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Herner, Holly <Holly.Herner@arcadis.com> Thursday, July 9, 2020 3:38 PM Koster, Katherine (EGLE); EGLE-ROP Green, Tom; Perko, Matt; Herner, Holly B4243 - ROP Application Renewal B4243 ROP Renewal Application 7 9 2020.pdf

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Subject: Edw. C. Levy Co. Plant 6 Renewable Operating Permit SRN4243 MI-ROP-B4243-2016

Dear Ms. McLemore:

Enclosed is an application for renewal of ROP No. MI-ROP-B4243-2016 for Edw. C. Levy Co. (Levy) Plant 6 13800 Mellon St., Detroit, MI, 48209. Included is a cover letter, the marked up version of the current ROP, the applications forms, and supplemental information including the Fugitive Dust Plan, PTIs, and MAERs information. In addition to this electronic submittal, the ROP application package will also be submitted in hard copy with arrival on Friday, July 10, 2020 at EGLE Detroit office in accordance with the EGLE procedure for obtaining an administrative completeness determination within 15 days.

If you have any questions regarding this submittal or need additional information, please contact me, Tom Green at 313-690-0139 or tgreen@edwclevy.net, or Matt Perko at 313-820-4057 or mperko@edwclevy.net.

Holly Herner, PE, PhD | Vice President | <u>holly.herner@arcadis.com</u> Region Manager- Michigan Operations

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July 9, 2020

District Supervisor EGLE Detroit - AQD Detroit Field Office, Cadillac Place 3058 W. Grand Blvd., Suite 2-300 Detroit, MI 48202-6058

Subject: Edw. C. Levy Co. Plant 6 Renewable Operating Permit SRN4243 MI-ROP-B4243-2016

Dear Ms. McLemore:

Enclosed is an application for renewal of ROP No. MI-ROP-B4243-2016 for Edw. C. Levy Co. (Levy) Plant 6 located at 13800 Mellon St., Detroit, MI, 48209. The ROP application package has also been submitted electronically in accordance with the EGLE procedure for obtaining an administrative completeness determination within 15 days.

If you have any questions regarding this submittal or need additional information, please contact me at 313-690-0139 or tgreen@edwclevy.net or Matt Perko, Environmental Engineer, at 313-820-4057 or mperko@edwclevy.net.

Sincerely,

Thomas C.D.

Tom Green

Edw. C. Levy Co. Director, EHS Mobile: 313-690-0139 tgreen@edwclevy.net

CC: Matt Perko, Edw. C. Levy Co. Holly Herner, Arcadis

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

EFFECTIVE DATE: JANUARY 29, 2016

ISSUED TO

EDW. C. LEVY CO. PLANT 6

State Registration Number (SRN): B4243

LOCATED AT

13800 Mellon Street, Detroit, Michigan 48209

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B4243-2016

Expiration Date: January 29, 2021

Administratively Complete ROP Renewal Application Due Between 7-29-2019 and 7-29-2020

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B4243-2016

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

Wilhemina McLemore, Detroit District Supervisor

ROP No: MI-ROP-B4243-2016 Expiration Date: January 29, 2021 PTI No: MI-PTI-B4243-2016

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order Number 18-1993 entered on September 9, 1994 between the Air Quality Division of the Department of Natural Resources and the permittee.

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A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

General Provisions

- The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R 336.1213(1)(a))
- It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (R 336.1213(1)(b))
- 3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R 336.1213(1)(c))
- 4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (R 336.1213(1)(d)):
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
- 5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

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and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))

- 6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))
- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

- 9. Any 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)
- 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

Emission Limits

- 11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: (R 336.1301(1))
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

- 12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ (R 336.1901(a))
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ (R 336.1901(b))

Testing/Sampling

- 13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). (R 336.2001)
- 14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
- 15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

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Monitoring/Recordkeeping

- 16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate (**R 336.1213(3)(b)**):
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
- 17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(1)(e), R 336.1213(3)(b)(ii))

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

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- 22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following (**R 336.1213(3)(c)**):
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
- 23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
- 24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. (R 336.1212(6))
- 25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. (R 336.1912)

Permit Shield

- 26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. (R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

- 27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. (R 336.1213(6)(b)(i))
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. (R 336.1213(6)(b)(ii))
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. (R 336.1213(6)(b)(iii))

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- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
- The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(iii))
 - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(9))
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions proposed in the application seeks to change. However, if the permittee fails to comply with the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
 - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (R 336.1217(2)(a)(i))
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. (R 336.1217(2)(a)(iii))
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))

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Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R 336.1210(7))

Stratospheric Ozone Protection

- 36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
- 37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

- 38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
- 39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR Part 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR Part 68.130, or
 - c. The date on which a regulated substance is first present above a threshold quantity in a process.
- 40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
- 41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). (40 CFR Part 68)

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. (R 336.1213(12))

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Permit To Install (PTI)

- 43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (R 336.1201(1))
- 44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (R 336.1201(8), Section 5510 of Act 451)
- 45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² (R 336.1219)
- 46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b). ²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

POLLUTION CONTROL EQUIPMENT: Water sprays, side shields

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fugitive Dust	5% opacity ²	3-minute average ^{a,b}	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile	SC VI.1&2	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)
2. Fugitive Dust	20% opacity ²	3-minute average ^a	Fugitive dust from any other source	SC VI.1&2	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

^a in accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

^b The provisions of this subsection shall not apply to storage pile material handling activities when wind speeds are in excess of 25 miles per hour (40.2 kilometers per hour).

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

A. PROCESS CONTROL MEASURES

 Control on Process Equipment shall be as follows: <u>Process consists of a series of equipment including</u> grizzly/hopper feeders, screens, conveyors (including the bridge conveyor), crushers, and stackers. Material is thoroughly wetted prior to processing. Water sprays are installed on process equipment and are utilized as necessary to control fugitive emissions. In addition, the bridge conveyor has side shields to prevent loss of material to the river. Units with water sprays are identified in the emission unit description.

Grizzly / Feeder (601 A)	Material watered before feeding
Conveyor #1 (604)	Uncovered, Material still wet
Crusher / Screen Tower (611/606)	Water sprays

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Conveyor 609	Uncovered
Conveyor 610 #2	Uncovered
Conveyor 610 A #3	Uncovered
Conveyor 612 #9	Uncovered
FE Conveyor 614 #10	Uncovered
FE Screen	Uncovered
Bridge conveyor (BC)	Side shields

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

- 2. To minimize the fugitive emissions from the loading of trucks and the transporting of material off-site, the following operating practices shall be adhered to:
 - a. All trucks transporting finished product shall be tarped before leaving the property.
 - b. Drop heights of the front end loader bucket will be no more than two (2) feet above sideboard of the trucks.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

3. Control of emissions due to vehicle movement about the stockpiles shall be accomplished by applying lignosulfonate, <u>calcium chloride</u>, or an equivalent or more effective material to the traveled areas among the piles. When lignosulfonate is used, the application rate of 5 gal/100 sq. ft. shall be used. The diluted ratio shall be 3:1. <u>The</u>, <u>and the</u> application frequency <u>for a chemical suppressant</u> shall be once per month <u>between March and October</u>. The actual square footage to be controlled shall be dependent upon the amount of material in storage. If a dust suppressant other than lignosulfonate <u>or calcium chloride</u> is used, facility shall submit the demonstration required in IX.1.B.1.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

4. Spilled material under conveyors shall be attended to on an ongoing basis. Spillage on roadways shall be removed daily. A truck operator who has spilled material onto the road shall be notified so that appropriate action can be taken to prevent future incidences.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.A)

B. STOCKPILE AREAS and ACTIVITIES.

Raw slag shall be watered prior to transfer by front end loader to the grizzly/feeder at the beginning of the
process plant. Raw materials are watered to maintain product moisture specifications and for fugitive dust
control purposes. Volume of water added to slag processed is estimated and proper watering is
confirmed by acceptable visible emissions. Water is added to the material at a rate of 4.0 gallons per ton
of slag processed.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.B)

2. Load-out emissions shall be controlled by limiting drop height of the bucket to a maximum of two (2) feet above the sideboard of the truck.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.B)

C. ROADWAYS AND PARKING LOTS

- 1. Paved Roads
 - a. Paved roads shall be cleaned daily during operating hours, weather permitting, with a power flush or wet/vacuum truck.
 - b. Track-out shall be cleaned up daily when it occurs.
 - c. Speed limit on paved roads is 15 MPH.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.C)

- 2. Unpaved Roads
 - a. Unpaved roads shall be treated with a lignosulfonate, <u>calcium chloride</u> (or equivalent) dust suppressant. If lignosulfate is used, the application rate shall be no less than 0.45 gallons of solution per square yard with dilution ratio of 3:1. <u>The application frequency of a chemical suppressant shall</u>

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be once per month between March and October. If a dust suppressant other than lignosulfonate or calcium chloride is used, facility shall submit the demonstration required in IX.1.B.1.

b. Speed limit on unpaved roads is 5 MPH.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.C)

D. PROCESS EMISSIONS (Crushing, Screening, Conveying, and Transfer)

- 1. Crushing / Screening operations shall be equipped with water sprays for fugitive dust control. Materials shall be wetted with water sprays prior to entering the crushing/screening operations.
- 2. Conveying and transferring for those conveyors and transfer points covered under III.A.1 shall be equipped with covered conveyors, water sprays, side shields, or scope for fugitive dust control as described under III.A.1.
- 3. Load-out emission shall be controlled by limited drop height to a maximum of two (2) feet above the sideboard of the truck. All trucks shall be tarped.

(Consent Order SIP 18-1993 (Revised 9/9/94), Exhibit A, Section 3.D)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

 The permittee shall record the data and information specified in Appendix 4, Section 4.1- Required Records for Fugitive Dust Sources and shall keep the records for a period of at least two years. Records shall be made available to AQD upon written or verbal request. The permittee may use alternate formats with the approval by the AQD District Supervisor for recording equivalent information without the need to modify or amend this permit.

(Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum), R336.1213(3))

 The permittee shall perform a non-certified visible emission observation of the fugitive dust sources in III.A,B,C,&D at least 5 days per week during representative operations, excluding non-operating days, during March through October. The permittee shall initiate corrective action upon observation of visible emissions and shall keep a written or electronic record of each required observation and corrective action taken. (R336.1213(3))

See Appendix 4

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

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- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. A quarterly report shall be submitted by the permittee to AQD identifying each day in which an emission limit, operational requirement, or recording requirement, as specified in SIP No. 18-1993 (Revised 9/9/94) Exhibit A (Fugitive Dust Control Plan, Edward C. Levy Co. Plant #6), was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. These reports shall be submitted within 30 days following the end of the calendar quarter in which the data was collected. (Consent Order SIP 18-1993 (Revised 9/9/94), Paragraph 11)

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee may change its processes, modify the fugitive dust control program summarized in Section III, Process/Operational Restrictions and contained in SIP No. 18-1993, or modify the particulate emission control program in accordance with the following:

A. Process Change

- 1. The Permittee may change its operations or process, which are sources of particulate and fugitive dust provided all of the following conditions are met:
 - a. The provisions of the Control Programs continue to apply to the subject operation or process;
 - b. The change does not result in an increase in the level of fugitive dust or particulate emissions;
 - c. The change is approved.
- 2. The permittee shall submit to MDEQ a written description of the proposed change and how it meets the requirements of A(1).
- 3. The MDEQ shall approve or disapprove the proposed change, in writing, within 45 days after receiving the submitted proposed change, which meets the requirements of (A)(1).
- 4. Should the MDEQ disapprove the proposed change, the disapproval must describe the specific reasons for the decision and must be forwarded to the Permittee.

B. Control Program Revision

- 1. The Permittee may revise the Control Programs provided both of the following conditions are met:
 - a. The permittee demonstrates, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the MDEQ for approval.
 - b. The revision is approved.

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- 2. The MDEQ shall approve or disapprove the proposed revision, in writing, within 45 days after receiving the submitted proposed revision using an applicable U.S. EPA approved method to demonstrate the proposed revision meets the requirements of B(1).
- 3. Should the MDEQ disapprove the proposed revision, the disapproval must describe the specific reasons for the decision and must be forwarded to the permittee. (Consent Order SIP 18-1993, (Revised 9/9/94), Paragraph 13(A)(1), (2), and (B))
- 2. The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The effective date of termination is defined for the purposes of the conditions as the date upon which the Termination Order is signed by the Chief of the AQD. (R336.1213(3))

Footnotes: ¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b). ²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

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))	Installation Date/ Modification Date	Flexible Group ID
EULEVYPLANT6	Processing equipment associated with Levy Plant 6, including a grizzly feederfeeder, sevenup to ten-conveyors and stackers including the bridge conveyor, two up to two screenge and a crusher. Equipped with water spray system for air pollution control. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.	01/01/1971 9/19/2006 <u>3/2019</u>	NA
EUCONVEYORSYSTEM	Five conveyors, located downstream of the Deister Screen (EUDEISTERSCREEN), designed to transfer slag and related materials to finished product stockpiles. Equipped with water spray system for air pollution control. Additional conveyors located downstream of the Deister Screen are not part of this emission unit.	05/09/1997 9/19/2006	NA
EUDEISTERSCREEN	A 350 ton per hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and <u>threefour</u> knuckle conveyors. All but two conveyors are located downstream of the screen. Equipped with water spray system and adjustable stacker height mechanism for air pollution control.	04/17/1995 <u>04/2020</u>	NA
EUBOFSLAGPIT	Basic Oxygen Furnace (BOF) slag pits equipped with water spray system for air pollution control. Also includes a partial enclosure of the pot knocking station for emission control.	04/17/1995	NA
EUCOLDCLEANERS	Cold cleaners that meet the applicable requirements of R336.1281(h)	After 7/1/1979	FGCOLDCLEANERS
EUDROPBALLCRANE	This process consists of dropping a large steel ball from a crane onto scrap steel to break it into small pieces to be reused by adjacent steel mill, AK Steel, Dearborn Works.	04/17/1995	FGRULE290

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPROCESS#2	1-100 tons per hour hopper and 2-100 tons per hour conveyor used for recycling slag materials back into the screening portion of the existing slag processing plant.	5/11/2004	FGRULE290
EUMATRANSCONVEY	1-200 tons per hour hopper and one conveyor (Pot Slagger)	1985	FGRULE290

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EULEVYPLANT6 EMISSION UNIT CONDITIONS

DESCRIPTION

Processing equipment associated with Levy Plant 6, including a <u>grizzly</u>-feeder, <u>up to ten seven</u> conveyors<u>and</u> <u>stackers</u> including the bridge conveyor, <u>two-up to two</u> screen<u>s</u> and a crusher. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Water spray system

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements			
1. PM10	1.06 <u>0.73</u> pounds per hour ²	Calendar day average	EULEVYPLANT6	SC VI.1,2&4	<u>40 CFR 52.21</u>		Formatted: Left	
2. PM10	0. <u>64</u> 93 tons per year ²	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3&5	<u>40 CFR 52.21</u> (<u>c)&(d)</u> R336.1201(3)		Formatted: Left	
3. Particulate Matter	2.038.44 pounds per hour ²	Calendar day average	EULEVYPLANT6	SC VI.1,2&4	40 CFR 52.21 (c)&(d) R336.1201(3)		Formatted: Left	
4. Particulate Matter	<u>1.79</u> 7.43 tons per year ²	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3&5	40 CFR 52.21 (c)&(d) R336.1201(3)	-	Formatted: Left	
5. Visible Emissions	10% opacity ²	6-Minute Average	Slag screening operations, conveyors or transfer points on conveyors		R336.1301(1)(c)	-		
6. Fugitive dust	5% opacity ²	3-Minute Average	Roadways, parking lots, or storage piles, including any material handling activity at a storage pile		Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)			

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements	
1. Slag processing plant raw material throughput	400 tons per hour ²	Calendar day average	EULEVYPLANT6	SC VI.1&2	40 CFR 52.21 * (c)&(d) R336.1201(3)	Formatted: Left
2. Slag processing plant raw material throughput	704,000 tons per year ²	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3	40 CFR 52.21 (c)&(d) R336.1201(3)	Formatted: Left
3. Hexavalent chromium content of	Not more than <u>11 ppmw</u>	Average of all samples taken, not to exceed three samples per	EULEVYPLANT6	<u>SC. V. 1</u>	<u>R 336.1225</u> *	Formatted: Numbered + Level: 1 + Numbering Style: 1, 2, 3, + Start at: 2 + Alignment: Left + Aligned at: 0" + Indent at: 0.25"
raw materials (slag) processed		<u>month,ª</u>				Formatted: Superscript
<u>a.</u>		is not required to sample ne permittee takes more t				Formatted: Numbered + Level: 2 + Numbering Style: a, b, c, + Start at: 1 + Alignment: Left + Aligned at: 1" + Tab after: 1.25" + Indent at: 1.25"
 The permittee than three qua and crushed s 	shall maintain a arters of an inch tone ² . (40 CFR	<u>RESTRICTION(S)</u> minimum moisture conter in diameter and finished p 52.21(c)&(d)) (R 336.120	roduct less than three 1 1(3))	<u>e quarters of an ir</u>	nch in diameter	
water spray sy screens, conv	stems are instal	e the slag processing plan led, <u>operated</u> , and maintai exit points in order to mee 336.1201(3))	ned to minimize fugi	tive dust emissior	is on crushers,	Formatted: Font: Bold
National Emis		and screen asbestos tailing or Hazardous Air Pollutan 1201(3))				
		e the slag processing plan has been implemented ar				
IV. <u>Design/eq</u>	UIPMENT PAR	RAMETER(S)				
NA						
V. TESTING/SA Records shall be r		e for a period of five years	(R 336.12 <u>01</u> 13(3) <u>)</u>	(b)(ii))		
using method SW accurately determ	/-846 7199 or a ining the hexava	exavalent chromium conte another method acceptab alent chromium content of Supervisor within 45 days	le to the AQD Dist the material being to	rict Supervisor the sted. The perm	nat is capable of ittee must submit	Formatted: Font: Bold

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Edw.C. Levy Co.	
Plant 6	

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VI. <u>MONITORING/RECORDKEEPING</u> Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1.	The permittee shall monitor and record the daily tonnage of material throughput ² . The permittee shall keep all	
	records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&((d)) (R 336.1201(3))	Formatted: Font: Bold
2.	The permittee shall monitor and record the daily hours of operation of the slag processing plant ⁺ . <u>The permittee</u> shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR <u>52.21(c)&(d)</u> , -(R 336.1901)	Formatted: Font: Bold
3.	The permittee shall monitor and record the total material throughput of the slag processing plant on a monthly and 12-month rolling time period as determined at the end of each calendar month. (40 CFR 52.21(c)&(d) (R336.1213(3))	
4.	The permittee shall calculate and maintain records of the PM and PM10 hourly emissions based on the daily operating hours and daily throughput and appropriate AP42 emission factors or other factors agreed upon by the appropriate AQD Detroit Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d)) -(R -336.1213(3))	Formatted: Font: Bold
5.	The permittee shall keep, in a satisfactory manner, calculations determining the monthly and 12-month rolling time period mass emissions of PM and PM_{10} as determined at the end of each calendar month. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d)) (R 336.1213(3))	
6.	The permittee shall keep records as specified in the fugitive dust control program and as required under Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum and Appendix 4 of this permit ² . <u>The permittee shall keep all records on file at the facility and make them available to the Department upon request.</u> (40 CFR 52.21(c)&(d)) (R 336.1201(3))	Formatted: Font: Bold
7.	The permittee shall perform a Method 9 certified visible emission observation of the <u>feeder</u> , <u>grizzly feeder</u> , screens, crusher, or of the conveyor system at least once every two calendar weeks for a minimum of 15 minutes during representative operations. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken <u>The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))_{(R 336.1213(3))}</u>	
8.	The permittee shall perform a Method 9D certified visible emission observation of loading activities from a finished product storage pile into a truck at least once every two calendar weeks for a minimum of 15 minutes when the loading process is operating. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken <u>The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))(R-336.1243(3))</u>	
9.	The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the adjustable stacker height mechanisms, and water spray systems, on crushers, screens, conveyors, and theincluding bridge conveyor side shields (from both sides of the river), and all exit points, and if necessary, identify the reasons for malfunction or failure. These inspections shall be conducted immediately after observing visible emissions in excess of the visible emission limit, but not less frequently than at least once a month and the permittee shall keep a written or electronic record of each inspection and corrective action taken if any. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d)) (R-336.1213(3))	
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EUCONVEYORSYSTEM EMISSION UNIT CONDITIONS

