

M4685  
M4685

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

M468541645

FACILITY: DETROIT SALT CO		SRN / ID: M4685
LOCATION: 12841 SANDERS, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: John Shook , Vice President of Operations		ACTIVITY DATE: 09/26/2017
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

COMPANY NAME :Detroit Salt  
FACILITY ADDRESS :12841 Sanders, Detroit MI 48121  
STATE REGISTRAT. NUMBER :M4685  
SIC CODE :1476  
EPA SOURCE CLASS : **B Minor**  
EPA POLLUTANT CLASS : PM  
LEVEL OF INSPECTION : PCE  
DATE OF INSPECTION :09/26/17  
TIME OF INSPECTION : 12:30 PM  
DATE OF REPORT : 09/26/17  
REASON FOR INSPECTION : Annual Compliance Inspection.  
INSPECTED BY : Jorge Acevedo  
PERSONNEL PRESENT : John Shook, Plant Manager  
FACILITY PHONE NUMBER :  
FACILITY FAX NUMBER :

FACILITY BACKGROUND:

The Detroit salt mine was started initially in 1906 and operated until 1983 at which time it was shut down. Detroit Salt acquired the mining rights in 1998, demolished and cleared the site, rebuilt the buildings and started to operate the mine again. Salt is mined, crushed and screened underground. Crushed salt is then carried to about 120 feet above ground by two cable operated, 10-ton skips which dump it through a bin onto conveyor belts that carry it to storage piles. The same conveyor system can transfer crushed salt directly into rail cars. Large front end loaders are used to load crushed salt onto 50-ton trucks for shipment, also. These end loaders also can be used to remove salt from the storage pile back onto the conveyor belts for loading railcars. Industrial and commercial establishments border Detroit Salt on the west; to the north and east the facility is closely adjacent to residential neighborhoods.

INSPECTION NARRATIVE:

On September 26, 2017, I arrived in the vicinity of Detroit Salt at 12:30 PM. The purpose of the inspection was to conduct a partial compliance evaluation of Detroit Salt. I parked the car at the inside of the facility. There was a truck exiting the facility. I observed the truck as it put on its truck cover prior to leaving the facility. I met with John Shook, vice president of operations, and explained to him the purpose of the inspection. Detroit Salt had previously received a permit to install in June 2017 for a bagging plant. Mr. Shook explained that they were in pre production of the bagging plant and were trying to optimize the operation before proceeding with full production. I observed operation of the bagging plant and did not observe any excess emissions as spills were minimized and no excess dust was coming from the hopper.

After observing the bagging plant, Mr. Shook accompanied me on the grounds of the facility. Work was ongoing in repaving the expanded area of the facility. I observed the storage pile of salt and did not observe any fugitive dust. Mr. Shook explained that the mined salt is brought up from the mine using two cable-operated 10-ton skips. It is dumped onto a conveyor belt which is angled at 45 degrees on both sides to prevent the salt from spilling. The conveyor belt has 180 degree covers to ensure that spilling is minimal. The salt which is carried by the surge bin can go to three locations: the rail system, where the salt is loaded onto rail cars; a covered building for further processing for special applications;

and onto the stockpile. Mr. Shook explained that barge loading does not occur any more. Mr. Shook showed me the new water tank for wheel washing operation.

I left the facility at 1:40 PM.

**COMPLAINT/COMPLIANCE HISTORY:**

There have not been complaints recently. A Violation Notice was issued on August 8, 2013, but it was resolved.

**OUTSTANDING CONSENT ORDERS:**

None

**OUTSTANDING LOVs**

None

**OPERATING SCHEDULE/PRODUCTION RATE:**

The Detroit facility operates two shifts a day, 6 days per week.

**APPLICABLE RULES/PERMIT CONDITIONS:**

Detroit Salt operates under Permti to Install 318-98A, issued on June 2, 2017. The following special conditions apply:

The following conditions apply to: EU-BAGPLANT

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

Flexible Group ID:

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

**I. EMISSION LIMITS**

1. Visible emissions from the EU-BAGPLANT building openings shall not exceed 7 percent opacity. (R 336.1301, 40 CFR 52.21 (c) & (d), 40 CFR 60.672(e)(1))

Compliance- Bagging plant was in its shake out period but I did not observe any opacity while the plant was running.

**II. MATERIAL LIMITS**

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))

Compliance- Full production was not occurring at the time of the inspection. Also, the permit to install was issued in June 2017 therefore a full 12 month rolling time period did not occur.

