
Conveyor 9	C-9	Perpendicular Conveyor Belt 1	Proposed
Conveyor 10	C-10	Perpendicular Conveyor Belt 2	Proposed
Conveyor 11	C-11	Conveyor Belt 1	Proposed
Conveyor 12	C-12	Conveyor Belt 2	Proposed
Conveyor 13	C-13	Conveyor 3 (72" Coke Reclaim)	Proposed
Reclaim Conveyor 1	RC-1		Existing
Reclaim Conveyor 2	RC-2		Existing
Reclaim Conveyor 3	RC-3		Existing
Reclaim Conveyor 4	RC-4		Existing
Reclaim Conveyor 5	RC-5	Reclaim Feeder 1	Proposed
Reclaim Conveyor 6	RC-6	Reclaim Feeder 2	Proposed
Reclaim Conveyor 7	RC-7	Reclaim Feeder 3	Proposed
Portable Conveyor 1	PC-1		Proposed
Portable Conveyor 2	PC-2		Proposed
Portable Conveyor 3	PC-3		Proposed
Portable Conveyor 4	PC-4		Proposed
Portable Conveyor 5	PC-5		Proposed
Portable Conveyor 6	PC-6	Portable Conveyor (Skid Mounted)	Proposed
Portable Conveyor 7	PC-7	Portable Conveyor (Wheel Mounted)	Proposed
Portable Conveyor 8	PC-8	Portable Conveyor (Wheel Mounted)	Proposed
<u>Transfer Hopper Operations</u>			
Direct Ship Hopper 1	DSH-1	Direct Ship Hopper	Proposed
Portable Feed Hopper	PFH-1	Portable Feed Hopper	Proposed
Portable Feeder	PF-1	Portable Feeder	Proposed
Rental Portable Screen	RPS-1	Rental Portable Screen	Proposed
Rental Portable Crusher/Screen	RPCS-1	Rental Portable Crusher/Screen	Proposed
Transfer Point 1	TP-1	Transfer Point 1	Proposed
Transfer Point 2	TP-2	Transfer Point 2	Proposed
Stacker Feed Transfer Point	SFTP-1	Stacker Feed Transfer Point	Proposed

TABLE 13
LISTING OF EMISSION UNITS

<i>Process Equipment</i>	<i>Unit Designation</i>	<i>DTE Designation</i>	<i>Submittal</i>
<u>Stacker Operations</u>			
Stacker 1	S-1		Existing
Stacker 2	S-2		Existing
Stacker 3	S-3		Existing
Stacker 4	S-4	150' Radial Stacker Conveyor	Proposed
<u>Loadout Operations</u>			
Salt Loadout to Truck	TL-1		Existing
Coal Loadout to Rail	RL-1		Existing
Coal Loadout to Barge	BL-1		Existing
Coal Loadout to Truck	TL-1		Existing
<u>Storage Pile Operations</u>			
Coal Pile 1	CLP-1		Existing
Coal Pile 2	CLP-2		Existing
Coal Pile 3	CLP-3		Existing
Coal Pile 4	CLP-4		Existing
Coal Pile 5	CLP-5		Existing
Coal Pile 6	CLP-6		Existing
Salt Pile 1	SP-1		Existing
Coke Pile 1	CEP-1		Proposed
Coke Pile 2	CEP-2		Proposed
Coke Pile 3	CEP-3		Proposed
<u>Diesel Generators</u>			
Diesel Generator - 118 HP (1)	DG-1	Portable Conveyor 1	Proposed
Diesel Generator - 118 HP (2)	DG-2	Portable Conveyor 2	Proposed
Diesel Generator - 118 HP (3)	DG-3	Portable Conveyor 3	Proposed
Diesel Generator - 118 HP (4)	DG-4	Portable Conveyor 4	Proposed
Diesel Generator - 118 HP (5)	DG-5	Portable Conveyor 5	Proposed
Diesel Generator - 118 HP (6)	DG-6	Portable Feed Hopper	Proposed
Diesel Generator - 400 HP (7)	DG-7	Portable Diesel Feeder	Proposed
Diesel Generator - 375 HP (8)	DG-8	Portable Conveyor 6	Proposed
Diesel Generator - 40 HP (9)	DG-9	Rental Portable Screen	Proposed
Diesel Generator - 300 HP (10)	DG-10	Rental Portable Crusher/Screen	Proposed
Diesel Generator - 300 HP (11)	DG-11	Portable Conveyor 7	Proposed
Diesel Generator - 300 HP (12)	DG-12	Portable Conveyor 8	Proposed
Diesel Water Pump	DWP-1	Diesel Water Pump	Proposed

APPENDIX A
NOTICE OF INCOMPLETENESS COMMENTS AND RESPONSES

RESPONSES TO SEPTEMBER 11, 2008
ILLINOIS EPA COMMENTS ON THE
NOTICE OF INCOMPLETENESS

1. IEPA Comment

Detailed narrative description and presentation of all the production/material handling processes, emission units, and pollution control equipment at the source that the revised permit will need to address, including any proposed processes/revisions that includes but is not limited to the following:

Response

The narrative that describes the operations conducted at the facility is located in Section 1 of the application.

1a. IEPA Comment

A process flow diagram that at a minimum illustrates the location of all existing and proposed process equipment, emission units, pollution control equipment, emission points, and the process flow of materials handled/processed;

Response

The process flow diagram is contained in the application as Figure 2.

1b. IEPA Comment

A detailed list and description of all existing and proposed process equipment, emission units, and pollution control equipment (indicate what emission unit(s) the equipment controls), including size and maximum manufacturer's rated capacity and date of construction/installation and modification of each;

Response

A listing of all equipment is found in Table 13. The capacities of the process equipment excluding the diesel fuel-fired generators are located in Tables 1 and 2. The capacities of the diesel fuel-fired generators are located in Table 3.

1c. IEPA Comment

A detailed description, quantification and justification of the anticipated maximum actual annual and short-term operating emissions (e.g., tons/year, pounds/hour, etc.) to be emitted from all the emission units at your source that you would propose to include

as annual and short-term emission limits in your permit for the criteria pollutants (e.g., PM, PM₁₀, etc.) to be emitted, including emission factors to be used to estimate emissions;

Justify the PM and PM₁₀ emission factors used and indicate why the emission factor for coal truck loading in AP-42 Table 11.9-1 was not used. Show calculations for the emission factors used if calculated with equation and justify the use of the variable values used in the equation. Document and justify the 50% control efficiency for moisture content control.

Response

The emission rates for the facility are located in Tables 1 and 2 and a summary of emissions. Truck loading emissions for coal were calculated in the manner they are because the trucks are loaded via end loaders and the emission factors for coal truck loading at western surface coal mines, contained in AP-42 Table 11.9-1, are based on conventional truck loading operations.

1d. IEPA Comment

A detailed listing, presentation and justification of proposed maximum actual operating limitations on the annual and short-term throughput or usage (e.g., tons/year, pounds/hour, etc.) of criteria pollutant-containing material(s) to be processed/produced at your source that you would propose to include in your permit, including proposed limitations on the criteria pollutant content (e.g., weight percent, pounds per ton, etc.) of the criteria pollutant containing material(s) to be processed/produced associated with your proposed maximum actual annual and short-term operating emissions;

Response

The facility will process 11,250,000 tons of coal and petroleum coke and 250,000 tons of salt per year.

1e. IEPA Comment

Please note that in order for the Illinois EPA to develop enforceable permit conditions related to emission limits, the application must provide/identify a measurable and verifiable methodology (e.g., use of appropriate emission factors, material pollutant-content characterization and throughput/usage record-keeping, recording durations of operations, etc.) to correlate the amount and rate of criteria pollutant-containing material throughput/usage and durations of operations proposed in d. above to the emission limits proposed in c. above; and

Response

The narrative, Section 1 of the application, addresses this question.

1f. IEPA Comment

A detailed listing and description of activities/equipment at the source that are claimed as being exempt from permitting pursuant to the permitting exemptions in 35 Ill. Adm. Code 201.146.

Response

There will be 13 aboveground diesel storage tanks no larger than 500 gallons at the facility for the associated diesel fuel-fired engines. The storage tanks are exempt from permitting under 35 IAC 201.146 (n) (3).

2. IEPA Comment

Pursuant to 35 Ill. Adm. Code 201.160 and Section 39(a) of the Illinois Environmental Protection Act (Act), a clear and thorough presentation including information and data to either confirm non-applicability of or demonstrate compliance with potentially applicable regulatory requirements including, but not limited to, 35 Ill. Adm. Code Parts 201 and 212, and 40 CFR Part 60 Subpart IIII. This includes, but is not limited to, listing the sections of the regulations (e.g., 212.123, 212.301, 212.302 through 212.310, 212.312, 212.316, 212.321, 212.324, 40 CFR 60.4204, .4207, .4209, .4211, .4212, and .4214 etc.) that the source's activities/equipment are subject to and then submitting documentation necessary to demonstrate that the emission units or air pollution control equipment will not cause a violation of the applicable regulations. Pursuant to 35 Ill. Adm. Code 201.160 and Section 39(a) of the Act, the Agency shall not issue a construction or operating permit unless the applicant submits proof to the Agency that the emission unit(s) or air pollution control equipment has been constructed or modified to operate so as not to cause a violation of the Act or of regulations hereunder.

Response

212.123 – Visible Emissions Limitations for All Other Emission Units
The source will achieve compliance through the Fugitive Dust Plan.

35 IAC Section 212.301 – Fugitive Particulate Matter
The source will not allow fugitive particulate matter to leave the source's boundaries. This will be accomplished through control practices discussed in this Fugitive Dust Plan.

35 IAC Section 212.302 – Fugitive Particulate Matter
The source is located in Cook County, Illinois therefore it is subject to 35 IAC Sections 212.304 – 212.310 and 212.312.

35 IAC Section 212.304 – Storage Piles
The storage piles located at the source will be sprayed with water via a water cannon to control fugitive dust emissions. The piles will be sprayed on an as needed basis. Figure 2 indicates the locations of the water cannons.

35 IAC Section 212.305 – Conveyor Loading Operations

The inherent moisture content of the coal and telescoping chutes will provide adequate control for particulate matter emissions.

35 IAC Section 212.306 – Traffic Areas

The source operates a water truck for dust suppression on traffic areas. The traffic areas will be sprayed with water on an as needed basis.

35 IAC Section 212.307 – Materials Collected By Pollution Control Equipment

The source will recycle the coal dust collected in the dust collectors located at the facility.

35 IAC Section 212.308 – Spraying or Choke-Feeding Required

The inherent moisture content of the coal will provide adequate control for particulate matter emissions for all of the emission points at the facility except for the coke rail unloading operations which will employ choke loading to reduce particulate matter emissions.

35 IAC Section 212.309 – Operating Program

This Fugitive Dust Plan is in response to this requirement.

35 IAC Section 212.310 – Minimum Operating Program

The data is included in this Fugitive Dust Plan.

35 IAC Section 212.312 – Amendment to Operating Program

Attached is the most current Fugitive Dust Plan. If the source changes their operating scenario an amendment to the Operating Program will be submitted to the Agency.

35 IAC Section 212.316– Emission Limitations for Emission Units in Certain Areas

The source, which is subject to the requirements set forth in this Section, will, as discussed in this Fugitive Dust Plan, maintain compliance with the limitations in this Section. Regarding the crushing and screening operations, it has been stated that the inherent moisture content of the materials being processed will provide adequate control of particulate matter emissions. The roadways will be sprayed with water on an as needed basis to control fugitive dust emissions. Water cannons will be used to control fugitive particulate matter emissions from the storage piles. The source will maintain records and provide reports as outlined in 35 IAC Section 212.316 (g).

35 IAC Section 212.321 – Process Emission Units for Which Construction or Modification Commenced on or After April 14, 1972.

To show compliance with the process weight rate rule a sample calculation is contained below using the throughput of a single transfer point.

$$E = A(P)^B$$

Where:

P = Process Weight Rate; and

E = Allowable Emission Rate

$$E = 2.54(4000)^{0.534}$$

E = 212.97 pounds per hour

The actual emissions from this transfer point are 1 pound per hour. Therefore, the source is in compliance with the Process Weight Rate Rule.

35 IAC Section 212.324 – Process Emission Units in Certain Areas

The source is subject to the requirements in this section. See the response to 35 IAC Section 212.316.

40 CFR 60.4204 – Emission Standards For Non-Emergency Engines
Manufacturer's certification.

40 CFR 60.4207 – Fuel Requirements For Non-Emergency Engines
DTE will only use compliant fuels in the engines.

40 CFR 60.4209 – Monitoring Requirements For Non-Emergency Engines
The use of a non-resettable hour meter.

40 CFR 60.4211 – Compliance Requirements For Non-Emergency Engines
Manufacturer's certification.

40 CFR 60.4212 – Test Method Requirements For Non-Emergency Engines
DTE will test the engines in a manner consistent with the requirements set forth in this regulation.

40 CFR 60.4214 – Notification, Reporting, and Recordkeeping Requirements For Non-Emergency Engines
DTE will track hour usage on a rolling monthly basis and track fuel quality by purchase receipts and will record routine maintenance activities.

3. IEPA Comment

A clear and thorough presentation, including detailed calculations, of the potential to emit (PTE) for the entire source (including any proposed revisions) including, but not limited to, particulate matter (PM, PM₁₀), volatile organic materials (VOM), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and hazardous air pollutants (HAP):

Response

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application.

3a. IEPA Comment

PTE shall be calculated based on the maximum potential usage of raw materials with the maximum allowable criteria pollutant content, at the maximum potential production rate, and year round (8,760 hours/year) operation of all processes including the diesel generators and emission units at the source.

Response

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application.

3b. IEPA Comment

Be specific in describing the maximum content (e.g., weight percent, pounds per gallon, pounds per ton, etc.) and name and type of criteria pollutant (e.g., PM, PM₁₀, etc.) in each of the raw materials, wastes and products handled and/or generated at the source when presenting your calculations.

Response

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application.

3c. IEPA Comment

Provide documentation and references for emission factors and other input data to the PTE calculations that support their use as representative of activities to be conducted at this source. Justify the PM and PM₁₀ emission factors used and indicate why the emission factor for coal truck loading in AP-42 Table 11.9-1 was not used. Show calculations for the emission factors used if calculated with equations and justify the use of the variable values used in the equations.

Response

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application. The emission factors used are justified in the response to comment 1c.

3d. IEPA Comment

Please note that PTE calculations can not include emission reductions associated with pollution control equipment (e.g., baghouse, filters, scrubbers, etc.) unless the use of pollution control equipment is specifically required by regulations applicable to the subject process/activity, or if emission reductions are required to a certain percentage in order to comply with an applicable emission rate limitation such as 35 Ill. Adm. Code 212.321. If you believe emission reductions due to controls are applicable for your PTE calculations, please clearly identify those reductions and justify them by referencing the applicable regulations/requirements. Justify the use of controls in PTE calculations.

Response

The moisture content of the coal and petroleum coke and the bag houses associated with the coke railcar unloading operations are inherent to the process. The moisture content is based on the product as received.

3e. IEPA Comment

Please note that emissions from emission units claimed to be exempt from permitting pursuant to 35 Ill. Adm. Code 201.146 need to be identified and included in the PTE calculations.

Response

See response to comment 1f.

APPENDIX B
FUGITIVE DUST PLAN

052450 (1)

KM00000329

DTE Chicago Fuels Terminal, LLC
10730 South Burley Avenue
Chicago, Illinois 60617
Facility I.D. No.: 031600GSF

FUGITIVE DUST PLAN

DTE Chicago Fuels Terminal, LLC (DTE) is submitting this Fugitive Dust Plan in accordance to 35 IAC Section 212.310. DTE is owner of the source and is responsible for the execution of this Fugitive Dust Plan operating program. A map of the source showing emission sources and, if applicable, their related control equipment, as set forth in 35 IAC Section 212.310 (c) and (d), is contained in this plan as Figure 1.

A detailed description of the best management practices utilized by the source to achieve compliance is contained below.

Storage Piles - The ten storage piles at the facility, which have uncontrolled emissions of fugitive particulate matter in excess of 50 tons per year that are located within a source whose potential particulate emissions from all emission units exceeds 100 tons per year, are controlled by dust suppression water spray (water cannon). The piles are sprayed with water on an as needed basis depending upon weather conditions. When the temperatures are below freezing water suppression will not be used to control fugitive emissions because this would cause the coal products to freeze, therefore not allowing the coal to be processed throughout the facility as necessary. Records of each dust suppression event on the storage piles will be recorded in a logbook and kept at the source at all times.

Traffic Areas - All of the normal traffic pattern access areas surrounding the storage piles and all normal traffic pattern roads and parking facilities which are located on the property shall be treated with water (water truck). The roadways are sprayed with water on an as needed basis depending upon weather conditions. When temperatures are below freezing (32° F or equivalent) water will not be used for dust suppression purposes. While temperatures are below freezing, if dust suppression is needed, a chemical dust suppression agent will be used on an as needed basis. Records of each dust suppression event on the roadways will be recorded in a logbook and kept at the source at all times.

Conveyor Loading Operations - All conveyor loading operations to storage piles are controlled by telescoping chutes and the inherent moisture content of the coal product. The coal, when delivered, has an inherently high moisture content. The inherent high

moisture content coupled with the water applied to the storage piles for fugitive dust suppression provides more than adequate fugitive dust suppression for the conveyor loading operations.

Materials Collected by Pollution Control Equipment – All unloading and transporting operations of materials collected by the railcar unloading bag houses will be recycled back to the railcar unloading system. Fugitive dust suppression consisting of water spray may be used when the filter bag is unloaded depending upon moisture content of the coal dust in the filter bag. Records of each dust suppression event on the filter bag unloading will be recorded in a logbook and kept at the source at all times.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506-(217) 782-2113

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

December 20, 2012

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

I.D. No.: 031600GSF

Dear Mr. Walker:

The Illinois EPA acknowledges your request for an ownership change. The Illinois EPA has appropriately updated its records accordingly.

The TV FESOP permit application revision you requested is currently pending and is under review. Until any revised permit is issued, the facility remains subject to the requirements in the existing permit(s).

If you have any questions concerning this matter, please contact Lori Pennington at 217/785-1720.

Edwin C. Bakowski
End

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

ECB:LP:jws

Enclosure

cc: Region 1
I.D. File
Permit File
Kathy Hodge, Hodge Dwyer & Driver



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 (217) 782-2113

PAT QUINN, GOVERNOR

217/785-1705

CONSTRUCTION PERMIT -- NSPS and NESHAP SOURCE -- REVISED

PERMITTEE

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

Application No.: 07059082

I.D. No.: 031600GSF

Applicant's Designation:

Date Received: March 11, 2013

Subject: Conveyor Addition

Date Issued: April 18, 2013

Location: 10730 South Burley Avenue, Chicago, 60617

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of the following:

Two (2) Rail Unloaders (RU-1 and RU-2);
Truck Unloading (TU-1);
Twelve (12) Fixed Conveyors (FC-1, FC-2, FC-3, FC-4, FC-5, FC-6, FC-7, FC-8, FC-9, FC-10, FC-11, and FC-12);
Ten (10) Portable Conveyors (PC-3, PC-4, PC-5, PC-6, PC-7, PC-8, PC-9, PC-10, PC-11, and PC-12);
One (1) Portable Hopper (PH-1);
One (1) Portable Feeder (PF-1);
One (1) Rental Portable Crusher/Screen (PCS-1);
Four (4) Stacking Conveyors (SC-1, SC-2, SC-3, and SC-4);
Two (2) 779 bhp Diesel-Powered Generators (DG-1 and DG-2);
Six (6) 118 HP Diesel-Powered Generators (DG-3, DG-4, DG-5, DG-6, DG-7, and DG-8);
One (1) 400 HP Diesel-Powered Generator (DG-9);
One (1) 375 HP Diesel-Powered Generator (DG-10); and
Bulk Material Storage Piles

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

- 1a. This Permit is issued based on the modification of the materials transloading system (to increase the permitted throughput) and the construction of the diesel generators and portable conveyors not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major

Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Nitrogen Oxides (NO_x) and Particulate Matter less than 10 microns (PM₁₀) from the above-listed equipment below the levels that would trigger the applicability of these rules.

- b. The Permittee may operate the equipment listed above under this construction permit until the Illinois EPA takes final action on the Permittee's application for a Federally Enforceable State Operating Permit (FESOP) provided that the Permittee timely complies with all the terms of this construction permit. In accordance with the existing operating component of this permit, the Permittee may continue to operate the equipment listed in prior versions of this permit, including the Joint Construction and Operating Permit, issued February 13, 2008, and the revised version issued May 21, 2009, until final action is taken on the aforementioned FESOP application.
- 2a. Diesel-Powered Generators DG-1 through DG-10 are subject to the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60 Subparts A and IIII. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.4200(a), the provisions of 40 CFR 60 Subpart IIII are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in 40 CFR 60.4200(a)(1) through (4). For the purposes of 40 CFR 60 Subpart IIII, the date that construction commences is the date the engine is ordered by the owner or operator.
- i. Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines,
 - ii. Owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005,
 - iii. The provisions of 40 CFR 60.4208 are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005
- b. Pursuant to 40 CFR 60.4201(a), stationary CI internal combustion engine manufacturers must certify their 2007 model year and later non-emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 kilowatt (KW) (3,000 horsepower (HP)) and a displacement of less than 10 liters per cylinder to the certification emission standards for new nonroad CI engines in 40 CFR 89.112, 40 CFR 89.113, 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same model year and maximum engine power.

- c. Pursuant to 40 CFR 60.4204(b), owners and operators of 2007 model year and later non-emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with the emission standards for new CI engines in 40 CFR 60.4201 for their 2007 model year and later stationary CI ICE as applicable.
- 3a. Diesel-Powered Generators DG-1 through DG-10 are subject to the National Emission Standards for Hazardous Air pollutants (NESHAP) Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subparts A and ZZZZ. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Pursuant to 40 CFR 63.6590(a), an affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.
- b. Pursuant to 40 CFR 63.6590(c)(1), new or reconstructed stationary RICE located at an area source must meet the requirements of 40 CFR 63.6590(c) by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.
- 4a. Pursuant to 40 CFR 89.112(a), exhaust emission from nonroad engines to which 40 CFR 89 Subpart B is applicable shall not exceed the applicable exhaust emission standards contained in Table 1, as follows:

Table 1.—Emission Standards (g/kW-hour)

Rated Power (kW)	Tier	Model Year ¹	NO _x	HC	NMHC + NO _x	CO	PM
75 ≤ kW < 130	Tier 1	1997	9.2	--	--	--	--
	Tier 2	2003			6.6	5.0	0.30
	Tier 3	2007		--	4.0	5.0	
130 ≤ kW < 225	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2003	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
225 ≤ kW < 450	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2002	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
kW>560	Tier 1	2000	9.2	1.3	--	11.4	0.54
	Tier 2	2006	--	--	6.4	3.5	0.20

¹ The model years listed indicates the model years for which the specified tier of standards take effect.

- b. Pursuant to 40 CFR 89.112(d), in lieu of the NO_x standards, NMHC + NO_x standards, and PM standards specified in 40 CFR 89.112(a), manufacturers may elect to include engine families in the averaging, banking, and trading program, the provisions of which are specified in 40 CFR 89 Subpart C. The manufacturer must set a family emission limit (FEL) not to exceed the levels contained in Table 2. The FEL

established by the manufacturer serves as the standard for that engine family. Table 2 follows:

Table 2.--Upper Limit for Family Emission Limits (g/kW-hour)

Rated Power (kW)	Tier	Model Year ¹	NO _x FEL	NMHC + NO _x FEL	PM FEL
75 < kW < 130	Tier 1	1997	14.6	--	1.2
	Tier 2	2003	--	11.5	
	Tier 3	2007	--	6.6	
130 < kW < 225	Tier 1	1996	14.6	--	--
	Tier 2	2003	--	10.5	0.54
	Tier 3	2006	--	6.6	
225 < kW < 450	Tier 1	1996	14.6	--	--
	Tier 2	2001	--	10.5	0.54
	Tier 3	2006	--	6.4	
kW > 560	Tier 1	2000	14.6	--	--
	Tier 2	2006	--	10.5	0.54

¹ The model years listed indicates the model years for which the specified tier of standards take effect.

- c. Pursuant to 40 CFR 89.112(e), naturally aspirated nonroad engines to which 40 CFR 89 Subpart B is applicable shall not discharge crankcase emissions into the ambient atmosphere, unless such crankcase emissions are permanently routed into the exhaust and included in all exhaust emission measurements. This provision applies to all Tier 2 engines and later models. This provision does not apply to engines using turbochargers, pumps, blowers, or superchargers for air induction.
- d. Pursuant to 40 CFR 89.113(a), exhaust opacity from compression-ignition nonroad engines for which 40 CFR 89 Subpart B is applicable must not exceed:
 - i. 20 percent during the acceleration mode;
 - ii. 15 percent during the lugging mode; and
 - iii. 50 percent during the peaks in either the acceleration or lugging modes.
- 5a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute

period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.316(b), no person shall cause or allow fugitive particulate matter emissions generated by the crushing or screening of slag, stone, coke or coal to exceed an opacity of 10 percent.
- e. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM_{10} , or fugitive particulate matter emissions limitation elsewhere in 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code 212 Subparts R or S, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.
- f. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- g. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of PM_{10} from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.
- h. Pursuant to 35 Ill. Adm. Code 212.700(a), 35 Ill. Adm. Code 212 Subpart 00 (Additional Control Measures) shall apply to those sources in the areas designated in and subject to 35 Ill. Adm. Code 212.324(a)(1) or 212.423(a) and that have actual annual source-wide emissions of PM_{10} of at least fifteen (15) tons per year.
- 6a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).
- b. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of

sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.