DESCRIPTION

Five conveyors, located downstream of the Deister Screen (EUDEISTERSCREEN), designed to transfer slag and related materials to finished product stockpiles. Additional conveyors located downstream of the Deister Screen are not part of this emission unit.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Water sprays

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible emissions	10% opacity ²	6-Minute Average	EUCONVEYORSYSTEM	SC VI.4&6	R336.1301(1)(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Material	250 tons per hour ²	Calendar day	EUCONVEYORSYSTEM	SC VI.1&2	R336.1201(3)
conveyed		average			
Material	492,800	Calendar year	EUCONVEYORSYSTEM	SC VI.3	R336.1201(3)
conveyed	tons per year ²	-			

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate the conveyor system unless the water spray systems are installed, maintained, and operated to minimize fugitive dust emissions on conveyors². (R 336.1301, R 336.1901)
- 2. The permittee shall not operate the conveyor system unless the program for continuous fugitive dust emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations has been implemented and is maintained². (R 336.1372, R 336.1901)
- The permittee shall not process any asbestos tailing or waste materials containing asbestos in the conveyor system pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61, Subpart M¹. (R 336.1224, R 336.1225, R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall monitor and record the daily tonnage of material conveyed². (R 336.1201(3))
- 2. The permittee shall monitor and record the daily hours of operation of the conveyor system¹. (R 336.1901)
- 3. The permittee shall monitor and record the total material throughput of the conveyor system on a monthly and 12-month rolling time period as determined at the end of each calendar month. (R 336.1213(3))
- 4. The permittee shall perform a Method 9 certified visible emission observation of a representative operating conveyor, including the transfer/drop points of the conveyor system at least once every two calendar weeks for a minimum of 15 minutes during conveying operations. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- The permittee shall keep records as specified in the fugitive dust control program and as required under Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum and Appendix 4 of this permit². (R 336.1213(3))
- 6. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the water spray systems on conveyors, and if necessary, the reasons for malfunction or failure. These inspections shall be conducted immediately after observing visible emissions in excess of the visible emission limit, but not less frequently than at least once a month and the permittee shall keep a written or electronic record of each inspection and corrective action taken if any. (R 336.1213(3))

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

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:

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Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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EUDEISTERSCREEN EMISSION UNIT CONDITIONS

DESCRIPTION

A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and <u>threefour</u> knuckle conveyors. All but two conveyors are located downstream of the screen.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Equipped with wWater spray and adjustable stacker mechanism for air pollution control.s

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible emissions	10% opacity ²	6-Minute Average	EUDEISTERSCREEN	SC VI.4&5	R336.1301(1)(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Material throughput	350 tons per hour ²	Hourly	EUDEISTERSCREEN	SC VI.1&2	R336.1 <u>301</u> 201(3 }
2. Material throughput	616,000 tons per year ²	Based on a 12 month rolling time period <u>as</u> <u>determined</u> at the end of each calendar month	EUDEISTERSCREEN	SC VI.3	R336.120 <u>5</u> 1 (3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Materials shall be wetted with water sprays to minimize the fugitive emissions prior to entering the screening operations of EUDEISTERSCREEN. **(R336.1301(1)(c))** The permittee shall set and maintain the opacity sensor at a visible emission rate of five percent opacity². **(R 336.1201(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUDEISTERSCREEN with water sprays for fugitive dust control. (R336.1205, R336.1301(1)(c)) NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

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VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3)) 13(3)(b)(ii))

- The permittee shall monitor and record the hourly tonnage of material throughput <u>for EUDEISTERSCREEN</u>. (R 336.12<u>05, R 336.1301) 13(3)</u>)
- The permittee shall monitor and record the daily hours of operation of <u>EUDEISTERSCREEN</u>the Deister screen system. (R 336.1<u>301</u>213(3))
- The permittee shall monitor and record the total material throughput of <u>EUDEISTERSCREEN the Deister</u> screen system on a monthly and 12-month rolling time period as determined at the end of each calendar month. (R 336.120513(3))
- 4. The permittee shall perform a Method 9 certified visible emission observation of a representative operating conveyor of <u>EUDEISTERSCREENthe Deister screen system</u> at least once every two calendar weeks for a minimum of 15 minutes during screening operation. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation in <u>SCI.1</u> and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1205, R 336.130113(3))
- 5. The permittee shall activate the water sprays if visible emissions are observed during the regular non-certified visible emissions observations that are required to occur at least 5 days per week during representative operations, excluding non-operating days, during March through October. If the sensor reads above 5% opacity, the water sprays shall be actuated. The pPermittee shall keep a record of corrective actions taken, if other than water sprays. (R 336.1205, R 336.130113(3))

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

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Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b). ²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUBOFSLAGPIT EMISSION UNIT CONDITIONS

DESCRIPTION

Basic Oxygen Furnace (BOF) slag pit with water spray system for fugitive dust emission control. Also includes a partial enclosure of the pot knocking station for emission control.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Water sprays

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fugitive Dust	5% opacity ²	3-minute average ^{a,b}	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile	SC VI.1,2&3	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)
2. Fugitive Dust	20% opacity ²	3-minute average ^a	Fugitive dust from any other source	SC VI.1,2&3	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

^b The provisions of this subsection shall not apply to storage pile material handling activities when wind speeds are in excess of 25 miles per hour (40.2 kilometers per hour).

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall quench the dumped slag with water sprays before digging. (Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Section 3.A)

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2. The permittee shall operate and maintain a partial enclosure with water misting at the pot knocking station¹.(R336.1901)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall perform a Method 9D certified visible emission observation of slag dumping or digging operation at least once every calendar week for a minimum of 15 minutes during representative dumping or digging operations. Both operations shall be observed within a month. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- The permittee shall perform a Method 9D certified visible emission observation of the pot knocking station during representative pot knocking operations at least once every calendar week for a minimum of 15 minutes. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1213(3))
- 3. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the water spray systems on the slag pit dumping areas and the pot knocking station, and if necessary record the reasons for malfunction or failure noted from the inspection. These inspections shall be conducted during scheduled outages or downtimes, and immediately after observing visible emissions, but not less frequently than at least once every calendar week and permittee shall keep a written or electronic record of each inspection and corrective action taken if any. (R 336.1213(3))

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for reporting period July 1 to December 31 and November 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by May 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

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IX. OTHER REQUIREMENT(S)

NA

<u>Footnotes</u>: ¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b). ²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

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	- Formatted Table
FGCOLDCLEANERS	Cold cleaners that meet the applicable requirements of R336.1281(h).	EUCOLDCLEANERS	
FGRULE290	New and existing emission units that meet R336.1290 exemption criteria.	EUDROPBALLCRANE, EUPROCESS#2, EUMATRANSCONVEY	
FGRICEMACT	New and existing emission units that meet the R336.1285(g) exemption criteria and are subject to the RICE MACT.	EURICECRUSHER, EUFEEDERSTACKERGEN, EUFEEDERMAGSEPARATORGEN, EUSLAGCONVEYORGEN1, EUSLAGCONVEYORGEN2, EUSLAGSTACKERGEN, EUSLAGSCREENGEN, EULIGHTGENS	

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FG-COLD CLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EUCOLDCLEANERS

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
- 2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(h))
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts.

(R 336.1611(2)(b), R 336.1707(3)(b))

- All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))
- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

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- a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))
- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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FG-RULE 290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Units: EUDROPBALLCRANE, EUPROCESS#2, EUMATRANSCONVEY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMIT(S)

- Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(a)(i))
- Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(a)(ii))
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. (R 336.1290(a)(ii)(A))
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(B))
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(C))
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (R 336.1290(a)(ii)(D))
- B. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: (R 336.1290(a)(iii))
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than

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or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(a)(iii)(A))

- b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. (R 336.1290(a)(iii)(B))
- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(a)(iii)(C))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (R 336.1213(3))
 - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
 - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). (R 336.1213(3))
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. (R 336.1213(3), R 336.1290(c))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(b), R 336.1213(3))
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (R 336.1213(3))

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3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (R 336.1213(3))

See Appendix 4

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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FGRICEMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each existing or each new non-emergency, stationary, reciprocating internal combustion engine (RICE) equal to or less than 300 hp as identified within 40 CFR Part 63 Subpart ZZZZ, 63.6590(a)(1)(ii) or 63.6590(a)(2)(ii) at a major source, that is exempt from the requirements of Rule 201 pursuant to Rule 285(g).

Emission Units: EURICECRUSHER, EUFEEDERSTACKERGEN, EUFEEDERMAGSEPARATORGEN, EUSLAGCONVEYORGEN1, EUSLAGCONVEYORGEN2, EUSLAGSTACKERGEN, EUSLAGSCREENGEN EULIGHTGENS

POLLUTION CONTROL EQUIPMENT

<u>NA</u>

I. EMISSION LIMIT(S)

- 1. New stationary CI ICE model years 2007 and later with a displacement of less than 30 liters per cylinder must comply with emission standards for new CI engines per 40 CFR 60.4201. (40 CFR 60.4204(b))
- 2. New stationary CI ICE, model years 2007 and later, engines with maximum engine power less than or equal to 2,237 kilowatt (3,000 hp) and a displacement of less than 10 liters per cylinder must comply with emission standards for new non-road CI engines. (40 CFR 60.4201(a))
- 3. The permittee shall not emit more than 120 parts per million by volume SO2 at 50% excess air. This applies individually to each emission unit of FGRICEMACT. (R 336.1401(1), Michigan State Implementation Plan)

II. MATERIAL LIMIT(S)

 Owners and operators of new stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. (40 CFR 60.4207(b))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. For new stationary RICE, the permittee must meet the requirements of 40 CFR Part 63 Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart IIII, for compression ignition engines. (40 CFR 63.6590(c)
- For new stationary RICE, the permittee must operate and maintain the stationary CI ICE and control device according to the manufacturer's emission-related written instructions, change only those emission-related settings that are permitted by the manufacturer; and meet the requirements of 40 CFR parts 89, 94 and/or 1068, as applicable. (40 CFR 60.4211)
- 3. For existing stationary RICE, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.6605(b))
- 4. For existing stationary RICE, the permittee must operate and maintain the existing stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow maintenance plan for existing stationary RICE which must provide to the extent practicable for the

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maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e)(4), 40 CFR 63 Subpart ZZZ Table 6, Item 9).