### III. PROCESS/OPERATIONAL RESTRICTIONS

NA

### IV. DESIGN/EQUIPMENT PARAMETERS

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))

Compliance- Full production was not occurring and final building preparations were not completed. I will make notes during the next inspection.

### 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 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. 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)

Compliance- Mr. Shook was preparing to have his consultant perform the necessary tests per the Federal NSPS. AQD received a test plan on October 18, 2017.

### 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))

Compliance- Full production was not occurring at the time of the inspection. Also, the permit to install was issued in June 2017 therefore a full 12 month rolling time period did not occur.

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)

Compliance- Mr. Shook was preparing to have his consultant perform the necessary tests per the Federal NSPS. AQD received a test plan on October 18, 2017.

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)

Not Evaluated- Facility is not in full production as of inspection date and as such, visible emissions inspections have not been conducted.

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))

Compliance- Facility is still in shake down period and the permit was issued in June 2017 and therefore, the 12-month rolling time period has not been completed.

## 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)).

NOT EVALUATED- Facility did not commence with trial operation.

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)

NOT EVALUATED- AQD will verify notification submittal in the future.

## VIII. STACK/VENT RESTRICTIONS

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))

Compliance- No exhaust gases were observed discharging through a vent.

## IX. OTHER REQUIREMENTS

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)

Compliance- AQD received test plan on October 18, 2017. AQD is awaiting results of the test.

## FLEXIBLE GROUP SUMMARY TABLE

The following conditions apply to: FG-ROCKSALTPLANT

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

**Emission Units:** EU-SBIN, EU-STACKER, EU-CONRAIL, EU-CONTRFR, EU-FLOADER, EU-TRAF, EU-STKPILE, EU-CRUSHER

**POLLUTION CONTROL EQUIPMENT:** Partially enclosed conveyors

#### **I. EMISSION LIMITS**

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 7 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)

Compliance- Visible emissions were not observed during inspection.

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 (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, 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)

Compliance- Crusher was not operating at time of inspection.

#### **II. MATERIAL LIMITS**

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))

Compliance Assumed- The crusher is used mainly in the winter. Mr. Shook explained that perhaps 1/2%-1% of total salt production is processed through the crusher. 1,586,395 tons of salt were processed in 2016 and year to date 2017, it was 690,486 tons of salt so crusher production would be 15863 tons in 2016 and 6905 tons year to date 2017.

#### **III. PROCESS/OPERATIONAL RESTRICTIONS**

NA

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

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))

Compliance. Conveyor belts are enclosed.

## 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 3 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)

Compliance- AQD received test plan on October 18, 2017 and are awaiting test results.

## 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))

Compliance- Records are kept on total production of salt. Not all salt is crushed and the crusher is used predominantly in the winter time.

## 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)).

Undetermined- AQD is awaiting notification.

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)

Undetermined- AQD is awaiting notification.

#### VIII. STACK/VENT RESTRICTIONS

NA

#### IX. OTHER REQUIREMENTS

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)

Compliance- It appears that Detroit Salt is complying with Subparts A and OOO.

The following conditions apply Source-Wide to: FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Each bagging plant line has a bag sealing machine with an associated dust collector that is vented inside the building. The rock salt plant conveyors are partially enclosed.

#### I. EMISSION LIMITS

NA

#### II. MATERIAL LIMITS

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)

Compliance unknown- No asbestos or asbestos containing waste are processed according to the facility but no sample was taken.

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. (R336.1205, 40 CFR 52.21 (c) & (d))

**Compliance-** Facility is tracking production. Since Permit to Install was issued in June 2017 a full 12-month rolling time period has not commenced.

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

**1.** The permittee shall not exceed a maximum equivalent of 34,000 50-ton rock salt transportation trucks leaving the facility for each 12-month rolling time period, as determined at the end of each calendar month. (R336.1205, 40 CFR 52.21 (c) & (d))

**Compliance-** Facility is tracking production. Since Permit to Install was issued in June 2017 a full 12-month rolling time period has not commenced.

**2.** The permittee shall not exceed a maximum equivalent of 8,000 25-ton palletized rock salt trucks leaving the facility for each 12-month rolling time period, as determined at the end of each calendar month. (R336.1205, 40 CFR 52.21 (c) & (d))

**Compliance-** Facility is tracking production. Since Permit to Install was issued in June 2017 a full 12-month rolling time period has not commenced.