- c. Pursuant to 35 Ill. Adm. Code 214.304, the emissions from the burning of fuel at process emission sources located in the Chicago or St. Louis (Illinois) major metropolitan areas shall comply with applicable 35 Ill. Adm. Code 214 Subparts B through F (i.e., 35 Ill. Adm. Code 214.122).
- 7. This permit is issued based on the conveyors, crushers, and screens at this source not being subject to the New Source Performance Standards (NSPS) for Coal Preparation Plants, 40 CFR 60 Subpart Y, because no machinery at this source facility is used to reduce the size of coal or to separate coal from refuse.
- 8a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- b. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).
- 9a. Pursuant to 40 CFR 60.11(b), compliance with opacity standards in 40 CFR Part 60 shall be determined by conducting observations in accordance with Method 9 in Appendix A of 40 CFR Part 60, any alternative method that is approved by the Illinois EPA or USEPA, or as provided in 40 CFR 60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).
- b. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.
- c. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing

emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

- 10a. Pursuant to 40 CFR 60.4206, owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4204 and 60.4205 according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.
- b. Pursuant to 40 CFR 60.4207(a), beginning October 1, 2007, owners and operators of stationary CI ICE subject to 40 CFR 60 Subpart IIII that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).
- c. Pursuant to 40 CFR 60.4207(b), beginning October 1, 2010, owners and operators of stationary CI ICE subject to 40 CFR 60 Subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.
- d. Pursuant to 40 CFR 60.4211(a), if you are an owner or operator and must comply with the emission standards specified in 40 CFR 60 Subpart IIII, you must operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those settings that are permitted by the manufacturer. You must also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.
- e. Pursuant to 40 CFR 60.4211(c), if you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in 40 CFR 60.4204(b) or 40 CFR 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to 40 CFR 60 Subpart IIII and must comply with the emission standards specified in 40 CFR 60.4205(c), you must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4204(b), or 40 CFR 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in 40 CFR 60.4211(g).
- f. Pursuant to 40 CFR 60.4211(e)(1), if you are an owner or operator of a modified or reconstructed stationary CI internal combustion engine and must comply with the emission standards specified in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), you must demonstrate compliance according to one of the methods specified in 40 CFR 60.4211(e)(1) or (2). Purchasing,

or otherwise owning or operating, an engine certified to the emission standards in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), as applicable.

- 11a. Pursuant to 40 CFR 80.510(b), beginning June 1, 2010. Except as otherwise specifically provided in 40 CFR 80 Subpart I, all NR and LM diesel fuel is subject to the following per-gallon standards:

- i. Sulfur content 15 ppm maximum for NR diesel fuel.
- ii. Cetane index or aromatic content, as follows:
 - A. A minimum cetane index of 40; or
 - B. A maximum aromatic content of 35 volume percent.

- 12a. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 Ill. Adm. Code 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in this 35 Ill. Adm. Code 212.324 shall be met at all times. 35 Ill. Adm. Code 212.324 shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:

- i. Visual inspections of air pollution control equipment;
- ii. Maintenance of an adequate inventory of spare parts; and
- iii. Expeditionary repairs, unless the emission unit is shutdown.

- b. Pursuant to 35 Ill. Adm. Code 212.701(a), those sources subject to 35 Ill. Adm. Code 212 Subpart UU shall prepare contingency measure plans reflecting the PM_{10} emission reductions set forth in 35 Ill. Adm. Code 212.703. These plans shall become federally enforceable permit conditions. Such plans shall be submitted to the Illinois EPA by November 15, 1994. Notwithstanding the foregoing, sources that become subject to the provisions of 35 Ill. Adm. Code 212 Subpart UU after July 1, 1994, shall submit a contingency measure plan to the Illinois EPA for review and approval within ninety (90) days after the date such source or sources became subject to the provisions of 35 Ill. Adm. Code 212 Subpart UU or by November 15, 1994, whichever is later. The Illinois EPA shall notify those sources requiring contingency measure plans, based on the Illinois EPA's current information; however, the Illinois EPA's failure to notify any source of its requirement to submit contingency measure plans shall not be a defense to a violation of 35 Ill. Adm. Code 212 Subpart UU and shall not relieve the source of its obligation to timely submit a contingency measure plan.

- c. Pursuant to 35 Ill. Adm. Code 212.703(a), all sources subject to 35 Ill. Adm. Code 212 Subpart UU shall submit a contingency measure plan. The contingency measure plan shall contain two levels of control measures:

- i. Level I measures are measures that will reduce total actual annual source-wide fugitive emissions of PM_{10} subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 15%.
 - ii. Level II measures are measures that will reduce total actual annual source-wide fugitive emissions of PM_{10} subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 25%.
- d. Pursuant to 35 Ill. Adm. Code 212.703(b), a source may comply with 35 Ill. Adm. Code 212 Subpart UU through an alternative compliance plan that provides for reductions in emissions equal to the level of reduction of fugitive emissions as required at 35 Ill. Adm. Code 212.703(a) and which has been approved by the Illinois EPA and USEPA as federally enforceable permit conditions. If a source elects to include controls on process emission units, fuel combustion emission units, or other fugitive emissions of PM_{10} not subject to 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 at the source in its alternative control plan, the plan must include a reasonable schedule for implementation of such controls, not to exceed two (2) years. This implementation schedule is subject to Illinois EPA review and approval.
 - e. Pursuant to 35 Ill. Adm. Code 212.704(b), if there is a violation of the ambient air quality standard for PM_{10} as determined in accordance with 40 CFR Part 50, Appendix K, the Illinois EPA shall notify the source or sources the Illinois EPA has identified as likely to be causing or contributing to one or more of the exceedences leading to such violation, and such source or sources shall implement Level I or Level II measures, as determined pursuant to 35 Ill. Adm. Code 212.704(e). The source or sources so identified shall implement such measures corresponding to fugitive emissions within ninety (90) days after receipt of a notification and shall implement such measures corresponding to any nonfugitive emissions according to the approved schedule set forth in such source's alternative control plan. Any source identified as causing or contributing to a violation of the ambient air quality standard for PM_{10} may appeal any finding of culpability by the Illinois EPA to the Illinois Pollution Control Board pursuant to 35 Ill. Adm. Code 106 Subpart J.
 - f. Pursuant to 35 Ill. Adm. Code 212.704(e), the Illinois EPA shall require that sources comply with the Level I or Level II measures of their contingency measure plans, pursuant 35 Ill. Adm. Code 212.704(b), as follows:
 - i. Level I measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, is less than or equal to 170 ug/m^3 .

- ii. Level II measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, exceeds 170 ug/m³.
- 13a. Pollution control devices associated with the emission units being modified under this permit shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.
 - b. The transloading facility shall be operated in accordance with good operating practices to minimize particulate matter emissions including the following.
 - i. Enclosures shall be maintained in good condition and wet suppressant shall be applied as needed whenever materials are being moved past a point of application; and
 - ii. Remedial actions shall be taken if visible emissions are observed beyond the property line.
 - c. This permit is issue based on the handling of only coal, petroleum coke, and like materials, and salt at the plant. The handling of any other material at the source requires that the Permittee first obtain a construction permit from the Illinois EPA.
 - d. The generators shall only be operated with distillate fuel oil as the fuel. The use of any other fuel in the generators requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
 - e. The Permittee shall not keep, store, or use distillate fuel oil (Grades No. 1 and 2) at this source with a sulfur content greater than the larger of the following values:
 - i. 0.28 weight percent, or
 - ii. The Wt. percent given by the formula: Maximum Wt. percent sulfur = $(0.000015) \times (\text{Gross heating value of oil, Btu/lb})$.
 - f. Organic liquid by-products or waste materials shall not be used in the diesel generators without written approval from the Illinois EPA.
 - g. The Illinois EPA shall be allowed to sample fuel stored at the source associated with the diesel generators.
- 14a. The total amount of materials handled through the transloading facility shall not exceed 1.13 million tons/month and 11.25 million tons/year as measured by the amount of materials shipped from the facility.
 - b. Materials handled by truck shall not exceed 175,000 tons/month and 1,750,000 tons per year (includes coal inbound/outbound via truck).

- c. Emissions and operation of the transloading facility shall not exceed the following limits:

- i. Material Storage Piles and Transfer and Conveying, and Loadout:

Process	Material Throughput**		PM Emissions			PM ₁₀ Emissions		
	(Ton/Mo)	(Ton/Yr)	(lb/Ton)	(T/Mo)	(T/Yr)	(lb/Ton)	(T/Mo)	(T/Yr)
Coal & Coke*	1,100,000	11,000,000	0.00064	12.21	102.08	0.0003	4.79	47.85
Incidental Soil Crushing*	30,660	306,600	0.0033	0.03	0.25	0.00101	0.01	0.08
Incidental Soil Screening*	30,660	306,600	0.00067	0.01	0.05	0.00034	0.01	0.03
				Totals	102.38			47.96

* 50 % control for wet suppression

** Throughput is measured by the amount of material shipped from the site.

- ii. These limits are based on the maximum materials throughput of 11.25 million tons per year with at most 1,750,000 tons/year handled by trucks, and standard emission factors (Table 13.2.4, AP 42, Fifth Edition, Volume I, November 2006 with U = 16.4 and M = 18.3).
- iii. The above limitations contain revisions to previously issued Permits C3100038 and C6040012. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the aforementioned permit. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the construction permit application contains the most current and accurate information for the source. Specifically, the source's permitted annual throughput is being increase from 11.0 million tons per year to 11.25 million tons per year and the permitted emissions of PM₁₀ are being increases from 12.5 tons per year to 49.24 tons per year.
- d. Emissions and operation of the two 581 kW (779 HP) Diesel-Powered Generator (DG-1 and DG-2) combined shall not exceed the following:
- i. The diesel-powered generator runtime shall not exceed 770 hours/month and 7,700 hours/year year from the two generators combined.
- ii. Emissions from the two diesel-powered generators combined shall not exceed:

Pollutant	Emission Factor	Emissions	
	(lb/HP-Hour)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00575	1.72	17.25
Nitrogen Oxides (NO _x) *	0.00999	3.00	29.96
Particulate Matter (PM)	0.00033	0.10	0.99
Particulate Matter-10 (PM ₁₀)	0.00033	0.10	0.99
Sulfur Dioxide (SO ₂) **	0.00040	0.12	1.20
Volatile Organic Material (VOM)	0.00053	0.16	1.59

These limits are based on the emission factors for units with power rating greater than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

* The NO_x emission factor is based on 95% of the NMHC + NO_x standard as described in Table B-22 of "The Carl Moyer Program Guidelines", California Air Resources Board, November 2005.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and the standard emission factor for SO₂ (Table 3.4-1, AP-42 Fifth Edition, Volume I, Supplement B, October 1999).

- e. Emissions and operation of the six 88 kW (119 HP) Diesel-Powered Generators (DG-3, DG-4, DG-5, DG-6, DG-7, and DG-8) combined will not exceed the following:

- i. The diesel-powered generators runtime shall not exceed 1,800 hours/month and 18,000 hours/year from the six generators combined.
- ii. Emissions from the six diesel-powered generators combined shall not exceed:

Pollutant	Emission Factor	Emissions	
	(lb/HP-Hour)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00815	0.87	8.66
Nitrogen Oxides (NO _x)	0.015	1.59	15.93
Particulate Matter (PM)	0.0005	0.05	0.53
Particulate Matter-10 (PM ₁₀)	0.0005	0.05	0.53
Sulfur Dioxide (SO ₂) **	**	0.03	0.32
Volatile Organic Material (VOM)	0.00033	0.04	0.35

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by

multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

18,000 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S /
2,000 lbs/gallon = 0.32 tpy

f. Emissions and operation of the 230 kW (375 HP) Diesel-Powered Generator (DG-10) shall not exceed the following:

- i. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
- ii. Emissions from the diesel-powered generator shall not exceed:

Pollutant	Emission	Emissions	
	Factor (lb/HP-Hour)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00573	0.38	3.76
Nitrogen Oxides (NO _x)	0.015	0.98	9.84
Particulate Matter (PM)	0.0003	0.02	0.20
Particulate Matter-10 (PM ₁₀)	0.0003	0.02	0.20
Sulfur Dioxide (SO ₂)	**	0.01	0.06
Volatile Organic Material (VOM)	0.00033	0.02	0.22

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

3,500 hours/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S /
2,000 lbs/gallon = 0.06 tpy

g. Emissions and operation of the 298 kW (400 HP) Diesel-Powered Generator (DG-9) shall not exceed the following:

- i. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
- ii. Emissions from the diesel-powered generator shall not exceed:

Emission Factor	Emissions

Pollutant	(lb/HP-Hour)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00573	0.40	4.01
Nitrogen Oxides (NO _x)	0.015	1.05	10.50
Particulate Matter (PM)	0.0003	0.02	0.21
Particulate Matter-10 (PM ₁₀)	0.0003	0.02	0.21
Sulfur Dioxide (SO ₂)	**	0.01	0.06
Volatile Organic Material (VOM)	0.000033	0.02	0.23

These limits are based on the emission factors for units with power rating less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

3,500 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S /
2,000 lbs/gallon = 0.66 tpy

- h. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).
15. This permit is issued based on the potential to emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
16. This permit is issued based on Diesel-Powered Generators Sets DG-1 through DG-10 each having a displacement of less than 30 liters per cylinder and have been certified by the manufacturer, as required by 40 CFR 60.4211(c), to meet the standards of 40 CFR 60.4204(b) or 60.4205(b). As a result, this permit is issued based on the Diesel-Powered Generators Sets DG-1 through DG-10 not being subject to the testing requirements of 40 CFR 60.8.
- 17a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be

specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 18 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
18. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 19a. Pursuant to 40 CFR 60.4209(a), if you are an owner or operator, you must meet the monitoring requirements of 40 CFR 60.4209. In addition, you must also meet the monitoring requirements specified in 40 CFR 60.4211. If you are an owner or operator of an emergency stationary CI internal combustion engine, you must install a non-resettable hour meter prior to startup of the engine.
- b. Pursuant to 40 CFR 60.4209(b), If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.
- 20a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.

21. Pursuant to 40 CFR 60.4214(c), if the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.

22a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

- b. i. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code 212.316 and shall submit to the Illinois EPA an annual report containing a summary of such information.

ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(2), the records required under 35 Ill. Adm. Code 212.316(g) shall include at least the following:

- A. The name and address of the source;
- B. The name and address of the owner and/or operator of the source;
- C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;
- D. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day; and
- E. A log recording incidents when control measures were not used and a statement of explanation.

- iii. Pursuant to 35 Ill. Adm. Code 212.316(g)(3), the records required under 35 Ill. Adm. Code 212.316 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
 - iv. Pursuant to 35 Ill. Adm. Code 212.316(g)(4), the records required under 35 Ill. Adm. Code 212.316(g) shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- c. i. Pursuant to 35 Ill. Adm. Code 212.324(g)(1), written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).
- ii. Pursuant to 35 Ill. Adm. Code 212.324(g)(2), the owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.
- iii. Pursuant to 35 Ill. Adm. Code 212.324(g)(3), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
- iv. Pursuant to 35 Ill. Adm. Code 212.324(g)(5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- 23a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the dust suppression systems associated with the materials transloading system:
 - A. Records for periodic inspection of the dust suppression systems with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Name and total amount of each material shipped (tons/month and tons/year);

- iii. Name and amount of each material shipped by truck (tons/month and tons/year);
 - iv. Amount of each material that is deposited on storage piles (tons/month and tons/year);
 - v. Diesel generators runtime (hours/month and hours/year);
 - vi. Delivery ticket from the fuel supplier showing delivery of ultra low sulfur diesel fuel and sulfur content in weight percent for fuel shipments received;
 - vii. An inspection, maintenance and repair log of the generators listing each activity performed with date; and
 - viii. Monthly and annual emissions of NO_x, CO, SO₂, PM, PM₁₀ and VOM from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 24a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and USEPA and the owner or operator of a source, electronic notification, as follows:
- i. A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
 - ii. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
 - iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion

date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.

25a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

b. i. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.

ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of 35 Ill. Adm. Code 212.316. This report shall be submitted to the Illinois EPA thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

iii. Pursuant to 35 Ill. Adm. Code 212.324(g)(6), upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

26a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

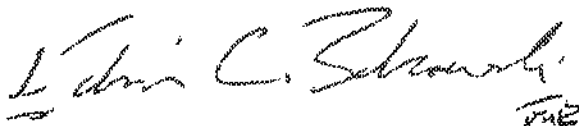
Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It shall be noted that this permit was revised to add four portable conveyors to the list of emission units, to increase the emissions limits in Condition 14(c), to correct emission units and revise the emissions limits in Condition 14(c), and to add two 779 bhp diesel-fired generators (DG-1 and DG-2) to the list of emission sources and Condition 14(d).

If you have any questions on this, please call Mike Dragovich at 217/785-1705.



Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: 4/18/2013

ECB:MJD:jws

cc: Region 1



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19508
SPRINGFIELD, ILLINOIS 62794-9506

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emissions of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

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- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
- 6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
- b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
- 7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
 - a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

**DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR**

For assistance in preparing a permit application contact the Permit Section.

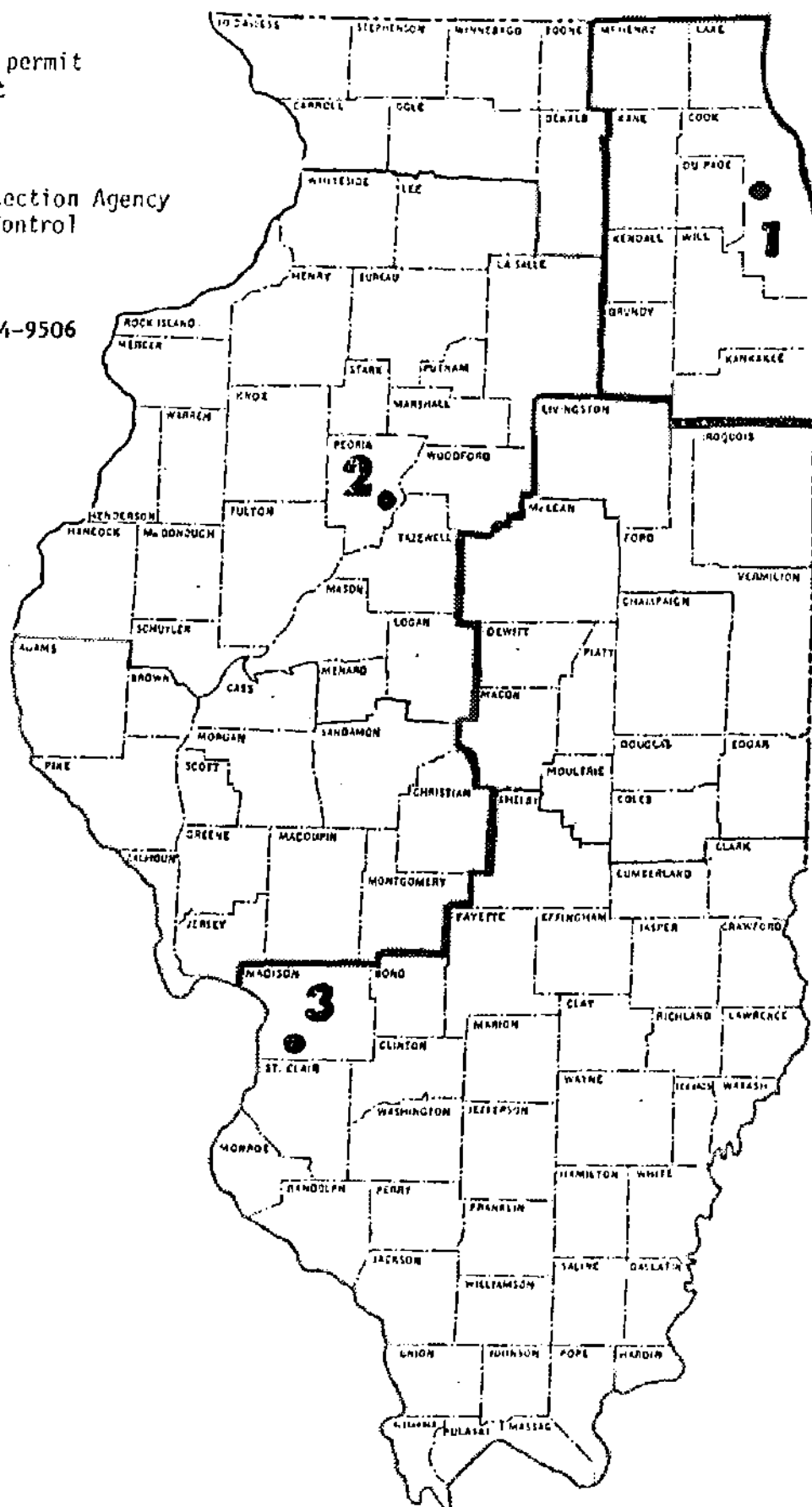
**Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O.Box 19506
Springfield, Illinois 62794-9506**

For a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

**Illinois EPA
Region 1
Bureau of Air, FOS
9511 West Harrison
Des Plaines, Illinois 60016
847/294-4000**

**Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614-
309/693-5463**

**Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
618/346-5120**



217/782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT - NSPS SOURCE

PERMITTEE

DTE Chicago Fuels Terminal, LLC
Attn: Kim Bradford
414 South Main Street
Ann Arbor, Michigan 48104

Application No.: 07050082

I.D. No.: 031600GSF

Applicant's Designation:

Date Received: February 3, 2009

Subject: New Materials Transloading Facility

Date Issued: May 21, 2009

Expiration Date: May 21, 2010

Location: 10730 South Burley Avenue, Chicago, 60617

Permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and/or air pollution control equipment consisting of the following:

Two (2) Rail Unloaders (RU-2 and RU-3);
Seven (7) Conveyors (C-7, C-8, C-9, C-10, C-11, C-12, and C-13);
Three (3) Reclaim Conveyors (RC-5, RC-6, and RC-7);
Eight (8) Portable Conveyors (PC-1, PC-2, PC-3, PC-4, PC-5, PC-6, PC-7, and PC-8);
Direct Ship Hopper 1 (DSH-1);
Portable Feed Hopper (PFH-1);
Portable Feeder (PF-1);
Rental Portable Screen (RPS-1);
Rental Portable Crusher/Screen (RPCS-1);
Two (2) Transfer Points (TP-1 and TP-2);
Stacker Feed Transfer Point (SFTP-1);
Stacker 4 (S-4);
Three (3) Coke Piles (CEP-1, CEP-2, and CEP-3);
Six (6) 118 HP Diesel-Powered Generators (DG-1, DG-2, DG-3, DG-4, DG-5, and DG-6);
One (1) 400 HP Diesel-Powered Generator (7) (DG-7);
One (1) 375 HP Diesel-Powered Generator (8) (DG-8);
One (1) 40 HP Diesel-Powered Generator (9) (DG-9);
Three (3) 300 HP Diesel Generators (DG-10, DG-11, and DG-12); and
One (1) 20HP Diesel-Powered Water Pump (DWP-1)

and OPERATE emission source(s) and/or air pollution control equipment consisting of:

Barge Unloader (BU-1);
Rail Unloader (RU-1);
Truck Unloader (TU-1);
Six (6) Conveyors (C-1, C-2, C-3, C-4, C-5, and C-6);
Four (4) Reclaim Conveyors (RC-1, RC-2, RC-3, and RC-4);
Three (3) Stackers (S-1, S-2, and S-3);
Salt Loadout to Truck (TL-1);
Coal Loadout to Rail (RL-1);

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Coal Loadout to Barge (BL-1);
Coal Loadout to Truck (TL-1);
Six (6) Coal Piles (CLP-1, CLP-2, CLP-3, CLP-4, CLP-5, and CLP-6); and
Salt Pile 1 (SP-1)

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

1. This Permit is issued based on the modification of the materials transloading system (to increase the permitted throughput) and diesel generators not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Nitrogen Oxides (NO_x) and Particulate Matter less than 10 microns (PM₁₀) from the above-listed equipment below the levels that would trigger the applicability of these rules.
- 2a. The 20 hp diesel-powered water pump, the 40 hp, 118 hp, 300 hp, 375 hp, and 400 hp diesel-powered generators sets are subject to the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60 Subparts A and IIII. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.4201(a), stationary CI internal combustion engine manufacturers must certify their 2007 model year and later non-emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 kilowatt (KW) (3,000 horsepower (HP)) and a displacement of less than 10 liters per cylinder to the certification emission standards for new nonroad CI engines in 40 CFR 89.112, 40 CFR 89.113, 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same model year and maximum engine power.
- c. Pursuant to 40 CFR 60.4204(b), owners and operators of 2007 model year and later non-emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with the emission standards for new CI engines in 40 CFR 60.4201 for their 2007 model year and later stationary CI ICE as applicable.
- d. Pursuant to 40 CFR 60.4206, owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4204 according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.

- 3a. Pursuant to 40 CFR 89.112(a), exhaust emission from nonroad engines to which 40 CFR 89 Subpart B is applicable shall not exceed the applicable exhaust emission standards contained in Table 1, as follows:

Table 1.—Emission Standards (g/kW-hr)

<u>Rated Power (kW)</u>	<u>Tier</u>	<u>Model Year¹</u>	<u>NO_x</u>	<u>HC</u>	<u>NMHC + NO_x</u>	<u>CO</u>	<u>PM</u>
75 ≤ kW < 130	Tier 1	1997	9.2	--	--	--	--
	Tier 2	2003			6.6	5.0	0.30
	Tier 3	2007		--	4.0	5.0	
kW>560	Tier 1	2000	9.2	1.3	--	11.4	0.54
	Tier 2	2006	--	--	6.4	3.5	0.20

¹ The model years listed indicates the model years for which the specified tier of standards take effect.

- b. Pursuant to 40 CFR 89.112(d), in lieu of the NO_x standards, NMHC + NO_x standards, and PM standards specified in 40 CFR 89.112(a), manufacturers may elect to include engine families in the averaging, banking, and trading program, the provisions of which are specified in 40 CFR 89 Subpart C. The manufacturer must set a family emission limit (FEL) not to exceed the levels contained in Table 2. The FEL established by the manufacturer serves as the standard for that engine family. Table 2 follows:

Table 2.—Upper Limit for Family Emission Limits (g/kW-hr)

<u>Rated Power (kW)</u>	<u>Tier</u>	<u>Model Year¹</u>	<u>NO_x FEL</u>	<u>NMHC+NO_x FEL</u>	<u>PM FEL</u>
75 ≤ kW < 130	Tier 1	1997	14.6	--	1.2
	Tier 2	2003	--	11.5	
	Tier 3	2007	--	6.6	
kW>560	Tier 1	2000	14.6	--	--
	Tier 2	2006	--	10.5	0.54

¹ The model years listed indicates the model years for which the specified tier of standards take effect.