- 5. For operation of an existing stationary RICE, comply with the requirements in 40 CFR 63.6603 and Table 2c:

 a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;¹
 b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as
 - <u>necessary:</u>
 c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
 - d. During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. (40 CFR 63.6625(h))

IV. DESIGN/EQUIPMENT PARAMETER(S)

<u>NA</u>

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall keep records for existing stationary RICE as required per 40 CFR 63.6655 (except 63.6655(c) and (f)). (40 CFR 63.6655)
- 2. The permittee shall maintain, at a minimum, the following records for existing stationary RICE by the applicable compliance date:
 - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63. Subpart ZZZZ and the documentation supporting each notification and report. (40 CFR 63.6655(a)(1))
 - b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(2))
 - c. Records of all required maintenance performed on the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(4))
 - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 <u>CFR 63.6605(b)</u>, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**
- The permittee shall keep records for existing stationary RICE as required to show continuous compliance with each emission or operating limit that applies. (40 CFR 63.6655(d))
 The permittee shall keep records for existing stationary RICE of the maintenance conducted on the existing
- 4. The permittee shall keep records for existing stationary RICE of the maintenance conducted on the existing stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. (40 CFR 63.6655(e))

VII. REPORTING

1. For existing stationary RICE, report each instance an operating limitation was not met per Table 2c. These instances are deviations from the emission and operating limitations and must be reported according to the requirements in §63.6650. (40 CFR 63.6640(b))

2. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

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- 3. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 4. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

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	<u>Maximum</u> <u>Exhaust</u> <u>Dimensions</u> <u>(inches)</u>	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

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APPENDICES

Appendix 1. Abbreviations and Acronyms

	Common Acronyms		Pollutant / Measurement Abbreviations
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F gr	Degrees Fahrenheit Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H ₂ S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental Quality	NOx	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng PM	Nanogram Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10
NAAQS	National Ambient Air Quality Standards		microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
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	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection	μg	Microgram
	Agency	um	Micrometer or Micron
VE	Visible Emissions	VOC yr	Volatile Organic Compounds Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

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Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in Part B / Source-Wide Conditions. Alternative formats must be approved by the AQD District Supervisor.

4.1 Required Records for Fugitive Dust Sources

- A. Unpaved Roads / Lots
 - 1. Date of Treatment
 - 2. Control Measure Used
 - 3. Responsible Person's Initial
 - 4. Name of Product Applied
 - 5. Amount of Solution / Water Applied
 - 6. Dilution Ratio
 - 7. Road Segment / Lot Identification
- B. Paved Roads / Lots
 - 1. Date of Treatment
 - 2. Control Measure Used
 - 3. Responsible Person's Initial
 - 4. Road Segment / Lot Identification
- C. Storage Piles / Material Handling
 - 1. Date of Treatment
 - 2. Control Measure Used
 - 3. Responsible Person's Initial
 - 4. Dilution Ratio
 - 5. Amount of Dust Suppressant / Water Applied
 - 6. Identification of Pile / Material Handling Operation Treated
 - 7. Equipment Used
- D. Optional Records
 - 1. Precipitation
 - 2. Temperature
 - 3. Wind Direction and Velocity

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

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Appendix 6. Permits to Install

Source-Wide PTI No MI-PTI-B4243-2009 is being reissued as Source-Wide PTI No. MI-PTI-B4243-2016.

Appendix 7. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

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RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN B4243	SIC Code 3295	NAICS Co 327992	de	Existing ROP Number State Strength Stre			Section Num	ber (if applicable)
Source Name Edw. C. Levy Co.	Plant 6			1			L	
Street Address 13800 Mellon Stre	et							
City			State	ZIP (Code	County		
Detroit			MI	482	09	Wayne		
Section/Town/Range(if address not av	ailable)						
Source Description								
Edw. C. Levy Co. o operations associ entirely dependen	ated with oper	rations at 1	3800 Mel	lon St., D	etroit, MI, kr			l conveying int's operations are
□ Check here if a on the marked				ferent tha	n what appe	ears in the existing	ROP. Ide	ntify any changes
OWNER INFORM								
Owner Name							Section Num	ber (if applicable)
Edw. C. Levy Co.								
Mailing address (check if same as source address) 8800 Dix Ave.								
City			State	7IP	Code	County		Country
Detroit			MI	482		Wayne		USA
L			I	1				<u> </u>

Check here if any information in this ROP renewal application is confidential.	Confidential information should be
identified on an Additional Information (AI-001) Form.	

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PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name Title						
Matt Perko			Environmental Engineer			
Company Name & Mailing address (check if same as source address 8800 Dix Ave.			s)			
City	State	ZIP Code	:	County	Country	
Detroit	MI	48209		Wayne	USA	
Phone number E-mail a			ail address			
313-820-4057		mperko	rko@edwclevy.net			

Contact 2 Name (optional)		Title				
Company Name & Mailing address (check if same as source address)						
City	State	ZIP Code		County	Country	
Phone number		E-mail address				

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name J. Keith Walker II				Title General Operations Manager		
Company Name & Mailing address (check if same as source address)						
City Detroit		ZIP Code 48209	!	County Wayne	Country USA	
Phone number 260-417-6331		E-mail address kwalker@edwclevy.net				

				Title Director Steel Mill Services			
Company Name & Mailing address (check if same as source address 8800 Dix Ave.)				
City Detroit	State MI	ZIP Code 48209	9	County Wayne	Country USA		
Phone number 313-429-2601		E-mail ad	ldress Dedwclevy	r.net			

Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listi	isting of ROP Application Contents. Check the box for the items included with your application.						
	Completed ROP Renewal Application Form (and any AI-001 Forms) (required)		Compliance Plan/Schedule of Compliance				
	Mark-up copy of existing ROP using official version from the AQD website (required)		Stack information				
	Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)		Acid Rain Permit Initial/Renewal Application				
	Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations (COMBUSTION)		Cross-State Air Pollution Rule (CSAPR) Information				
	MAERS Forms (to report emissions not previously submitted)		Confidential Information				
	Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	\boxtimes	Paper copy of all documentation provided (required)				
	Compliance Assurance Monitoring (CAM) Plan	\boxtimes	Electronic documents provided (optional)				
	Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)		Other, explain:				

Compliance Statement

This source is in compliance with <u>all</u> of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	🛛 Yes	🗌 No
This source will continue to be in compliance with all of its applicable requirements, including those		

contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, Yes Ves No and other applicable requirements not currently contained in the existing ROP.

This source will meet in a timely manner applicable requirements that become effective during the permit term.

🛛 Yes 🗌 No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

Name and Title of the Responsible Official (Print or Type)

J. Keith Walker II, General Operations Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

Signature of Responsible Official

Date

18/2020

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from <u>all</u> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <u>not</u> been reported in MAERS for the most recent emissions reporting year? If <u>Yes</u> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	🛛 Yes	□ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	🛛 Yes	🗌 No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)	🗌 Yes	🛛 No
	If <u>Yes</u> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	🗌 Yes	🗌 No
C4.	Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO ₂ , VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application	🛛 Yes	🗌 No
	numbers, or other references for the PTE demonstration) for the added or modified equipment on an Al-001 Form. If <u>No</u> , criteria pollutant potential emission calculations do not need to be included.		
C5.	Has this stationary source added or modified equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act?	🗌 Yes	🛛 No
	If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <u>must</u> be included in HAP emission calculations. If <u>No</u> , HAP potential emission calculations do not need to be included.		
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <u>Yes</u> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	🗌 Yes	🛛 No
C7.	Are any emission units subject to the federal Acid Rain Program? If <u>Yes</u> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form.	🗌 Yes	🛛 No
	Is an Acid Rain Permit Renewal Application included with this application?	🗌 Yes	🛛 No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <u>Yes</u> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan	🗌 Yes	🛛 No
	has not been previously submitted to the MDEQ, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application?	🗌 Yes	🖂 No
	If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible		
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement?	🛛 Yes	🗌 No
	If <u>Yes</u> , then a copy must be submitted as part of the ROP renewal application.		
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non- applicable? If <u>Yes</u> , then a description of the requirement and justification must be submitted as part of the	🗌 Yes	🛛 No
	ROP renewal application on an Al-001 Form.		
\boxtimes	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 For FULEVYPLANTE ALCOMBUSTION ALMAERS	m ID: Al	-FDP, AI

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If <u>Yes</u> , identify the emission units in the table below. □ Yes ⊠ No								
If <u>No</u> , go to Part E	If <u>No</u> , go to Part E.							
	that are subject to process specific emission limi either Part G or H of this application form. Identic (s).							
Emission Unit ID	Emission Unit Description	Rule 212(4) Citation [e.g. Rule 212(4)(c)]	Rule 201 Exemption Rule Citation [e.g. Rule 282(2)(b)(i)]					
Comments:								
Check here if an	AI-001 Form is attached to provide more inform	nation for Part D. Enter A	I-001 Form ID: AI-					

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the <u>existing</u> ROP and answer the questions below as they pertain to <u>all</u> emission units and <u>all</u> applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP?	🛛 Yes 🗌 No
If Yes, identify changes and additions on Part F, Part G and/or Part H.	
E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u> , identity the stack(s) that was/were not reported on applicable MAERS form(s).	🗌 Yes 🛛 No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI?	🛛 Yes 🗌 No
If <u>Yes</u> , complete Part F with the appropriate information.	
E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u> , identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	🗌 Yes 🛛 No
Comments:	
Facility fugitive emissions are regulated under the source-wide conditions listed in B. of the ROP and emissions from stockpiles, loading and unloading of material, and paved and unpaved roadways and Requirements are also captured in the Fugitive Dust Control plan (Consent Order SIP 18-1993 (Rev. .Exhibit A) included in AI FDP .	l areas. vised 9/9/94),
Existing emission units EULEVYPLANT 6 and EUDEISTERSCREEN have or will be been modified. EULEVYPLANT6 and EUDEISTERSCREEN are included in AI EULEVYPLANT6 and AI EUDEISTE summary of requested updates to the ROP are included in AI SUMMARY .	
Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 F AI-SUMMARY, AI-LEVYPLANT6, and AI-DEISTERSCREEN	Form ID: AI-FDP,

