

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

September 23, 2016

PERMIT TO INSTALL
104-16

ISSUED TO
Edw. C. Levy Co. Plant 1

LOCATED AT
8800 Dix Avenue
Detroit, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
B3533

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:

August 15, 2016

DATE PERMIT TO INSTALL APPROVED:

September 23, 2016

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	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 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)	Flexible Group ID
EUPROCESS	A slag processing plant consisting of crushers, feeders, screens, and stackers. Water spray systems are used for air pollution control.	NA
EUTRUCKTRAFFIC	Truck traffic for delivery of material products to customers; truck traffic from the road to processing area and material storage piles and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. Includes all commercial truck areas and unpaved road portions of the site.	NA
EUSTORAGE	Open area stock piles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles.	NA

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: EUPROCESS

DESCRIPTION: A slag processing plant consisting of crushers, feeders, screens, and stackers. Water spray systems are used for air pollution control.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Water spray systems are used for air pollution control.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	20.4 tpy	12-month rolling time period as determined at the end of each calendar month	EUPROCESS	SC VI.2	R 336.1331, 40 CFR 52.1170(d)
2. PM10	7.1 tpy	12-month rolling time period as determined at the end of each calendar month	EUPROCESS	SC VI.2	40 CFR 52.21 (c) & (d), 40 CFR 52.1170(d)
3. Visible Emissions	10 percent opacity	Test Protocol*	Each drop point, transfer point, crusher, and screen of EUPROCESS	SC V.1	R 336.1301, 40 CFR 52.21 (c) & (d)

* Test protocol shall specify averaging time

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Slag processed	16,800 tons per day	Calendar day	EUPROCESS	SC VI.1	R 336.1331, 40 CFR 52.21 (c) & (d)
2. Slag processed	2,100,000 tons per year	12-month rolling time period as determined at the end of each calendar month	EUPROCESS	SC VI.1	R 336.1331, 40 CFR 52.21 (c) & (d), 40 CFR 52.1170(d)

3. The permittee shall not process any asbestos tailing or asbestos containing waste materials in EUPROCESS pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 Subpart M. **(40 CFR Part 61 Subpart M)**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall utilize water spray systems, as needed, in order to minimize the fugitive dust emissions from EUPROCESS. The water spray systems shall be installed, maintained, and operated in a satisfactory manner. **(R 336.1301, R 336.1331, Act 451 324.5524(4), 40 CFR 52.1170(d), 40 CFR 52.21 (c) & (d))**
2. The permittee shall not operate EUPROCESS unless a Nuisance Minimization Plan (NMP) for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations, as specified in Appendix B, has been implemented and is maintained. The permittee shall amend the NMP within 45 days upon request from the District Supervisor. The permittee shall submit the NMP and any amendments to the NMP to the AQD District Supervisor for review and approval. The permittee may also propose revisions to the NMP by submitting a request to the AQD District Supervisor. If the AQD does not notify the permittee within 90 days of submittal, the NMP or amended NMP shall be considered approved. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1301, R 336.1331, Act 451 324.5524(4) through (7), 40 CFR 52.1170(d), 40 CFR 52.21 (c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any portion of EUPROCESS unless the equipment's specified control device is installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1910, Act 451 324.5524(4), 40 CFR 52.1170(d), 40 CFR 52.21 (c) & (d))**
2. The permittee shall install and maintain a belt scale on the plant feed conveyor portion of EUPROCESS, which continuously shows the daily throughput rate for the conveyor. **(40 CFR 52.21 (c) & (d))**
3. The permittee shall equip and maintain EUPROCESS with water spray systems in order to minimize fugitive dust emissions. **(R 336.1301, Act 451 324.5524(4), 40 CFR 52.1170(d), 40 CFR 52.21 (c) & (d))**

V. TESTING/SAMPLING

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

1. At the request of the AQD District Supervisor, the permittee shall evaluate visible emissions from EUPROCESS, at the owner's expense. The permittee must have prior approval from the AQD for visible emission observation procedures. Verification of visible emissions includes the submittal of a complete report of opacity observations to the AQD Technical Programs Unit and District Office within 45 days following the last date of the evaluation. **(R 336.1301, 40 CFR 52.21 (c) & (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of the amount of slag processed through EUPROCESS on a daily and monthly basis. On the last day of each month, the permittee shall also calculate amount of slag processed during the preceding 12-month rolling time period. The permittee shall keep records on file at the facility and make them available to the Department upon request. **(40 CFR 52.21 (c) & (d), 40 CFR 52.1170(d))**
2. The permittee shall calculate the PM and PM10 emission rate from EUPROCESS monthly, for the preceding 12-month rolling time period, using the method detailed in Appendix A, or an alternate format that has been approved by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(40 CFR 52.21 (c) & (d), 40 CFR 52.1170(d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