**3.** The permittee shall not operate the facility 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))

**Compliance-** Facility is implementing fugitive dust program. During inspection, facility had good housekeeping measure to minimize fugitive dust. A new water tank for the wheel wash was onsite and on track for installation in the near future.

**4.** The Permittee shall not form more than a single outdoor material storage pile. (R336.1205, 40 CFR 52.21 (c) & (d))

**Compliance-** There is one outdoor pile.

### **IV. DESIGN/EQUIPMENT PARAMETERS**

**1.** The permittee shall pave the plant roadways. (R 336.1205, R 336.1301, 40 CFR 52.21 (c) & (d))

**Compliance-** Roadways are paved.

### **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 facility. 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))

Compliance- Records are kept

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 facility. The permittee shall calculate an equivalent number of 50-ton rock salt transportation trucks entering and leaving the facility 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))

Compliance- Records are kept. A full year has not occurred and AQD will examine records during the next inspection.

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 facility. The permittee shall calculate an equivalent number of 25-ton palletized rock salt trucks entering and leaving the facility 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))

Compliance- Records are kept. A full year has not occurred and AQD will examine records during the next inspection.

## 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)

Unknown- The plant has not fully reached production capacity, therefore, notification has not been submitted according to NSPS provisions.

## VIII. STACK/VENT RESTRICTIONS

NA

## IX. OTHER REQUIREMENTS

1. Within 45 days of issuance of this permit, the permittee shall label all equipment using the company ID Numbers in Appendix B, 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)

Compliance- AQD staff observed equipment which was labeled.

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 FG FACILITY. (40 CFR Part 60 Subparts A & OOO)

Compliance- It appears that the facility is complying with provisions of NSPS Subparts A and OOO.

### Appendix A: Nuisance Management Plan for Fugitive Dust

#### 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.

Compliance- Dust is kept to a minimum.

B. All paved roadways /paved plant yard shall be swept as needed between applications. Applicant shall pave the plant roadways.

Compliance- Roadways are paved. Work was being done on paving expanded facility.

C. A record of all dust suppressant applications and vacuum sweepings shall be kept on file and made available upon request to the Division.

Unknown- AQD staff did not ask for records for vacuum sweepings as staff did not observe excess fugitive dust.

D. Maximum speed of vehicles shall be posted and limited to 10 mph. A minimum of 3 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.

Compliance- Detroit Salt requires that speeds of vehicles be below 5mph. Drivers cannot get out of the trucks onsite.

E. Any material spillage on roads shall be removed within a reasonable time period by vacuum sweeping or other means as needed.

Compliance- Spills appeared minimal.

## 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 3 feet or less. This requirement does not apply when the pile is less than 11 feet high.

Compliance- AQD staff did not observe stockpiling during inspection.

B. Remove spilled materials immediately by vacuum sweeping or by other means as needed.

Compliance- Excess spills or dust were kept to a minimum.

## 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.

Compliance- AQD staff did not observe overloading of trucks during inspection.

B. All salt trucks must be tarped prior to leaving the site.

Compliance- AQD staff observed one truck leave the facility with its tarp installed.

C. All salt trucks shall use Oakwood Avenue, S. Sanders Street, or Bayside Street.

Compliance- AQD did not observe any violation of this provision.

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)

Compliance- Facility is installing new wheel wash so this will be implemented in the near future.

## 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.

Compliance- Conveyor belts were enclosed.

B. All transfer guides shall be sufficiently narrowed and aligned properly to minimize the spills.

Compliance- Spills were kept to a minimum.

C. Conveyors to rail cars shall have a drop distance of less than 3 feet or operated with a telescopic chute.

**Compliance- No rail loading was observed.**

**D. The applicant shall clean and remove all spilled material from the ground under conveyors in reasonable time.**

**Compliance- Spills were kept to a minimum.**

**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 the permitted opacity limits are not being met.**

#### **Appendix B: 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  
APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:**

**Detroit Salt has a fugitive dust plan which is in Appendix A of Permit to Install 318-98A. The plan was evaluated during this partial compliance evaluation.**

**MAERS REPORT REVIEW**

**Pollutant 2016 Emissions (TPY)**

CO  
NOx  
PM 0.6  
Sox  
VOC

**FINAL COMPLIANCE DETERMINATION:**

**It appears that the facility is in compliance with Permit to Install 318-98A.**

NAME           *Jye AB*          

DATE           11-17          

SUPERVISOR           *w.m.*