

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

JANUARY 27, 2021

PERMIT TO INSTALL
186-99B

ISSUED TO
LAFARGE PRESQUE ISLE QUARRY

LOCATED AT
11351 EAST GRAND LAKE ROAD
PRESQUE ISLE, MICHIGAN 49777

IN THE COUNTY OF
PRESQUE ISLE

STATE REGISTRATION NUMBER
M1891

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: January 25, 2021	
DATE PERMIT TO INSTALL APPROVED: January 27, 2021	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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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 condition 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)**

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
FGLIMESTONE	Limestone processing facility	All equipment listed in Appendix A

**FGLIMESTONE
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Limestone processing facility.

Emission Unit: All equipment listed in Appendix A

POLLUTION CONTROL EQUIPMENT

Control devices as described in Appendix A

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.02 lb/1,000 lbs of gas	Hourly	Combined emissions from C-500 Hazemag crusher, conveyor C-3 and the two Symons 7 inch short head cone crushers	SC V.1	R 336.1205, R 336.1331
2. PM10	1.1 pph	Hourly		SC V.1	R 336.1205, 40 CFR 52.21(c) & (d)
3. PM10	4.7 tpy	12-month rolling time period as determined at the end of each calendar month		SC VI.2, SC VI.3	R 336.1205, 40 CFR 52.21(c) & (d)
4. Opacity (fugitive)	7 percent	Hourly		Sandvik CS660 w/ Hydroset (Secondary Crusher)	SC V.2

5. Visible emissions from all truck/loader traffic and all material storage piles shall not exceed 5 percent opacity. **(R 336.1205, R 336.1301, R 336.1901)**

II. MATERIAL LIMIT(S)

- The permittee shall not process more than 2,900 net tons per hour nor 11,972,650 net tons of limestone through FGLIMESTONE per calendar year. Note: net tons have 2,000 pounds per ton. **(R 336.1205, 40 CFR 52.21(c) and (d))**
- The permittee shall not process more than 840 net tons per hour nor 4,415,040 net tons of limestone per year through the Svedala H-8000 Hydrocone Crusher. **(R 336.1205, 40 CFR 52.21(c) and (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall maintain and operate a belt scale on conveyor C-1, located between the primary and secondary crushers, which continuously shows the throughput rate for the conveyor. **(R 336.1205, 40 CFR 52.21(c) and (d))**
- The permittee shall maintain and operate a belt scale on conveyor A-1, located between the screenhouse and mill addition crusher, which continuously shows the throughput rate for the conveyor. **(R 336.1205, 40 CFR 52.21(c) and (d))**

3. Permittee shall not operate the C-500 Hazemag crusher, conveyor C-3 and the two Symon 7 inch short head cone crushers unless the associated baghouse is operating properly. **(R 336.1205, R 336.1331, 40 CFR 52.21(c) and (d))**
4. Permittee shall equip, maintain, and operate the Svedala model SH triple deck screen within a complete enclosure. All enclosures shall be installed and operating properly whenever the Svedala model SH triple deck screen is in operation. **(R 336.1205, R 336.1301, R 336.1303, R 336.1901, 40 CFR 52.21(c) and (d))**
5. The permittee shall not operate any portion of FGLIMESTONE unless the equipment's specific opacity limit is being met and the equipment's specified control device is installed and operating properly as listed in Appendix A of this permit. **(R 336.205, R 336.301, R 336.901)**
6. Permittee shall not crush any asbestos tailings or asbestos containing waste material, as defined by the National Emission Standard for Hazardous Air Pollutants [40 CFR 61.141] regulations, in the limestone material processing plant. **(R 336.1224, 40 CFR 61 Subpart M)**
7. The permittee shall submit to AQD for review and written approval a fugitive dust control plan (FDCP). After AQD approval of the FDCP, the permittee shall not operate FGLIMESTONE unless the FDCP is implemented and maintained. If at any time the FDCP fails to address or inadequately addresses fugitive dust at the facility, the permittee shall amend the plan within 45 days after such an event occurs. The permittee shall also amend the FDCP within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the FDCP and any amendments to the AQD District Supervisor for review and approval. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1225, R 336.1331, 40 CFR 52.21(c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall label all equipment associated with FGLIMESTONE according to the company ID numbers shown on the equipment list in Appendix A in a manner acceptable to the AQD District Supervisor. **(R 336.1201)**

V. TESTING/SAMPLING

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

1. Upon the request of the AQD District Supervisor, the permittee shall verify PM and PM10 emission rates from Combined emissions from C 500 Hazemag crusher and the two Symons 7 inch short head cone crushers by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1205, R 336.1224, R 336.1225, R 336.1902, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

