

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

March 26, 2013

**PERMIT TO INSTALL**  
123-12A

**ISSUED TO**  
Dynamic Railroad Consulting, LLC

**LOCATED AT**  
1400 Zug Island Road  
River Rouge, Michigan

**IN THE COUNTY OF**  
Wayne

**STATE REGISTRATION NUMBER**  
A7809

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: <b>March 6, 2013</b>	
DATE PERMIT TO INSTALL APPROVED: <b>March 26, 2013</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

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**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant / Measurement Abbreviations</b>	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO <sub>2</sub> e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H <sub>2</sub> S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfuction Abatement Plan	NO <sub>x</sub>	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

\* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (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)	Installation Date / Modification Date	Flexible Group ID
EUPROCESS	A combination of process equipment (screens, conveyors, etc.) used to screen 200 tons per hour of coke, asphalt millings, and scarfing scrap materials into different size categories. Equipment consists of a 5' x 12' portable screener and a portable conveyor powered by a 200 kW portable generator set, two CEC portable 6' by 16' 2-deck screeners, three portable stacking conveyors approximately 36" by 80', a belt feeder, a portable diesel powered screener (2-deck with apron feeder), and a powerscreen M-80 portable diesel powered radial stacker (30" by 65'). Coke material is stockpiled, then either loaded to ships or trucked off site. Equipment drop-points are controlled by water spray.	August 27, 2012/ March 26, 2013	N/A
EUYARD	Truck traffic from coke delivery to the processing area. Loader traffic associated with processing equipment, storage pile handling, and loading delivery trucks. Truck traffic for delivery of material products to customers. All truck areas and unpaved roads.	August 27, 2012	N/A
EUSTORAGE	Open area stock piles of unscreened and screened coke materials. Water spray of material products are used when necessary for material storage piles.	August 27, 2012	N/A
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 combination of process equipment (screens, conveyors, etc.) used to screen 200 tons per hour of coke, asphalt millings, and scarfing scrap materials into different size categories. Equipment consists of a 5' x 12' portable screener and a portable conveyor powered by a 200 kW portable generator set, two CEC portable 6' by 16' 2-deck screeners, three portable stacking conveyors approximately 36" by 80', a belt feeder, a portable diesel powered screener (2-deck with apron feeder), and a powerscreen M-80 portable diesel powered radial stacker (30" by 65'). Coke material is stockpiled, then either loaded to ships or trucked off site. Equipment drop-points are controlled by water spray.

**Flexible Group ID:** N/A

**POLLUTION CONTROL EQUIPMENT:** Material drop-points are controlled by water spray.

**I. EMISSION LIMITS**

1. Visible emissions from the screening process, drop point, and transfer point portions of EUPROCESS shall not exceed 10 percent opacity on a six minute average. **(R 336.1301, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**

**II. MATERIAL LIMITS**

1. 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)**
2. The permittee shall not process more than 200 tons of material per hour on a 24-hour average, nor 225,000 tons of material through EUPROCESS per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
3. The permittee shall only process coke, asphalt millings, and scarfing scrap in EUPROCESS. **(R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUPROCESS unless the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1901)**
2. The permittee shall update the fugitive dust plan if it is determined by the AQD District Supervisor to be insufficient. The permittee shall provide an updated fugitive dust plan to the AQD District Supervisor for review and approval within 30 days of notification that the plan is insufficient. **(R 336.1371(5))**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate any portion of EUPROCESS unless effective water mist technology is used upon feed materials and installed on plant as is needed to comply with SC I.1. **(R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**

**V. TESTING/SAMPLING**

N/A

**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 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
2. The permittee shall keep the following records on a daily basis:
  - a) The type of material processed
  - b) The bucket-load weight of material screened in EUPROCESS
  - c) The number of bucket-loads of material processed in EUPROCESS
  - d) Calculations of the tons per hour throughput of EUPROCESS on a 24-hour basis, in accordance with SC II.2**(R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
3. The permittee shall keep monthly records of the amount of material processed through EUPROCESS. 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 on file records of the amount of material processed and make them available to the Department upon request. **(R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))**
4. The permittee shall keep records of a daily non-certified visual inspection of any uncovered points in EUPROCESS, using "yes" or "no" to indicate whether or not there are visible emissions, and keep records of corrective actions taken if visible emissions are present. **(R 336.301(1)(c), R 336.1901)**

**VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification 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 EUPROCESS. **(R 336.1201(7)(a))**

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**The following conditions apply to: EUYARD**

**DESCRIPTION:** Truck traffic from coke delivery to the processing area. Loader traffic associated with processing equipment, storage pile handling, and loading delivery trucks. Truck traffic for delivery of material products to customers. All truck areas and unpaved roads.

**Flexible Group ID:** N/A

**POLLUTION CONTROL EQUIPMENT:** Water spray or application of chemical dust suppressant as necessary.

**I. EMISSION LIMITS**

1. Visible emissions from all wheel loaders and all truck traffic, operated in conjunction with EUYARD, shall not exceed five (5) percent opacity on a three minute average. 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, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUYARD unless the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**
2. The permittee shall update the fugitive dust plan if it is determined by the AQD District Supervisor to be insufficient. The permittee shall provide an updated fugitive dust plan to the AQD District Supervisor for review and approval within 30 days of notification that the plan is insufficient. **(R 336.1371(5))**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

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

N/A

**VI. MONITORING/RECORDKEEPING**

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

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**The following conditions apply to: EUSTORAGE**

**DESCRIPTION:** Open area stock piles of unscreened and screened coke materials. Water spray of material products are used when necessary for material storage piles.

**Flexible Group ID:** N/A

**POLLUTION CONTROL EQUIPMENT:** Water spray of material products are used when necessary for material storage piles.

**I. EMISSION LIMITS**

1. Visible emissions from each of the material storage piles maintained under EUSTORAGE, shall not exceed five (5) percent opacity on a three minute average. 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, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUSTORAGE unless the fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. **(R 336.1371, R 336.1372, Act 451 324.5524)**
2. The permittee shall update the fugitive dust plan if it is determined by the AQD District Supervisor to be insufficient. The permittee shall provide an updated fugitive dust plan to the AQD District Supervisor for review and approval within 30 days of notification that the plan is insufficient. **(R 336.1371(5))**

**IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

**V. TESTING/SAMPLING**

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

N/A

**VI. MONITORING/RECORDKEEPING**

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

N/A

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

## **APPENDIX A Fugitive Dust Control Plan**

### **I. Site Roadways / Plant Yard**

- A. The dust on the site roadways and the plant yard shall be controlled by applications of water, calcium chloride, or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants shall be done as often as necessary to meet all applicable emission limits. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.
- B. All paved roadways and the plant yards shall be swept as needed between applications.
- C. Any material spillage on roads shall be cleaned up immediately.

### **II. Plant**

The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve.

### **III. Storage Piles**

- A. Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.
- B. Stockpiles shall be watered on an as needed basis in order to meet the opacity limit of 5 percent. Equipment to apply water or dust suppressant shall be available at the site or on call for use at the site within a given operating day. A record of all watering/dust suppressant applications shall be kept on file and be made available to the AQD upon request.

### **IV. Truck Traffic**

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 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 shall be tarped.

### **V. 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.