- c. Pursuant to 40 CFR 89.112(e), naturally aspirated nonroad engines to which 40 CFR 89 Subpart B is applicable shall not discharge crankcase emissions into the ambient atmosphere, unless such crankcase emissions are permanently routed into the exhaust and included in all exhaust emission measurements. This provision applies to all Tier 2 engines and later models. This provision does not apply to engines using turbochargers, pumps, blowers, or superchargers for air induction.
- d. Pursuant to 40 CFR 89.113(a), exhaust opacity from compression-ignition nonroad engines for which 40 CFR 89 Subpart B is applicable must not exceed:

- i. 20 percent during the acceleration mode;
 - ii. 15 percent during the lugging mode; and
 - iii. 50 percent during the peaks in either the acceleration or lugging modes.
- 4a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.305, all conveyor loading operations to storage piles specified in 35 Ill. Adm. Code 212.304 shall utilize spray systems, telescopic chutes, stone ladders or other equivalent methods in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- e. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- f. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.

- g. Pursuant to 35 Ill. Adm. Code 212.308, crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program.
- h. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- i. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- j. Pursuant to 35 Ill. Adm. Code 212.313, if particulate collection equipment is operated pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 212.312, emissions from such equipment shall not exceed 68 mg/dscm (0.03 gr/dscf).
- k. Pursuant to 35 Ill. Adm. Code 212.316(b), no person shall cause or allow fugitive particulate matter emissions generated by the crushing or screening of slag, stone, coke or coal to exceed an opacity of 10 percent.

1. Pursuant to 35 Ill. Adm. Code 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent.
- m. Pursuant to 35 Ill. Adm. Code 212.316(e)(1), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area located at a slag processing facility or integrated iron and steel manufacturing plant to exceed an opacity of 5 percent.
- n. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM_{10} , or fugitive particulate matter emissions limitation elsewhere in 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code 212 Subparts R or S, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.
- o. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- p. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of PM_{10} from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.
- q. Pursuant to 35 Ill. Adm. Code 212.700(a), 35 Ill. Adm. Code 212 Subpart UU (Additional Control Measures) shall apply to those sources in the areas designated in and subject to 35 Ill. Adm. Code 212.324(a)(1) or 212.423(a) and that have actual annual source-wide emissions of PM_{10} of at least fifteen (15) tons per year.
- 5a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).
- b. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.
- c. Pursuant to 35 Ill. Adm. Code 214.304, the emissions from the burning of fuel at process emission sources located in the Chicago or St. Louis (Illinois) major metropolitan areas shall comply with applicable 35 Ill. Adm. Code 214 Subparts B through F (i.e., 35 Ill. Adm. Code 214.122).

6. This permit is issued based on the conveyors, crushers, and screens at this source not being subject to the New Source Performance Standards (NSPS) for Coal Preparation Plants, 40 CFR 60 Subpart Y, because no machinery at this source facility is used to reduce the size of coal or to separate coal from refuse.
- 7a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- b. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).
8. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 9a. Pursuant to 40 CFR 60.4207(a), beginning October 1, 2007, owners and operators of stationary CI ICE subject to 40 CFR 60 Subpart IIII that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).
- b. Pursuant to 40 CFR 60.4207(b), beginning October 1, 2010, owners and operators of stationary CI ICE subject to 40 CFR 60 Subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.
- 10a. Pursuant to 40 CFR 80.510(a), beginning June 1, 2007. Except as otherwise specifically provided in 40 CFR 80 Subpart I, all NRLM diesel fuel is subject to the following per-gallon standards:
 - i. Sulfur content. 500 parts per million (ppm) maximum.

- ii. Cetane index or aromatic content, as follows:
 - A. A minimum cetane index of 40; or
 - B. A maximum aromatic content of 35 volume percent.
- b. Pursuant to 40 CFR 80.510(b), beginning June 1, 2010. Except as otherwise specifically provided in 40 CFR 80 Subpart I, all NR and LM diesel fuel is subject to the following per-gallon standards:
 - i. Sulfur content 15 ppm maximum for NR diesel fuel.
 - ii. Cetane index or aromatic content, as follows:
 - A. A minimum cetane index of 40; or
 - B. A maximum aromatic content of 35 volume percent.
- 11a. Pursuant to 40 CFR 60.4211(a), if you are an owner or operator and must comply with the emission standards specified in 40 CFR 60 Subpart IIII, you must operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those settings that are permitted by the manufacturer. You must also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.
- b. Pursuant to 40 CFR 60.4211(c), if you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in 40 CFR 60.4204(b) or 40 CFR 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to 40 CFR 60 Subpart IIII and must comply with the emission standards specified in 40 CFR 60.4205(c), you must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4204(b), or 40 CFR 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's specifications.
- 12a. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 Ill. Adm. Code 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in this 35 Ill. Adm. Code 212.324 shall be met at all times. 35 Ill. Adm. Code 212.324 shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:
 - i. Visual inspections of air pollution control equipment;

- ii. Maintenance of an adequate inventory of spare parts; and
 - iii. Expeditionary repairs, unless the emission unit is shutdown.
- b. Pursuant to 35 Ill. Adm. Code 212.701(a), those sources subject to 35 Ill. Adm. Code 212 Subpart UU shall prepare contingency measure plans reflecting the PM_{10} emission reductions set forth in 35 Ill. Adm. Code 212.703. These plans shall become federally enforceable permit conditions. Such plans shall be submitted to the Illinois EPA by November 15, 1994. Notwithstanding the foregoing, sources that become subject to the provisions of 35 Ill. Adm. Code 212 Subpart UU after July 1, 1994, shall submit a contingency measure plan to the Illinois EPA for review and approval within ninety (90) days after the date such source or sources became subject to the provisions of 35 Ill. Adm. Code 212 Subpart UU or by November 15, 1994, whichever is later. The Illinois EPA shall notify those sources requiring contingency measure plans, based on the Illinois EPA's current information; however, the Illinois EPA's failure to notify any source of its requirement to submit contingency measure plans shall not be a defense to a violation of 35 Ill. Adm. Code 212 Subpart UU and shall not relieve the source of its obligation to timely submit a contingency measure plan.
- c. Pursuant to 35 Ill. Adm. Code 212.703(a), all sources subject to 35 Ill. Adm. Code 212 Subpart UU shall submit a contingency measure plan. The contingency measure plan shall contain two levels of control measures:
- i. Level I measures are measures that will reduce total actual annual source-wide fugitive emissions of PM_{10} subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 15%.
 - ii. Level II measures are measures that will reduce total actual annual source-wide fugitive emissions of PM_{10} subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 25%.
- d. Pursuant to 35 Ill. Adm. Code 212.703(b), a source may comply with 35 Ill. Adm. Code 212 Subpart UU through an alternative compliance plan that provides for reductions in emissions equal to the level of reduction of fugitive emissions as required at 35 Ill. Adm. Code 212.703(a) and which has been approved by the Illinois EPA and USEPA as federally enforceable permit conditions. If a source elects to include controls on process emission units, fuel combustion emission units, or other fugitive emissions of PM_{10} not subject to 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 at the source in its alternative control plan, the plan must include a reasonable schedule for implementation of such controls, not to exceed two (2) years. This implementation schedule is subject to Illinois EPA review and approval.

- e. Pursuant to 35 Ill. Adm. Code 212.704(b), if there is a violation of the ambient air quality standard for PM_{10} as determined in accordance with 40 CFR Part 50, Appendix K, the Illinois EPA shall notify the source or sources the Illinois EPA has identified as likely to be causing or contributing to one or more of the exceedences leading to such violation, and such source or sources shall implement Level I or Level II measures, as determined pursuant to 35 Ill. Adm. Code 212.704(e). The source or sources so identified shall implement such measures corresponding to fugitive emissions within ninety (90) days after receipt of a notification and shall implement such measures corresponding to any nonfugitive emissions according to the approved schedule set forth in such source's alternative control plan. Any source identified as causing or contributing to a violation of the ambient air quality standard for PM_{10} may appeal any finding of culpability by the Illinois EPA to the Illinois Pollution Control Board pursuant to 35 Ill. Adm. Code 106 Subpart J.
- f. Pursuant to 35 Ill. Adm. Code 212.704(e), the Illinois EPA shall require that sources comply with the Level I or Level II measures of their contingency measure plans, pursuant 35 Ill. Adm. Code 212.704(b), as follows:
 - i. Level I measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, is less than or equal to 170 ug/m^3 .
 - ii. Level II measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, exceeds 170 ug/m^3 .
- 13a. Pollution control devices associated with the emission units being modified under this permit shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.
- b. The transloading facility shall be operated in accordance with good operating practices to minimize particulate matter emissions including the following.
 - i. Enclosures shall be maintained in good condition and wet suppressant shall be applied as needed whenever materials are being moved past a point of application; and
 - ii. Remedial actions shall be taken if visible emissions are observed beyond the property line.
- c. This permit is issue based on the handling of only coal, petroleum coke, and like materials, and salt at the plant. The handling of any other material at the source requires that the Permittee first obtain a construction permit from the Illinois EPA.

- d. The water pump and the generator sets shall only be operated with distillate fuel oil as the fuel. The use of any other fuel in the water pump or the generator sets requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- e. The Permittee shall not keep, store, or use distillate fuel oil (Grades No. 1 and 2) at this source with a sulfur content greater than the larger of the following values:
 - i. 0.28 weight percent, or
 - ii. The Wt. percent given by the formula: Maximum Wt. percent sulfur = $(0.000015) \times (\text{Gross heating value of oil, Btu/lb})$.
- f. Organic liquid by-products or waste materials shall not be used in the diesel generator sets without written approval from the Illinois EPA.
- g. The Illinois EPA shall be allowed to sample fuel stored at the source associated with the diesel generator set.
- 14a. The total amount of materials handled through the transloading facility shall not exceed 1.13 million tons/month and 11.25 million tons/year.
 - b. Materials handled by truck shall not exceed 175,000 tons/month and 1,750,000 tons per year (includes coal inbound/outbound via truck and salt outbound via truck).
 - c. Emissions and operation of the transloading facility shall not exceed the following limits:
 - i. Material Storage Piles and Transfer and Conveying, and Loadout:

Process	Material Throughput		PM Emissions			PM ₁₀ Emissions		
	(Ton/Mo)	(Ton/Yr)	(lb/Ton)	(T/Mo)	(T/Yr)	(lb/Ton)	(T/Mo)	(T/Yr)
Coal & Coke *	1,100,000	11,000,000	0.0005	5.87	58.71	0.00024	2.82	28.18
Salt	25,000	250,000	0.0005	0.10	1.00	0.00024	0.05	0.48
Incidental Soil Crushing *	30,660	306,600	0.0033	0.03	0.25	0.00101	0.01	0.08
Incidental Soil Screening *	30,660	306,600	0.00067	0.01	0.05	0.00034	0.01	0.03
				Totals	60.01			28.77

* 50 % control for wet suppression

- iii. These limits are based on the maximum materials throughput of 11.25 million tons per year with at most 1,750,000 tons/year handled by trucks, and standard emission factors (Table 13.2.4, AP 42, Fifth Edition, Volume I, November 2006 with U = 16.4 and M = 18.3).

iv. The above limitations contain revisions to previously issued Permits 03100038 and 06040012. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the aforementioned permit. [The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules.] These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the construction permit application contains the most current and accurate information for the source. Specifically, the source's permitted annual throughput is being increase from 11.0 million tons per year to 11.25 million tons per year and the permitted emissions of PM₁₀ are being increases from 12.5 tons per year to 28.41 tons per year.

- d. Emissions and operation of the 15 kW (20 HP) diesel-powered emergency water pump will not exceed the following:
- i. The diesel-powered emergency water pump runtime shall not exceed 150 hours/month and 500 hours/year.
 - ii. Emissions from the diesel-powered emergency water pump shall not exceed:

Pollutant	Emission	Emissions	
	Factor (lb/HP-hr)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.01079	0.02	0.05
Nitrogen Oxides (NO _x)	0.015	0.03	0.08
Particulate Matter (PM)	0.0013	0.01	0.01
Particulate Matter-10 (PM ₁₀)	0.0013	0.01	0.01
Sulfur Dioxide (SO ₂)	**	0.01	0.01
Volatile Organic Material (VOM)	0.00062	0.01	0.01

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

500 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.01 tpy

- e. Emissions and operation of the 30 kW (40 HP) diesel-powered generator will not exceed the following:
- i. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
 - ii. Emissions from the diesel-powered generator shall not exceed:

Pollutant	Emission Factor	Emissions	
	(lb/HP-hr)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00903	0.06	0.63
Nitrogen Oxides (NO _x)	0.015	0.11	1.05
Particulate Matter (PM)	0.001	0.01	0.07
Particulate Matter-10 (PM ₁₀)	0.001	0.01	0.07
Sulfur Dioxide (SO ₂)	**	0.01	0.06
Volatile Organic Material (VOM)	0.00062	0.01	0.04

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.
 $3,500 \text{ hr/yr} \times 10 \text{ gal/hr} \times 7.1 \text{ lbs/gal} \times 0.05\% \text{ S} / 2,000 \text{ lb/gal} = 0.06 \text{ tpy}$

- f. Emissions and operation of the 88 kW (118 HP) diesel-powered generators combined will not exceed the following:
- i. The diesel-powered generators runtime shall not exceed 2,100 hours/month and 21,000 hours/year.
 - ii. Emissions from the six diesel-powered generators combined shall not exceed:

Pollutant	Emission Factor	Emissions	
	(lb/HP-hr)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00815	1.01	10.10
Nitrogen Oxides (NO _x)	0.015	1.86	18.59
Particulate Matter (PM)	0.0005	0.06	0.62
Particulate Matter-10 (PM-10)	0.0005	0.06	0.62
Sulfur Dioxide (SO ₂)	**	0.04	0.37
Volatile Organic Material (VOM)	0.00033	0.04	0.41

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1.

Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

21,000 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.37 tpy

- g. Emissions and operation of the 224 kW (300 HP) diesel-powered generators combined will not exceed the following:
 - i. The diesel-powered generators runtime shall not exceed 1,050 hours/month and 10,500 hours/year.
 - ii. Emissions from the three diesel-powered generators combined shall not exceed:

Pollutant	Emission Factor	Emissions	
	(lb/HP-hr)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00573	0.90	9.02
Nitrogen Oxides (NO _x)	0.015	2.36	23.63
Particulate Matter (PM)	0.0003	0.05	0.47
Particulate Matter-10 (PM ₁₀)	0.0003	0.05	0.47
Sulfur Dioxide (SO ₂)	**	0.02	0.19
Volatile Organic Material (VOM)	0.00033	0.05	0.52

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

10,500 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.19 tpy

- h. Emissions and operation of the 280 kW (375 HP) diesel-powered generator will not exceed the following:
 - iii. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
 - iv. Emissions from the diesel-powered generator shall not exceed:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u> <u>(lb/HP-hr)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.00573	0.38	3.76
Nitrogen Oxides (NO _x)	0.015	0.98	9.84
Particulate Matter(PM)	0.0003	0.02	0.20
Particulate Matter-10(PM ₁₀)	0.0003	0.02	0.20
Sulfur Dioxide (SO ₂)	**	0.01	0.06
Volatile Organic Material (VOM)	0.00033	0.02	0.22

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.
 $3,500 \text{ hr/yr} \times 10 \text{ gal/hr} \times 7.1 \text{ lbs/gal} \times 0.05\% \text{ S} / 2,000 \text{ lb/gal} = 0.06 \text{ tpy}$

- i. Emissions and operation of the 298 kW (400 HP) diesel-powered generator will not exceed the following:
 - i. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
 - ii. Emissions from the diesel-powered generator shall not exceed:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u> <u>(lb/HP-hr)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.00573	0.40	4.01
Nitrogen Oxides (NO _x)	0.015	1.05	10.50
Particulate Matter(PM)	0.0003	0.02	0.21
Particulate Matter-10(PM ₁₀)	0.0003	0.02	0.21
Sulfur Dioxide (SO ₂)	**	0.01	0.06
Volatile Organic Material (VOM)	0.00033	0.02	0.23

These limits are based on the emission factors for units with power rating less than 600 HP, and the emission factors for CO, NO_x, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

** SO₂ emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

$3,500 \text{ hour/year} \times 10 \text{ gallons/hour} \times 7.1 \text{ lbs/gallon} \times 0.05\% \text{ S} / 2,000 \text{ lbs/gallon} = 0.06 \text{ tpy}$

- j. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).
- 15. This permit is issued based on the potential to emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
- 16a. Pursuant to 40 CFR 60.8(a), within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Illinois EPA or USEPA under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Illinois EPA or USEPA a written report of the results of such performance test(s).
- b. Pursuant to 40 CFR 60.8(b), performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart of 40 CFR Part 60 unless the Illinois EPA or USEPA:
 - i. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;
 - ii. Approves the use of an equivalent method;
 - iii. Approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific source is in compliance;
 - iv. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected facility is in compliance with the standard; or
 - v. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under section 114 of the Clean Air Act.
- c. Pursuant to 40 CFR 60.8(c), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of the

performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

- d. Pursuant to 40 CFR 60.8(d), the owner or operator of an affected facility shall provide the Illinois EPA or USEPA at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Illinois EPA or USEPA the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Illinois EPA or USEPA as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Illinois EPA or USEPA by mutual agreement.
- e. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
 - i. Sampling ports adequate for test methods applicable to such facility. This includes:
 - A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test 1 methods and procedures; and
 - B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
 - ii. Safe sampling platform(s).
 - iii. Safe access to sampling platform(s).
 - iv. Utilities for sampling and testing equipment.
- f. Pursuant to 40 CFR 60.8(f), unless otherwise specified in the applicable subpart of 40 CFR Part 60, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard under 40 CFR Part 60. For the purpose of determining compliance with an applicable standard under 40 CFR Part 60, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train,

extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Illinois EPA's or USEPA's approval, be determined using the arithmetic mean of the results of the two other runs.

- 17a. Pursuant to 40 CFR 60.4212(a), the performance test must be conducted according to the in-use testing procedures in 40 CFR Part 1039, Subpart F.
- b. Pursuant to 40 CFR 60.4212(c), exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD})$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in 40 CFR 60.4213, as appropriate.

- 18a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the

emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

- b. Testing required by Condition 19 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 19a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. 35 Ill. Adm. Code 212 Subpart A shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
- c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
- d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate gas velocity shall be determined in accordance with 40 CFR Part 60 Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
- e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternate time for submittal is agreed to by the Illinois EPA.
- 20a. Within 60 days after achieving the maximum production rate at diesel-powered generators will be operated, the emissions and

of the diesel-powered generators shall be measured during conditions which are representative of maximum emissions. These tests shall determine compliance with 40 CFR 60.4204(b), 40 CFR 89.112(a), 40 CFR 89.112(d), and 40 CFR 89.113(a).

- b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR Part 1039, Subpart F for USEPA test methods.
- 21a. At least 30 days prior to the actual date of testing, the Permittee shall submit a written test plan to the Illinois EPA, Compliance Section. This plan shall include as a minimum:
- i. The name (or other identification) of the emission unit(s) to be tested and the name and address of the facility at which they are located;
 - ii. The name and address of the independent testing service(s) performing the tests, with the names of the individuals who may be performing sampling and analysis and their experience with similar tests;
 - iii. The specific determinations of emissions and/or performance which are intended to be made, including the site(s) in the ductwork or stack at which sampling will occur;
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, minimum control performance, the levels of operating parameters for the emission unit, including associated control equipment, at or within which compliance is intended to be shown, and the means by which the operating parameters will be determined;
 - v. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control procedures which will be used, with an identification of the standard methods upon which they are based;
 - vi. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification;
 - vii. Any proposed use of an alternative test method, with detailed justification; and
 - viii. The format and content of the Source Test Report.
- b. The Permittee shall provide the Illinois EPA with written notification of testing at least thirty (30) days prior to testing to enable the Illinois EPA to have an observer present. This notification shall

include the name of emission unit(s) to be tested, scheduled date and time, and contact person with telephone number.

- c. If testing is delayed, the Permittee shall promptly notify the Illinois EPA by facsimile, at least 5 days prior to the scheduled date of testing or immediately, if the delay occurs in the 5 days prior to the scheduled date. This notification shall also include the new date and time for testing, if set, or a separate notification shall be sent with this information when it is set.
- d. The Permittee shall submit the Final Test Report(s) for those tests accompanied by a cover letter stating whether or not compliance was shown, to the Illinois EPA without delay, within 30 days after the results are compiled, but no later than 60 days after the date of testing or sampling. The Final Report shall include as a minimum:
 - i. General information describing the test, including the name and identification of the emission source which was tested, date of test, names of personnel performing the tests, and Illinois EPA observers, if any;
 - ii. A summary of results;
 - iii. Description of test procedures and method(s), including description and map of emission units and sampling points, sampling train, testing and analysis equipment, and test schedule;
 - iv. Detailed description of test conditions, including:
 - A. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information (i.e., mode(s) of operation, process rate/throughput, fuel or raw material consumption rate, and heat content of the fuels);
 - B. Control equipment information (i.e., equipment condition and operating parameters) during testing; and
 - C. A discussion of any preparatory actions taken (i.e., inspections, maintenance and repair).
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration. Identification of the applicable regulatory standards that the testing was performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards, and a statement whether the test(s) demonstrated compliance with the applicable standards;
 - vi. An explanation of any discrepancies among individual tests, failed tests or anomalous data;

- vii. The results and discussion of all quality control evaluation data, including a copy of all quality control data; and
 - viii. The applicable operating parameters of the pollution control device(s) during testing (temperature, pressure drop, scrubbing flow rate, etc.), if any.
 - e. Satisfactory completion of this test so as to demonstrate compliance with applicable emission standards is a prerequisite to issuance of an operating permit, pursuant to 35 Ill. Adm. Code 201.160(a), (b) and (c).
- 22a. Pursuant to 40 CFR 60.4209, if you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in 40 CFR 60.4211.
- b. Pursuant to 40 CFR 60.4209(b), If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.
- 23a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
24. Pursuant to 40 CFR 60.4214(c), if the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.
- 25a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be

retained for at least three (3) years after the date a test is performed.

- b. i. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code 212.316 and shall submit to the Illinois EPA an annual report containing a summary of such information.
- ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(2), the records required under 35 Ill. Adm. Code 212.316(g) shall include at least the following:
 - A. The name and address of the source;
 - B. The name and address of the owner and/or operator of the source;
 - C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;
 - D. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day; and
 - E. A log recording incidents when control measures were not used and a statement of explanation.
- iii. Pursuant to 35 Ill. Adm. Code 212.316(g)(3), the records required under 35 Ill. Adm. Code 212.316 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- iv. Pursuant to 35 Ill. Adm. Code 212.316(g)(4), the records required under 35 Ill. Adm. Code 212.316(g) shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- c. i. Pursuant to 35 Ill. Adm. Code 212.324(g)(1), written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).
- ii. Pursuant to 35 Ill. Adm. Code 212.324(g)(2), the owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to

cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.

- iii. Pursuant to 35 Ill. Adm. Code 212.324(g)(3), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
- iv. Pursuant to 35 Ill. Adm. Code 212.324(g)(5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.

26a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

- i. Records addressing use of good operating practices for the dust suppression systems associated with the materials transloading system:
 - A. Records for periodic inspection of the dust suppression systems with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- ii. Name and total amount of each material shipped (tons/month and tons/year);
- iii. Name and amount of each material shipped by truck (tons/month and tons/year);
- iv. Amount of each material that is deposited on storage piles (tons/month and tons/year);
- v. Diesel generator sets runtime (hours/month, hours/year);
- vi. Certification from the fuel supplier of weight percent sulfur content of each fuel shipment received;
- vii. Amount of fuel used (gallons/month, gallons/year);
- viii. An inspection, maintenance and repair log of the generators listing each activity performed with date; and
- iv. Monthly and annual emissions of NO_x, CO, SO₂, PM, PM₁₀ and VOM from the source with supporting calculations (tons/month, tons/year).

- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 27a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and USEPA and the owner or operator of a source, electronic notification, as follows:
- i. A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
 - ii. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
 - iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.
- 28a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- b. i. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
 - ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a

listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of 35 Ill. Adm. Code 212.316. This report shall be submitted to the Illinois EPA thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

- iii. Pursuant to 35 Ill. Adm. Code 212.324(g)(6), upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

- 29a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that during the analysis of this permit application, it was determined that your facility has the potential to emit more than 100 tons/year of nitrogen oxides (NO_x) and particulate matter of less than ten microns (PM₁₀) and will be classified as a major source under the Clean Air Act Permit Program (CAAPP). To avoid the CAAPP permitting requirements, if eligible, you may want to consider immediately applying for a Federally

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Enforceable State Operating Permit (FESOP), if your actual emissions of particulate matter of less than ten microns are less than major threshold levels. A FESOP is an operating permit, which contains enforceable limits in the form of permit conditions, which effectively restrict the potential emissions of a source to below major source thresholds, thereby excluding the source from the CAAPP.

A FESOP is an operating permit containing federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source thresholds, thereby excluding the source from the CAAPP. The necessary application forms are available on the Illinois EPA's website at <http://www.epa.state.il.us/air/caapp/permit-forms.html>.

If you have any questions on this, please call Mike Dragovich at 217/782-2113.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:MJD:jws

cc: Region 1

July 23, 2013

VIA HAND DELIVERY

Robert W. Bernoteit
Acting Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, Illinois 67294-9276

Re: Request for Revision to Revised Construction Permit
KCBX Terminals Company
10730 South Burley Avenue, Chicago, Illinois 60617
Permit No. 07050082 (Conveyor Addition Project)
Facility I.D. 031600GSF

Dear Mr. Bernoteit:

This letter is written on behalf of KCBX Terminals Company ("KCBX") to request that the Illinois Environmental Protection Agency ("Illinois EPA") revise the above-referenced revised construction permit ("Revised Construction Permit") issued to KCBX for the purpose of authorizing the proposed installation of certain additional conveyance and handling equipment as part of the Conveyor Addition Project at its facility located at 10730 South Burley Avenue, Chicago, IL 60617 (Facility I.D. No. 031600GSF) ("South Facility").

As background, the KCBX North Facility, located at 3259 East 100th Street, Chicago, IL 60617 (Facility I.D. No. 031600AHI) ("North Facility"), is currently operated pursuant to a Federally Enforceable State Operating Permit ("FESOP") that Illinois EPA issued on April 5, 2012. As discussed with you and your Staff on several occasions, KCBX intends to operate the South Facility and the North Facility as a single source, pursuant to either a single FESOP or separate FESOPs. There are pending applications for both the South Facility and the North Facility indicating KCBX's intent to accept limitations on emissions and production and/or operation of this new combined source such that potential emissions would not exceed major source applicability levels and, thereby, exclude the new combined source from requiring a CAAPP permit.

