

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

June 17, 2020

PERMIT TO INSTALL
318-98B

ISSUED TO
Detroit Salt Co.

LOCATED AT
12841 Sanders Street
Detroit, Michigan 45217
and
10335 Flora Street
Detroit, Michigan 48217

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
M4685

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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 7, 2020	
DATE PERMIT TO INSTALL APPROVED: June 17, 2020	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS	2
POLLUTANT / MEASUREMENT ABBREVIATIONS.....	3
GENERAL CONDITIONS	4
EMISSION UNIT SPECIAL CONDITIONS.....	6
EMISSION UNIT SUMMARY TABLE	6
EU-BAGPLANT.....	7
FLEXIBLE GROUP SPECIAL CONDITIONS.....	9
FLEXIBLE GROUP SUMMARY TABLE	9
FGROCKSALTPLANT	10
FGFACILITY CONDITIONS.....	12
APPENDIX A: Nuisance Management Plan for Fugitive Dust -12841 Sanders Street.....	14
APPENDIX B: Nuisance Management Plan for Fugitive Dust -10335 Flora Street.....	15
APPENDIX C: Equipment List	16

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

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 Environment, Great Lakes, and Energy, 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 Rule 210 (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 Rule 219 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 Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(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 Rule 301, 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 Rule 303 (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 Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT 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 (Including Process Equipment & Control Device(s))	Flexible Group ID
EU-SBIN	Surge Bin Transfer Point (1 Unit)	FG-ROCKSALTPLANT
EU-STACKER	Storage Pile Stacker	FG-ROCKSALTPLANT
EU-CONRAIL	Conveyor to Load Rail Cars	FG-ROCKSALTPLANT
EU-CONTRFR	Conveyor Transfer Points	FG-ROCKSALTPLANT
EU-FLOADER	Fugitive Emissions from Front Loaders	FG-ROCKSALTPLANT
EU-TRAF	Fugitive Emissions from Truck Traffic	FG-ROCKSALTPLANT
EU-STKPILE	Material Storage Pile	FG-ROCKSALTPLANT
EU-CRUSHER	Inline Breaker	FG-ROCKSALTPLANT
EU-BAGPLANT	Bagging plant – two identical lines to package rock salt into bags. Each line has a bag sealing machine with an associated dust collector that is vented inside the building.	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 336.1291.

EU-BAGPLANT EMISSION UNIT CONDITIONS

DESCRIPTION

Bagging plant – two identical lines to package rock salt into bags.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Each line has a bag sealing machine with an associated dust collector that is vented inside the building.

I. EMISSION LIMIT(S)

1. Visible emissions from the EU-BAGPLANT building openings shall not exceed seven percent opacity. **(R 336.1301, 40 CFR 52.21 (c) & (d), 40 CFR 60.672(e)(1))**

II. MATERIAL LIMIT(S)

1. The permittee shall not process more than 200,000 tons of rock salt through EU-BAGPLANT per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, 40 CFR 52.21 (c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall keep all doors and building openings closed while EU-BAGPLANT is operating, except as necessary for vehicle access. **(R 336.1205, R 336.1301, 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. Within 60 days after achieving maximum production rate, but not later than 180 days after commencement of trial operation, the permittee shall evaluate visible emissions from EU-BAGPLANT, at owner's expense, in accordance with federal Standards of Performance for New Stationary Sources 40 CFR Part 60, Subparts A and OOO, using USEPA Method 9 or an alternative method approved by the AQD. 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 within 45 days following the last date of the evaluation. **(R 336.1301, 40 CFR 60.672, 40 CFR 60.675(d)(1), 40 CFR Part 60 Subparts A & OOO)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, 40 CFR 52.21 (c) & (d))**
2. The permittee shall conduct, at owner's expense, quarterly 30-minute visible emissions inspections of each EU-BAGPLANT baghouse using US EPA Method 22 while the baghouse is operating in accordance with federal Standards of Performance for New Stationary Sources 40 CFR Part 60, Subparts A and OOO. If any visible emissions are observed, the permittee must initiate corrective action within 24 hours to return the baghouse to normal operation. The permittee must record each Method 22 (40 CFR part 60, appendix A-7)

test, including the date and any corrective actions taken, in the logbook required under 40 CFR 60.676(b). 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 within 45 days following the last date of the evaluation. **(R 336.1301, 40 CFR 60.674(c), 40 CFR Part 60, Subparts A & OOO)**

