APPENDIX G

FUGITIVE DUST CONTROL PLAN
As required by §324.5524 a fugitive dust control plan has been prepared. Pertinent sections are as follows:

(1) The provisions of this section, including subsection (2), shall apply to any fugitive dust source at all mining operations.

(2) Except as provided in subsection (8), a person responsible for any fugitive dust source regulated under this section shall not cause or allow the emission of fugitive dust from any road, lot, or storage pile, including any material handling activity at a storage pile, that has an opacity greater than 5% as determined by reference test method 9d. Except as otherwise provided in subsection (8) or this section, a person shall not cause or allow the emission of fugitive dust from any other fugitive dust source that has an opacity greater than 20% as determined by test method 9d. The provisions of this subsection shall not apply to storage pile material handling activities when wind speeds are in excess of 25 miles per hour (40.2 kilometers per hour).

(3) In addition to the requirements of subsection (2), and except as provided in subdivisions (e), (f), and (g), a person shall control fugitive dust emissions in a manner that results in compliance with all of the following provisions:

(iv) 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.

(v) Crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyor 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 required under subsection (4). This subparagraph shall not apply to high-lines at steel mills.

(b) If particulate collection equipment is operated pursuant to this section, emissions from such equipment shall not exceed 0.03 grains per dry standard cubic foot (0.07 grams per cubic meter).

(c) A person shall not cause or allow the operation of a vehicle for the transporting of bulk materials with a silt content of more than 1% without employing 1 or more of the following control methods:

(i) The use of completely enclosed trucks, tarps, or other covers for bulk materials with a silt content of 20% or more by weight.
(ii) The use of tarps, chemical dust suppressants, or water in sufficient quantity to maintain the surface in a wet condition for bulk materials with a silt content of more than 5% but less than 20%.

(iii) Loading trucks so that no part of the load making contact with any sideboard, side panel, or rear part of the load comes within 6 inches of the top part of the enclosure for bulk materials with a silt content of more than 1% but not more than 5%.

(d) All vehicles for transporting bulk materials off-site shall be maintained in such a way as to prevent leakage or spillage and shall comply with the requirements of section 720 of the Michigan vehicle code, Act No. 300 of the Public Acts of 1949, being section 257.720 of the Michigan Compiled Laws, and with R 28.1457 of the Michigan administrative code.

(4) All fugitive dust sources subject to the provisions of this section shall be operated in compliance with both the provisions of an operating program that shall be prepared by the owner or operator of the source and submitted to the department and with applicable provisions of this section. Such operating program shall be designed to significantly reduce the fugitive dust emissions to the lowest level that a particular source is capable of achieving by the application of control technology that is reasonably available, considering technological and economic feasibility. The operating program shall be implemented with the approval of the department.

(5) The operating program required by subsection (4) is subject to review and approval or disapproval by the department and shall be considered approved if not acted on by the department within 90 days of submittal. All programs approved by the department shall become a part of a legally enforceable order or as part of an approved permit to install or operate. At a minimum, the operating program shall include all of the following:

(a) The name and address of the facility.

(b) The name and address of the owner or operator responsible for implementation of the operating program.

(c) A map or diagram of the facility showing all of the following:

(i) Approximate locations of storage piles.

(ii) Conveyor loading operations.

(iii) All traffic patterns within the facility.

(d) The location of unloading and transporting operations with pollution control equipment.
(e) A detailed description of the best management practices utilized to achieve compliance with this section, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals, and dust suppressants utilized, and equivalent methods utilized.

(g) The frequency of application, application rates, and dilution rates if applicable, of dust suppressants by location of materials.

(h) The frequency of cleaning paved traffic pattern roads and parking facilities.

(i) Other information as may be necessary to facilitate the department's review of the operating program.

(6) Except for fugitive dust sources operating programs approved by the department pursuant to R 336.1373 of the Michigan administrative code between April 23, 1985 and May 12, 1987, the owner or operator of a source shall submit the operating program required by subsection (4) to the department by August 12, 1987.

(7) The operating program required by subsection (4) shall be amended by the owner or operator so that the operating program is current and reflects any significant change in the fugitive dust source or fugitive dust emissions. An amendment to an operating program shall be consistent with the requirements of this section and shall be submitted to the department for its review and approval or disapproval.

The following have been identified as sources of fugitives:

- Temporary Development Rock Storage Area
- Roadways

**Temporary Development Rock Storage Area**

The TDRSA will be used to store rock produced during development of mine drifts, ramps, and decline. Once stope areas are mined out, rock will be reclaimed from the TDRSA and used to backfill secondary stopes. Rock may also be reclaimed from the TDRSA and crushed for use in the backfill plant. Except for active portions of the storage area, development rock will be covered to the extent practical in order to reduce windblown fugitive dust.
**Roadways**

Unpaved (gravel-surfaced) roadways include:

- Main Entrance Road, Point C to F, and all parking areas.
- Roadway past the Water Treatment Plant and continuing to the MVAR stack.

To the west of the truck wash building, (point E on the drawing) traffic areas will be covered in asphalt or concrete. The surfaced areas are designed for run off to flow into the contact water basins.

Originally, water trucks were proposed to keep unpaved roadways damp and dust free. During the winter, it was assumed that the roadways will be covered with snowpack. It is not uncommon for freeze-dry conditions to occur during late fall, winter, and again in the spring. Freeze-drying occurs when there is no snow cover combined with extended below freezing temperatures. Roadway surfaces can freeze and a very thin layer becomes desiccated. It is not practical to use water to prevent freeze-drying. Rather than relying on snow cover, approved dust suppressants will be applied to unpaved roadways on an as-needed basis. Water trucks will also be available during warmer months.

Paved areas may be cleaned using a street sweeper. Paved areas may also be washed (flushed) using water trucks.

On site staff will continually monitor roadways. Application of dust suppressants or water will be performed when any visible emissions from unpaved routes are observed. Paved areas will be swept on a regular basis. The goal is to prevent visible dust emissions from roadways when wind speeds do not exceed 25 mph. Attached is the Roadway Dust Suppression Form, which will be completed on a daily basis.
Eagle Project - Roadway Dust Suppression Form

Date: ____ / ____ / ______  Shift: ______________________

Employee: ______________________________

Temperature: ______________________

Weather Conditions*:

________________________________________________________________________

Dust from roadways observed?  Yes: ____  Road segment(s): ______________________________

No: ___

If yes to above, actions taken:

Sweeping: _______  Road segment(s): ______________________________

Dust suppressant: _______  Road segment(s): ______________________________

Water applied: _______  Road segment(s): ______________________________

Comments:

________________________________________________________________________

________________________________________________________________________

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* During windy conditions, use on site weather station data to verify winds speeds in excess of 25 mph and note above.