As you know, KCBX acquired the South Facility in late 2012, along with the transfer of coverage under a prior version of the Revised Construction Permit. Since that time, KCBX

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Mr. Robert W. Bernoteit
July 23, 2013
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requested certain revisions to the Revised Construction Permit, which were included in a reissued permit, dated April 18, 2013. Also, since the acquisition and the progression of the construction at the South Facility, KCBX has discovered that the equipment included in the Conveyor Addition Project (and authorized by the Revised Construction Permit) will not allow KCBX to achieve the material handling and throughput rates envisioned for the facility, which rates are less than the rates established in Special Condition 14(a) – (c) of the Revised Construction Permit.

Instead, additional equipment consisting of ten (10) Portable Conveyors, one (1) Box Hopper and one (1) Stacker, all of which may be relocated from the North Facility, will be necessary to achieve the throughput contemplated for the Conveyor Addition Project, again, which throughput will be less than the 11,000,000 tons per year of coal and coke authorized in Special Condition 14(c)(1) of the Revised Construction Permit. Thus, KCBX is requesting revisions to page 1 of the Revised Construction Permit to allow the installation of this additional equipment. Finally, on this point, please note, that KCBX is not requesting any changes to the annual and monthly throughput limitations and/or the emission limitations in the Revised Construction Permit, and/or to the related testing, monitoring, recordkeeping and reporting requirements. Similarly, KCBX is not requesting any changes to any other applicable requirements in the Revised Construction Permit.

The following air permit application forms are included with this application:

APC-628
197-Fee
220-CAAPP

KCBX renews its prior requests for a meeting and/or telephone conference with the appropriate representatives at Illinois EPA for the purpose of discussing the changes to the Conveyor Addition Project and the requested revisions to the Revised Construction Permit.

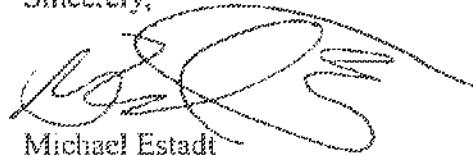
Mr. Robert W. Bernoteit

July 23, 2013

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Finally, KCBX respectfully requests that it be allowed to review a draft of the revised construction permit prior to issuance. If you should have any questions, please do not hesitate to contact Mr. Terry Steinert at 316.828.7847.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Estadt", written over a horizontal line.

Michael Estadt
Operations Manager

Attachments

pc: Robb Layman, Esq. (via hand delivery; w/enclosures)
Jeff Culver, Esq. (via electronic mail; w/enclosures)
Terry Steinert (via electronic mail; w/enclosures)
Katherine D. Hodge, Esq. (via electronic mail; w/enclosures)



Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY

ID Number: _____ Permit #: _____
☐ Complete ☐ Incomplete Date Complete: _____
Check Number: _____ Account Name: _____

This form is to be used to supply fee information that must accompany all construction permit applications. This application must include payment in full to be deemed complete. Make check or money order payable to the Illinois Environmental Protection Agency, Division of Air Pollution Control - Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

Source Information

1. Source Name: KCBX Terminals Company
2. Project Name: Conveyor Addition 3. Source ID #, (if applicable) 031600GSF
4. Contact Name: Michael Esladt 5. Contact Phone #: (773) 375-6974

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal \$0.00 + Section 2, 3 or 4 Subtotal \$10,000.00 = \$10,000.00
Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- Major Source is a source that is required to obtain a CAAPP permit.
- Synthetic Minor Source is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g., FESCP).
- Non-Major Source is a source that is not a major or synthetic minor source.

- ☒ Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.
- ☐ Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.
- ☐ New major or synthetic minor source. Proceed to Section 4. \$0.00
- ☐ New non-major source. Proceed to Section 3. Section 1 Subtotal
- ☐ AGENCY ERROR. If this is a timely request to correct an issued permit that involves only an agency error and if the request is received within the deadline for a permit appeal to the Pollution Control Board. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

This agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 ET SEQ. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Section 2: Special Case Filing Fee

8. Filing Fee. If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

- Addition or replacement of control devices on permitted units.
- Pilot projects/trial burns by a permitted unit
- Land remediation projects \$0.00
- Revisions related to methodology or timing for emission testing
- Minor administrative-type change to a permit

Section 3: Fees for Current or Projected Non-Major Sources

9.	This application consists of a single new emission unit or no more than two modified emission units. (\$500 fee)	9.	_____
10.	This application consists of more than one new emission unit or more than two modified units. (\$1,000 fee)	10.	_____
11.	This application consists of a new source or emission unit subject to Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator or a municipal waste, hazardous waste, or waste tire incinerator, a commercial power generator, or an emission unit designated as a complex source by agency rulemaking. (\$15,000 fee)	11.	\$0.00
12.	A public hearing is held (see instructions). (\$10,000 fee)	12.	_____
13.	Section 3 subtotal. (lines 9 through 12 - entered on page 1)	13.	\$0.00

Section 4: Fees for Current or Projected Major or Synthetic Minor Sources

Application contains modified emission units only	14. For the first modified emission unit, enter \$2,000.	
	15. Number of additional modified emission units = _____ x \$1,000.	15. \$0.00
	16. Line 14 plus line 15, or \$5,000, whichever is less.	16. \$0.00
Application contains new and/or modified emission units	17. For the first new emission unit, enter \$4,000.	17. \$4,000.00
	18. Number of additional new and/or modified emission units = _____ x \$1,000	18. \$11,000.00
	19. Line 17 plus line 18, or \$10,000, whichever is less.	19. \$10,000.00
Application contains netting exercise	20. Number of individual pollutants that rely on a netting exercise or contemporaneous emissions decrease to avoid application of PSD or nonattainment area NSR = _____ x \$3,000.	20. \$0.00
Additional Supplemental Fees	21. If the new source or emission unit is subject to Section 39.2 of the Act (i.e. siting); a commercial incinerator or other municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or one or more other emission units designated as a complex source by Agency rulemaking, enter \$25,000.	21. _____
	22. If the source is a new major source subject to PSD, enter \$12,000.	22. _____
	23. If the project is a major modification subject to PSD, enter \$6,000.	23. _____
	24. If this is a new major source subject to nonattainment area (NAA) NSR, enter \$20,000.	24. _____
	25. If this is a major modification subject to NAA NSR, enter \$25,000.	25. _____
	26. If the application involves a determination of MACT for a pollutant and the project is not subject to BACT or LAER for the related pollutant under PSD or NSR (e.g., VOM for organic HAP), enter \$5,000 per unit for which a determination is requested or otherwise required. _____ x \$5,000.	26. \$0.00
	27. If a public hearing is held (see instructions), enter \$10,000.	27. _____
28. Section 4 subtotal (line 16 and lines 19 through 28) to be entered on page 1		28. \$10,000.00

Section 5: Certification

NOTE: Applications without a signed certification will be deemed incomplete.

28. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the information contained in this fee application form is true, accurate and complete.

by:



Signature

Michael Estadt

Typed or Printed Name of Signatory

Operations Manager

Title of Signatory

7/18/2013

Date



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 15506
Springfield, Illinois 62794-9506

Construction Permit Application For a FESOP Source (FORM APC628)	For Illinois EPA use only
	BOA ID No.:
	Application No.:
	Date Received:

This form is to be used to supply information to obtain a construction permit for a proposed project involving a Federally Enforceable State Operating Permit (FESOP) or Synthetic Minor source, including construction of a new FESOP source. Other necessary information must accompany this form as discussed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project	
1. Working Name of Proposed Project: Conveyor Addition	
2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)? ☐ No ☒ Yes If Yes, provide BOA ID Number: 031600GSF	
3. Does this application request a revision to an existing construction permit issued by the BOA? ☐ No ☒ Yes If Yes, provide Permit Number: 07050082	
4. Does this application request that the new/modified emission units be incorporated into an existing FESOP issued by the BOA? ☒ No ☐ Yes If Yes, provide Permit Number: _____	

Source Information		
5. Source name: KCBX Terminals Company		
6. Source street address: 10730 South Burley Avenue		
7. City: Chicago	8. County: Cook	9. Zip code: 60617
ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.		
10. Is the source located within city limits? ☒ Yes ☐ No If no, provide Township Name: _____		
11. Description of source and product(s) produced:		12. Primary Classification Code of source: SIC: 4491 or NAICS: _____
13. Latitude (DD:MM:SS.SSSS):		14. Longitude (DD:MM:SS.SSSS):

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Applicant Information	
15. Who is the applicant? ☐ Owner ☒ Operator	16. All correspondence to: (check one) ☐ Owner ☒ Operator ☐ Source
17. Applicant's FEIN: 48-1082551	18. Attention name and/or title for written correspondence: Michael Estadt, Operations Manager

This Agency is authorized to require and you must disclose this information under 415 ILCS 406. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the permit management center.
IL 532-2855 APC628 5/07 Printed on Recycled Paper Page 1 of 4

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Owner Information*		
19. Name: KM Railways, LLC		
20. Address: 4111 East 37th Street North		
21. City: Wichita	22. State: Kansas	23. Zip code: 67220

* If this information different than previous information, then complete Form 272-CAAPP for a Request for Ownership Change for CAAPP Permit for an initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued

Operator Information (If Different from Owner)*		
24. Name: KCBX Terminals Company		
25. Address: 10730 South Burley Avenue		
26. City: Chicago	27. State: Illinois	28. Zip code: 60617

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC 620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Technical Contacts for Application	
29. Preferred technical contact: (check one) ☒ Applicant's contact ☐ Consultant	
30. Applicant's technical contact person for application: Terry Steinert	
31. Contact person's telephone number: (316) 826-7547	32. Contact person's email address: STEINERT@KCOCHIND.COM
33. Applicant's consultant for application: N/A	
34. Consultant's telephone number: N/A	35. Consultant's email address: N/A

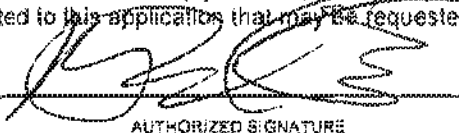
Review Of Contents of the Application	
36. Is the emission unit covered by this application already constructed? ☐ Yes ☒ No If "yes", provide the date construction was completed: Note: The Illinois EPA is unable to issue a construction permit for a emission unit that has already been constructed.	
37. Does the application include a narrative description of the proposed project?	☒ Yes ☐ No
38. Does the application contain a list or summary that clearly identifies the emission units and air pollution control equipment that are part of the project?	☒ Yes ☐ No
39. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment and related existing equipment and their relationships?	☒ Yes ☐ No
40. If the project is at a source that has not previously received a permit from the BOA, does the application include a source description, plot plan and site map?	☐ Yes ☐ No N/A

Review Of Contents of the Application (continued)		
41. Does the application include relevant information for the proposed project as requested on Illinois EPA, BOA application forms (or otherwise contain all the relevant information)?	☒ Yes	☐ No
42. Does the application identify and address all applicable or potentially applicable emissions standards, including: a. State emission standards (35 IAC Chapter I, Subtitle B); b. Federal New Source Performance Standards (40 CFR Part 60); c. Federal standards for HAPs (40 CFR Parts 61 and 63)?	☒ Yes	☐ No
43. Does the application address whether the proposed project or the source could be a major project for Prevention of Significant Deterioration (PSD), 40 CFR 52.21?	☐ Yes	☐ No ☒ N/A
44. Does the application address for which pollutant(s) the proposed project or the source could be a major project for PSD, 40 CFR 52.21?	☐ Yes	☐ No ☒ N/A
45. Does the application address whether the proposed project or the source could be a major project for "Nonattainment New Source Review," (NA NSR), 35 IAC Part 203?	☐ Yes	☐ No ☒ N/A
46. Does the application address for which pollutant(s) the proposed project or the source could be a major project for NA NSR, 35 IAC Part 203?	☐ Yes	☐ No ☒ N/A
47. Does the application address whether the proposed project or the source could potentially be subject to federal Maximum Achievable Control Technology (MACT) standard under 40 CFR Part 63 for Hazardous Air Pollutants (HAP) and identify the standard that could be applicable?	☐ Yes ☐ No	☒ N/A* * Source not major ☒ Project not major ☒
48. Does the application identify the HAP(s) from the proposed project or the source that would trigger the applicability of a MACT standard under 40 CFR Part 63?	☐ Yes	☐ No ☒ N/A
49. Does the application include a summary of the current and the future potential emissions of the source after the proposed project has been completed for each criteria air pollutant and/or HAP (tons/year)?	☒ Yes	☐ No ☐ N/A* * Applicability of PSD, NA NSR or 40 CFR 63 not applicable to the source's emissions.
50. Does the application include a summary of the requested permitted annual emissions of the proposed project for the new and modified emission units (tons/year)?	☐ Yes	☐ No ☒ N/A* * Project does not involve an increase in emissions from new or modified emission units.
51. Does the application include a summary of the requested permitted production, throughput, fuel, or raw material usage limits that correspond to the annual emissions limits of the proposed project for the new and modified emission units?	☐ Yes	☐ No ☒ N/A* * Project does not involve an increase in emissions from new or modified emission units.
52. Does the application include sample calculations or methodology for the emission estimations and the requested emission limits?	☒ Yes	☐ No
53. Does the application address the relationships with and implications of the proposed project for the source's FESOP?	☐ Yes	☐ No ☒ N/A* * FESOP not yet issued.
54. If the application contains information that is considered a TRADE SECRET, has such information been properly marked and claimed and other requirements to perfect such a claim been satisfied in accordance with 35 IAC Part 130?	☐ Yes	☐ No ☒ N/A* * No information in the application is claimed to be a TRADE SECRET

Note: *Claimed information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information.

Review Of Contents of the Application (continued)		
55. If the source is located in a county other than Cook County, are two separate copies of this application being submitted?	☐ Yes	☒ No
56. If the source is located in Cook County, are three separate copies of this application being submitted?	☒ Yes	☐ No
57. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, for the emission units and control equipment for which a permit for construction or modification is being sought?	☒ Yes	☐ No
58. Does the application include a check in the proper amount for payment of the Construction permit fee?	☒ Yes	☐ No

Note: Answering "No" to Items 55 through 58 may result in the application being deemed incomplete.

Signature Block	
Pursuant to 35 IAC 201.159, all applications and supplements thereto shall be signed by the owner and operator of the source, or their authorized agent, and shall be accompanied by evidence of authority to sign the application. Applications without a signed certification will be deemed incomplete.	
59. Authorized Signature:	
I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete and that I am a responsible official for the source, as defined by Section 39.5(1) of the Environmental Protection Act. In addition, the technical contact person identified above is authorized to submit (by hard copy and/or by electronic copy) any supplemental information related to this application that may be requested by the Illinois EPA.	
BY	
	Operations Manager
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
Michael Estadt	7/18/2013
TYPED OR PRINTED NAME OF SIGNATORY	DATE



HODGE DWYER & DRIVER

ATTORNEYS AT LAW

KATHERINE D. HODGE
E-mail: khodge@hddattorneys.com

December 20, 2012

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Environmental Protection Agency
BUREAU OF AIR

VIA HAND DELIVERY

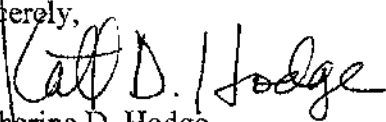
Edwin C. Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 67294-9276

Re: Supplement to Pending FESOP Application
KCBX Terminals Company
10730 South Burley Avenue, Chicago, Illinois 60617
Facility I.D. 031600GSF

Dear Mr. Bakowski:

Please find enclosed a copy of the September 20, 2012 application to revise the Joint Construction and Operating Permit (No. 07050082) to construct additional equipment at the above-referenced site, which was formerly owned and operated by DTE Chicago Fuels Terminal, LLC.¹ KCBX Terminals Company requests that the enclosed application be considered a supplement to the pending FESOP application for this site. If you have any questions regarding this supplement, please do not hesitate to contact me.

Sincerely,


Katherine D. Hodge

KDH:MTR:kjg
enclosures

¹ On December 20, 2012, KM Railways, LLC and KCBX Terminals Company became the owner and operator, respectively, of the site.

September 17, 2012

Reference No. 052450

Mr. Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

RECEIVED
STATE OF ILLINOIS

SEP 20 2012

Environmental Protection Agency
BUREAU OF AIR

Dear Mr. Bakowski:

Re: Construction Permit Application
Portable Conveyors and Diesel Generators
Chicago Fuels Terminal, LLC
ID# 031600GSF

Enclosed please find three copies of an Air Pollution Control Permit application to construct additional portable conveyors, stackers, and storage piles diesel generators for the Chicago Fuels Terminal ID# 031600GSF. DTE requests that the emission units included in this application be incorporated into the FESOP application currently under review.

In regards to the FESOP request, we have included a table outlining the throughput limitations and hours of operation that we request to be made federally enforceable.

We have enclosed the revised Fee Determination for Construction Permit Application (197-FEE) form and a check for \$7,000.

If you have any questions or need additional information, please contact Don Sutton with Conestoga-Rovers & Associates at 217-717-9009.

Yours truly,



Donald Januszek
Environmental Affairs
DTE Chicago Fuels Terminal

DJ/DS/sm/07
Encl.

US EPA ARCHIVE DOCUMENT

KM00000397



CONSTRUCTION PERMIT APPLICATION FOR A FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) SOURCE

DTE CHICAGO FUELS TERMINAL, LLC
10730 SOUTH BURLEY AVENUE
CHICAGO, ILLINOIS

DISCLAIMER:
SOME FORMATTING CHANGES MAY HAVE OCCURRED WHEN
THE ORIGINAL DOCUMENT WAS PRINTED TO PDF; HOWEVER,
THE ORIGINAL CONTENT REMAINS UNCHANGED.

SEPTEMBER 2012
REF. NO. 052450 (2)

Prepared by:
Conestoga-Rovers
& Associates

1234 Centre West Drive
Springfield, Illinois 62704

Office: (217) 717-9000
Fax: (217) 717-9001

web: <http://www.CRAworld.com>

Worldwide Engineering, Environmental, Construction, and IT Services

KM00000398

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1.0 PROJECT NARRATIVE

On February 13, 2008, the Illinois Environmental Protection Agency (IEPA) Bureau of Air (Agency) issued a Joint Construction and Operating Permit to DTE Chicago Fuels Terminal, LLC (DTE), Permit #07050082, ID# 031600CSF, for its facility located at 10730 South Burley Avenue in Chicago, Illinois (Facility). In this permit, the Agency determined that this Facility has potential to emit (PTE) more than 100 tons per year (ton/yr) of particulate matter of less than ten microns (PM₁₀).

DTE filed a Federally Enforceable State Operating Permit (FESOP) application on February 2, 2009 and this application is still under review by the Agency. The FESOP application was deemed complete by the IEPA per the May 12, 2009 CAAPP Application Completeness Determination Letter. The purpose of this application is to request a modification to Construction Permit #07050082 issued on May 21, 2009 to allow the installation of additional equipment. DTE also requests that the FESOP application be updated to include the limitations contained in this application.

DTE proposes to construct four portable conveyors, fourteen storage piles, one 100-Horsepower (HP) air compressor, and five 15-HP light standards. Emissions from the 14 storage piles are fugitive and are not included in the 197-FEE form. The air compressor and five light standards are exempt from permitting under 35 IAC 201.146(i) are not included in the 197-FEE form.

Emissions from the proposed emission units including existing emission units are contained in Tables 1-12. Table 13 provides a listing of all emission units at the Facility.

In the permit application received by the IEPA on August 15, 2008, we noted that, upon review of Section 39.5 (2)(c)(ii) of the Illinois Environmental Protection Act (Act), the Facility is not one of the 28 categories of stationary sources listed there and is not subject to a standards promulgated under Section 111 or 112 of the Clean Air Act which would require them to include fugitive emissions. Therefore, the PTE does not include fugitive emissions.

DTE requests a control efficiency of 50% for the control of particulate matter using a water suppression system.

A list of State Rules and an applicability determination for each Rule are as follows:

212.123 – Visible Emissions Limitations for All Other Emission Units
The source will achieve compliance through the Fugitive Dust Plan.

35 IAC Section 212.301 – Fugitive Particulate Matter

The source will not allow fugitive particulate matter to leave the source's boundaries. This will be accomplished through control practices in the Fugitive Dust Plan.

35 IAC Section 212.302 – Fugitive Particulate Matter

The source is located in Cook County, Illinois therefore it is subject to 35 IAC Sections 212.304 – 212.310 and 212.312.

35 IAC Section 212.304 – Storage Piles

The storage piles located at the source will be sprayed with water via a water cannon to control fugitive dust emissions. The piles will be sprayed on an as needed basis.

35 IAC Section 212.305 – Conveyor Loading Operations

The inherent moisture content of the coal/pet coke, telescoping chutes, and water suppression will provide adequate control for particulate matter emissions.

35 IAC Section 212.306 – Traffic Areas

The source operates a water truck for dust suppression on traffic areas. The traffic areas will be sprayed with water on an as needed basis.

35 IAC Section 212.307 – Materials Collected By Pollution Control Equipment

The source will recycle the coal/pet coke dust collected in the dust collectors located at the facility.

35 IAC Section 212.308 – Spraying or Choke-Feeding Required

The inherent moisture content of the coal/pet coke and water suppression will provide adequate control for particulate matter emissions for all of the emission points at the facility except for the pet coke rail unloading operations which will employ choke loading to reduce particulate matter emissions.

35 IAC Section 212.309 – Operating Program

A Fugitive Dust Plan has been created/updated.

35 IAC Section 212.310 – Minimum Operating Program

The data is included in this Fugitive Dust Plan.

35 IAC Section 212.312 – Amendment to Operating Program

A Fugitive Dust Plan has been created/updated to include the operating scenario at the Facility. If the Facility changes their operating scenario an amendment to the Operating Program will be submitted to the Agency.

35 IAC Section 212.316– Emission Limitations for Emission Units in Certain Areas

The source, which is subject to the requirements set forth in this Section, will, as discussed in this Fugitive Dust Plan, maintain compliance with the limitations in this Section. Regarding the crushing and screening operations, it has been stated that the inherent moisture content of the materials being processed will provide adequate

control of particulate matter emissions. The roadways will be sprayed with water on an as needed basis to control fugitive dust emissions. Water cannons will be used to control fugitive particulate matter emissions from the storage piles. The source will maintain records and provide reports as outlined in 35 IAC Section 212.316 (g).

35 IAC Section 212.321 – Process Emission Units for Which Construction or Modification Commenced on or After April 14, 1972.

To show compliance with the process weight rate rule a sample calculation is contained below using the throughput of a single transfer point.

$$E = A(P)^B$$

Where:

P = Process Weight Rate; and

E = Allowable Emission Rate

$$E = 2.54(2500)^{0.531}$$

$$E = 165.70 \text{ pounds per hour}$$

The actual emissions from this transfer point are 0.79 pound per hour. Therefore, the source is in compliance with the Process Weight Rate Rule.

35 IAC Section 212.324 – Process Emission Units in Certain Areas

The source is subject to the requirements in this section. See the response to 35 IAC Section 212.316.

The diesel fuel-fired engines are subject to 40 Code of Federal Regulations (CFR) Part 60 Subpart IIII. The source will comply with the requirements through the following:

40 CFR 60.4204 – Emission Standards for Non-Emergency Engines
Manufacturer's certification.

40 CFR 60.4207 – Fuel Requirements for Non-Emergency Engines
DTE will only use compliant fuels in the engines.

40 CFR 60.4209 – Monitoring Requirements for Non-Emergency Engines
The use of a non-resettable hour meter.

40 CFR 60.4211 – Compliance Requirements for Non-Emergency Engines
Manufacturer's certification.

40 CFR 60.4212 – Test Method Requirements for Non-Emergency Engines
DTE will test the engines in a manner consistent with the requirements set forth in this regulation.

40 CFR 60.4214 – Notification, Reporting, and Recordkeeping Requirements for Non-Emergency Engines

DTE will track hour usage on a rolling monthly basis and track fuel quality by purchase receipts and will record routine maintenance activities.

The PTE calculations in Table 1 indicates that the source is major, but the limitations set forth in Table 8A support the fact that this source is a synthetic minor source.

The emissions contained in Table 8A are based on the maximum facility throughput level of 11,000,000 tons of coal and petroleum coke and 250,000 ton/yr of salt. Therefore, please use the emissions listed in the tables below to establish the allowable emissions for FESOP limitations and for fee purposes.

Transfer and Conveying, and Loadout – Requested Permit Limitations

Material Handled	Throughput		Emission Factor (lb/ton)		Number of Transfer Points	PM Emissions		PM10 Emissions	
	ton/month	ton/yr	PM	PM ₁₀		ton/month	ton/yr	ton/month	ton/yr
Coal & Pet Coke	1,100,000	11,000,000	0.00064	0.0003	58	10.3	102.5	4.9	48.5
Salt	25,000	250,000	0.00064	0.0003	34	0.14	1.4	0.06	0.6
Incidental Soil Crushing	29,400	294,000	0.0033	0.00101	N/A	0.03	0.25	0.01	0.08
Incidental Soil Screening	29,400	294,000	0.00067	0.00034	N/A	0.01	0.05	0.01	0.03

The emission factors are based on material unloading, all possible transfer points located at the facility, and loadout. The emission factors are derived from AP-42 Section 13.2.4.3. There is also a 50% control efficiency taken into account in the emission calculations based on the use of water suppression.

The equation is as follows:

$$E = k(0.0032) \times ((U/5)^{-0.5}) / ((M/2)^{1.5})$$

$$\text{Coal and Coke Handling PM Emission Factor} = 0.74(0.0032) \times ((10.3/5)^{-0.5}) / ((10\%/2)^{1.5}) = 0.00064$$

$$\text{Coal and Coke Handling PM}_{10} \text{ Emission Factor} = 0.35(0.0032) \times ((10.3/5)^{-0.5}) / ((10\%/2)^{1.5}) = 0.0003$$

Coal and Coke Handling PM Emissions were calculated via the following formula:

$$11,000,000 \text{ ton/yr} \times 0.00064 \text{ lb/ton} \times 50\% \text{ control efficiency} \times 58 \text{ transfers} / 2,000 \text{ lb/ton} = 102.5 \text{ ton/yr}$$

$$102.5 \text{ ton/yr} / 10 \text{ months} = 10.3 \text{ ton/month}$$

118 HP Diesel Engine Emissions (Diesel Generators 1-3) – Requested Permit Limitations

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO _x	0.015	1.77	1.12	11.15
CO	0.00815	0.96	0.61	6.06
SO ₂	**	0.021	0.013	0.13
PM	0.0005	0.06	0.04	0.37
PM ₁₀	0.0005	0.06	0.04	0.37
VOM	0.00033	0.04	0.03	0.25

This Table provides the emissions for DG (1-3).