2. The permittee shall evaluate visible emissions, as listed in Appendix A of this permit, from PAQ-02 (Sandvik CS660 w/ Hydroset), as required by federal Standards of Performance for New Stationary Sources, at owner's expense, in accordance 40 CFR Part 60 Subparts A and OOO. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD

must approve the final plan prior to testing. Verification of visible emissions includes the submittal of a complete report of opacity observations to the AQD Technical Programs Unit and District Office within 60 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. Hourly and yearly records of the amount of limestone processed in FGLIMESTONE, in net tons, shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. Note: net tons have 2,000 pounds per ton. **(R 336.1205)**
2. Hourly and yearly records of the amount of limestone processed through the Svedala H-8000 Hydrocone Crusher, in net tons, shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. Note: net tons have 2,000 pounds per ton. **(R 336.1205)**
3. The permittee shall keep the following information on a monthly basis for the combined emissions from C-500 Hazemag crusher and the two Symons 7 inch short head cone crushers:
 - a) PM mass emission calculations determining the monthly emission rate in tons per calendar month.
 - b) PM mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1205, 40 CFR 52.21)**

VII. REPORTING

1. The permittee shall provide written notification of construction and operation of the Sandvik CS660 w/ Hydroset (Secondary Crusher) 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 30 days, as specified in 40 CFR 60.7. **(40 CFR 60.7)**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE01*	28 by 21	7	R 336.1331, 40 CFR 52.21(c) and (d)

* Not discharged unobstructed vertically upwards.

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 FGLIMESTONE. **(40 CFR Part 60 Subparts A & OOO)**

APPENDIX A

Emission Unit List

Emission Unit	Opacity Limit	Control Device	Description of Physical Plant Equipment
PRODUCTION PROCESS			
PAQ-01	15		Allis Chalmers 60-89 Superior Gyratory Primary Crusher w/Hydroset
PAQ-03 ¹	5	Baghouse	C-500 Hazemag Crusher
PAQ-04 ¹	5	Baghouse	Two Symons 7" Short Head Cone Crushers
PAQ-05 ¹	No Visible Emissions ²		Twelve 6'x14' F-800 Tyrock Double Deck Screens
PAQ-06 ¹	No Visible Emissions ²		Two 6'x12' F-900 Tyrock Scalping Screens Double Deck
PAQ-07 ¹	No Visible Emissions ²		Splitter - Option to cones, Hazemag or both
PAQ-08 ¹	No Visible Emissions ²		300 Ton Bin/Syntron, Vib. Feeder FMC-1000
PAQ-09 ¹	No Visible Emissions ²		500 Tons Bin w/4-way Splitter/4 Syntron Dual F-86 Vib. Feeder
PAQ-10 ¹	No Visible Emissions ²		Hopper w/splitter, Syntron Dual Vib. Feeder w/Grizzly, 1 FMC-400
PAQ-11	No Visible Emissions ²		Three Syntron F-55 D.T. Vib. FOR., FMC-F480C
PAQ-12	5		Storage Pile -1 5/8" x 1" ROT. Kiln "B"
PAQ-13	5		Storage Pile - 1 x 1/2 Special Kiln
PAQ-14	5		Storage Pile -2 1/8" x 1 5/8" ROT. Kiln "A"
PAQ-15	5		Storage Pile -4M x 0 Sinter Flux
PAQ-16	5		Storage Pile –BFF 2 1/4 x 2 1/8
PAQ-17	5		Storage Pile –VKS 5 1/2 x 3 1/2
PAQ-18	5		Storage Pile -1/2" x 4 M Screenings
PAQ-19	5		Storage Pile - 1 x 4M Rescreen
PAQ-20	5		Storage Pile - Wash Pond Sand (WPS)
PAQ-21	10		Conveyor B-1, 36"
PAQ-22	10		Conveyor B-2, 36"
PAQ-23	10		Conveyor B-3, 36"
PAQ-24	10		Conveyor B-4, 36"
PAQ-25	10		Conveyor B-5, 30"
PAQ-26	10		Conveyor B-6, 30"
PAQ-27	10		Conveyor B-7, 30"
PAQ-28 ¹	No Visible Emissions ²		Conveyor C-1, 54"
PAQ-29 ¹	No Visible Emissions ²	Baghouse	Conveyor C-3, 54"