1. Within 45 days of issuance of this permit, the permittee shall label all equipment with company ID numbers, according to a method acceptable to the AQD District Supervisor. Labels shall be in a conspicuous location on the equipment. The permittee shall keep records of each piece of equipment with the corresponding ID numbers on file at the facility and make them available to the Department upon request. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. **(R 336.1201(3))**

The following conditions apply to: EUTRUCKTRAFFIC

DESCRIPTION: Truck traffic for delivery of material products to customers; truck traffic from the road to processing area and material storage piles and loader traffic associated with processing equipment, storage pile handling and loading delivery trucks. Includes all commercial truck areas and unpaved road portions of the site.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

1. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUTRUCKTRAFFIC, shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). **(R 336.1301, Act 451 324.5524(2), 40 CFR 52.21(c) & (d))**

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUTRUCKTRAFFIC unless a Nuisance Minimization Plan (NMP) for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations, as specified in Appendix B, has been implemented and is maintained. The permittee shall amend the NMP within 45 days upon request from the District Supervisor. The permittee shall submit the NMP and any amendments to the NMP to the AQD District Supervisor for review and approval. The permittee may also propose revisions to the NMP by submitting a request to the AQD District Supervisor. If the AQD does not notify the permittee within 90 days of submittal, the NMP or amended NMP shall be considered approved. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1301, R 336.1331, Act 451 324.5524(4) through (7), 40 CFR 52.1170(d), 40 CFR 52.21 (c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUSTORAGE

DESCRIPTION: Open area stock piles of various material sizes and product types. Water spray of material products are used when necessary for material storage piles.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

1. Visible emissions from each of the material storage piles maintained under EUSTORAGE shall not exceed five (5) percent opacity. Compliance shall be demonstrated using Test Method 9D as defined in Section 324.5525(j) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). **(R 336.1301, Act 451 324.5524(2), 40 CFR 52.21(c) & (d))**

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUSTORAGE unless a Nuisance Minimization Plan (NMP) for fugitive dust for all plant roadways, the plant yard, all material storage piles, and all material handling operations, as specified in Appendix B, has been implemented and is maintained. The permittee shall amend the NMP within 45 days upon request from the District Supervisor. The permittee shall submit the NMP and any amendments to the NMP to the AQD District Supervisor for review and approval. The permittee may also propose revisions to the NMP by submitting a request to the AQD District Supervisor. If the AQD does not notify the permittee within 90 days of submittal, the NMP or amended NMP shall be considered approved. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1301, R 336.1331, Act 451 324.5524(4) through (7), 40 CFR 52.1170(d), 40 CFR 52.21 (c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

**APPENDIX A
 Calculation Method for Monthly**

The permittee shall demonstrate compliance with the PM and PM10 annual emission limits by keeping records of the amount of slag processed through EUPROCESS during the preceding 12-month rolling time period, and using the following emission factors to calculate emissions for the preceding month and 12-month rolling time period. Alternative emission factors or another method may be allowed, if it is approved by the AQD District Supervisor:

Equipment	Emission Factor (lb PM/ton)	Emission Factor (lb PM10/ton)	AP-42 from Chapter 11.19.2-2: Table 11.19.2-2
Feeders	0.00014	4.6×10^{-5}	Conveyor Transfer Point (controlled) (SCC 3-05-020-06)
Screens	0.0022	0.00074	Screening (controlled) (SCC 3-05-020-02, 03)
Crushers	0.0012	0.00054	Tertiary Crushing (controlled) (SCC 3-05-020-03)
Conveyors	0.00014	4.6×10^{-5}	Conveyor Transfer Point (controlled) (SCC 3-05-020-06)
Stackers	0.00014	4.6×10^{-5}	Conveyor Transfer Point (controlled) (SCC 3-05-020-06)

APPENDIX B
Nuisance Minimization Plan
Fugitive Dust

Facility Name and Address:

Edw. C. Levy Co.
Plant #1
8800 Dix Avenue
Detroit, Michigan 48209

Name and Address of Responsible Person:

Tom Green
Edw. C. Levy Co.
8800 Dix Avenue
Detroit, Michigan 48209

Edw. C. Levy Co. (Levy) operates a slag processing facility located at 8800 Dix Avenue, Detroit, Michigan known as Plant 1. Levy Plant 1 receives raw slag from two locations by truck; US Steel Company and AK Steel Company. The raw slag is watered at the steel mills prior to transport to Levy Plant 1.