Emissions are based on 4,200 hours of operation per year for each unit, or 12,600 hr/yr total (three units). (118 HP x 0.015 lb/bhp-hr x 4,200 hr/yr / 2,000 lb/ton x 3 units = 11.15 ton/yr)

Emission factors are from 40 CFR 89.112 Table 1.

** SO₂ emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

12,600 hr/yr x 10 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO₂/32 MW of S = 0.13 ton/yr

500 HP Diesel Engine Emissions (Diesel Generators 4-7) – Requested Permit Limitations

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO _x	0.015	7.5	6.30	63.00
CO	0.00573	2.86	2.41	24.05
SO ₂	**	0.013	0.036	0.36
PM	0.0003	0.15	0.13	1.26
PM ₁₀	0.0003	0.15	0.16	1.26
VOM	0.00033	0.17	0.14	1.39

This Table provides the emissions for DG-(4-7).

Emissions are based on 4,200 hours of operation per year for each unit, or 16,800 hr/yr total

(500 HP x 0.015 lb/bhp-hr x 4,200 hr/yr / 2,000 lb/ton x 4 units = 63.00 ton/yr)

Emission factors are from 40 CFR 89.112 Table 1.

** SO₂ emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 20 gallons of diesel fuel per hour per engine.

16,800 hr/yr x 20 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO₂/32 MW of S = 0.36 ton/yr

100 HP Diesel Engine Emissions (Air Compressor) – Requested Permit Limitations

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO _x	0.015	1.50	0.99	3.15
CO	0.00815	0.82	0.38	1.71
SO ₂	**	0.02	0.004	0.04
PM	0.0005	0.05	0.02	0.11
PM ₁₀	0.0005	0.05	0.02	0.11
VOM	0.00033	0.03	0.16	0.07

This Table provides the emissions for AC-1.

Emissions are based on 4,200 hours of operation per year.

$(100 \text{ HP} \times 0.015 \text{ lb/bhp-hr} \times 4,200 \text{ hr/yr} / 2,000 \text{ lb/ton} = 3.15 \text{ tons/yr})$

Emission factors are from 40 CFR 89.112 Table 1.

** SO₂ emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.15% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

$4,200 \text{ hr/yr} \times 10 \text{ gal/hr} \times 7.1 \text{ lb/gal} \times 0.015\% \text{ S} / 2,000 \text{ lb/ton} \times 64 \text{ MW of SO}_2/32 \text{ MW of S} = 0.04 \text{ ton/yr}$

MW of S = 0.04 ton/yr

15 HP Diesel Engine Emissions (Light Standards 1-5) – Requested Permit Limitations

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO _x	0.015	0.23	0.11	2.36
CO	0.00903	0.12	0.06	1.28
SO ₂	**	0.01	0.011	0.11
PM	0.001	0.01	0.007	0.08
PM ₁₀	0.001	0.01	0.007	0.08
VOM	0.00033	0.005	0.02	0.05

This Table provides the emissions for LS 1(5).

Emissions are based on 4,200 hours of operation per year for each unit, or 21,000 hr/yr total

$(15 \text{ HP} \times 0.015 \text{ lb/bhp-hr} \times 3,500 \text{ hr/yr} / 2,000 \text{ lb/ton} \times 5 \text{ units} = 2.36 \text{ tons/yr})$

Emission factors are from 40 CFR 89.112 Table 1.

** SO₂ emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 5 gallons of diesel fuel per hour per engine.

$21,000 \text{ hr/yr} \times 5 \text{ gal/hr} \times 7.1 \text{ lb/gal} \times 0.015\% \text{ S} / 2,000 \text{ lb/ton} \times 64 \text{ MW of SO}_2/32 \text{ MW of S} = 0.11 \text{ ton/yr}$

20 HP Diesel Engine Emissions (Emergency Water Pump) – Requested Permit Limitations

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO _x	0.015	0.3	0.01	0.08
CO	0.01079	0.22	0.005	0.05
SO ₂	**	0.01	0.0003	0.003
PM	0.0013	0.03	0.0007	0.01
PM ₁₀	0.0013	0.03	0.0007	0.01
VOM	0.00033	0.01	0.001	0.01

This Table provides the emissions for DWP 1.

Emissions are based on 500 hours of operation per year.

(20 HP x 0.015 lb/bhp-hr x 500 hr/yr / 2,000 lb/ton = 0.08 ton/yr)

Emission factors are from 40 CFR 89.112 Table 1.

** SO₂ emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 5 gallons of diesel fuel per hour per engine.

500 hr/yr x 5 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO₂/32

MW of S = 0.003 ton/yr



**Construction Permit Application
For a FESOP Source
(FORM APC628)**

For Illinois EPA use only

BOA ID No.:

Application No.:

Date Received:

This form is to be used to supply information to obtain a construction permit for a proposed project involving a Federally Enforceable State Operating Permit (FESOP) or Synthetic Minor source, including construction of a new FESOP source. Other necessary information must accompany this form as discussed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project

1. Working Name of Proposed Project:
Conveyor Addition
2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)?
☐ No ☒ Yes If Yes, provide BOA ID Number: 0 3 1 6 0 0 G S F
3. Does this application request a revision to an existing construction permit issued by the BOA?
☐ No ☒ Yes If Yes, provide Permit Number: 0 7 0 5 0 0 8 2
4. Does this application request that the new/modified emission units be incorporated into an existing FESOP issued by the BOA? **
☐ No ☐ Yes If Yes, provide Permit Number: _____

Source Information

5. Source name: *
DTE Chicago Fuels Terminal, LLC
6. Source street address: *
10730 South Burley Avenue
7. City: Chicago 8. County: Cook 9. Zip code: 60617
- ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.**
10. Is the source located within city limits? ☐ Yes ☐ No
If no, provide Township Name: _____
11. Description of source and product(s) produced: 12. Primary Classification Code of source:
SIC: _____ or NAICS: _____
13. Latitude (DD:MM:SS.SSSS): 14. Longitude (DD:MM:SS.SSSS):

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Applicant Information

15. Who is the applicant?
☒ Owner ☐ Operator
16. All correspondence to: (check one)
☒ Owner ☐ Operator ☐ Source
17. Applicant's FEIN:
204570538
18. Attention name and/or title for written correspondence:
Donald Januszek

****The FESOP has not been issued yet.**

Owner Information*		
19. Name: DTE Chicago Fuels Terminal, LLC		
20. Address: 414 South Main Street		
21. City: Ann Arbor	22. State: Michigan	23. Zip code: 48104

* If this information different than previous information, then complete Form 272-CAAPP for a Request for Ownership Change for CAAPP Permit for an initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Operator Information (If Different from Owner)*		
24. Name DTE Chicago Fuels Terminal, LLC		
25. Address: 10730 South Burley Avenue		
26. City: Chicago	27. State: Illinois	28. Zip code: 60617

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Technical Contacts for Application	
29. Preferred technical contact: (check one) ☒ Applicant's contact ☐ Consultant	
30. Applicant's technical contact person for application: Donald Januszek	
31. Contact person's telephone number 734-302-5344	32. Contact person's email address: januszekd@dteenergy.com
33. Applicant's consultant for application: Conestoga-Rovers & Associates (Don Sutton)	
34. Consultant's telephone number: 217-717-9009	35. Consultant's email address: dsutton@craworld.com

Review Of Contents of the Application	
36. Is the emission unit covered by this application already constructed? ☐ Yes ☒ No If "yes", provide the date construction was completed: Note: The Illinois EPA is unable to issue a construction permit for a emission unit that has already been constructed.	
37. Does the application include a narrative description of the proposed project? ☒ Yes ☐ No	
38. Does the application contain a list or summary that clearly identifies the emission units and air pollution control equipment that are part of the project? ☒ Yes ☐ No	
39. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment and related existing equipment and their relationships? ☒ Yes ☐ No	
40. If the project is at a source that has not previously received a permit from the BOA, does the application include a source description, plot plan and site map? ☐ Yes ☐ No ☒ N/A*	

*Information previously submitted.

Review Of Contents of the Application (continued)	
41. Does the application include relevant information for the proposed project as requested on Illinois EPA, BOA application forms (or otherwise contain all the relevant information)?	☒ Yes ☐ No
42. Does the application identify and address all applicable or potentially applicable emissions standards, including: a. State emission standards (35 IAC Chapter I, Subtitle B); b. Federal New Source Performance Standards (40 CFR Part 60); c. Federal standards for HAPs (40 CFR Parts 61 and 63)?	☒ Yes ☐ No
43. Does the application address whether the proposed project or the source could be a major project for Prevention of Significant Deterioration (PSD), 40 CFR 52.21?	☐ Yes ☐ No ☒ N/A
44. Does the application address for which pollutant(s) the proposed project or the source could be a major project for PSD, 40 CFR 52.21?	☐ Yes ☐ No ☒ N/A
45. Does the application address whether the proposed project or the source could be a major project for "Nonattainment New Source Review," (NA NSR), 35 IAC Part 203?	☐ Yes ☐ No ☒ N/A
46. Does the application address for which pollutant(s) the proposed project or the source could be a major project for NA NSR, 35 IAC Part 203?	☐ Yes ☐ No ☒ N/A
47. Does the application address whether the proposed project or the source could potentially be subject to federal Maximum Achievable Control Technology (MACT) standard under 40 CFR Part 63 for Hazardous Air Pollutants (HAP) and identify the standard that could be applicable?	☐ Yes ☐ No ☒ N/A* * Source not major ☒ Project not major ☒
48. Does the application identify the HAP(s) from the proposed project or the source that would trigger the applicability of a MACT standard under 40 CFR Part 63?	☐ Yes ☐ No ☒ N/A
49. Does the application include a summary of the current and the future potential emissions of the source after the proposed project has been completed for each criteria air pollutant and/or HAP (tons/year)?	☒ Yes ☐ No ☐ N/A* * Applicability of PSD, NA NSR or 40 CFR 63 not applicable to the source's emissions.
50. Does the application include a summary of the requested permitted annual emissions of the proposed project for the new and modified emission units (tons/year)?	☒ Yes ☐ No ☐ N/A* * Project does not involve an increase in emissions from new or modified emission units.
51. Does the application include a summary of the requested permitted production, throughput, fuel, or raw material usage limits that correspond to the annual emissions limits of the proposed project for the new and modified emission units?	☒ Yes ☐ No ☐ N/A* * Project does not involve an increase in emissions from new or modified emission units.
52. Does the application include sample calculations or methodology for the emission estimations and the requested emission limits?	☒ Yes ☐ No
53. Does the application address the relationships with and implications of the proposed project for the source's FESOP?	☐ Yes ☐ No ☒ N/A* *FESOP not yet issued.
54. If the application contains information that is considered a TRADE SECRET, has such information been properly marked and claimed and other requirements to perfect such a claim been satisfied in accordance with 35 IAC Part 130?	☐ Yes ☐ No ☒ N/A* * No information in the application is claimed to be a TRADE SECRET

Note: "Claimed information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information."

Review Of Contents of the Application (continued)

55. If the source is located in a county other than Cook County, are two separate copies of this application being submitted? ☐ Yes ☒ No
56. If the source is located in Cook County, are three separate copies of this application being submitted? ☒ Yes ☐ No
57. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, for the emission units and control equipment for which a permit for construction or modification is being sought? ☒ Yes ☐ No
58. Does the application include a check in the proper amount for payment of the Construction permit fee? ☒ Yes ☐ No

Note: Answering "No" to Items 36 through 58 may result in the application being deemed incomplete.

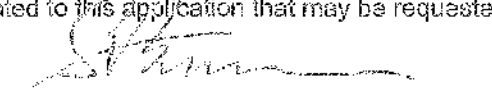
Signature Block

Pursuant to 35 IAC 201.159, all applications and supplements thereto shall be signed by the owner and operator of the source, or their authorized agent, and shall be accompanied by evidence of authority to sign the application. Applications without a signed certification will be deemed incomplete.

59. Authorized Signature:

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete and that I am a responsible official for the source, as defined by Section 39.5(1) of the Environmental Protection Act. In addition, the technical contact person identified above is authorized to submit (by hard copy and/or by electronic copy) any supplemental information related to this application that may be requested by the Illinois EPA.

BY:



AUTHORIZED SIGNATURE

Vice President

TITLE OF SIGNATORY

Stephen C. Burrows

TYPED OR PRINTED NAME OF SIGNATORY

1 13 2011

DATE



Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY

ID Number: _____

Permit #: _____

☐ Complete

☐ Incomplete

Date Completed: _____

Check Number: _____

Account Name: _____

This form is to be used to supply fee information that must accompany all construction permit applications. This application must require payment in full to be deemed complete. Make check or money order payable to the Illinois Environmental Protection Agency, Division of Air Pollution Control - Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

Source Information

1. Source Name: DTE Chicago Fuels Terminal, LLC
2. Project Name: Conveyor Addition
3. Source ID #: (if applicable) 031600GF
4. Contact Name: Donald Januszek
5. Contact Phone #: 734-302-5344

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal \$0 • Section 2, 3 or 4 Subtotal \$7,000 = \$7,000
Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- ☐ Major Source is a source that is required to obtain a CAAPP permit.
- ☐ Synthetic Minor Source is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g., FESOP).
- ☐ Non-Major Source is a source that is not a major or synthetic minor source.
- ☒ Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.
- ☐ Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.
- ☐ New major or synthetic minor source. Proceed to Section 4. \$0
- ☐ New non-major source. Proceed to Section 3. Section 1 Subtotal
- ☐ AGENCY ERROR. If this is a timely request to correct an issued permit that involves only an agency error and if the request is received within the deadline for a permit appeal to the Pollution Control Board. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

This agency is authorized to require and you must disclose this information under 415 ILCS 5/36. Failure to do so could result in the application being denied and penalties under 415 ILCS 5/11. SFC. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Section 2: Special Case Filing Fee

8. Filing Fee. If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

- ☐ Addition or replacement of control devices on permitted units.
- ☐ Pilot projects/trial burns by a permitted unit.
- ☐ Land remediation projects.
- ☐ Revisions related to methodology or timing for emission testing.
- ☐ Minor administrative-type change to a permit.

Section 3: Fees for Current or Projected Major or Minor Sources

9. ☐ This application consists of a single new emission unit or no more than two modified emission units. (\$200 fee) 9. _____
10. ☐ This application consists of more than one new emission unit or more than two modified units. (\$1,000 fee) 10. _____
11. ☐ This application consists of a new source or emission unit subject to Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator or a municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or an emission unit designated as a complex source by agency rulemaking. (\$15,000 fee) 11. _____
12. ☐ A public hearing is held (see instructions). (\$10,000 fee) 12. _____
13. Section 3 subtotal (lines 9 through 12 - entered on page 1) 13. _____

Section 4: Fees for Current or Projected Major or Synthetic Minor Sources

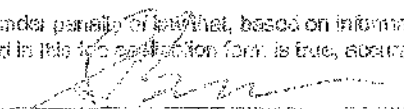
Application contains modified emission units only	14. For the first modified emission unit, enter \$2,000.	14.
	15. Number of additional modified emission units = _____ x \$1,000.	15.
	16. Line 14 plus line 15, or \$5,000, whichever is less.	16.
Application contains new and/or modified emission units	17. For the first new emission unit, enter \$4,000.	17. \$4,000
	18. Number of additional new and/or modified emission units = 3 x \$1,000.	18. \$3,000
	19. Line 17 plus line 18, or \$10,000, whichever is less.	19. \$7,000
Application contains netting exercise	20. Number of individual pollutants that rely on a netting exercise or contemporaneous emissions decrease to avoid application of PSD or nonattainment area NSR = _____ x \$3,000.	20.
Additional Supplemental Fees	21. If the new source or emission unit is subject to Section 39.2 of the Act (i.e., siting); a commercial incinerator or other municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or one or more other emission units designated as a complex source by Agency rulemaking, enter \$25,000.	21.
	22. If the source is a new major source subject to PSD, enter \$12,000.	22.
	23. If the project is a major modification subject to PSD, enter \$6,000.	23.
	24. If this is a new major source subject to nonattainment area (NAA) NSR, enter \$20,000.	24.
	25. If this is a major modification subject to NAA NSR, enter \$25,000.	25.
	26. If the application involves a determination of MACT for a pollutant and the project is not subject to BACT or LACT for the related pollutant under PSD or NSR (e.g., VOCs for organic HAP), enter \$5,000 per unit for which a determination is requested or otherwise required. x \$5,000.	26.
	27. If a public hearing is held (see instructions), enter \$10,000.	27.
28. Section 4 subtotal (line 16 and lines 19 through 27) to be entered on page 1		28. \$7,000

Section 5: Certification

NOTE: Applications without a signed certification will be deemed incomplete.

29. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the information contained in this fee certification form is true, accurate and complete.

By:


 Signature

 Vice President
 Title of Signatory

 Stephen C. Brown
 Typed or Printed Name of Signatory

 9-17-2010
 Date

Page 1 of 1

Application Fee Worksheet

13

Page 1 of 1



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE

Revision #: _____
Date: ____ / ____ / ____
Page _____ of _____
Source Designation: _____

PROCESS EMISSION UNIT DATA AND INFORMATION	FOR AGENCY USE ONLY
	ID NUMBER: _____
	EMISSION POINT #: _____
	DATE: _____

SOURCE INFORMATION	
1) SOURCE NAME: DTE Chicago Fuels Terminal, LLC	
2) DATE FORM PREPARED: March 12, 2012	3) SOURCE ID NO. (IF KNOWN): 031600GSF

GENERAL INFORMATION	
4) NAME OF EMISSION UNIT: Four additional portable conveyors	
5) NAME OF PROCESS: Material Handling	
6) DESCRIPTION OF PROCESS: Handling of coal, pet coke, and salt.	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Material transfer station	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT: See figure 1.	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): To Be Determined	
10) MODEL NUMBER (IF KNOWN): To Be Determined	11) SERIAL NUMBER (IF KNOWN): To Be Determined
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR): Upon issuance of permit
	b) OPERATION (MONTH/YEAR): Upon issuance of permit
	c) LATEST MODIFICATION (MONTH/YEAR): N/A
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE): N/A	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

APPLICATION PAGE 14

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220-CAAPP

FOR APPLICANT'S USE

052450-02-220-CAAPP

Page 1 of 10

KM00000414

US EPA ARCHIVE DOCUMENT

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION?

☐ YES☒ NO

IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):

None, although water suppression is used to control particulate emissions.

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION?

☐ YES☒ NO

IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):

The source has limited their material throughput per year to obtain a FESOP.

OPERATING INFORMATION

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS	HOURS/DAY: 12	DAYS/WEEK: 7	WEEKS/YEAR: 50
b) TYPICAL OPERATING HOURS	HOURS/DAY: 12	DAYS/WEEK: 5.2	WEEKS/YEAR: 50
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25
			SEP-NOV(%): 25

MATERIAL USAGE INFORMATION

21a) RAW MATERIALS	MAXIMUM RATES			TYPICAL RATES		
	LBS/HR		TONS/YEAR	LBS/HR		TONS/YEAR
See Tables 5 & 6						

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR		TONS/YEAR	

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR		TONS/YEAR	

FUEL USAGE DATA		
22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
d) FUEL TYPE: ☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER _____ ☐ COAL ☐ OTHER _____ IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.		
e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %, NA FOR NATURAL GAS):	
g) TYPICAL ASH CONTENT (WT %, NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):	
23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? ☐ YES ☐ NO IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:		

See Narrative, Section 1.0.

APPLICABLE RULES		
24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):		
REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :		
REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE?

☐ YES ☒ NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

COMPLIANCE INFORMATION

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?

☒ YES ☐ NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

See Narrative, Section 1.0.

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

See Narrative, Section 1.0.

TESTING, MONITORING, RECORDKEEPING AND REPORTING

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Visible Emissions	Percent Opacity	Method 9	Upon request by the Agency

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Throughput	Log Book	Operations Manager	Operations Manager

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS?

☒ YES

☐ NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST?

☒ YES

☐ NO

IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

N/A

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

N/A

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

N/A

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?

☐ YES☐ NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:

N/A

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?

☐ YES☐ NO

IF NO, EXPLAIN:

N/A

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION?

☐ YES☐ NO

IF NO, EXPLAIN:

N/A

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
	N/A			

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
	A	A

See Tables 1-12.

(37) EMISSION INFORMATION											
REGULATED AIR POLLUTANT		☐ ¹ ACTUAL EMISSION RATE ☐ ¹ UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			² PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	³ OTHER TERMS	⁴ DM	⁵ RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM						()				
	TYPICAL						()				
LEAD	MAXIMUM						()				
	TYPICAL						()				
NITROGEN OXIDES (NO _x)	MAXIMUM						()				
	TYPICAL						()				
PARTICULATE MATTER (PART)	MAXIMUM						()				
	TYPICAL						()				
PARTICULATE MATTER ≤ 10 MICROMETERS (PM ₁₀)	MAXIMUM						()				
	TYPICAL						()				
SULFUR DIOXIDE (SO ₂)	MAXIMUM						()				
	TYPICAL						()				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM						()				
	TYPICAL						()				
OTHER, SPECIFY:	MAXIMUM						()				
	TYPICAL						()				
EXAMPLE: PARTICULATE MATTER	MAXIMUM	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

¹ CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED. OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.

² PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.

³ PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)

⁴ DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)

⁵ RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

N/A

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION								
		☐ ¹ ACTUAL EMISSION RATE ☐ ¹ UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE		
NAME OF HAP EMITTED	² CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	³ OTHER TERMS	⁴ DM	⁵ RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
		MAXIMUM						
		TYPICAL						
EXAMPLE: Benzene	71432	MAXIMUM	10.0	1.2		2	98% by wt control device leak-tight trucks	CFR 61 61.302(b),(d)
		TYPICAL	8.0	0.8		2		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.

¹PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.

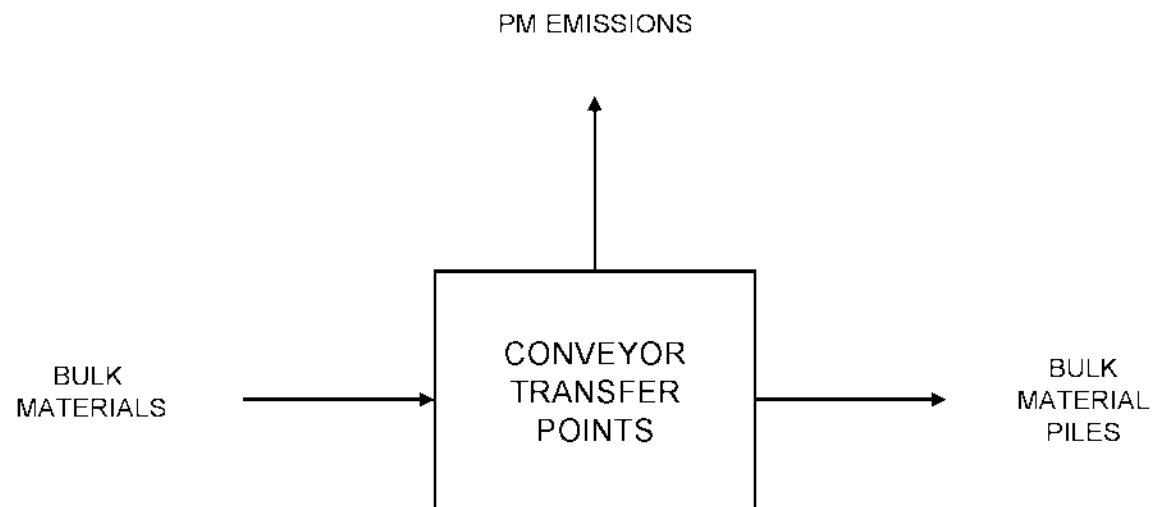
²CAS - CHEMICAL ABSTRACT SERVICE NUMBER.

³PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G., PPM, GR/DSCF, ETC.).

⁴DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS, 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS).