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to <u>all</u> emission units with PTIs. Any PTI(s) identified below must be attached to the application.

	ated into the existing RC	ere the applicable requirements from the PTI have not DP? If <u>Yes</u> , complete the following table.	🛛 Yes 🗌 No
Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed
5-19	EULEVYPLANT6	Processing equipment associated with Levy Plant 6, including a feeder, up to ten conveyors including the bridge conveyor, up to two screens, and a crusher. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.	March 12, 2019
45-20	EUDEISTERSCREEN	A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and three knuckle conveyors. All but two conveyors are located downstream of the screen. Equipped with water spray system and adjustable stacker height mechanism for air pollution control.	May 29, 2020
emission unit affected in the	s in the existing ROP?	Je, add, or delete terms/conditions to established If <u>Yes</u> , identify the emission unit(s) or flexible group(s) or on an AI-001 Form and identify all changes, additions, ting ROP.	🛛 Yes 🗌 No
the ROP? If Y	es, submit the PTIs as	Ty new emission units that need to be incorporated into part of the ROP renewal application on an AI-001 Form, flexible group(s) in the mark-up of the existing ROP.	🗌 Yes 🛛 No
listed above th	at were not reported in	equirements for emission unit(s) identified in the PTIs MAERS for the most recent emissions reporting year? If t reported on the applicable MAERS form(s).	🗌 Yes 🛛 No
or control device the ROP? If Y			🛛 Yes 🗌 No
in AI EUDEISTER	SCREEN. Also noted in	ntified in AI EULEVYPLANT6. Changes to EUDEISTERSC AI-SUMMARY. tive emissions. Additional information is included in AI FDF	
	es to EULEVYPLANT6 a DEISTERSCREEN.	are identified in AI EULEVYPLANT6. Changes to EUDEIS	TERSCREEN are

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: AI-FDP, AI-SUMMARY, AI-EUDEISTERSCREEN, and AI-EULEVYPLANT6

SRN: B4243 Section Number (if applicable):

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

	ny new and/or existing emission units which do <u>not</u> already appear in hich meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 29	0.
If <u>Yes</u> , identify the emis	sion units in the table below. If <u>No</u> , go to Part H.	🗌 Yes 🛛 No
	on units were installed under the same rule above, provide a descriptic ion/modification/reconstruction date for each.	on
Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
Rule 287(2)(c) surface coating line		
Rule 290 process with limited emissions		
Comments:		
Check here if an Al-00	1 Form is attached to provide more information for Part G. Enter AI-00)1 Form ID: AI-

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Par F and G? If <u>Yes</u> , answer the questions below.	ts 🛛 Yes	🗌 No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	🛛 Yes	🗌 No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below at in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.		No
See AI-COMBUSTION for addition of PTI exempt equipment.		
H4. Does the source propose to add new state or federal regulations to the existing ROP?	🛛 Yes	∐ No
If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.		
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Groun Tables in the mark-up of the ROP.	ne Ip	□ No
The Consent Order, Attachment A (FDP) is included in the current ROP. However, Levy is required the FDP as indicated in AI-FDP.	lesting upda	ates to
H6. Does the source propose to add, change and/or delete source-wide requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	🛛 Yes	🗌 No
See AI SUMMARY of the requested changes to the existing ROP and AI-FDP that includes the proposed FDP. The requested changes also reflect modification to description of Process con Wide III.A.1., fugitive dust controls in B Source Wide III A.3, clarification for watering Stockpile Activities in B. Source-Wide Conditions III.B.1., and updates to watering of Unpaved Roads bo	trols in B S areas and	
H7. Are you proposing to streamline any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.		No No

SRN: B4243 Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete emission limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes	No
H9. Does the source propose to add, change and/or delete material limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes	No No
 H10. Does the source propose to add, change and/or delete process/operational restriction requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. See AI SUMMARY of the requested changes to the existing ROP and the ROP mark-up. 	⊠ Yes	□ No
H11.Does the source propose to add, change and/or delete design/equipment parameter requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes	No No
H12.Does the source propose to add, change and/or delete testing/sampling requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes	No No
H13.Does the source propose to add, change and/or delete monitoring/recordkeeping requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	Yes	No
H14.Does the source propose to add, change and/or delete reporting requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	🗌 Yes	🛛 No

SRN: B4243	Section Number (if applicable):
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PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15.Does the source propose to add, change and/or delete stack/vent restrictions ? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes	⊠ No
H16.Does the source propose to add, change and/or delete any other requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes	No 🛛
H17.Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If <u>Yes</u> , identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	Yes	No No
Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 For AI-SUMMARY, AI-FDP, AI-COMBUSTION	rm ID:	

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Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

CDNI-	B4243
SRIN.	B4243

Section Number (if applicable):

1. Additional Information ID	
AI-SUMMARY	

Additional Information						
2. Is This Information Confidential?	🗌 Yes 🛛 No					
Attached is a summary of the proposed changes that Levy is requesting in their current ROP, followed by a copy of the ROP.						

Page 1 of 10



Al-Summary Plant 6 – 13800 Mellon, Detroit, Michigan (C.1, C.4, C.9)

Emission Unit ID	Emission Unit Description	Installation/ Modificatio n Date	Flexible Group ID	C.1 Actual Emissions not submitted to MAERS	C.4 Added or Modified Equipment	C.9 Plan required to be Submitted
SOURCE-WIDE CONDITIONS	Update B. III. A. 1 Description of Process equipment.	1/1/1971	NA	NA	NA	Yes - see Al FDP
EULEVYPLANT6	Processing equipment associated with Levy Plant 6, including a feeder, up to ten conveyors and stackers including the bridge conveyor, up to two screens and a crusher. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.	1/1/1971 9/19/2006	NA	NA	Yes- See AI EULEVYPLANT 6	NA
EUEUCONVEYORSYSTEM	Five conveyors, located downstream of the Deister Screen (EUDEISTERSCREEN), designed to transfer slag and related materials to finished product stockpiles. Additional conveyors located downstream of the Deister Screen are not part of this emission unit.	5/9/1997 9/19/2006	NA	NA	NA	NA
EUDEISTERSCREEN	A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and three knuckle conveyors. All but two conveyors are located downstream of the screen	4/17/1995	NA	NA	NA	NA

Emission Unit ID	Emission Unit Description	Installation/ Modificatio n Date	Flexible Group ID	C.1 Actual Emissions not submitted to MAERS	C.4 Added or Modified Equipment	C.9 Plan required to be Submitted
EUBOFSLAGPIT	Basic Oxygen Furnace (BOF) slag pits equipped with water spray systems for air pollution control.	4/17/1995	NA	NA	NA	Yes – See Al FDP
EUCOLDCLEANERS	Cold cleaners that meet the applicable requirements of R336.1281(h)	After 7/1/1979	FGCOLDCLEANER S	NA	NA	NA
EUPROCESS#2	1-100 tons per hour hopper and 1-100 tons per hour conveyor used for recycling slag materials back into the screening portion of the existing slag processing plant.	5/11/2004	FGRULE290	NA	NA	NA
EUMATRANSCONVEY	1-200 tons per hour hopper and one conveyor (Pot Slagger)	1985	FGRULE290	NA	NA	NA
EUDROPBALLCRANE	This process consists of dropping a large steel ball from a crane onto scrap steel to break it into small pieces to be reused the adjacent steel mill.	4/17/1995	FGRULE290	NA	NA	NA
EURICECRUSHER	300 hp diesel-fired generator that provides support power to portable crusher. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	NA	Yes – See Al COMBUSTION	NA
EUFEEDERSTACKERGEN	100 hp portable diesel-fired engine that provides support power to facility processes. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	Yes- See Al MAERS	Yes – See Al COMBUSTION	NA

Emission Unit ID	Emission Unit Description	Installation/ Modificatio n Date	Flexible Group ID	C.1 Actual Emissions not submitted to MAERS	C.4 Added or Modified Equipment	C.9 Plan required to be Submitted
EUFEEDERMAGSEPARATO R GEN	150 hp portable diesel-fired engine that provides support power to facility processes. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	Yes- See Al MAERS	Yes – See Al COMBUSTION	NA
EUSLAGCONVEYORGEN1	74 hp portable diesel-fired engine that provides support power to facility processes. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	Yes- See Al MAERS	Yes – See Al COMBUSTION	NA
EUSLAGCONVEYORGEN2	74 hp portable diesel-fired engine that provides support power to facility processes. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	Yes- See Al MAERS	Yes – See Al COMBUSTION	NA
EUSLAGSTACKERGEN	100 hp portable diesel-fired engine that provides support power to facility processes. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	Yes- See Al MAERS	Yes – See Al COMBUSTION	NA
EUSLAGSCREENGEN	111 hp portable diesel-fired engine that provides support power to facility processes. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	Yes- See Al MAERS	Yes – See Al COMBUSTION	NA
EULIGHTGENS	7 - 27 hp portable diesel-fired engines that provides support portable light towers. Exempt per Rule 285 (g) with RICE MACT applicability.	2019	FGRICEMACT	Yes- See Al MAERS	Yes – See Al COMBUSTION	NA

Al-Summary Plant 6 – 13800 Mellon, Detroit, Michigan (E.1, E.3, F.1, F.2, F.5)

Emission Unit ID	E.1 Additions, changes or deletions to terms, conditions, & underlying applicable requirements	E.3 Existing emission units modified or reconstructed that required a PTI	F.1 PTIs where the applicable requirements have not been incorporated into existing ROP	F.2 PTIs add, or delete terms/conditions to established emission units in the existing ROP	F.5 proposed administrative changes to any emission unit names, descriptions or control devices in the PTIs
SOURCE-WIDE CONDITIONS	Yes – see Part H	NA	NA	NA	NA
EULEVYPLANT6	NA	Yes – see Al EULEVYPLANT6	Yes – see EULEVYPLANT6 in marked up ROP for proposed changes	Yes – see EULEVYPLANT6 in marked up ROP for proposed changes	Yes – see EULEVYPLANT6 in marked up ROP for proposed changes
EUEUCONVEYORSYSTEM	NA	NA	NA	NA	NA
EUDEISTERSCREEN	NA	Yes – see Al EUDEISTERSCREEN	Yes – see EUDEISTERSCREEN in marked up ROP for proposed changes	Yes – see EUDEISTERSCREEN in marked up ROP for proposed changes	Yes – see EUDEISTERSCREEN in marked up ROP for proposed changes
EUBOFSLAGPIT	NA	NA	NA	NA	NA
EUCOLDCLEANERS	NA	NA	NA	NA	NA
EUPROCESS#2	NA	NA	NA	NA	NA
EUMATRANSCONVEY	NA	NA	NA	NA	NA
EUDROPBALLCRANE	NA	NA	NA	NA	NA