3. The permittee shall keep, in a satisfactory manner, records of each quarterly visible emission inspection required under 40 CFR 60.674(c), including dates of the inspections and any corrective actions taken, in a logbook (in written or electronic format). The permittee shall keep records on file at the facility and make them available to the Department upon request. **(40 CFR 60.676(b), 40 CFR Part 60, Subparts A & OOO)**
4. The permittee shall keep daily and monthly records of the amount of material processed through EU-BAGPLANT. Further the permittee shall calculate on a monthly basis, the yearly throughput rate based upon the most recent 12-month rolling time period. The permittee shall keep records of the amount of material processed on file and make them available to the Department upon request. **(R 336.1205, 40 CFR 52.21 (c) & (d))**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of EU-BAGPLANT authorized by this Permit to Install, 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, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-BAGPLANT. **(R 336.1201(7)(a))**
2. The permittee shall provide written notification of construction and operation of EU-BAGPLANT to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. **(40 CFR 60.7)**

VIII. STACK/VENT RESTRICTION(S)

1. The exhaust gases from EU-BAGPLANT shall not be discharged to the ambient air through a vent, as defined in 40 CFR 60.671, at any time. **(40 CFR 52.21(c) & (d))**

IX. OTHER REQUIREMENT(S)

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 OOO, as they apply to EU-BAGPLANT. **(40 CFR Part 60, Subparts A & OOO)**

Footnotes:

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

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-ROCKSALTPLANT	Rock salt production process, including conveyors, the stockpile, and vehicle loading.	EU-SBIN, EU-STACKER, EU-CONRAIL, EU-CONTRF, EU-FLOADER, EU-TRAF, EU-STKPILE, EU-CRUSHER

FGROCKSALTPLANT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Rock salt production process, including conveyors, the stockpile, and vehicle loading.

Emission Unit: EU-SBIN, EU-STACKER, EU-CONRAIL, EU-CONTRF, EU-FLOADER, EU-TRAF, EU-STKPILE, EU-CRUSHER

POLLUTION CONTROL EQUIPMENT

Partially enclosed conveyors

I. EMISSION LIMIT(S)

1. Visible emissions from each bucket elevator, conveyor belt transfer point, truck loading station, railcar loading station, or any other affected facility as defined in 40 CFR 60.670 and 60.671 of FG-ROCKSALTPLANT shall not exceed seven percent opacity, except as specified in the Federal Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subparts A and OOO. **(R 336.1205, R 336.1301, 40 CFR 52.21 (c) & (d), 40 CFR 60.672(b), 40 CFR Part 60, Subpart OOO)**
2. Visible emissions from all wheel loaders, all truck traffic, and the stockpile operated in conjunction with FG-ROCKSALTPLANT, shall not exceed a six minute average of five 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, 40 CFR 52.21(c) & (d))**
3. Visible emissions from EU-CRUSHER shall not exceed 15 percent opacity except as specified in the Federal Standards of Performance for New Stationary Sources, 40 CFR Part 60, Subparts A and OOO. **(R336.1205, R336.1301, 40 CFR 52.21 (c) & (d), 40 CFR Part 60, Subpart OOO)**

II. MATERIAL LIMIT(S)

1. The Permittee shall not process more than 200,000 tons of salt per 12-month rolling time period, as determined at the end of each calendar month, year in EU-CRUSHER. **(R336.1205, 40 CFR 52.21 (c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall ensure that all above ground conveyor belts and stackers are 180° enclosed and are equipped with belt wipers and hoppers of proper size to prevent excessive spills. **(R336.1205, R336.1901, 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. Within 60 days after achieving maximum production rate, but not later than 180 days after commencement of trial operation, the permittee shall evaluate visible emissions from each new affected facility, at owner's expense, in accordance with federal Standards of Performance for New Stationary Sources 40 CFR Part 60, Subparts A and OOO, using US EPA Method 9 or an alternative method approved by the AQD. The permittee must have prior approval from the AQD for visible emission observation procedures. No less than 10 days prior to the anticipated test date, the permittee shall notify the AQD District Supervisor of the test date. If after