Emission Unit	Opacity Limit	Control Device	Description of Physical Plant Equipment
PAQ-30 ¹	No Visible Emissions ²		Conveyor C-4, 24"
PAQ-31 ¹	No Visible Emissions ²		Conveyor C-5, 24"
PAQ-32 ¹	10	Partially Enclosed	Conveyor C-6, 30"
PAQ-33 ¹	No Visible Emissions ²		Conveyor C-7, 30"
PAQ-34 ¹	No Visible Emissions ²		Conveyor C-8, 30"
PAQ-35	10	Partially Enclosed	Conveyor C-9, 36"
PAQ-36	10		Conveyor C-10, 36"
PAQ-37	10		Conveyor D-1, 36"
PAQ-38	10		Conveyor D-3, 36"
PAQ-39	10		Conveyor D-4, 36"
PAQ-40	10		Conveyor D-5, 30"
PAQ-41	10		Conveyor D-6, 30"
PAQ-42	10		Conveyor D-7, 30"
PAQ-43 ¹	No Visible Emissions ²		Conveyor S-2, 36"
PAQ-44 ¹	No Visible Emissions ²		Conveyor S-3, 36"
PAQ-45 ¹	No Visible Emissions ²		Conveyor S-4, 36"
PAQ-46 ¹	No Visible Emissions ²		Conveyor S-5, 30"
PAQ-47 ¹	No Visible Emissions ²		Conveyor S-6, 30"
PAQ-48 ¹	No Visible Emissions ²		Conveyor S-7, 30"
PAQ-49	10	Partially Enclosed	Conveyor T-5, 36"
SHIPPING PROCESS			
PAQ-50 ¹	No Visible Emissions ²		Two 6' x 16' Triple Deck Screen
PAQ-51 ¹	No Visible Emissions ²		Two 6' x 16' Triple Deck Screen
PAQ-52 ¹	No Visible Emissions ²		4-way Splitter
PAQ-53	5		Storage Pile – Flux/Sinter
PAQ-54	10	Partially Enclosed	Conveyor, L Flume "Launders" System
PAQ-55	10	Partially Enclosed	Conveyor L-1, 60"
PAQ-56 ¹	10		Conveyor L-1A, 60"
PAQ-57	10	Partially Enclosed	Conveyor L-2, 60"
PAQ-58	10	Partially Enclosed	Conveyor L-3, 72"
PAQ-59	10	Partially Enclosed	Conveyor L-7, 42"
PAQ-60	10	Partially Enclosed	Conveyor L-8, 42"
PAQ-61	10	Partially Enclosed	Conveyor R-1 1 x 4M, 30"
PAQ-62	10	Partially Enclosed	Conveyor R1A, 30"

Emission Unit	Opacity Limit	Control Device	Description of Physical Plant Equipment
PAQ-63	10	Partially Enclosed	Conveyor R-2, 30"
PAQ-64	10		Conveyor R-3, 30"
PAQ-65	10	Partially Enclosed	Conveyor R-4 1 x 4M, 30"
PAQ-66	10	Partially Enclosed	Conveyor R-5, 30"
PAQ-67	10	Partially Enclosed	Conveyor T-1, 60"
PAQ-68	10	Partially Enclosed	Conveyor T-2, 60"
PAQ-69 ¹	No Visible Emissions ²		Conveyor T-3, 60"
PAQ-70 ¹	No Visible Emissions ²		Conveyor T-4, 60"
MILL ADDITION AND SANDVIK CS660 W/ HYDROSET (SUBJECT TO NSPS SUBPART OOO)			
PAQ-71	5	Enclosure	Svedala H-8000 Hydrocone Crusher
PAQ-72 ¹	No Visible Emissions ²	Enclosure	Svedala Model SH RIPL-FLO Tripe Deck Screen
PAQ-73	5		Svedala Eastern 60 ton Variable Speed Belt Feeder
PAQ-74	5	Enclosure/Cover	Conveyor A-1, 36"
PAQ-75	5	Enclosure/Cover	Conveyor A-2, 36"
PAQ-76	5	Enclosure/Cover	Conveyor A-3, 36"
PAQ-77	5		Conveyor A-4, 30"
PAQ-78 ¹	5		Conveyor A-5, 30"
PAQ-79 ¹	5		Conveyor A-6, 30"
PAQ-80 ¹	5		Conveyor A-7, 30"
PAQ-02 ¹	No Visible Emissions ²		Sandvik CS660 w/ Hydroset (Secondary Crusher)

¹ Equipment is enclosed within a building or located within underground tunnels.

² As determined by Method 22.