Emission Unit ID	E.1 Additions, changes or deletions to terms, conditions, & underlying applicable requirements	E.3 Existing emission units modified or reconstructed that required a PTI	F.1 PTIs where the applicable requirements have not been incorporated into existing ROP	F.2 PTIs add, or delete terms/conditions to established emission units in the existing ROP	F.5 proposed administrative changes to any emission unit names, descriptions or control devices in the PTIs
EURICECRUSHER	NA	NA	NA	NA	NA
EUFEEDERSTACKERGEN	NA	NA	NA	NA	NA
EUFEEDERMAGSEPARATOR GEN	NA	NA	NA	NA	NA
EUSLAGCONVEYORGEN1	NA	NA	NA	NA	NA
EUSLAGCONVEYORGEN2	NA	NA	NA	NA	NA
EUSLAGSTACKERGEN	NA	NA	NA	NA	NA
EUSLAGSCREENGEN	NA	NA	NA	NA	NA
EULIGHTGENS	NA	NA	NA	NA	NA

Al-Summary Plant 6 – 13800 Mellon, Detroit, Michigan (H.1, H.2, H.3, H.4)

Emission Unit ID	H.1 Changes to Incorporate not included in Sections F or G	H.2 Administrative Changes to EU Names, descriptions, or control devices	H.3 New Emission Unit of Flex Group not included in Section F or G	H.4 Add Federal Regulations to ROP
SOURCE-WIDE CONDITIONS	Yes- See AI FDP for proposed updates to the Consent Order FDP	Update B. III. A. 1 description to match nomenclature of equipment in process.	NA	NA
EULEVYPLANT6	Yes – See AI FDP and marked up ROP	NA	NA	NA
EUEUCONVEYORSYSTEM	NA	NA	NA	NA
EUDEISTERSCREEN	NA	NA	NA	NA
EUBOFSLAGPIT	NA	NA	NA	NA
EUCOLDCLEANERS	NA	NA	NA	`NA
EUPROCESS#2	NA	NA	NA	NA
EUMATRANSCONVEY	NA	NA	NA	NA
EUDROPBALLCRANE	NA	NA	NA	NA

Emission Unit ID	H.1 Changes to Incorporate not included in Sections F or G	H.2 Administrative Changes to EU Names, descriptions, or control devices	H.3 New Emission Unit of Flex Group not included in Section F or G	H.4 Add Federal Regulations to ROP
EURICECRUSHER	Yes – See Al COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT
EUFEEDERSTACKERGEN	Yes – See AI COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT
EUFEEDERMAGSEPARATOR GEN	Yes – See AI COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT
EUSLAGCONVEYORGEN1	Yes – See AI COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT
EUSLAGCONVEYORGEN2	Yes – See AI COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT
EUSLAGSTACKERGEN	Yes – See AI COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT
EUSLAGSCREENGEN	Yes – See AI COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT

Emission Unit ID	H.1 Changes to Incorporate not included in Sections F or G	H.2 Administrative Changes to EU Names, descriptions, or control devices	H.3 New Emission Unit of Flex Group not included in Section F or G	H.4 Add Federal Regulations to ROP
EULIGHTGENS	Yes – See Al COMBUSTION	NA	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT	Yes- See AI COMBUSTION for addition of a RICE unit and FGRICEMACT

Al-Summary Plant 6 – 13800 Mellon, Detroit, Michigan (H.5, H.6, H.10)

Emission Unit ID	H.5 Consent Order where requirements not included in the ROP	H.6 Add, change, and/or delete source-wide requirements	H.10 Add, Change, or delete process or operational requirements
SOURCE-WIDE CONDITIONS	Yes – See Al FDP	Update B.III. A.3, C.1 & C.2a to reflect requested changes to chemical suppressant type and application frequency.	Update B.III. A.3, C.1 & C.2a to reflect requested changes to chemical suppressant type and application frequency.
EULEVYPLANT6	NA	NA	NA
EUEUCONVEYORSYSTEM	NA	NA	NA
EUDEISTERSCREEN	NA	NA NA	
EUBOFSLAGPIT	NA	NA	NA
EUCOLDCLEANERS	`NA	NA	NA

Emission Unit ID	H.5 Consent Order where requirements not included in the ROP	H.6 Add, change, and/or delete source-wide requirements	H.10 Add, Change, or delete process or operational requirements
EUPROCESS#2	NA	NA	NA
EUMATRANSCONVEY	NA	NA	NA
EUDROPBALLCRANE	NA	NA	NA
EURICECRUSHER	NA	NA	NA
EUFEEDERSTACKERGEN	NA	NA	NA
EUFEEDERMAGSEPARATOR GEN	NA	NA	NA
EUSLAGCONVEYORGEN1	NA	NA	NA
EUSLAGCONVEYORGEN2	NA	NA	NA
EUSLAGSTACKERGEN	NA	NA	NA
EUSLAGSCREENGEN	NA	NA	NA
EULIGHTGENS	NA	NA	NA



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: B4243	Section Number (if applicable):
1. Additional Information ID AI-FDP	-	•
Additional Information		
2. Is This Information Confidential?		🗌 Yes 🛛 No
3. Narrative		
Attached here is the facility's Fugitive Dust Control Plan (F and the proposed, updated FDP submitted to EGLE for rev	DP), Consent Order view and approval.	SIP 18-1993 (Revised 9/9/94), Exhibit A

Page 1 of 1

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division





July 9, 2020

Ms. Katie Koster EGLE Detroit - AQD Detroit Field Office, Cadillac Place 3058 W. Grand Blvd., Suite 2-300 Detroit, MI 48202-6058

Subject: Edw. C. Levy Co. Plant 6 Consent Order SIP 18-1993 (Revised 1994), Exhibit A Fugitive Dust Control Plan Update Request SRN4243 MI-ROP-B4243-2016

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) operates a slag processing plant (Plant 6) located at 13800 Mellon Ave., Detroit, MI 48217. The facility operates under both an ROP (MI-ROP-B4243-2016) and a Fugitive Dust Plan (Consent Order SIP 18-1993 (Revised 1994), Exhibit A — Fugitive Dust Control Plan) for the minimization of criteria pollutant emissions. The Fugitive Dust Control Plan (FDP) is referenced in the ROP under Section B. SOURCE-WIDE CONDITIONS.

While in general the same, both the operations at Plant 6 and the fugitive dust controls have been updated over the past twenty years. As permitted in Section B.IX of the ROP and Section 13.B of the Consent Order 18-1993 (Consent Order), Levy requests approval from EGLE to update the FDP.

As discussed in the Consent Order and referenced in ROP B4243, Levy may revise the FDP provided that the following conditions are met:

- The provisions of the Control Programs continue to apply to the subject operation or process.
- Levy demonstrates in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the EGLE for approval.

Per the Consent Order, EGLE shall approve or disapprove the proposed change, in writing, within 45 days from receiving proposed changes. If EGLE disapproves the proposed change, the disapproval must describe the specific reasons for the decision and must be forwarded to Levy. Upon approval of a change, EGLE shall notify U.S.EPA, in writing, of the revised provisions which are enforceable for the facility.

Enclosed please find (1) the proposed, updated FDP, (2) the existing Consent Order including the Exhibit A — Fugitive Dust Control Plan, and (3) the demonstration that the updated FDP will provide consistent control of particulates and not contribute to an increase in the level of fugitive dust or particulate matter emissions. The updated FDP also includes the Addendum for recordkeeping and updated figures consistent with the current FDP. The updated FDP would replace Exhibit A, the Addendum for recordkeeping, and the figures in Consent Order SIP 18-1993 (Revised 1994), Exhibit A.



If you have any questions regarding this submittal or need additional information, please contact me at 313-690-0139 or tgreen@edwclevy.net or Matt Perko, Environmental Engineer, at 313-820-4057 or mperko@edwclevy.net.

Sincerely,

Thomas CDr

Tom Green Edw. C. Levy Co. Director, EHS Mobile: 313-690-0139 tgreen@edwclevy.net
EXHIBIT A FUGITIVE DUST CONTROL PLAN EDW. C. LEVY CO. – PLANT #6

July 2020

1. Facility Name and Address

Edw. C. Levy Co. Plant #6 13800 Mellon Detroit, Michigan 48127

2. Name and Address of Responsible Person

<RESPONSIBLE OFFICIAL> Edw. C. Levy Co. 8800 Dix Avenue Detroit, Michigan 48209

3. Facility Process Summary and Controls

A. Source Process Description

Edw. C. Levy Co. (Levy) operates a slag processing facility located at 13800 Mellon, Detroit, Michigan, known as Plant #6. The Plant #6 operation processes the steel furnace slag and other iron and steel making co-products generated by the collocated steel mill's Basic Oxygen Furnace (BOF).

Plant #6 operations consist of the BOF slag pits, slag processing operations (known as Levy Plant #6) located on the steel mill property adjacent to the Rouge River, and additional processing operations on the opposite side of the Rouge River (known as the Detroit Side) on Levy property. The operations on opposite sides of the Rouge River are connected by a bridge conveyor system. Key operations on the Detroit Side include the Deister Screen and Conveyor System. The attached Figures illustrate the general layout of Levy Plant #6.

<u>Levy Plant #6</u> - Pot carriers transport molten steel furnace slag from the steel mill to the BOF slag dump station at Levy Plant #6. At the dump station, the molten slag is dumped, and then quenched by water sprays. The quenched slag is removed from the pits by front end loaders and stockpiled prior to processing. This stockpiled slag is the primary raw feed for the slag processing plant. Caster and runway slags are brought to Levy Plant #6 in haul trucks or on pallet box carriers. These slags are watered in the trucks or pallet boxes prior to dumping at the BOF slag pits. Front end loaders transfer slag from the raw feed stockpile to the plant feeder, the first processing step of the slag plant. The slag plant operates at a maximum rate of 400 tph.