⁵RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION		
THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.		
39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT: See figure 1.		
40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS. Varies		
41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT): Varies		
42) DISCHARGE HEIGHT ABOVE GRADE (FT): Varies		
43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA. N/A		
45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM): N/A	b) TYPICAL (ACFM): N/A
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F): N/A	b) TYPICAL (°F): N/A
47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD): N/A		
48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:		
NAME		FLOW DIAGRAM DESIGNATION
a) See Table 13		
b)		
c)		
d)		
e)		
THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.		
49a) LATITUDE:	b) LONGITUDE:	
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



Note: End loaders transfer stored materials to transport vehicle.

figure 1

CONVEYOR TRANSFER POINTS PROCESS FLOW DIAGRAM
CONSTRUCTION PERMIT APPLICATION
DTE Chicago Fuels Terminal, LLC
Chicago, Illinois



TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE AND DENSITY ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE ⁴		PM ₁₀ EMISSION RATE ⁴	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE ⁵	EFFICIENCY	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Unloading Emissions</i>													
BU 1 to C (1 to 6) (Coal/Petcoke)	2m	2,690,160	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	2.05	0.57	0.96	0.18
KU 7 to C (1 to 6) (Coal/Petcoke)	2m	2,690,160	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	2.05	0.57	0.96	0.18
KU 7 to C (1 to 6) (Coal/Petcoke)	2m	2,690,160	0.740	0.350	0.00064	0.00050	lb/ton	Baghouse	90.0%	0.41	0.07	0.19	0.034
KU 7 to C 7 (Coal/Petcoke)	2,000	17,420,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	13.28	2.79	7.23	1.32
KU 7 to C 8 (Coal/Petcoke)	2,000	17,420,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	13.28	2.79	7.23	1.32
<i>Emissions From Coal/Petcoke Unloading: Total>></i>										35.0	6.4	16.6	3.0
<i>Coal/Petcoke Conveyor Transfer Point Emissions</i>													
C 1 to C 2	2,500	21,900,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	6.0	3.16	6.03	.65
C 2 to S 1	1,000	9,500,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	30.5h	5.59	1.15	2.61
C 2 to C 2	1,000	9,500,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	30.5h	5.59	1.15	2.61
C 3 to S 3	2,500	21,900,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	6.0	3.16	6.03	.65
C 3 to C 4	2,500	21,900,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	6.0	3.16	6.03	.65
C 4 to C 5	2,500	21,900,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	6.0	3.16	6.03	.65
C 5 to S 2	2,500	21,900,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	6.0	3.16	6.03	.65
A/C 1 to C 3	3,000	26,290,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	22.62	1.9	0.91	.68
A/C 2 to C 3	3,000	26,290,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	22.62	1.18	12.81	.68
A/C 3 to C 2	3,000	26,290,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	22.62	1.9	0.91	.68
A/C 4 to C 3	3,000	26,290,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	22.62	1.9	0.91	.68
C 7 to C 9	2,000	17,520,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	5.28	2.76	7.23	.32
C 8 to C 10	2,000	17,520,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	5.28	2.76	7.23	.32
C 9 to C 11	2,000	17,520,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	5.28	2.76	7.23	.32
C 12 to C 11	2,000	17,520,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	5.28	2.76	7.23	.32
C 11 to HP 1	2,000	17,520,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	5.28	2.76	7.23	.32
HP 1 to C 12	2,000	17,520,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	5.28	2.76	7.23	.32
C 12 to SH HP 1	2,000	17,520,000	0.740	0.350	0.00064	0.00050	lb/ton	Water Suppression	90.0%	15.28	2.76	7.23	.32

TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE AND THICKER ²		EMISSION FACTORS ³			CONTROL		PM ₁₀ EMISSION RATE ⁴		PM _{2.5} EMISSION RATE ⁴	
	ton/hr	ton/yr	PM	PM _{2.5}	PM	PM ₁₀	UNITS	TYPE ⁵	EFFICI ⁶	lb/day	ton/yr	lb/day	ton/yr
SP#1 FeS ₂	2.000	17,520.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	16.28	2.79	7.23	1.12
SP#2 FeCl ₃	2.000	17,520.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	16.28	2.79	7.23	1.12
SC#3 FeCl ₃	1.000	8,760.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	7.04	1.19	3.61	0.56
SC#4 FeCl ₃	1.000	8,760.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	7.04	1.19	3.61	0.56
SC#5 FeCl ₃	1.000	8,760.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	7.04	1.19	3.61	0.56
Emissions From Coal/Petcoke Transfer Points: Total>>										408.7	74.6	193.3	35.3
Coal/Petcoke Portable Conveyor Emissions													
Pk#1 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#2 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#3 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#4 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#5 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#6 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#7 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#8 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#9 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#10 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#11 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Pk#12 Drop Point	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
PP#1 to PC (1-12)	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
PP#10 to PC (1-12)	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
RPCS#1 to PC (1-12)	2.500	21,900.000	0.540	0.540	0.00064	0.00040	lb/ton	Water Suppression	90.0%	19.13	3.19	9.23	1.45
Emissions From Coal/Petcoke Portable Conveyor Transfer Points: Total>>										286.5	52.3	135.5	24.7

TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE AND DENSITY ²		EMISSION FACTORS ³			CONTROL		PM ₁₀ EMISSION RATE ⁴		PM _{2.5} EMISSION RATE ⁴	
	ton/hr	ton/yr	PM	PM _{2.5}	PM	PM ₁₀	UNITS	TYPE ⁵	EFFICIENCY	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Stacker Emissions</i>													
S-1 to CLP-3	1,000	35,000,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	1.15	2.64
S-1 to CLP-4	4,000	140,000,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	122.24	22.38	44.40	2.64
S-2 to CLP-2	2,500	2,600,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	6.12	3.18	0.23	.65
S-2 to CLP-3	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.23	1.66
S-3 to CLP-1	2,500	2,600,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	6.12	3.18	0.23	.65
S-3 to CLP-4	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.23	1.66
S-4 to CLP-6	2,500	2,600,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	6.12	3.18	0.23	.65
S-4 to CLP-7	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.23	1.66
S-4 to CLP-8	2,500	2,600,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	6.12	3.18	0.23	.65
S-4 to CLP-9	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.23	1.66
S-4 to CLP-10	2,500	2,600,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	6.12	3.18	0.23	.65
S-4 to CLP-11	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.23	1.66
S-4 to CLP-12	2,500	2,600,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	6.12	3.18	0.23	.65
S-4 to CLP-13	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.23	1.66
S-4 to CLP-14	2,500	2,600,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	6.12	3.18	0.23	.65
S-4 to CLP-15	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.23	1.66
S-4 to CLP-1	2,000	7,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	5.28	2.76	7.23	.39
S-4 to CLP-2	2,000	17,620,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	16.28	2.79	7.23	1.32
S-4 to CLP-3	2,000	7,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	5.28	2.76	7.23	.39
S-4 to CLP-4	2,000	17,620,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	16.28	2.79	7.23	1.32
S-4 to CLP-5	2,000	7,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	5.28	2.79	7.23	.39
S-4 to CLP-6	2,000	17,620,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	16.28	2.79	7.23	1.32
S-4 to CLP-7	2,000	7,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	5.28	2.79	7.23	.39
S-4 to SSI	2,000	17,620,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	16.28	2.79	7.23	1.32
<i>Emissions from Coal/Petcoke Stacker: Total>>></i>										450.7	82.3	213.2	38.9
<i>Coal/Petcoke Loadout Emissions Emissions</i>													
Coal Loadout to S-1	1,000	35,000,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	1.15	2.64
Coal/Petcoke Loadout to T-2	550	5,800,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	1.20	0.77	.66	0.36
Petcoke Loadout to S-1	1,000	35,000,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	1.15	2.64
<i>Emissions from Coal/Petcoke Loadout: Total>>></i>										61.3	11.9	30.9	5.6
<i>Coal/Petcoke Emissions: Total>>></i>										1246.2	227.4	589.4	107.6
<i>Salt Handling Emissions</i>													
S-1 to S-2 (Salt)	3,500	30,000,000	0.740	0.350	0.00064	0.00030	lb/ton	None	0.0%	53.17	6.76	25.26	1.62

KM00000427

TABLE 2

FUGITIVE POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE AND FUG D ₅₀ (μm) ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Storage Pile Emissions</i>													
CL-1-1	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-2	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-3	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-4	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-5	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-6	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-7	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-8	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-9	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-10	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-11	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-12	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-13	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-14	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-15	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-16	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-17	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-18	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-19	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-20	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-21	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-22	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-23	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-24	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-25	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-26	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	176.66	24.74	67.77	12.37
CL-1-27	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	36.56	24.74	67.77	2.37
CL-1-28	N/A	N/A	1,000	0.500	4847.6	2473.8	lb/acre	Water Suppression	75.0%	39.89	6.18	16.91	3.09
<i>Storage Pile Emissions: Total>></i>										3016.0	650.4	1508.0	275.2

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DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICULATE SIZE MULTIPLIER ²		EMISSION FACTORS			CONTROL		PM ₁₀ EMISSION RATE		PM _{2.5} EMISSION RATE	
	ton/hr	ton/gr	PM ₁₀	PM _{2.5}	PM	PM _{2.5}	LEUITS	TYPE	EFFICIENCY	lb/day	ton/yr	lb/day	ton/yr
Reclaim Belt Loading Emissions													
KC-1 Loaded by Dozer/Feed Loader	3.000	8.780E+00	0.740	0.350	0.00061	0.00030	lb/ton	Water Suppression	50.0%	22.82	1.39	10.84	0.66
KC-2 Loaded by Dozer/Feed Loader	3.000	8.780E+00	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.82	1.39	10.84	0.66
KC-3 Loaded by Dozer/Feed Loader	3.000	8.780E+00	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.82	1.39	10.84	0.66
KC-4 Loaded by Dozer/Feed Loader	3.000	8.780E+00	0.740	0.350	0.00061	0.00030	lb/ton	Water Suppression	50.0%	22.82	1.39	10.84	0.66
Front End Loader ³ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lb/VMT	Water Suppression	75.0%	251.65	46.47	85.89	11.99
Front End Loader ³ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lb/VMT	Water Suppression	75.0%	254.65	46.47	85.89	11.99
KC-5 Loaded by Dozer ⁴	3.000	8.780E+00	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.08	1.09	7.03	0.46
KC-6 Loaded by Dozer ⁴	3.000	8.780E+00	0.740	0.350	0.00061	0.00030	lb/ton	Water Suppression	50.0%	7.64	1.39	3.61	0.66
KC-7 Loaded by Dozer ⁴	3.000	8.780E+00	0.740	0.350	0.00061	0.00030	lb/ton	Water Suppression	50.0%	7.64	1.39	3.61	0.66
Reclaim Belt Loading Emissions: Total>>										631.5	102.7	189.2	28.6
Truck Loading Emissions													
Salt Loaded by Feed Loader ⁴	550	4.818E+00	0.740	0.350	0.00061	0.00030	lb/ton	None	0.0%	8.40	1.39	3.97	0.79
Coal Loaded by Feed Loader ⁴	475	4.161E+00	0.740	0.350	0.00061	0.00030	lb/ton	Water Suppression	50.0%	3.63	0.66	1.72	0.31
Truck Loading Emissions: Total>>										12.0	2.2	5.7	1.0
Roadway Emissions													
Inbound Coal Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	1.7	lb/VMT	Fugitive Dust Management Plan	75.0%	0.00	0.00	0.00	0.00
Outbound Coal Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	1.7	lb/VMT	Fugitive Dust Management Plan	75.0%	1274.83	196.12	277.29	90.59
Outbound Salt Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	1.7	lb/VMT	Fugitive Dust Management Plan	75.0%	244.3	227.29	321.00	56.56
Roadway Emissions: Total>>										2318.9	423.2	598.2	109.2
Facility Total>>										5978.5	1078.5	2301.1	414.0

- The hourly rate is based on 4,200 hours/year of operation.
- Agency name: Particulate Size Multiplier (s) per AP-42 Section 3.2.4.3, Aggregate Handling and Storage Pile, H/50.
- Mean Wind Speed (ft/s) (estimate).
- Emission factor for material handling emissions calculated per Equation 6 of AP-42 Section 3.2.4.3, Aggregate Handling and Storage Pile.
- Emission factor for unpaved road emissions calculated per Equation AP-42 Section 3.2.2, Unpaved Roads.
- From National Weather Service (estimate).
- From Air Pollution Engineering Manual and References Section 9.3, (<http://www.epa.gov/epaosmp/pdfs/eqtlb/carbon/c19-storage%20wind%20emission%20app.pdf>)

$$\text{CO}_2 \text{ (lb/year/acre surface)} = 1.7(s/1.5)(365/365 \text{ s}/24 \text{ h}/5/10)$$

Coal and pet coke received at the facility have an average moisture content of 8.0% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

Assumptions:**COAL BACKGROUND DATA**

Coal/Bit Coke moisture content (weighted average) = 10.0%

Sulfur content of coal = 0.03%

FRONT LOADER/DOZER OPERATIONS

Front End Loader/Dozer (Storage Piles) = 24 hours/day

Front End Loader/Dozer (Stockpiles) = 24 hours/day

Operating Schedule = 24 hours/day

Operating Schedule = 765 days/year

Operating Schedule = 8,760 hours/year

Front end loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 120.0 miles/day

VMT of Front End Loader/Dozer (Reclaim) = 120.0 miles/day

Front End Loader/Dozer Average Weight (Cut 980) = 79 tons

STORAGE PILE INFORMATION

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Sulf) = 10.0 acres

Days in storage pile = 360 days

Number of days¹ with winds > 12.0 mph = 117 daysMean wind speed¹ = 12.0 mphPercent of time² winds > 12 mph = 31.3%**INBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck lane weight = 12 tons

Maximum full truck weight = 28 tons

Average truck weight = 22 tons

Maximum facility output = 35,340,000 tons/year

Maximum truck loadout = 4,181,000 tons/year

Number of coal trucks = 28,214 trucks/year

Miles per trip = 6.8 miles

Miles per day = 65.1 miles/day

Miles per year = 23,171 miles/year

OUTBOUND COAL TRUCK BACKGROUND DATA

Delivery truck lane weight = 12 tons

Maximum full truck weight = 28 tons

Average truck weight = 22 tons

Maximum facility output = 35,340,000 tons/year

Maximum truck delivery = 4,181,000 tons/year

Number of coal trucks = 28,214 trucks/year

Miles per trip = 6.8 miles

Miles per day = 65.1 miles/day

Miles per year = 23,171 miles/year

SALT HAULING TRUCK BACKGROUND DATA

Delivery truck lane weight = 12 tons

Maximum full truck weight = 28 tons

Average truck weight = 22 tons

Maximum facility output = 4,818,000 tons/year

Maximum truck loading = 4,818,000 tons/year

Number of coal trucks = 34,143 trucks/year

Miles per trip = 6.8 miles

Miles per day = 75.13 miles/day

Miles per year = 27,514 miles/year

TABLE 3
POTENTIAL TO EMIT CALCULATIONS
DIESEL GENERATORS

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^d	SO ₂ ^b	PM ^g	PM ₁₀ ^d	VOM ^d
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Diesel Generator 1	DG-1	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 2	DG-2	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 3	DG-3	118	1.77	0.96	0.021	0.06	0.06	0.04
Totals (lb/hr)			5.31	2.89	0.06	0.18	0.18	0.12
Totals (ton/yr) ^c			23.26	12.64	0.28	0.78	0.78	0.51

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^d	SO ₂ ^b	PM ^g	PM ₁₀ ^d	VOM ^d
			0.015	0.00573	**	0.0003	0.0003	0.00033
			Emissions (lb/hr)					
Diesel Generator 4	DG-4	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 5	DG-5	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 6	DG-6	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 7	DG-7	500	7.50	2.86	0.043	0.15	0.15	0.17
Totals (lb/hr)			30.00	11.45	0.17	0.60	0.60	0.66
Totals (ton/yr) ^c			131.40	50.17	0.75	2.63	2.63	2.89

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^d	SO ₂ ^b	PM ^g	PM ₁₀ ^d	VOM ^d
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Air Compressor	AC-1	100	1.50	0.82	0.02	0.05	0.05	0.03
Totals (lb/hr)			1.50	0.82	0.02	0.05	0.05	0.03
Totals (ton/yr) ^c			6.57	3.57	0.09	0.22	0.22	0.14

TABLE 3
POTENTIAL TO EMIT CALCULATIONS
DIESEL GENERATORS

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ["]	CO ["]	SO ₂ ["]	PM ["]	PM ₁₀ ["]	VOM ["]
			0.015	0.00903	**	0.001	0.001	0.00033
			Emissions (lb/hr)					
Light Standard	LS-1	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-2	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-3	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-4	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-5	15	0.23	0.14	0.01	0.02	0.02	0.005
Totals (lb/hr)			1.13	0.68	0.05	0.08	0.08	0.02
Totals (ton/yr) ^e			4.93	2.97	0.23	0.33	0.33	0.11

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^d	SO ₂ ^b	PM ^c	PM ₁₀ ^d	VOM ^d
			0.015	0.01079	**	0.0013	0.0013	0.00033
			Emissions (lb/hr)					
Diesel Water Pump	DWP 1	20	0.30	0.22	0.01	0.03	0.03	0.01
Totals (lb/hr)			0.30	0.22	0.01	0.03	0.03	0.01
Totals (ton/yr) ^e			0.08	0.05	0.003	0.01	0.01	0.002
Facility Emissions (ton/yr)			166.23	69.39	1.36	3.96	3.96	3.66

PTF Emissions Assumptions:

^a Calculated using NSPS emission factors for stationary combustion sources (40 CFR Part 89, Section 112). VOM emission factor from Permit #07050082 issued on May 21, 2009.

^b Calculated using low sulfur diesel fuel and formula used in Permit #07050082 issued on May 21, 2009 with revised diesel fuel consumption data as follows:

500 HP Engine 20 gal/hr

100 & 118 HP Engines 10 gal/hr

15 & 20 HP Engines 5 gal/hr

^c Hours of operation 8,760 hr/yr

500 hr/yr (For emergency diesel water pump only.)

^d It is assumed that PM₁₀ emissions are equal to PM.

Example Calculation

500 HP Diesel Engine NO_x Emissions

555 horsepower x 0.015 lb NO_x per horsepower hour x 8,760 hr/yr / 2,000 lb/ton = 32.85 ton/yr NO_x

Conversion of NSPS Emission Factors

NO_x = 9.2 g/kW-hr or 6.9 g/HP-hr

6.9 g/HP-hr / 454 g per pound = 0.015 lb/hp-hr

TABLE 3A
POTENTIAL TO EMIT HAP CALCULATIONS
DIESEL GENERATORS

CAS No.	Pollutant	Diesel Engines		
		Emission Factor ^a (lb/hp-hr)	Emission Rate ^b (lb/hr)	Emission Rate ^c (ton/yr)
71-43-2	Benzene	6.56E-06	1.67E-02	7.32E-02
108-88-3	Toluene	2.88E-06	7.33E-03	3.21E-02
1330207	Xylene	2.00E-06	5.11E-03	2.24E-02
106-99-0	1,3-Butadiene	2.75E-07	7.01E-04	3.07E-03
50-00-0	Formaldehyde	8.29E-06	2.11E-02	9.26E-02
75070	Acetaldehyde	5.39E-06	1.37E-02	6.02E-02
107028	Acrolein	6.50E-07	1.66E-03	7.26E-03
91-20-3	Naphthalene	5.96E-07	1.52E-03	6.66E-03
HAP Totals:			6.79E-02	2.97E-01

^a AP-42, Fifth Edition, Volume I, Section 3.3, Gasoline and Industrial Engines (October 1996)

^b Diesel Fuel-Fired Engines maximum heat input 2549 Horsepower

^c Diesel Fuel-Fired Engines maximum hours of operation 8760 hr/yr

Emission Factor Conversion Factor 0.007

Calculated by dividing the emission factor for Nox (lb/hp-hr) into the NO_x emission factor (lb/MMBtu). This provides a conversion factor for use with HAP emission calculation.

0.031 lb/hp-hr / 4.41 lb/MMBtu = 0.007

TABLE 4

PTE EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (ton/yr)</i>					
	<i>NO_x</i>	<i>CO</i>	<i>SO₂</i>	<i>PM</i>	<i>PM₁₀</i>	<i>VOM</i>
Process				349.93	165.35	
Generator	166.23	69.39	1.36	3.96	3.96	3.66
Total	166.23	69.39	1.36	353.89	169.30	3.66

TABLE 5

MAXIMUM PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Unloading Emissions</i>													
BU 1 to C (1-6) (Coal/Petcoke)	266	1,117,200	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.02	0.18	0.48	0.08
RL/TL-1 to C-(1-6) (Coal/Petcoke)	266	1,117,200	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.02	0.18	0.48	0.08
RL/TL 1 to C (1-6) (Coal/Petcoke)	266	1,117,200	0.740	0.350	0.00064	0.00030	lbs/ton	Baghouse	90.0%	0.20	0.04	0.10	0.02
RL-2 to C-7 (Coal/Petcoke)	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
RL 3 to C 8 (Coal/Petcoke)	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
<i>Emissions From Coal/Petcoke Unloading : Total>></i>										17.5	3.1	8.3	1.4
<i>Coal/Petcoke Conveyor Transfer Point Emissions</i>													
C-1 to C-2	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-2 to S-1	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
C-3 to C-2	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
C-6 to S-3	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-1 to C-4	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-4 to C-5	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-5 to S-2	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
RC-1 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
RC-2 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
RC-3 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
RC-4 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
C-7 to C-9	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-8 to C-10	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-9 to C-11	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-10 to C-11	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-11 to TP-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
TP-1 to C-12	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-12 to STTP-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63

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TABLE 5

MAXIMUM PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
SFTP-1 to S-4	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
DH-1 to C-3	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
RC-5 to C-3	1,000	4,200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.67	1.81	0.32
RC-6 to C-3	1,000	4,200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.67	1.81	0.32
RC-7 to C-3	1,000	4,200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.67	1.81	0.32
<i>Emissions From Coal/Petcoke Transfer Points: Total>></i>										204.3	32.9	96.6	15.6
<i>Coal/Petcoke Portable Conveyor Emissions</i>													
PC-1 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-2 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-3 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-4 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-5 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-6 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-7 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-8 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-9 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-10 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-11 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-12 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PFH-1 to PC-(1-12)	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PF-1 to PC-(1-12)	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
RPCS-1 to PC-(1-12)	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
<i>Emissions From Coal/Petcoke Portable Conveyor Transfer Points: Total>></i>										143.2	25.1	67.7	11.9

TABLE 5

MAXIMUM PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Stacker Emissions</i>													
S-1 to CLP-5	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
S-1 to CLP-4	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
S-2 to CLP-2	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-2 to CLP-3	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-3 to CLP-1	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-3 to CLP-4	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-6	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-7	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-8	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-9	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-10	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-11	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-12	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-13	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-14	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-15	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-4 to CEP-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-2	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-3	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-4	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-5	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-6	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-7	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to DSH-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
<i>Emissions from Coal/Petcoke Stacker: Total>></i>										225.3	37.6	106.6	17.8

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TABLE 5

MAXIMUM PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICULATE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Loadout Emissions Emissions</i>													
Coal Loadout to S 1	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
Coal/Pet Coke Loadout to H, 2	550	2,310,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	2.10	0.37	0.99	0.17
Petcoke Loadout to S 1	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
<i>Emissions From Coal/Petcoke Loadout: Total>></i>										32.7	3.9	15.1	1.8
<i>Coal/Petcoke Emissions: Total>></i>										623.1	102.5	294.7	38.5
<i>Salt Handling Emissions</i>													
BU 1 to SP 1 (Salt)	3,500	250,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	26.74	0.08	12.65	0.04
In Various Transfer Points	2,500	250,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	305.56	1.27	144.52	0.60
<i>Emissions From Salt Handling: Total>></i>										332.3	1.4	157.2	0.6
<i>Soil Crushing/Screening Emissions</i>													
RPCS 1 (Crushing)	140	306,600			0.0033	0.00101	lbs/ton	Water Suppression	50.0%	2.77	0.25	0.85	0.08
RPCS 1 (Screening)	140	306,600			0.00067	0.00034	lbs/ton	Water Suppression	50.0%	0.56	0.05	0.29	0.03
<i>Emissions From Soil Crushing/Screening: Total>></i>										3.3	0.3	1.1	0.1
<i>Facility Total>></i>										958.7	104.1	453.0	49.2

Assumptions:

BACKGROUND DATA

1. The hourly rate is based on 4,200 hours/year of operation.

2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06

3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.

4. <http://www.nce.noaa.gov/oa/climate/online/crd/avgwind.html>

Coal/Pet Coke moisture content (weighted average): 10.0%

Operating Schedule = 12 hours/day

Operating Schedule = 350 days/year

Operating Schedule = 4,200 hours/year

Mean wind speed² = 10.3 mph

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservative in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

Facility has a water suppression system to control particulate matter emissions.

Coal and pet coke received at the facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst case scenario.

TABLE 6

MAXIMUM FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Storage Pile Emissions</i>													
CLP-1 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-2 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-3 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-4 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-5 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-6 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-7 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-8 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-9 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-10 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-11 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-12 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-13 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-14 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-15 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-1	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-2	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-3	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-4	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-5	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
CEP 6	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP 7	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
SP-1 ³	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	32.49	5.93	16.25	2.97
Storage Pile Emissions: Total>>										2892.0	527.8	1446.0	263.9
Reclaim Belt Loading Emissions													
RC 1 Loaded by Dozer/End Loader ⁴	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
RC 2 Loaded by Dozer/End Loader ⁴	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
RC 3 Loaded by Dozer/End Loader ⁴	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
RC 4 Loaded by Dozer/End Loader ⁴	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
Front End Loader ⁴ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Suppression	75.0%	127.32	22.28	32.85	5.75
Front End Loader ⁴ Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Suppression	75.0%	127.32	22.28	32.85	5.75
RC 5 Loaded by Dozer ⁴	2,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.44	3.61	0.21
RC 6 Loaded by Dozer ⁴	1,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.44	1.81	0.21
RC 7 Loaded by Dozer ⁴	1,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.44	1.81	0.21
Reclaim Belt Loading Emissions: Total>>										315.8	47.6	94.6	12.9
Truck Loading Emissions													
Salt Loaded by End Loader ⁴	550	250,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	4.20	0.08	1.99	0.04
Coal Loaded by End Loader ⁴	475	1,995,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.81	0.32	0.86	0.15
Truck Loading Emissions: Total>>										6.0	0.4	2.8	0.2
Roadway Emissions													
Inbound Coal Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	296.27	51.85	76.43	13.37
Outbound Coal Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	296.27	51.85	76.43	13.37
Outbound Salt Truck Traffic ⁵	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	67.33	11.78	17.37	3.04
Roadway Emissions: Total>>										659.9	115.5	170.2	29.8
Facility Total>>										3873.7	691.3	1713.7	306.8

1. The hourly rate is based on 4,200 hours/year of operation.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Mean Wind Speed (U) (estimate).
4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
5. Emission factor for unpaved road emissions calculated per Equation AP-42 Section 13.2.2, Unpaved Roads.
6. From National Weather Service (estimate).
7. From Air Pollution Engineering Manual and References Section 9.3. (http://www.wrapair.org/forums/dej/fdh/content/Ch9-Storage_Pile_Wind%20Erosion_Rev06.pdf)

$$\text{TSP (lb/year/acre surface)} = 1.7(s/1.5)(365/365-p)/235(f/15)$$

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

Assumptions:

COAL BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) = 10.0%

Silt content of coal = 5.0%

FRONT LOADER/DOZER OPERATIONS

Front End Loaders/Dozer (Storage Piles) = 12 hours/day

Front End Loaders/Dozer (Reclaim) = 12 hours/day

Operating Schedule = 12 hours/day

Operating Schedule = 350 days/year

Operating Schedule = 4,200 hours/year

Front End Loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 60.0 miles/day

VMT of Front End Loader/Dozer (Reclaim) = 60.0 miles/day

Front End Loader/Dozer Average Weight (Cat 980) = 39 tons

STORAGE PILE INFORMATION

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Salt) = 10.0 acres

Days in storage pile = 350 days

Number of days⁶ with rain > 0.01 inch = 117 days

Mean wind speed⁷ = 10.3 mph

Percent of time⁷ winds > 12 mph = 34.0%

INBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility input= 11,000,000 tons/year

Maximum truck loadout= 1,100,000 tons/year

Number of coal trucks= 78,571 trucks/year

Miles per trip= 0.8 miles

Miles per day= 179.6 miles/day

Miles per year= 62,857 miles/year

OUTBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 11,000,000 ton/year

Maximum truck delivery= 1,100,000 ton/year

Number of coal trucks= 78,571 trucks/year

Miles per trip= 0.8 miles

Miles per day= 179.6 miles/day

Miles per year= 62,857 miles/year

SALT HAULING TRUCK BACKGROUND DATA

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 250,000 ton/year

Maximum truck loading= 250,000 ton/year

Number of coal trucks= 17,857 trucks/year

Miles per trip= 0.8 miles

Miles per day= 40.8 miles/day

Miles per year= 14,286 miles/year

TABLE 7
MAXIMUM EMISSION CALCULATIONS
DIESEL GENERATORS

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx ^a	CO ^a	SO ₂ ^b	PM ^a	PM ₁₀ ^d	VOM ^a
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Diesel Generator 1	DC 1	118	1.77	0.96	0.021	0.06	0.06	0.01
Diesel Generator 2	DC 2	118	1.77	0.96	0.021	0.06	0.06	0.01
Diesel Generator 3	DC 3	118	1.77	0.96	0.021	0.06	0.06	0.01
Totals (lb/hr)			5.31	2.89	0.06	0.18	0.18	0.12
Totals (ton/yr) ^c			11.15	6.06	0.13	0.37	0.37	0.25

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx ^a	CO ^a	SO ₂ ^b	PM ^a	PM ₁₀ ^d	VOM ^a
			0.015	0.00573	**	0.0003	0.0003	0.00033
			Emissions (lb/hr)					
Diesel Generator 4	DC-4	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 5	DC-5	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 6	DC-6	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 7	DC-7	500	7.50	2.86	0.043	0.15	0.15	0.17
Totals (lb/hr)			30.00	11.45	0.17	0.60	0.60	0.66
Totals (ton/yr) ^c			63.00	24.05	0.36	1.26	1.26	1.39

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx ^a	CO ^a	SO ₂ ^b	PM ^a	PM ₁₀ ^d	VOM ^a
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Air Compressor	AC-1	100	1.50	0.82	0.02	0.05	0.05	0.03
Totals (lb/hr)			1.50	0.82	0.02	0.05	0.05	0.03
Totals (ton/yr) ^c			3.15	1.71	0.04	0.11	0.11	0.07

TABLE 7

**MAXIMUM EMISSION CALCULATIONS
DIESEL GENERATORS**

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^b	PM ^a	PM ₁₀ ^d	VOM ^a
			0.015	0.00903	**	0.001	0.001	0.00033
			Emissions (lb/hr)					
Light Standard	LS-1	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-2	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-3	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-4	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-5	15	0.23	0.14	0.01	0.02	0.02	0.005
Totals (lb/hr)			1.13	0.68	0.05	0.08	0.08	0.02
Totals (ton/yr) ^c			2.36	1.42	0.11	0.16	0.16	0.05

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^b	PM ^a	PM ₁₀ ^d	VOM ^a
			0.015	0.01079	**	0.0013	0.0013	0.00033
			Emissions (lb/hr)					
Diesel Water Pump	DWP 1	20	0.30	0.22	0.01	0.03	0.03	0.01
Totals (lb/hr)			0.30	0.22	0.01	0.03	0.03	0.01
Totals (ton/yr) ^c			0.08	0.05	0.003	0.01	0.01	0.002
Facility Emissions (ton/yr)			79.74	33.30	0.65	1.90	1.90	1.75

Maximum Emissions Assumptions:

^a Calculated using NSPS emission factors for stationary combustion sources (40 CFR Part 89, Section 112). VOM emission factor from Permit #07050082 issued on May 21, 2009.