the anticipated test date has been submitted to the AQD District Supervisor, there is a delay in conducting the test, the permittee shall submit to the AQD District Supervisor notice of the new test date. This notification shall take place a minimum of three days prior to the rescheduled test-taking place. Verification of visible emissions includes the submittal of a complete report of opacity observations to the AQD within 45 days following the last date of the evaluation. **(R 336.1301, 40 CFR Part 60 Subparts A & OOO)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep daily, monthly, and 12-month rolling time period records of the amount of salt processed in EU-CRUSHER. The permittee shall keep all records and calculations on file for a period of at least five years and make them available to the Department upon request. **(R336.1205, 40 CFR 52.21 (c) & (d))**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FG-ROCKSALTPLANT authorized by this Permit to Install, 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, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FG-ROCKSALTPLANT. **(R 336.1201(7)(a))**
2. The permittee shall provide written notification of construction and operation of the modifications to FG-ROCKSALTPLANT to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. **(40 CFR 60.7)**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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 OOO, as they apply to FG-ROCKSALTPLANT. **(40 CFR Part 60 Subparts A & OOO)**

Footnotes:

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

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

At the salt mine facility located at 12841 Sanders Street, each bagging plant line has a bag sealing machine with an associated dust collector that is vented inside the building and the rock salt plant conveyors are partially enclosed. At the marine terminal facility located at 10335 Flora Street, salt is stored inside of the salt storage building, and the conveyors that load salt onto marine vessels from the salt storage building are partially enclosed.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not process any asbestos tailing or asbestos containing waste materials in FGFACILITY pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61, Subpart M. **(40 CFR Part 61 Subpart M)**
2. The permittee shall not process more than 600 tons of salt per hour nor more than 2,500,000 tons of salt per 12-month rolling time period, as determined at the end of each calendar month, at the salt mine facility located at 12841 Sanders Street. **(R336.1205, 40 CFR 52.21 (c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not exceed a maximum equivalent of 34,000 50-ton rock salt transportation trucks leaving the salt mine facility located at 12841 Sanders Street for each 12-month rolling time period, as determined at the end of each calendar month. **(R336.1205, 40 CFR 52.21 (c) & (d))**
2. The permittee shall not exceed a maximum equivalent of 8,000 25-ton palletized rock salt trucks leaving the salt mine facility located at 12841 Sanders Street for each 12-month rolling time period, as determined at the end of each calendar month. **(R336.1205, 40 CFR 52.21 (c) & (d))**
3. The permittee shall not operate the salt mine facility located at 12841 Sanders Street unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, the material storage pile, and all material handling operations specified in Appendix A has been implemented and is maintained. **(R336.1205, R 336.1901, 40 CFR 52.21 (c) & (d))**
4. The permittee shall not operate the marine terminal facility located at 10335 Flora Street unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, the material storage pile, and all material handling operations specified in Appendix B has been implemented and is maintained. **(R336.1205, R 336.1901, 40 CFR 52.21 (c) & (d))**
5. The Permittee shall not form more than a single outdoor material storage pile at the salt mine facility located at 12841 Sanders Street. **(R336.1205, 40 CFR 52.21 (c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall pave the plant roadways. **(R 336.1205, R 336.1301, 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))**