Skulls, the steel/slag crust that forms inside a slag pot, are removed from the slag pots at the slag pot knock station. The slag pot knock station is equipped with a partial enclosure that was designed to control particulate emissions. After cooling, the skulls are transferred to the drop

ball crane area to separate the large pieces of steel from the slag. The steel is recycled by the steel mill and the slag is further processed.

Processing equipment associated with the slag plant includes a feeder, up to two screens, a crusher, and up to ten conveyors and stackers. The processing plant extracts the metals from the slag, which are returned to the steel mill for reuse. The slag is crushed and screened to produce different sizes of finished product. The slag plant also includes a bridge conveyor that transports the material to the Detroit side for additional processing at the Deister Screen and Conveyor System processes. Raw or processed slag products may also be directly loaded into trucks from the steel mill side of the operation for off-site transport instead of being sent across the bridge conveyor to the Detroit side.

<u>Deister Screen and Conveyor System Processes</u> - Non-metallic slag is screened to produce various finished construction products. Finished products are loaded by front end loaders and transported by customer-owned or operated trucks. Processing equipment associated with the Deister Screen operation includes thirteen conveyors/knuckle conveyors, and the screen. Processing equipment associated with the Conveyor System includes five additional conveyors.

B. Fugitive Dust Control Measures

Fugitive dust control measures are implemented to minimize emissions from both primary process activities and supporting activities. Control measures include the following:

I. Levy Plant #6, Deister Screen, and Conveyor System Processes:

Fugitive emissions are minimized during processing of steel furnace slag by the following control measures:

- Raw slag is watered in the slag pits prior to excavation and delivery to the slag plant for screening and crushing activities.
- A partial enclosure is maintained at the pot knocking station to reduce fugitive emissions.
- Water sprays are located at the slag raw feed stockpile, and prior to all screens and crushers on the slag plant. These water sprays are used as necessary to minimize fugitive emissions.
- Conveyors are equipped to minimize fugitive emissions by using methods such as conveyor covers, water sprays, side shields, etc., as necessary.
- Water sprays are installed on finished product stackers for use as needed to minimize fugitive emissions.
- Opacity observations are completed every two weeks on the slag plant dumping or digging, pot knocking, slag plant components (within EUSLAGPLANT), Deister Screen, Conveyor System, and on slag truck loading to confirm visible emissions are below opacity limitations.

II. <u>Material Stockpiling and Transport</u>:

Materials are stockpiled at various stages of processing and as finished products. Fugitive emissions are minimized for materials during stockpiling, storage, loading and transport by performing the following:

- Material spilled beneath conveyors is managed on an ongoing basis.
- All trucks transporting finished products that have the potential to emit fugitive emissions are tarped before leaving the property.
- Drop heights of the front-end loader bucket are no more than two feet above the sideboard of the trucks.
- Additional water is added to the finished product stockpiles, if emissions from load-out exceed 5% opacity.

III. Roadway and Vehicle Movement Areas:

The attached Figures show the unpaved and paved road areas that are maintained as detailed below.

Paved:

- Paved roads are inspected and cleaned as necessary during operating hours, weather permitting with a power flush truck or wet/vacuum truck.
- Track out on paved roads is cleaned daily as it occurs.
- The paved road speed limit is limited to 15 miles per hour.

Unpaved:

- Fugitive emissions on unpaved areas are controlled by applying a solution of chemical suppressant (lignosulfonate, calcium chloride, or equivalent), or water, monthly. Chemical suppressant will be applied during the months of March through October.
- A water truck is used, as necessary and weather permitting, between water, chemical suppressant, or equivalent treatments.
- The unpaved road speed limit is restricted to 5 miles per hour.
- Fugitive emissions generated by vehicle traffic in unpaved areas around the stockpiles are controlled by applying a solution of chemical suppressant, water, or equivalent, monthly. Chemical suppressant will be applied during the months of March through October.

General:

- Material spilled on roadways is removed daily.
- Truck operators are notified promptly if they spill material on a roadway to prevent future incidences.

4. EGLE Required Recordkeeping Requirements - Fugitive Dust Sources

- A. Unpaved Roads/Lots
 - Date of Treatment
 - Control Measure Used
 - Name of Employee
 - Name of product Applied
 - Amount of Solution/Water Applied
 - Dilution Ratio (if applicable)
 - Road Segment/Lot Identification
- B. Paved Roads/Lots
 - Date of Treatment
 - Control Measure Used
 - Name of Employee
 - Road Segment/Lot Identification
- C. Storage Piles/ Material Handling
 - Date of Treatment
 - Control Measure Used
 - Name of Employee
 - Dilution Ratio (if applicable)
 - Amount of Dust Suppressant/Water Applied
 - Identification of Pile/Material Handling Operation Treated
 - Equipment Used



-- UNPAVED ROADS

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BLAST FURNACE ROADWAYS AREA 1 OF 4

LEVY PLANT 6 FUGITIVE DUST PLAN – 2020 UPDATE

FIGURE



--- PAVED ROADS



DETROIT SIDE ROADWAYS AREA 2 OF 4

FIGURE

2

LEVY PLANT 6 FUGITIVE DUST PLAN – 2020 UPDATE







BASIC OXYGEN FURNACE (BOF) ROADWAYS SOUTH END OF BOF AREA 3 OF 4

LEVY PLANT 6 FUGITIVE DUST PLAN – 2020 UPDATE

-- UNPAVED ROADS

Ν



-- UNPAVED ROADS

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FIGURE

Ν

AK STEEL SIDE ROADWAYS STEEL MILL SIDE AREA 4 OF 4



Levy Plant 6 - Demonstration of Fugitive Dust and Particulate Emission Equivalent Controls

This demonstration shows that the updated Fugitive Dust Control Plan (FDP) for Levy Plant 6 will not result in an increase in fugitive dust or particulate emissions from the existing FDP that is included in the facility's Consent Order SIP 18-1993 (Revised 1994), Exhibit A. The updated FDP includes controls that are in general the same and are as protective of the environment as the controls detailed in the existing FDP. The differences are mostly in organization of the information and in some cases allowing flexibility in application of controls. The assumptions for calculating potential and actual emissions are consistent. The proposed changes will not increase production or change equipment or material handling processes. Levy will continue to keep records of fugitive dust controls implemented. Each section of the existing FDP is shown below with the relevant information from the proposed FDP.

Summary of Facility Processes

In general, the processes operated at Levy Plant 6 and described in the FDP are consistent between the existing FDP and the updated version. The facility operates the following basic processes: the BOF slag pits, slag processing operations (known as Levy Plant #6) located on steel mill property adjacent to the Rouge River, and additional slag processing operations on the opposite side of the Rouge River (known as the Detroit Side) on Levy property. The operations on opposite sides of the Rouge River are connected by a bridge conveyor system. Key operations on the Detroit Side include the Deister Screen and Conveyor System. The updated FDP describes the processes with more detail and consistent with the renewable operating permit (ROP B4243).

It should be noted that the existing FDP provides an incomplete list of specific points in the plants with a numbering system that is not consistent with current operations. Conveyors, stackers and other points within the processes are not numbered or identified in this way. In addition, the Controls on Equipment List (Section 3.A. of existing FDP) is not useful because the identified points within the list are almost all points without control. The Controls on Equipment list in the existing FDP does not provide value and Levy requests it be removed.

The control points in the Controls on Equipment list that do identify dust controls have been specifically correlated in the updated FDP to show that these controls are still in place and what part of the process is being controlled. These references are included in the material processing section.

Materials Processing

Following the process description, the existing FDP provides general controls or actions utilized during material processing. Levy will continue to perform these actions which include:

- Watering and quenching materials as required prior to processing included in section B.I of Updated FDP
- A partial enclosure is maintained at the pot knocking station included in section B.I of updated FDP.

- Water sprays are located at the slag raw feed stockpile, and prior to all screens and crushers on the slag plant included in section B.I of updated FDP.
- Conveyors are equipped with conveyor covers, water sprays, side shields, etc., as necessary included in section B.I of updated FDP.
- Water sprays are installed on finished product stackers for use as needed included in section B.I of updated FDP.
- Tarping trucks transporting finished product included in section B.II of updated FDP
- Limiting drop heights to two feet above sideboard of the trucks included in section B.II of updated FDP
- Washing wheels (weather permitting) of trucks transporting finished product or waste materials included in section B.II of updated FDP
- Watering finished product stockpiles, if emissions from load-out exceed 5% opacity included in section B.II of updated FDP

Stockpile Areas and Activities

The existing FDP provides general controls or actions utilized for control of stockpiling of raw materials and finished products. Levy will continue to perform these actions which include:

- Quenching and watering of raw materials as required prior to processing included in section B.I of updated FDP
- Watering of slag products included in section B.II of updated FDP
- Load out of finished products included in section B.II of updated FDP.

Watering and the use of chemical wetting agents are the principal means for control of aggregate storage pile emissions. The quantity of dust emissions from aggregate storage operations varies with the volume of aggregate passing through the storage cycle. Emissions also depend on the age of the pile, moisture content, and proportion of aggregate fines. As the material piles at Plant 6 have not changed in material throughput, moisture content nor percent of fines, no emission increases will occur due to the proposed changes to the FDP.

Paved and Unpaved Roads

The existing FDP provides general controls or actions utilized for control on paved roads. Levy will continue to perform these actions as included in section B. III of updated FDP. In general, the quantity of particulate emissions from resuspension of loose material on the road surface is based on the vehicle miles traveled, precipitation or watering of the roads, the road surface silt loading, average weight (tons) of the vehicles traveling the road, and vehicle speed (unpaved). Controls for paved roads include vacuum sweeping, water flushing, and broom sweeping and flushing. In order to limit emissions from unpaved roads, Levy will continue to limit the speed, weight and number of vehicles and to continue surface treatment, such as watering or chemical dust suppressants (lignosulfonate, calcium chloride, or equivalent). Levy proposes to add calcium chloride as a possible chemical suppressant as it is widely available and known in the industry to be highly effective for this purpose. Levy also proposes to apply chemical suppressant on a monthly basis during the months of March through October.

The proposed changes to the FDP will not impact the vehicle miles traveled or the weight of the vehicles. The road surface silt loading and the annual precipitation will remain the same. Levy proposes to continue to inspect and clean paved roads and limit the vehicle speed to 15 miles per hour. Levy proposes to continue to treat unpaved roads and limit the vehicle speed to 5 miles per hour.