^b Calculated using low sulfur diesel fuel and formula used in Permit #07050082 issued on May 21, 2009 with revised diesel fuel consumption data as follows:

500 HP Engine	20 gal/hr
100 & 118 HP Engines	10 gal/hr
15 & 20 HP Engines	5 gal/hr
^c Hours of operation	4,200 hr/yr
	500 hr/yr (For emergency diesel water pump only.)

^d It is assumed that PM₁₀ emissions are equal to PM.

Example Calculation

500 HP Diesel Engine NO_x Emissions

$$500 \text{ horsepower} \times 0.015 \text{ lb NO}_x \text{ per horsepower hour} \times 4,200 \text{ hr/yr} = 2,625 \text{ lb/ton} = 15.75 \text{ ton/yr NO}_x$$

Conversion of NSPS Emission Factors

NO_x = 9.2 g/kW-hr or 6.9 g/HP-hr

6.9 g/HP-hr / 454 g per pound = 0.015 lb/hp-hr

TABLE 8

FESOP REQUESTED LIMITATION AND
FEE ALLOWABLE EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (ton/yr)</i>					
	<i>NO_x</i>	<i>CO</i>	<i>SO₂</i>	<i>PM</i>	<i>PM₁₀</i>	<i>VOM</i>
Process				104.14	49.22	
Generator	79.74	33.30	0.65	1.90	1.90	1.75
Total	79.74	33.30	0.65	106.04	51.12	1.75

Based on limiting operations to 4,200 hours per year.

TABLE 9

TYPICAL PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Unloading Emissions</i>													
BL 1 to C-(1-6) (Coal/Petcoke)	266	829,920	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.03	0.13	0.48	0.06
RU/TU-1 to C-(1-6) (Coal/Petcoke)	266	829,920	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.03	0.13	0.48	0.06
RU/TU-1 to C-(1-6) (Coal/Petcoke)	266	829,920	0.740	0.350	0.00064	0.00030	lbs/ton	Baghouse	90.0%	0.20	0.03	0.10	0.01
RU 2 to C 7 (Coal/Petcoke)	2,000	6,240,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.99	3.61	0.47
RU 3 to C 8 (Coal/Petcoke)	2,000	6,240,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.99	3.61	0.47
<i>Emissions From Coal/Petcoke Unloading : Total>></i>										17.5	2.3	8.3	1.1
<i>Coal/Petcoke Conveyor Transfer Point Emissions</i>													
C-1 to C-2	2,500	7,800,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.24	4.52	0.59
C-2 to S-1	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
C-3 to C-2	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
C-6 to S-3	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
C-1 to C-4	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
C-4 to C-5	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
C-5 to S-2	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
RC-1 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
RC-2 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
RC-3 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
RC-4 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
C-7 to C-9	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-8 to C-10	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-9 to C-11	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-10 to C-11	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-11 to T/P-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
T/P-1 to C-12	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-12 to S/FTP-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S/FTP-1 to S-4	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15

TABLE 9

TYPICAL PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
DSH 1 to C-3	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
RC-5 to C-3	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
RC-6 to C-3	1,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.32	1.81	0.15
RC-7 to C-3	1,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.32	1.81	0.15
Emissions From Coal/Petcoke Transfer Points: Total>>										208.2	8.2	98.5	3.9
Coal/Petcoke Portable Conveyor Emissions													
PC-1 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-2 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-3 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-4 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-5 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-6 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-7 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-8 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-9 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-10 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-11 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-12 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PFH 1 to PC (1-12)	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PF-1 to PC (1-12)	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
RPCS 1 to PC (1-12)	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
Emissions From Coal/Petcoke Portable Conveyor Transfer Points: Total>>										143.2	9.3	67.7	4.4

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TABLE 9
TYPICAL PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Stacker Emissions</i>													
S-1 to C1.P-5	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
S-1 to C1.P-4	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
S-2 to C1.P-2	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-2 to C1.P-3	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-3 to C1.P-1	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-3 to C1.P-4	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-6	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-7	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-8	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-9	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-10	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-11	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-12	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-13	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-14	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to C1.P-15	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-4 to CEP-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-2	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-3	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-4	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-5	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-6	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-7	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to DSH-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
<i>Emissions From Coal/Petcoke Stacker: Total>></i>										225.3	7.6	106.6	3.6

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TABLE 9

TYPICAL PROCESS UNIT EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE ¹		PARTICLE SIZE MULTIPLIER ²		EMISSION FACTORS ³			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/yr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
<i>Coal/Petcoke Loadout Emissions Emissions</i>													
Coal Loadout to S-1	4,000	1,300,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.21	7.23	0.10
Coal/Pet Coke Loadout to T1-2	550	200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	2.10	0.03	0.99	0.02
Pet Coke Loadout to S-1	4,000	1,300,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.21	7.23	0.10
<i>Emissions From Coal/Petcoke Loadout: Total>></i>										32.7	0.4	15.4	0.2
<i>Coal/Petcoke Emissions: Total>></i>										626.9	27.9	296.5	13.2
<i>Salt Handling Emissions</i>													
BL-1 to SP-1 (Salt)	3,500	1,25,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	26.74	0.06	12.65	0.03
16 Various Transfer Points	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	19.10	0.64	9.03	0.30
<i>Emissions From Salt Handling: Total>></i>										45.8	0.7	21.7	0.3
<i>Soil Crushing/Screening Emissions</i>													
RPC# 1 (Crushing)	140	218,400			0.0033	0.00101	lbs/ton	Water Suppression	50.0%	2.77	0.18	0.85	0.06
RPC# 1 (Screening)	140	218,400			0.00067	0.00034	lbs/ton	Water Suppression	50.0%	0.56	0.04	0.29	0.02
<i>Emissions From Soil Crushing/Screening: Total>></i>										3.3	0.2	1.1	0.1
<i>Facility Total>></i>										676.1	28.8	319.3	13.6

Assumptions:BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) : 10.0%

Operating Schedule = 12 hours/day

Operating Schedule = 260 days/year

Operating Schedule = 3,120 hours/year

Mean wind speed⁴ = 10.3 mph

1. The hourly rate is based on 3,120 hours/year of operation.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
4. <http://www.nedk.noaa.gov/oa/climate/online/ccd/avgwind.html>

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservative in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

Facility has a water suppression system to control particulate matter emissions.

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

TABLE 10

TYPICAL FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	APPROXIMATE MATERIAL HANDLING RATE ¹		PARTICULATE SIZE AND FREQUENCY ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	ton/hr	ton/gr	PM	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFICIENCY	lb/day	ton/gr	lb/day	ton/gr
Storage Pile Emissions													
C1P-1 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-2 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-3 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-4 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-5 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-6 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-7 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-8 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-9 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-10 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-11 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-12 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-13 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-14 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-15 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-1	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-2	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-3	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-4	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
C1P-5	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-6	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	35.55	34.74	87.77	12.97
C1P-7	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	176.55	34.74	87.77	12.97
SP-1 ³	N/A	N/A	1,000	0.500	4947.5	2473.8	lbs/acre	Water Suppression	75.0%	33.89	6.18	18.91	3.09
Storage Pile Emissions: Total>>										3016.0	550.4	1508.0	275.2

DESCRIPTION	ATANKRAMAT VITRIAL HANDLING RATE ¹		PARTICULATE MULTIPLIER ²		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM ₁₀ EMISSION RATE	
	tons/hr	tons/year	PM ₁	PM ₁₀	PM	PM ₁₀	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Reclaim Belt Loading Emissions													
SC1 Loaded by Dozer/Trail Loader ⁴	3,330	500,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	11.46	0.38	3.47	0.22
SC2 Loaded by Dozer/Trail Loader ⁴	3,330	500,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	11.46	0.38	3.47	0.22
SC3 Loaded by Dozer/Trail Loader ⁴	3,330	500,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	11.46	0.38	3.47	0.22
SC4 Loaded by Dozer/Trail Loader ⁴	3,330	500,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	11.46	0.38	3.47	0.22
Front End Loader ⁵ Roadway Emissions	N/A	N/A	4.930	1.500	8.5	2.2	lbs/VMT	Water Suppressor	75.0%	27.32	n.35	32.85	4.27
Front End Loader ⁵ Roadway Emissions	N/A	N/A	4.930	1.500	8.5	2.2	lbs/VMT	Water Suppressor	75.0%	27.32	n.35	32.85	4.27
SC5 Loaded by Dozer ⁴	2,330	500,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	7.84	0.28	3.61	0.24
SC6 Loaded by Dozer ⁴	1,330	500,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	3.82	0.18	1.81	0.14
SC7 Loaded by Dozer ⁴	1,330	500,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	3.82	0.18	.8	0.22
Reclaim Belt Loading Emissions: Total>>										315.8	33.7	94.6	8.8
Truck Loading Emissions													
Salt Loaded by Trail Loader ⁴	550	1,716,000	0.740	0.350	0.00064	0.00093	lbs/ton	None	0.0%	4.20	0.30	1.99	0.26
Coal Loaded by Trail Loader ⁴	475	1,482,000	0.740	0.350	0.00064	0.00093	lbs/ton	Water Suppressor	50.0%	.8	0.24	0.86	0.1
Truck Loading Emissions: Total>>										6.0	0.8	2.8	0.4
Roadway Emissions													
Inbound Coal Truck Traffic ⁶	N/A	N/A	4.930	1.500	6.8	1.7	lbs/VMT	Engine/ Dust Management Plan	75.0%	72.31	9.13	18.71	2.13
Outbound Coal Truck Traffic ⁶	N/A	N/A	4.930	1.500	6.8	1.7	lbs/VMT	Engine/ Dust Management Plan	75.0%	72.31	9.13	18.71	2.13
Outbound Salt Truck Traffic ⁶	N/A	N/A	4.930	1.500	6.8	1.7	lbs/VMT	Engine/ Dust Management Plan	75.0%	83.49	8.20	18.97	2.13
Roadway Emissions: Total>>										208.5	27.1	53.8	7.0
Facility Total>>										3546.2	612.0	1659.2	291.4

1. The hourly rate is based on 3, 30 hours/year of operation.

2. Aerodynamic/Particle Size Multiplier (dk) per AP-42 Section 13.2.1.3, Aggregate Handling and Storage Piles, 11/08.

3. Mean Wind Speed (U) (estimate).

4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 9.3.4.3.

Aggregate Handling and Storage Piles.

5. Emission factor for unpaved road emissions calculated per Equation A.1-42 Section 13.2.1, Unpaved Roads.

6. From National Weather Service (estimate).

7. From Air Pollution Engineering Manual and References Section 9.3, http://www.wcupa.edu/faculty/djg/Life/Content/C594Storage_Pile_Wind%20Emission_Rev06.pdf

$$E_{\text{road}} (\text{lb/y ear}/\text{open surface}) = 1.768 \times 10^{-5} [365 \times P] / (35 U^{0.75})$$

Coal and pet coke received at the facility have an average moisture content of 18.3% and 11.00% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

Assumptions:

COAL BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) = 10.0%
Silt content of coal = 5.0%

FRONT LOADER/DOZER OPERATIONS

Front End Loaders/Dozer (Storage Piles) = 12 hours/day
Front End Loaders/Dozer (Reclaim) = 7 hours/day
Operating Schedule = 7 hours/day
Operating Schedule = 260 days/year
Operating Schedule = 3,120 hours/year
Front End Loader/Dozer speed = 5.0 mph
VMT of front end loader/Dozer (Storage Piles) = 60.0 miles/day
VMT of front end loader/Dozer (Reclaim) = 60.0 miles/day
Front end loader/Dozer Average Weight (Cat 980) = 39 tons

STORAGE PILE INFORMATION

Surface area of storage piles (Coal) = 40.0 acres
Surface area of storage piles (Coke) = 40.0 acres
Surface area of storage piles (Silt) = 10.0 acres
Days in storage pile = 365 days
Number of days^a with rain > 0.01 inch = 7 days
Year wind speed^b = 10.3 mph
Percent of time^c winds > 12 mph = 34.0%

INBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight = 5 tons
Maximum full truck weight = 39 tons
Average truck weight = 23 tons
Maximum facility input = 2,000,000 tons/year
Maximum truck loading = 700,000 tons/year
Number of coal trucks = 4,286 trucks/year
Miles per trip = 0.8 miles
Miles per day = 44.0 miles/day
Miles per year = 11,428 miles/year

OUTBOUND COAL TRUCK BACKGROUND DATA

Delivery truck tare weight = 5 tons
Maximum full truck weight = 39 tons
Average truck weight = 23 tons
Maximum facility output = 2,000,000 tons/year
Maximum truck delivery = 700,000 tons/year
Number of coal trucks = 4,286 trucks/year
Miles per trip = 0.8 miles
Miles per day = 44.0 miles/day
Miles per year = 11,428 miles/year

SILT HAULING TRUCK BACKGROUND DATA

Delivery truck tare weight = 5 tons
Maximum full truck weight = 39 tons
Average truck weight = 23 tons
Maximum facility output = 75,000 tons/yr
Maximum truck loading = 75,000 tons/yr
Number of coal trucks = 2,500 trucks/year
Miles per trip = 0.8 miles
Miles per day = 38.0 miles/day
Miles per year = 10,000 miles/year

TABLE 11

**TYPICAL EMISSION CALCULATIONS
DIESEL GENERATORS**

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^b	PM ^c	PM ₁₀ ^d	VOM ^e
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Diesel Generator 1	DG-1	118	1.77	0.96	0.021	0.06	0.06	0.01
Diesel Generator 2	DG 2	118	1.77	0.96	0.021	0.06	0.06	0.01
Diesel Generator 3	DG-3	118	1.77	0.96	0.021	0.06	0.06	0.01
Totals (lb/hr)			5.31	2.89	0.06	0.18	0.18	0.12
Totals (ton/yr) ^e			8.28	4.50	0.10	0.28	0.28	0.18

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^b	PM ^c	PM ₁₀ ^d	VOM ^e
			0.015	0.00573	**	0.0003	0.0003	0.00033
			Emissions (lb/hr)					
Diesel Generator 4	DG 4	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 5	DG-5	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 6	DG-6	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 7	DG 7	500	7.50	2.86	0.043	0.15	0.15	0.17
Totals (lb/hr)			30.00	11.45	0.17	0.60	0.60	0.66
Totals (ton/yr) ^e			46.80	17.87	0.27	0.91	0.91	1.03

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^b	PM ^c	PM ₁₀ ^d	VOM ^e
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Air Compressor	AC 1	100	1.50	0.82	0.02	0.05	0.05	0.03
Totals (lb/hr)			1.50	0.82	0.02	0.05	0.05	0.03
Totals (ton/yr) ^e			2.31	1.27	0.03	0.08	0.08	0.05

TABLE 11

**TYPICAL EMISSION CALCULATIONS
DIESEL GENERATORS**

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^b	PM ^a	PM ₁₀ ^d	VOM ^a
			0.015	0.00903	**	0.001	0.001	0.00033
Light Standard	LS 1	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS 2	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-3	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-1	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS 5	15	0.23	0.14	0.01	0.02	0.02	0.005
Totals (lb/hr)			1.13	0.68	0.05	0.08	0.08	0.02
Totals (ton/yr) ^c			1.76	1.06	0.08	0.12	0.12	0.01

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NO _x ^a	CO ^a	SO ₂ ^b	PM ^a	PM ₁₀ ^d	VOM ^a
			0.015	0.01079	**	0.0013	0.0013	0.00033
Diesel Water Pump	DWP 1	20	0.30	0.22	0.01	0.03	0.03	0.01
Totals (lb/hr)			0.30	0.22	0.01	0.03	0.03	0.01
Totals (ton/yr) ^c			0.01	0.03	0.001	0.003	0.003	0.001
Facility Emissions (ton/yr)			59.22	24.72	0.48	1.41	1.41	1.30

Maximum Emissions Assumptions:

^a Calculated using NSPS emission factors for stationary combustion sources (40 CFR Part 89, Section 112). VOM emission factor from Permit #07050082 issued on May 21, 2009.

^b Calculated using low sulfur diesel fuel and formula used in Permit #07050082 issued on May 21, 2009 with revised diesel fuel consumption data as follows:

500 HP Engine 20 gal/hr
100 & 118 HP Engines 10 gal/hr
15 & 20 HP Engines 5 gal/hr

^c Hours of operation 3,120 hr/yr
 250 hr/yr (for emergency diesel water pump only.)

^d It is assumed that PM₁₀ emissions are equal to PM.

Example Calculation

500 HP Diesel Engine NO_x Emissions

500 horsepower x 0.015 lb NO_x per horsepower hour x 3,120 hr/yr / 2,550 lb/ton = 11 / ton/yr NO_x

Conversion of NSPS Emission Factors

NO_x = 9.2 g/kW-hr or 6.9 g/HP-hr

6.9 g/HP-hr / 454 g per pound = 0.015 lb/hp-hr

TABLE 12

TYPICAL EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (ton/yr)</i>					
	<i>NO_x</i>	<i>CO</i>	<i>SO₂</i>	<i>PM</i>	<i>PM₁₀</i>	<i>VOM</i>
Process				28.82	13.60	
Generator	59.22	24.72	0.48	1.41	1.41	1.30
Total	59.22	24.72	0.48	30.23	15.01	1.30

TABLE 13
LISTING OF EMISSION UNITS

<i>Process Equipment</i>	<i>Unit Designation</i>	<i>Submittal</i>	<i>Permit #</i>
<u><i>Unloading Operations</i></u>			
Barge Unloader	BU-1	Existing	
Rail/Truck Unloader	RU/TU-1	Existing	
Rail Unloader 2	RU-2	Existing	7050082
Rail Unloader 3	RU-3	Existing	7050082
<u><i>Conveyor Operations</i></u>			
Conveyor 1	C-1	Existing	
Conveyor 2	C-2	Existing	
Conveyor 3	C-3	Existing	
Conveyor 4	C-4	Existing	
Conveyor 5	C-5	Existing	
Conveyor 6	C-6	Existing	
Conveyor 7	C-7	Existing	7050082
Conveyor 8	C-8	Existing	7050082
Conveyor 9	C-9	Existing	7050082
Conveyor 10	C-10	Existing	7050082
Conveyor 11	C-11	Existing	7050082
Conveyor 12	C-12	Existing	7050082
Reclaim Conveyor 1	RC-1	Existing	
Reclaim Conveyor 2	RC-2	Existing	
Reclaim Conveyor 3	RC-3	Existing	
Reclaim Conveyor 4	RC-4	Existing	
Reclaim Conveyor 5	RC-5	Existing	7050082
Reclaim Conveyor 6	RC-6	Existing	7050082
Reclaim Conveyor 7	RC-7	Existing	7050082
Portable Conveyor 1	PC-1	Existing	7050082
Portable Conveyor 2	PC-2	Existing	7050082
Portable Conveyor 3	PC-3	Existing	7050082
Portable Conveyor 4	PC-4	Existing	7050082
Portable Conveyor 5	PC-5	Existing	7050082
Portable Conveyor 6	PC-6	Existing	7050082
Portable Conveyor 7	PC-7	Existing	7050082
Portable Conveyor 8	PC-8	Existing	7050082
Portable Conveyor 9	PC-9	Proposed	
Portable Conveyor 10	PC-10	Proposed	
Portable Conveyor 11	PC-11	Proposed	
Portable Conveyor 12	PC-12	Proposed	
<u><i>Transfer Hopper Operations</i></u>			
Direct Ship Hopper 1	DSH-1	Existing	7050082
Portable Feed Hopper	PFH-1	Existing	7050082
Portable Feeder	PF-1	Existing	7050082
Rental Portable Crusher/Screen	RPCS-1	Existing	7050082
Transfer Point 1	TP-1	Existing	7050082
Stacker Feed Transfer Point	SFTP-1	Existing	7050082

TABLE 13
LISTING OF EMISSION UNITS

<i>Process Equipment</i>	<i>Unit Designation</i>	<i>Submittal</i>	<i>Permit #</i>
<u>Stacker Operations</u>			
Stacker 1/Barge & Rail Loadout	S-1	Existing	
Stacker 2	S-2	Existing	
Stacker 3	S-3	Existing	
Stacker 4	S-4	Existing	7050082
<u>Storage Pile Operations</u>			
Coal Pile 1	CLP-1	Existing	
Coal Pile 2	CLP 2	Existing	
Coal Pile 3	CLP 3	Existing	
Coal Pile 4	CLP 4	Existing	
Coal Pile 5	CLP 5	Existing	
Coal Pile 6	CLP 6	Proposed	
Coal Pile 7	CLP 7	Proposed	
Coal Pile 8	CLP 8	Proposed	
Coal Pile 9	CLP 9	Proposed	
Coal Pile 10	CLP 10	Proposed	
Coal Pile 11	CLP 11	Proposed	
Coal Pile 12	CLP 12	Proposed	
Coal Pile 13	CLP 13	Proposed	
Coal Pile 14	CLP 14	Proposed	
Coal Pile 15	CLP 15	Proposed	
Salt Pile 1	SP-1	Existing	7050082
Coke Pile 1	CEP 1	Existing	7050082
Coke Pile 2	CEP 2	Existing	7050082
Coke Pile 3	CEP 3	Existing	7050082
Coke Pile 4	CEP 4	Proposed	
Coke Pile 5	CEP 5	Proposed	
Coke Pile 6	CEP 6	Proposed	
Coke Pile 7	CEP 7	Proposed	
<u>Diesel Generators</u>			
Diesel Generator - 118 HP (1)	DG-1	Existing	7050082
Diesel Generator - 118 HP (2)	DG-2	Existing	7050082
Diesel Generator - 118 HP (3)	DG-3	Existing	7050082
Diesel Generator - 500 HP (1)	DG-4	Existing	7050082
Diesel Generator - 500 HP (5)	DG-5	Existing	7050082
Diesel Generator - 500 HP (6)	DG-6	Existing	7050082
Diesel Generator - 500 HP (7)	DG-7	Existing	7050082
Air Compressor - 100 HP	AC-1	Proposed	
Light Standard - 15 HP	LS-1	Proposed	
Light Standard - 15 HP	LS-2	Proposed	
Light Standard - 15 HP	LS-3	Proposed	
Light Standard - 15 HP	LS-4	Proposed	
Light Standard - 15 HP	LS-5	Proposed	
Diesel Water Pump - 20 HP	DWP-1	Existing	7050082



March 21, 1995

Wisconsin Department of Natural Resources
Bureau of Air Management
101 S. Webster Street; P.O. Box 7921
Madison, WI 53707-7921
Attn: Keith Pierce

Subject: Confirmation of Title V Permit Exempt Status as Pure Minor Stationary Sources - Coal Docks

Dear Mr. Pierce:

Attached find a copy of Koch's most recent "potential" emission inventory for coal docks located in Wisconsin (Green Bay, Manitowoc, Sheboygan, Ashland and Superior). Pursuant to Wisconsin rules and regulations, potential emissions are computed using AP-42 emission factors and calculation procedures as if equipment and processes are operated at maximum capacity, 24 hours/day, 365 days/year (i.e. 8760 hours/year). Included in the attached emission inventory are fugitive emissions as well as point source emissions. In summary, criteria emissions come from handling equipment (screens, conveyor belts, stackers, etc.), and fugitive PM10 emissions from front end loaders, active and passive coal storage piles as well as wheel dust emissions from in-plant roads. In addition, HAP emissions are well below major source triggers (bulk materials often contain trace HAPs). Although emissions are only presented for coal, other bulk materials such as road salt, petroleum coke, limestone, etc. are also handled based on customer demand. Coal emission factors represent the worst case from a particulate matter emission perspective.