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep monthly and 12-month rolling time period, as determined at the end of each calendar month, records of the amount of salt processed at the salt mine facility located at 12841 Sanders Street. The permittee shall keep all records and calculations on file for a period of at least five years and make them available to the Department upon request. **(R336.1205, 40 CFR 52.21 (c) & (d))**
2. The permittee shall keep, in a manner acceptable to the AQD District Supervisor, daily, monthly and 12-month rolling time period, as determined at the end of each calendar month, records of the type, size (weight) and number of rock salt transportation trucks entering and leaving the salt mine facility located at 12841 Sanders Street. The permittee shall calculate an equivalent number of 50-ton rock salt transportation trucks entering and leaving the salt mine facility located at 12841 Sanders Street based on that month's daily records. The permittee shall keep all records and calculations on file for a period of at least five years and make them available to the Department upon request. **(R336.1205, 40 CFR 52.21 (c) & (d))**
3. The permittee shall keep, in a manner acceptable to the AQD District Supervisor, daily, monthly and 12-month rolling time period, as determined at the end of each calendar month, records of the type, size (weight) and number of palletized rock salt trucks entering and leaving the salt mine facility located at 12841 Sanders Street. The permittee shall calculate an equivalent number of 25-ton palletized rock salt trucks entering and leaving the salt mine facility located at 12841 Sanders Street based on that month's daily records. The permittee shall keep all records and calculations on file for a period of at least five years and make them available to the Department upon request. **(R336.1205, 40 CFR 52.21 (c) & (d))**

VII. REPORTING

1. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. **(40 CFR 60.7)**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Within 45 days of installation, the permittee shall label all equipment using the company ID Numbers in Appendix C, according to a method acceptable to the AQD District Supervisor. Labels shall be in a conspicuous location on the equipment. 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)**
2. 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 OOO, as they apply to FGFACILITY. **(40 CFR Part 60 Subparts A & OOO)**

Footnotes:

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

APPENDIX A: Nuisance Management Plan for Fugitive Dust -12841 Sanders Street

- I. Site Roadways / Plant Yard
 - A. The dust on the site roadways/plant yard shall be controlled by applications of calcium chloride or sodium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as needed on a semi-monthly basis or more frequently if needed.
 - B. All paved roadways /paved plant yard shall be swept as needed between applications. Applicant shall pave the plant roadways.
 - C. A record of all dust suppressant applications and vacuum sweepings shall be kept on file and made available upon request to the Division.
 - D. Maximum speed of vehicles shall be posted and limited to 10 mph. A minimum of three speed - limit signs shall be posted in the facility where it is readily visible to truck drivers. One shall be posted at the entrance, another one shall be posted at the scale house and the last one shall be posted within the area of truck movement.
 - E. Any material spillage on roads shall be removed within a reasonable time period by vacuum sweeping or other means as needed.
- II. Material Storage Pile
 - A. Stockpiling of rock salt shall be performed with wheeled loaders and mechanical stackers and the maximum drop distance allowed is three feet or less. This requirement does not apply when the pile is less than 11 feet high.
 - B. Remove spilled materials immediately by vacuum sweeping or by other means as needed.
- III. Truck Traffic
 - A. On-site, vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that all loads shall remain below six inches of the top of any sideboard, side panel or tailgate.
 - B. All salt trucks must be tarped prior to leaving the site.
 - C. All salt trucks shall use Oakwood Avenue, South Sanders Street, or Bayside Street.
 - D. The applicant shall clean the wheels and body of each truck leaving the plant premises to remove spilled materials after the truck has been loaded with salt (The truck wheel wash station shall be located at or near the point of departure from the premises).
- IV. Conveyors
 - A. All above ground conveyor belts and stackers shall be 180° enclosed and be equipped with belt wipers and hoppers of proper size to prevent excessive spills.
 - B. All transfer guides shall be sufficiently narrowed and aligned properly to minimize the spills.
 - C. Conveyors to rail cars shall have a drop distance of less than three feet or operated with a telescopic chute.
 - D. The applicant shall clean and remove all spilled material from the ground under conveyors in reasonable time.
- V. AQD/EGLE 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 the permitted opacity limits are not being met.

APPENDIX B: Nuisance Management Plan for Fugitive Dust -10335 Flora Street

Overview

The property contains truck access and maneuvering area, personnel parking, a wharf area necessary for loading vessels, and a new open style structure designed for bulk salt storage which will be paved inside for a total +/- 3.58 acres of impermeable asphalt paved access & storage among (3) land parcels. There are +/- 0.84 acres identified as pallet storage that is intended to have gravel base and stone. The total operating area is +/- 4.42 acres.