Upon delivery to Levy Plant 1, the raw slag passes under a water spray station, while still in the truck, to further cool the slag, if necessary, prior to unloading. An excavator with a magnet is used to remove large pieces of iron from the raw slag prior to processing the slag. A dozer is used to transfer the material from the raw slag stockpile to the primary feeder of the slag processing plant. The processing plant consists of primary slag crushing, iron removal via magnets, primary screening, secondary crushing, secondary screening and material conveyance. The finished products are stored in stockpiles and loaded by front end loaders into trucks for transport to customers.

The slag plant processes a maximum of 700 tons per hour and consists of up to six (6) feeders, twenty-six (26) conveyors, four (4) crushers, eight (8) screens, and seven (7) stackers. Water spray systems are used for air pollution control. Plant 1 is powered by electricity and does not have a generator power source.

Levy has developed this Fugitive Dust Control Plan for operations that may generate fugitive dust. Levy has the following operations which are subject to the Fugitive Dust Control Plan per R336.1374 and is providing the control method for each operation.

- Storage Piles
- Material Handling (Crushers, Screens, Feeders, Conveyors, and Stackers)
- Paved Roads & Parking Lots
- Unpaved Roads & Parking Lots

Storage Piles

The facility has several storage piles of different sized slag. Storage piles are wetted on an as-needed basis and when weather conditions are such that fugitive emissions are likely to occur, in order to meet the opacity limit of 5 percent. Storage piles are wetted using a water truck. Free fall from front end loaders is also minimized to reduce fugitive dust emissions.

Primary Controls: Spraying the working surface of the pile with water or dust-suppressant compound as needed.

Secondary Controls: Minimizing the drop distance from which the material is discharged into the pile and periodic removal of spilled material.

Practices: Levy inspects operations frequently to assure that fugitive dust is properly mitigated.

Required Records:

1. Date of Treatment
2. Control Measure Used
3. Responsible Person's Initials
4. Dilution Ratio (if applicable)
5. Amount of Water Applied
6. Amount and Type of Dust Suppressant Applied, If Applicable
7. Identification of Pile
8. Equipment Used

Optional Records:

1. Precipitation
2. Temperature
3. Wind Direction and Velocity

Material Handling (Crushers, Screens, Feeders, Conveyors, and Stackers)

The facility operates feeders, crushers, screens, conveyors, and stackers for slag processing onsite which are located outside. Fugitive particulate emissions will be controlled from these operations using water spray systems. The drop distance at each transfer point will be reduced to the minimum the equipment can achieve.

Primary Controls: Utilizing water sprays at equipment as needed during non-freezing conditions.

Contingent Controls: Repairing or unplugging any malfunctioning equipment.

Practices: Levy inspects operations frequently to assure that fugitive dust is properly mitigated.

Required Records:

1. Weekly Inspection Records of Equipment and Water Sprays
2. Water Spray Malfunction and Corrective Action Records
3. Material Handling Operation Treated
4. Equipment Used

Paved Roads & Parking Lots

Levy employs many practices to minimize fugitive dust from paved roads and lots. Levy requires that vehicles travel under 15 miles per hour for both safety and for dust minimization. Levy also utilizes sweeping and watering to minimize fugitive dust emissions. Any material spillage on roads will be cleaned up promptly.

On-site vehicles will be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This will be accomplished by loading so that no part of the load shall come in contact within 6 inches of the top of any side board, side panel or tailgate. Otherwise, the truck will be tarped.

Primary Controls: Utilizing street sweeping and watering (during non-freezing conditions) as needed.

Contingent Controls: Increasing frequency of application of primary controls

Practices: Levy inspects the paved roads frequently and performs sweeping and washing of the road as necessary.

Required Records:

1. Date of Treatment
2. Control Measure Used
3. Responsible Person's Initials
4. Road Segment/Lot Identification

Unpaved Roads and Parking Lots

Levy employs many practices to minimize fugitive dust from unpaved roads and lots. Levy requires that vehicles travel under 10 miles per hour for both safety and for dust minimization. Levy also utilizes the application of water, calcium chloride, or other approved dust suppressants to minimize fugitive dust emissions. Any material spillage on roads will be cleaned up promptly.

On-site vehicles will be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This will be accomplished by loading so that no part of the load shall come in contact within 6 inches of the top of any side board, side panel or tailgate. Otherwise, the truck will be tarped.

Primary Controls: Utilizing street sweeping and watering (during non-freezing conditions) as needed.

Contingent Controls: Increasing frequency of application of water, calcium chloride, or other approved dust suppressants.

Practices: Levy inspects the unpaved roads frequently and applies dust suppressant as necessary.

Required Records:

1. Date of Treatment
2. Control Measure Used
3. Responsible Person's Initials
4. Road Segment/Lot Identification

AQD/MDEQ Inspection

The provisions and procedures of this plan are subject to adjustment by written notification from the AQD if, following an inspection, the AQD finds the fugitive dust requirements and/or permitted emission limits are not being met.