Based on this submittal, Koch requests confirmation as to the permit status of these facilities, as non part 70 sources (pure minor sources), and that based on recent amendments to Wisconsin rules and regulations, operating permits for non part 70 sources are now required with specific statutory permit application filing dates in 1997 and 1998. Our analysis (attached) indicates that the coal docks have potential PM10 emissions of less than 100 tons/year, thus qualifying as non part 70 sources. They are also exempt from emission fees.

Please confirm in writing that the above coal docks are; (1) Title V (part 70) permit exempt, (2) emission fee exempt and (3) required to submit an application only as a minor non part 70 source by 1997 and 1998.

Thank you for your cooperation in this matter. Please call me at (316 832-8255) (Wichita, Kansas) if you have any questions.

c.c. w/att.: Bob Beach
Dan Gerovac
Ken Musolf
Tom Roehrig
Bob Valley

Respectfully submitted,

David L. Nickel
David L. Nickel

List of Equipment - Ashland Coal Dock, Wisconsin

- 1 - Horizontal Welded 500 gal. Diesel Tank
- 1 - Michigan 175 Loader
- 1 - IH-80 Loader
- 1 - Water Truck
- 1 - 100' Horizontal Conveyor
- 1 - 80' Horizontal Conveyor

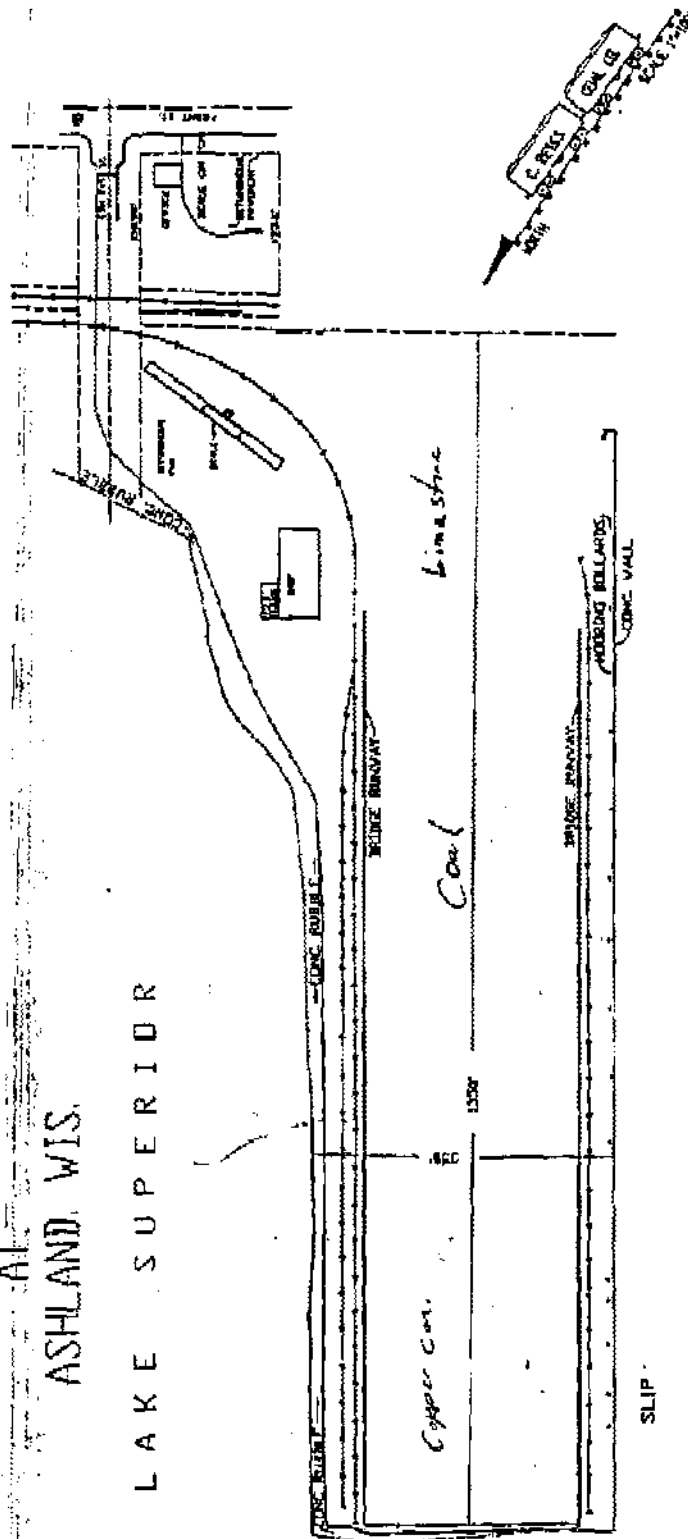
MAP

C. REISS COAL COMPANY

DECK NO. 2

ASHLAND, WIS.

LAKE SUPERIOR



Ashland

C. Reiss Coal Company - Ashland, Wisconsin**I. EMISSION FACTORS**

Ashland, Wisconsin wind speed: 11.1 mph avg.

a) **Batch/Continuous Drop Operations**

Using AP-42 (11.2.3) Aggregate Handling and Storage Piles

Coal Moisture M = 4.8 % avg.

PM10: (<10 um) k= 0.35

$$E = k (0.0032) ((U/5)^{1.3} / (M/2)^{1.4}) \text{ lb/ton}$$

$$E(\text{pm10}) = 0.000927 \text{ lb/ton}$$

b) **Screening Operations**

Using AP-42 (8.19.1-1) Sand and Gravel Processing

For Open Dust Sources Screening; Flat Screen (dry product)

$$E (\text{pm10}) (<10 \text{ um}) = 0.12 \text{ lb/ton}$$

Controls:

Because of water application on the dock, a 70%
reduction in emissions is used on an avg. of 12
months out of the year. Therefore:

$$E (\text{pm10}) (<10 \text{ um}) = 0.036 \text{ lb/ton}$$

c) **Storage Piles (active)**

Using AP-42 (8.19.1-1) Sand and Gravel Processing

$$E (\text{pm10}) (<10 \text{ um}) = 6.3 \text{ lb/acre/day}$$

Controls:

Due to moisture in the piles, a 70% reduction in emission factor is used.
Therefore:

$$E (\text{pm10}) (<10 \text{ um}) = 1.89 \text{ lb/acre/day}$$

Ashland

d) **Fugitive Emissions from Unpaved Roads**
 Using AP-42 (11.2.1-1) Unpaved Roads

VMT = Vehicle Mile Traveled

$$E = k (5.9) (s/12) (S/30) (W/3)^{0.7} (w/4)^{0.5} ((365-p)/365) \text{ lb/VMT}$$

PM10: (<10 um) k= 0.36

p = 0 Number of days with at least 0.01 in. of precipitation per year.

<i>factors</i>	Trucks	Pickups	Loaders/Dozers
s (silt content %):	5	5	5
S (miles/hour):	5	15	2.5
W (weight, tons):	13	2	10
w (no. of wheels):	18	4	4

	Trucks	Pickups	Loaders/Dozers
E(pm10; <10 um) =	0.873321	0.333157	0.171308

<u>Total facility acreage:</u>	<u>acres</u>	<u>%</u>
Annex area (unpaved):	4	50.00
Concrete storage pad:	4	50.00
	8	100.00

Controls:	
Efficiency due to unpaved and watered:	70%
Efficiency due to paved and watered:	95%

Weighted average of control efficiencies: **83%**

	Trucks	Pickups	Loaders/Dozers
E(pm10; <10 um) =	0.152831	0.058303	0.029979

Note:

- 1 Silt content assumed at 5%
- 2 Average semi-truck weight (empty & full) / 2
- 3 Mean number of wheels = 18 (worst case), 4 (pickup)

Ashland

II. POTENTIAL EMISSIONS (PM 10)

a) Batch/Continuous Drop Operations

					TPH
0 stackers	@	550 TPH	each	=	0
2 conveyors	@	550 TPH	each	=	1,100
1 ship unload *	@	700 TPH		=	700
1 rail unload *	@	0 TPH		=	0
1 H-80 loader	@	350 TPH		=	350
1 Mich-175 loader	@	350 TPH		=	350

 2,500 TPH Total

* - Combined rail and ship unloading is adjusted to match front end loader capacity.

$$2,500 \text{ TPH} \times 0.000927 \text{ lb/ton} = 2.32 \text{ lb/hour}$$

$$= 10.15 \text{ TPY}$$

b) Screening Operations

1 screens	@	75 TPH		=	<u>Total TPH</u> 75
75 TPH x		0.036000 lb/ton		=	2.70 lb/hour
				=	11.83 TPY

c) Storage Piles (active)

	Acres
Dock Storage	8
Ship Hold	0.1
	8.10 acres total

$$8.10 \text{ acres} \times 1.89 \text{ lb/acre/day} = 15.31 \text{ lb/day}$$

$$= 2.79 \text{ TPY}$$

Ashland

d) Fugitive Emissions from Unpaved Roads

Semi-Trucks:		<u>6,132,000</u> TPY total throughput	
		25.00 tons/truck	
		=	245,280 trucks/year
		x	0.40 miles/truck
		=	98,112 miles/year
			98,112 miles/year
		x	0.152831 lb/VMT
		=	14,995 lb/year
		=	7.50 TPY
Pickups:	1 pickup(s)	x	15 miles/hour
		=	15 miles/hour
		=	131,400 miles/year
			131,400 miles/year
		x	0.058303 lb/VMT
		=	7,681 lb/year
		=	3.83 TPY
Loaders/ Dozers:	3 vehicles	x	2.50 miles/hour
		=	8 miles/hour
		=	65,700 miles/year
			65,700 miles/year
		x	0.029979 lb/VMT
		=	1,970 lb/year
		=	0.98 TPY
Total Fugitive PM 10 Emissions:			<u>12.31</u> TPY

TOTAL POTENTIAL THROUGHPUT: 6,132,000 TPY

TOTAL POTENTIAL EMISSIONS (PM 10): 37.09 TPY

Ashland

III. ACTUAL EMISSIONS (PM 10)**TOTAL ACTUAL THROUGHPUT (1994): 117,000 TPY**

$$\frac{\text{Actual throughput}}{\text{Potential throughput}} = \frac{117,000}{6,132,000} = 1.91\%$$

$$\begin{aligned} \text{TOTAL ACTUAL EMISSIONS (PM 10):} & 1.91\% \times 37.09 \text{ TPY} \\ & = 0.71 \text{ TPY} \\ & \times \frac{2}{1.42 \text{ TPY (1994)}} \end{aligned}$$

RUST Rust Environment & Infrastructure Inc.

A Rust International Company
4738 North 40th Street
Sheboygan, WI 53083-1883
P.O. Box 1067
Sheboygan, WI 53082-1067

Phone 920.458.8711
Fax 920.458.0537

March 24, 1998

Wisconsin Department of Natural Resources
Bureau of Air Management
Permits Section
P.O. Box 7921
Madison, WI 53707-7921

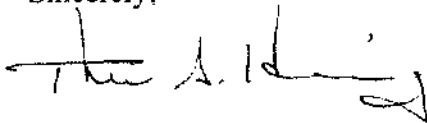
Re: Non-Part 70 Air Operating Permit Application
C. Reiss Coal Company
Manitowoc, Wisconsin

Dear Bureau of Air Management Staff:

Rust Environment & Infrastructure (Rust) submits this application for a Non-Part 70 air operating permit on behalf of the C. Reiss Coal Company. The application is for the C. Reiss Coal facility located in Manitowoc, Wisconsin. The facility requires a permit because maximum theoretical emissions of particulate matter exceeds the 5.7 pounds per hour applicability threshold. Potential emissions of particulate matter are less than 100 tons per year, so the facility is not a Part 70 major source.

If you have any questions regarding the calculations or the application, please contact me at 920-451-2519 or Tom Roehrig with C. Reiss Coal at 920-436-7600.

Sincerely,



Thomas A. Henning, P.E., C.H.M.M.
Environmental Project Manager

Enclosures: As Noted

c: Tom Roehrig - C. Reiss Coal Company
David Nickel - Koch Industries
Darryl Crane - Koch Industries

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Non-Part 70 Air Operating Permit Application



Prepared for:

**C. Reiss Coal Company
Manitowoc Facility**

Prepared by:

**Rust Environment &
Infrastructure
4738 North 40th Street
Sheboygan, WI 53083**

Job I.D. 102940.10200

March 1998

**Rust Environment &
Infrastructure**

KM00000467

I. ADMINISTRATION		
This application contains the following forms:	☒ Form 4530-100, Facility Identification	
	☒ Form 4530-101, Facility Plot Plan	
	☒ Forms 4530-102, -102A, and -102B, Source and Site Descriptions	
II. EMISSIONS SOURCE DESCRIPTION		
This application contains the following forms (one form for each facility boiler, printing operation, etc.):	☐ Form 4530-103, Stack Identification	Total Number of This Form
	☐ Form 4530-104, Boiler or Furnace Operation	
	☐ Form 4530-105, Storage Tanks	
	☐ Form 4530-106, Incineration	
	☐ Form 4530-107, Printing Operations	
	☐ Form 4530-108, Painting and Coating Operations	
	☐ Form 4530-109, Miscellaneous Processes	
III. AIR POLLUTION CONTROL SYSTEM		
This application contains the following forms:	☐ Form 4530-110, Miscellaneous	Total Number of This Form
	☐ Form 4530-111, Condensers	
	☐ Form 4530-112, Adsorbers	
	☐ Form 4530-113, Catalytic or Thermal Oxidation	
	☐ Form 4530-114, Cyclones/Settling Chambers	
	☐ Form 4530-115, Electrostatic Precipitators	
	☐ Form 4530-116, Wet Collection Systems	
	☐ Form 4530-117, Baghouses/Fabric Filters	
IV. COMPLIANCE DEMONSTRATION		
This application contains the following forms (one for each facility boiler, printing operation, etc.):	☐ Form 4530-118, Compliance Certification - Monitoring and Reporting	Total Number of This Form
	☐ Form 4530-119, Continuous Emission Monitoring	
	☐ Form 4530-120, Periodic Emission Monitoring Using Portable Monitors	
	☐ Form 4530-121, Control System Parameters or Operation Parameters of a Process	
	☐ Form 4530-122, Monitoring Maintenance Procedures	
	☐ Form 4530-123, Stack Testing	
	☐ Form 4530-124, Fuel Sampling and Analysis	
	☐ Form 4530-125, Recordkeeping	

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NON-PART 70 AIR OPERATING PERMIT APPLICATION

1.0 SOURCE DESCRIPTION

C. Reiss Coal Company operates a shipping and receiving dock in Manitowoc, Wisconsin. At the facility, coal, petroleum coke, timber, and other commodities are received by ship. Material is shipped off-site via trucks and rail cars which are filled with a front-end loader. The Standard Industrial Classification code for the site is 5052 (coal and other minerals and ores). The Wisconsin Department of Natural Resources (WDNR) has not assigned a facility identification number to the site.

The facility is located at 509 Jay Street, near the mouth of the Manitowoc River. The site has 775 feet of dock frontage and has a rail spur accessing the site. The site covers about 9.6 acres, of which about 6 acres are covered with a concrete pad.

2.0 EMISSION UNIT DESCRIPTIONS

Emissions from the site can be grouped into four categories: batch transfer of materials (receiving by ship, and loading trucks and rail cars), screening, fugitive emissions from active storage, and fugitive emissions from vehicle traffic. Fugitive emissions are not used to determine Part 70 source applicability unless the facility type is included in the list presented in NR 407.02(4). Shipping docks are not included in the list. However, WDNR has indicated that fugitive emissions are included in the determination of Non-Part 70 applicability.

Emissions are calculated for the handling of coal. Coal handling is assumed to generate the greatest potential emissions from the site.

1. Batch Transfer of Material - Bulk commodities are received at the site by ship and transferred off-site via truck or rail car. The trucks and rail cars are loaded with a front-end loader. Conveyors are not used at the site. Emissions from batch transfer of material are estimated using emission factors published in AP-42 Section 13.2.4, Aggregate Handling and Storage Piles.
2. Screening - From time to time, a portable screen is brought on-site to screen coal. The unit does not crush the material, only separate size fractions. Emissions from screening are estimated using an emission factor published in AP-42 Section 11.19.2, Crushed Stone Processing.
3. Active Storage Piles - Bulk materials are moved around on the property with a front-end loader and a bulldozer. Emissions from an active storage pile are calculated from an emission factor published in the Air and Waste Management Association, Air Pollution Control Manual, Chapter on Sand and Gravel Processing, Page 779.
4. Vehicle Traffic - Operation of vehicles on the property can generate some dust. Although much of the site (about 60 percent) is covered with a concrete pad, emissions from vehicle traffic are

estimated assuming the site is not paved. This assumption is made since much of the traffic occurs on coal-covered surfaces. Emissions generated from vehicle traffic are estimated using emission factors calculated from an emission model published in AP-42 Section 13.2.2, Unpaved Roads.

3.0 FACILITY PERMITTING STATUS

Maximum theoretical emissions (MTE) of particulate matter (PM) are shown for the facility on Table 1. Emissions are calculated assuming coal is the only commodity processed on-site. The calculations do not account for the dust suppression systems used at the facility to reduce the amount of dust generated. Total facility MTE of PM exceeds the Non-Part 70 applicability threshold of 5.7 pounds per hour (lb/hr). Non-fugitive PM emissions are less than the Part 70 major source level, 100 tons per year (tpy). Therefore, the C. Reiss Coal Company - Manitowoc facility is a Non-Part 70 source.

4.0 WDNR APPLICATION FORMS

Attached are the following WDNR permit application forms. These application forms and the attached emission calculations fulfill the WDNR's complete permit application as described in the WDNR letter dated January 21, 1998.

Form 4530-100	Facility Information
Form 4530-101	Facility Plot Plan
Form 4530-102	Source and Site Description
Form 4530-102A	Source Description Supplemental
Form 4530-102B	Insignificant Activities
Form 4530-134	Index of Air Pollution Permit Application Forms (located inside front cover)

**Table 1. C. Reiss Coal Company - Manitowoc
Maximum Theoretical Emission Calculations**

Emission Factors

1. Batch Transfer (AP-42 Sect. 13.2.4, Aggregate Handling and Storage Piles)

k = 0.74 for PM
U = 9.7 mph (average wind speed for Green Bay, from EPA's Tanks Program)
M = 6 % water content of coal (per discussion with site personnel)
(AP-42 Table 13.2.4-1 gives range of 2.7 to 7.4)

$$EM = k(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$$

$$EM = 0.0012038 \text{ lb PM/ton transferred}$$

2. Screening (from AP-42, Crushed Stone Processing, Table 11.19.2-2)

$$EM = 0.015 \text{ lb PM/ton screened}$$

3. Storage Piles

Air and Waste Management Association, Air Pollution Control Manual, Sand and Gravel Processing

$$EM = 6.3 \text{ lb PM/acre/day}$$

4. Vehicle Traffic (AP-42 Section 13.2.2 Unpaved Roads)

Although much of the site is paved, the pavement is covered with coal. Therefore, emissions are calculated as if the site is unpaved.

$$EM = k(5.9)(s/12)(S/30)[(W/3)^{0.7}][(w/4)^{0.5}]/[(365-p)/365]$$

Parameter	Trucks	Pickup	Loader/Dozer	Notes
k (Constant)	1	1	1	constant for PM
s (silt content)	2.2	2.2	2.2	percent, from Table 13.2.4-1
S (avg speed)	5	10	2.5	mph
W (mean wt)	14	2	10	ton, avg of full and empty trucks
w (no. of wheels)	18	4	4	assumes all truck have 18 wheels
p (days w/0.1 in.)	120	120	120	from AP-42 Figure 13.2.2-1
Trips/hour	7	10		
distance/trip	0.4	0.5		
VMT/hr	2.8	5	2.5	

	Emission Factor		Emissions	Emissions
Vehicle	lb PM/VMT	VMT/hr	lb PM/hr	ton PM/yr
Trucks	0.755	2.8	2.11	9.25
Pickup	0.182	5	0.91	3.99
Loader/Dozer	0.141	2.5	0.35	1.54
Total =			3.38	14.78

Emission Calculations

1. Batch Transfer

Transfer Capacity				
Ship Receiving	3,000	ton/hr (18,000 ton/ship / 6 hr/ship)		
Truck/Rail Unloading =	154	ton/hr (7 trucks/hr * 22 ton/truck)		
Total Capacity	3,154	ton/hr	2,698,080	ton/yr
Emission = Transfer capacity * Batch transfer EM				
Emission =	3.80	lb PM/hr	1.62	ton PM/yr

Note: Annual throughput is limited by loader capacity, i.e. receiving rate must equal shipping rate
(154 ton/hr received + 154 ton/hr shipped) * 8,760 hr/yr = 2,698,080 ton/yr

2. Screening

Screen Capacity =	75	ton/hr	657,000	ton/yr
Emission = Capacity * Screening EM				
Emission =	1.13	lb PM/hr	4.93	ton PM/yr

3. Active Storage Piles

Area available for storage =	8	acres		
Emission = Area * Active Storage Pile EM/24 hr/day				
Emission =	2.1	lb PM/hr	9.20	ton PM/yr

Total Facility Emissions

Batch Transfers =	3.8	lb PM/hr	1.6	ton PM/yr
Screening =	1.1	lb PM/hr	4.9	ton PM/yr
Active Storage Piles =	2.1	lb PM/hr	9.2	ton PM/yr
Vehicle Traffic =	3.4	lb PM/hr	14.8	ton PM/yr
Total =	10.4	lb PM/hr	30.5	ton PM/yr

SEE INSTRUCTIONS ON REVERSE SIDE

1. Facility name and mailing address	Name	C. Reiss Coal Company
	Street or Route	509 Jay Street
	City, State, Zip Code	Manitowoc, WI 54220
2. Facility location	Street Address	
	City, County	
3. Parent corporation	Name	Koch Industries
	Street or Route	4111 East 37th Street North
	City, State, Zip Code	Wichita, KS 67220
	Country (if not U.S.)	
4. Responsible official	Name	Tom Roehrig
	Title	Superintendent
	Telephone	920-436-7600
5. Permit contact person	Name	Tom Roehrig
	Title	Superintendent
	Telephone	920-436-7600

6. SIC code: 5052	7. Facility identification number:

8. Primary activity of the operating establishment: Coal dock

9. Type of permit

☐ Construction permit

Anticipated start date for construction:

Anticipated start date for operation:

This application is requesting an expedited review (see instructions)

☐ Yes ☐ No

☒ Operation Permit

☐ Part 70 Source Application

☒ Non - Part 70 Source Application

☐ Synthetic Minor, Non - Part 70 Source Application

☐ Elective operation permit

10. If facility is located in an area designated as "nonattainment," indicate the pollutant for the nonattainment designation.

11. List all air pollution permits and orders issued to this facility.

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

In order for a comprehensive air quality analysis to be accomplished, a facility plot plan **MUST** be included with the permit application. This facility plot plan must include all of the following items or the permit application will be deemed incomplete:

FOR DEPARTMENT USE ONLY

COMPLETE INCOMPLETE NOT APPLICABLE

☐	☐	
☐	☐	
☐	☐	
☐	☐	☐
☐	☐	
☐	☐	
☐	☐	

1. A building layout (blueprint, plan view) including all buildings occupied by or located on the site of the facility.
2. The maximum height of each building (excluding stack height).
3. The location and numerical designation of each stack. Please ensure these designations correspond to the appropriate stacks listed on the other permit forms in this application.
4. The location of fenced property lines (if any).
5. Identify direction "North" on all submittals.
6. All drawings shall be to scale and shall have the scale graphically depicted.
7. An additional regional map depicting the facility location in relation to the surrounding vicinity (roads or other features) shall be included.

Are there any outdoor storage piles on the facility site?

☒ Yes ☐ No

If so, what material does the pile(s) consist of?

Bulk commodities (coal, petroleum coke, timber, and other materials)

Are there any dirt roads or unpaved parking lots on the facility site?

☒ Yes ☐ No

SOURCE AND SITE DESCRIPTIONS
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-102 11-93 Information attached? __ (y/n)

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

1. Briefly describe the proposed project or existing Unit(s) to be permitted. Attached supplemental forms as needed.

See text.

2. Site Description

See text.

SOURCE DESCRIPTION - SUPPLEMENTAL
AIR POLLUTION CONTROL PERMIT APPLICATION
Form 4530-102A 11-93 Information attached? (y/n)

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

1. List all significant existing or proposed air pollution units, operations, and activities at the facility. A short narrative of the inventory of air pollution emissions unit (e.g., boiler, printing line, etc.) followed by equipment specifications will suffice. If the facility consists of several individual emission units, present this information in an outline format. (See instruction booklet for an example Unit description.)

1. Bulk transfer of materials from ship to shore.
2. Active storage piles.
3. Screening.
4. Loading of trucks and rail cars.
5. Fugitive emissions from vehicle traffic.

Materials that can be processed at the facility include:

- Petroleum coke
- Coal
- Timber
- Pig iron
- Wood chips
- Aggregate
- Tire chips
- Other commodities

A more detailed description of each of these activities is found in the text of the application. Emission calculations are attached.

Use of this form is required by the Department for any air pollution control permit application filed pursuant to s. 144.392 or 144.3925, Wis Stats. Completion of this form is mandatory. The Department will not consider or act upon your application unless you complete and submit this form. It is not the Department's intention to use any personally identifiable information from this form for any other purpose.

1. Mark all insignificant existing or proposed air pollution units, operations, and activities at the facility listed below. If not listed, provide a short narrative of the inventory of air pollution emissions unit (e.g., boiler, printing line, etc.) followed by equipment specifications. If the facility consists of several individual emission units, present this information in an outline format. (See instruction booklet for an example Unit description.)

☒ Maintenance of Grounds, Equipment, and Buildings (lawn care, painting, etc.)

☒ Boiler, Turbine, and HVAC System Maintenance

☐ Pollution Control Equipment Maintenance

☒ Internal Combustion Engines Used for Warehousing and Material Transport

☒ Fire Control Equipment

☒ Janitorial Activities

☒ Office Activities

☐ Convenience Water Heating

☒ Convenience Space Heating (< 5 million BTU/hr Burning Gas, Liquid, or Wood)

☐ Fuel Oil Storage Tanks (< 10,000 gal.)

☐ Stockpiled Contaminated Soils

☐ Demineralization and Oxygen Scavenging of Water for Boilers

☐ Purging of Natural Gas Lines

☒ Sanitary Sewer and Plumbing Venting

☐ _____

☐ _____

☐ _____

☐ _____

☐ _____

☐ _____

☐ _____