The terminal will be used primarily to bring bulk rock salt from the mine, stockpile the salt into the building, and then load bulk salt into vessels. As a secondary use, a small area will be used to store finished packaged & stretch-wrapped salt on pallets.

1. Identification of Fugitive Dust Sources

- A. Paved surface – This area will be used for personnel vehicles, truck access, wheel loader access, equipment positioning to load vessels, unloading staging, and loading palletized packaged salt.
- B. Unpaved surface – This area is designated to support forklift traffic only and no vehicular or truck traffic is necessary.
- C. Bin, Transfer, Feed Points
 - a. Stacking salt in the building involves the use of two wheel loaders, one bin and conveyor discharge point.
 - b. Loading vessels involve use of three or four wheel loaders, two bins, two feeders and four conveyors to complete the process.

2. Process Flow Description & Control Measures

- A. A maximum of 700,000 tons of bulk rock salt will be brought to the terminal by truck on a rolling 12 month period for the intent of loading into vessels. Bulk rock salt containing a liquid anti-caking agent will be dumped and stockpiled using a stacking conveyor inside a fabric covered bulk storage building. The terminal is designed and intended to only load vessels with bulk salt coated with a liquid anti-caking agent. The terminal is not designed or intended for any bulk commodities to be unloaded and stockpiled on the open paved portion of the terminal. Use of the covered storage building will nearly eliminate all potential fugitive dust creation. The two existing buildings will be used for equipment maintenance and supply storage. No additional processing, crushing, screening or other related activities will take place on the terminal property.

3. Other Specific Dust Control Measures

- A. The actively used inbound & outbound paved areas, estimated to be 0.97 acres. We expect this area will experience dust retention and deposition by trucks entering the facility despite the entire area being paved.
- B. Dust can become agitated on dry, sunny, and warm days. Plans are in place to manually or mechanically sweep the area as often as necessary during truck traffic activities to collect any spilled or residual dust.
- C. A record of all sweeping activities shall be kept on file and made available upon request to the Division.
- D. Maximum speed of vehicles shall be posted and limited to 10 mph. A minimum of two speed limit signs shall be posted in the facility where it is readily visible to truck drivers. One shall be posted at the entrance and the second within the area of truck movement.
- E. Any material spillage on roads shall be removed within a reasonable time period by vacuum sweeping or other means.

4. Truck Traffic

- A. All salt trucks shall use Flora Street and Reisener Street.

5. Conveyors

- A. All surface conveyor belts and stacker shall be 180° enclosed and be equipped with belt wipers and transfer points of proper size to prevent spills.
- B. The three conveyors will have semi-circular covers installed full length and the bin and feeder designs incorporate features that minimize drop distance during use.

APPENDIX C: Equipment List

SK1 - Skip

SK2 - Skip

SB1 - Surge Bin

C1 - Transfer Conveyor

C2 - Railcar loading conveyor

C3 - Transfer conveyor

C4 - Stacking conveyor

C5 - Yard conveyor

C6 - Yard conveyor

C7 - Yard conveyor

C8 - Yard conveyor

C9 - Yard Conveyor

C10 - Yard conveyor

C11 - Transfer conveyor

C12 - Yard Conveyor

C13 - Yard Conveyor

IB1 - Inline breaker

DW1 - Reclaimer

DW2 – Reclaimer

DW3 - Reclaimer

FL1 - Wheel Loader

FL2 - Wheel Loader

FL3 - Wheel Loader

FL4 - Wheel Loader

S1 – Marine terminal Stacker 1 used to CB covered building

CB – Marine terminal covered building

C1 – Marine terminal Conveyor 1 used to move salt from the CB to the KF

KF – Marine terminal Klochko Feeder

KVLC – Marine terminal Klochko vessel loading conveyer

C2 – Marine terminal vessel loading Conveyor #2

TF – Transfer Feeder #2

TTLC – Thor Telestacker Conveyor

MTWL1 – Marine terminal wheel loader

MTWL2– Marine terminal wheel loader

MTWL3– Marine terminal wheel loader

MTWL4– Marine terminal wheel loader