

Appendix H

Proposed Compliance Monitoring and Reporting Plan

Compliance Monitoring and Reporting for Permit to Install

KEMC understands the following permit conditions may apply upon approval of the Permit to Install for the Humboldt Mill:

General Permit Conditions

Equipment will not be constructed unless a Permit to Install authorizing action is issued and valid.

Installation, construction must commence within 18 months of issuance of the Permit to Install. Interruptions in construction of longer than 18 months will cause the permit to install to become void unless otherwise authorized by the MDEQ. KEMC shall notify MDEQ if construction of the project has not been pursued.

KEMC's intent is to obtain an ROP at the appropriate time and comply with those permitted conditions upon issuance.

KEMC understands an approved Permit to Install may be revoked if emitting equipment is not performing in accordance with terms and conditions of the permit or is violating Michigan air use rules or the Federal Clean Air Act.

KEMC understands the Permit to Install, once issued, applies to any person or legal entity that then or thereafter owns or operates the facility. Should KEMC desire a change of ownership, a request shall be made to the MDEQ in a timely manner.

In accordance with the approved Permit to Install, KEMC shall provide notice to MDEQ of abnormal conditions, start-up, shutdown or malfunction resulting in emissions of a hazardous or toxic air pollutant which continues for more than one hour in excess of any applicable standard or limitation or emissions of any air contaminant continuing for more than 2 hours in excess of an applicable standard or limitation as required in R 336.1912. The notice shall be provided within two business days after the abnormal start-up or shutdown or discovery of abnormal condition or malfunction. Written reports, if required, must be filed with MDEQ within 10 days after abnormal start-up or shutdown occurring, within 10 days after abnormal conditions or malfunction has been corrected, or within 30 days of discovery of abnormal condition or malfunction, whichever is first. Written reports shall include all information specified in R 336.1912(5).

KEMC acknowledges Permit to Install approval does not exempt it from complying with future applicable requirements which may be promulgated under Part 55 of 1994 PA Act 451, as amended, and the rules promulgated hereunder.

KEMC shall not cause or permit to be discharged into the air from a process or process equipment a visible emission of density greater than the permitted limit.

Collected air contaminants shall be removed as necessary and as outlined in the control equipment procedures approved by the MDEQ. The collection and disposal of the contaminants

shall be performed to minimize the escape of contaminants in accordance with Michigan rules and industry practice.

KEMC understands the MDEQ may require performance tests at KEMC expense in accordance with R 336.2001 and R 336.2003, under any conditions listed in R 336.2001.

Special Conditions

Process/Operational Limits

KEMC shall not operate processes identified as emitting fugitive dust (EUTRANSFERPTS, EUFELCOSA, EUFELCONC, EUROADWAY) unless a program for continuous control is implemented and maintained. This program is outlined in the *Fugitive Dust Control Plan*, Appendix D.

KEMC shall equip, maintain, and operate the specified emission control equipment in the Permit to Install:

EUPRIMCRUSHER, EUDUMPHOPPER and EUROCKBREAKER shall not be operated unless the wet spray system is operational.

EU2NDSCREEN, EU2NDCRUSHER, EU3RDSCREEN, EU3RDCRUSHER, and EUTRANSFERPTS shall not be operated unless the secondary crusher building dust collector is functioning within the pressure drop range specified by the manufacturer.

Where indicated, certain emission points associated with EUTRANSFERPTS in the transfer station and mill building will be controlled using wet spray systems.

EUFINEORESTORAGE shall not be operated unless the mill building dust collector No. 1 is functioning within the pressure drop range specified by the manufacturer.

EUCONVLOAD shall not be operated unless the conveyor load-out dust collector is functioning within the pressure drop range specified by the manufacturer.

EUAUXLOAD shall not be operated unless the auxiliary load-out dust collector is functioning within the pressure drop range specified by the manufacturer.

Testing

Stack testing, if required by the MDEQ, will be performed for specified emission rates as required by the MDEQ in the approved Permit to Install at KEMC expense.

Evaluation of visible emissions, if required by the MDEQ, will be performed at KEMC expense.

Monitoring

Monitoring for specified rates as required MDEQ in the approved Permit to Install shall be performed by KEMC at the specified time and frequency.

Recordkeeping/Reporting/Notification

KEMC shall maintain records of baghouse inspections and maintenance in a satisfactory manner to demonstrate compliance with the procedures outlined in the *Fugitive Dust Control Plan*. All records shall be kept on file for a period of five years and made available to the MDEQ upon request.

KEMC shall perform recordkeeping requirements for visible emission limits, stacks, and control equipment requirements in accordance with MDEQ approved *Fugitive Dust Control Plan* and the approved permit to install requirements.

Emissions Reporting

KEMC shall submit the annual Michigan Air Emission Reporting System (MAERS) report by March 15 of each year, covering emissions generated the previous calendar year (January 1 through December 31). The report shall be prepared in accordance with MDEQ instructions, MAERS Workbook, and Calculating Air Emissions for MAERS guidebook, published by the MDEQ.