STATE OF MICHIGAN DEPARTMENT OF NATURAL RESOURCES OFFICE OF THE DIRECTOR

In the matter of administrative proceedings) involving the EDWARD C. LEVY CO., PLANT #6,) a corporation organized under the laws) of the State of Michigan and doing business) at 13800 Mellon in the City of Detroit,) County of Wayne, State of Michigan.)

SIP No. 18-1993 Revised: 9/9/94

STIPULATION FOR ENTRY OF FINAL ORDER BY CONSENT

)

This proceeding results from provisions of the Federal Clean Air Act ("CAA"), 42 U.S.C. Section 7401 <u>et seq</u>., as amended by the Clean Air Act Amendments of 1990, P.L. No. 101-549, 104 Stat. 2399 (Nov. 15, 1990), that designate a portion of Wayne County as non-attainment for PM-10 (particulate matter less than 10 micrometers) and require a State Implementation Plan ("SIP"), based on legally enforceable control measures, that provides for a demonstration of attainment and maintenance of the primary National Ambient Air Quality Standard ("NAAQS") for PM-10 in Wayne County. Further, pursuant to Section 15 of the Michigan Air Pollution Act, 1965 PA 348, as amended ("Act 348"), companies in the standard industrial classifications listed in 15(1), and which are located in areas listed in Table 36 of R 336.1371 of the Michigan administrative code, are required to develop and implement an approved fugitive dust control operating program and to have the program embodied in a legally enforceable order or as part of an approved permit to install or operate.

SIP No. 18-1993 (Revised 9/9/94)

The Edward C. Levy Co. ("Company") owns and operates Levy Plant #6 ("Plant"), which is a slag processing facility, located at 13800 Mellon, City of Detroit, County of Wayne, State of Michigan. The Michigan Department of Natural Resources ("MDNR") alleges that the Plant is a significant source of fugitive dust emissions which contribute to the non-attainment problem. Further, the requirements for the control of fugitive dust, set forth in Section 15 of Act 348, apply to the Plant.

The Company and the MDNR stipulate as follows:

1. The Air Pollution Act, 1965 PA 348, as amended, ("Act 348"), MCL 336.11 et seq; MSA 14.58(1) et seq is an act to control air pollution in this state.

2. The Director of the MDNR ("Director") is authorized pursuant to Section 5 of Act 348 to administer and enforce all provisions of Act 348.

3. The Director has delegated authority to the Air Quality Division ("AQD Chief") to enter into the Consent Order.

4. The resolution of this matter by a Consent Order pursuant to Section 16c of Act 348 is proper and acceptable.

5. This Consent Order becomes effective on the date of execution ("effective date of this Consent Order") by the AQD Chief.

6. The emissions of fugitive dust from the Plant are subject to the opacity limitations and prohibitions contained in Sections 15 and 15a of Act 348. The particulate matter and fugitive dust emissions from the Plant must not cause or contribute to a violation of the PM-10 NAAQS. Further, the CAA and Act 348 require the application of all reasonably available control measures ("RACM") for the control of PM-10 emissions.

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SIP No. 18-1993 (Revised 9/9/94)

7. This Consent Order is designed to ensure attainment and maintenance of the PM-10 NAAQS, compliance with Sections 15 and 15a of Act 348, and compliance with the RACM requirements of the CAA and Act 348.

COMPLIANCE PROGRAM

8. On and after the effective date of this Consent Order, the Company shall fully comply with the provisions and requirements of the fugitive dust control operating program and Recordkeeping for Fugitive Dust Sources Addendum, which is attached as Exhibit A, incorporated by reference, and made an enforceable part of this Consent Order.

RECORDKEEPING AND REPORTING

9. On and after the effective date of this Consent Order, the Company shall keep records as specified in Exhibit A.

10. On and after the effective date of this Consent Order, the records required pursuant to this Consent Order shall be kept on file at the Company for a period of at least two (2) years, and shall be made available to MDNR upon written or verbal request.

11. Beginning with the calendar quarter starting after the effective date of this Consent Order, and quarterly thereafter, the Company shall submit to MDNR a report identifying each day in which any emission limit, operational requirement, or recordkeeping requirement, as specified in Exhibit A, was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. The reports shall be submitted within

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30 days following the end of the calendar quarter in which the data were collected.

GENERAL PROVISIONS

12. Upon entry, this Consent Order, along with other supporting documentation required by the United States Environmental Protection Agency ("U.S.EPA"), shall be submitted to the U.S.EPA for approval as a revision to the Michigan SIP in accordance with Part D, Section 171 <u>et seq.</u>, of the Federal Clean Air Act, as amended by Section 105 of the Clean Air Act Amendments of 1990. This Consent Order shall become effective immediately upon entry, except that this Consent Order shall have no effect on the federally-approved SIP unless and until the submitted SIP revision request is formally approved by the U.S.EPA.

13. Upon entry of this Consent Order, the Company may change it's processes, modify the fugitive dust control program contained in Exhibit A, or modify the particulate emission control program contained in Exhibit B ("Control Programs"), in accordance with the following:

A. <u>Process Change</u>

- (1) The Company may change it's operations or processes which are sources of particulate and fugitive dust provided all of the following conditions are met:
 - (a) The provisions of the Control Programs continue to apply to the subject operation or process;
 - (b) The change does not result in an increase in the level of fugitive dust or particulate emissions;
 - (c) The change is approved.

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- (2) The Company shall submit to MDNR a written description of the proposed change and how it meets the requirements of 13(A)(1).
- (3) The MDNR shall approve or disapprove the proposed change, in writing, within 45 days from receiving a proposed change which meets the requirements of 13(A)(1).
- (4) Should the MDNR disapprove the proposed change, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

B. <u>Control Program Revision</u>

- The Company may revise the Control Programs provided both of the following conditions are met:
 - (a) The Company demonstrates*, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the MDNR for approval.
 - (b) The revision is approved.
- (2) The MDNR shall approve or disapprove the proposed revision, in writing, within 45 days from receiving a proposed revision using an applicable U.S.EPA approved method to demonstrate the proposed revision meets the requirements of 13(B)(1).
- (3) Should the MDNR disapprove the proposed revision, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

C. U.S.EPA Notification

Upon approval of a change pursuant to subsection A above, or a substitution of a control measure pursuant to subsection B above, MDNR shall notify U.S.EPA, in writing, of the revised provisions which are enforceable for the facility.

D. Minor Modification

Upon adoption by the MDNR, and upon approval by U.S.EPA, of operating permit rules to implement the Permit Modification provisions recited at 40 CFR 70.7 (e), the Company may modify a fugitive dust or particulate emission source referred to in this Consent Order according to the terms and conditions contained in the operating permit rules.

E. Minor Modification Approval

Upon MDNR approval of a minor modification pursuant to subsection D above, the MDNR shall submit the approved minor modification to U.S.EPA as a proposed revision to the Michigan SIP.

F. Other Applicable Requirements

Any process change, control program revision, or minor modification made pursuant to this Paragraph does not affect the company's obligation to obtain a permit to install or operate required by Federal law or regulation, or contained in Part 2 of the Air Pollution Control ("APC") Rules and any other applicable requirement contained in the APC Rules or Act 348. SIP No. 18-1993 (Revised 9/9/94)

* - Demonstrations made pursuant to 13(B)(1)(a) involving chemical dust suppressant applications on unpaved roads shall be made using only petroleum resins, asphalt emulsions, or acrylic cements unless otherwise explicitly provided for by the applicable U.S.EPA approved SIP or U.S.EPA approved method.

14. This abatement program is not a variance subject to the 12 month limitation specified in Section 22 of the Air Pollution Act, being MCLA 336.32.

15. The provisions of this Consent Order shall be binding on the parties to this action, their officers, servants, employees, and attorneys, and on those persons in active concert or participation with them who receive actual notice of this Consent Order. In the event the Edward C. Levy Co. sells or transfers Plant #6, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within 30 calendar days, the Edward C. Levy Co. shall also notify MDNR Staff, in writing of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser or transferee. The purchaser must provide written agreement, to the Company, to assume the compliance responsibilities of the Consent Order and provide a copy of the agreement to the MDNR Staff.

16. Pursuant to the requirements of Section 5h of Act 348, the public was notified of a 30-day public comment period on this Consent Order which began on March 1, 1993 and a public hearing on this Consent Order which was held on March 30, 1993.

17. Section 16e of Act 348 may serve as a source of authority but not a limitation under which this Consent Order may be enforced. Further, the Michigan

Environmental Protection Act ("MEPA"), 1970 PA 127, MCLA 691.1201 et seq; MSA 14.528(201) et seq; and all other applicable laws may be used to enforce this Consent Order.

I, the undersigned, who is signing this Stipulation and Order for the Company, certify that I am fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

Approved as to Form and Content:

EDW. C. LRYY CO. PLANTG

EDWARD C. LEVY CO., PLANT #6 By: Dated:

The above signatory subscribed and sworn to before me this $23 \mu d$ day of Aeptimber, 1994.

alis Kany

Notary Public

NANCY ANN HUGHES NOTARY PUBLIC STATE OF MICHIGAN WAYNE COUNTY MY COMMISSION EXP. SEPT 3,1996

SIP No. 18-1993 (Revised 9/9/94)

Approved as to Content:

Dennis M. Drake, Acting Chief AIR QUALITY DIVISION DEPARTMENT OF NATURAL RESOURCES

Dated: 12

Approved as to Form:

Love.

A. Michael Leffler Assistant Attorney General, In Charge DEPARTMENT OF ATTORNEY GENERAL NATURAL RESOURCES DIVISION

194 Dated:

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Natural Resources pursuant to the provisions of the Air Pollution Control Act;

IT IS ORDERED that this Consent Order is approved and shall be entered in the record of the MDNR as a Final Order.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

By: 6122220

Dennis M. Drake, Acting Chief Air Quality Division

Dated:

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EXHIBIT A FUGITIVE DUST CONTROL PLAN EDWARD C. LEVY CO. - PLANT #6

1. Facility Name and Address:

Edward C. Levy Co. Plant #6 13800 Mellon Detroit, Michigan 48127

2. Name and Address of Responsible Person:

Gail Reninger Edward C. Levy Co. 8800 Dix Avenue Detroit, Mlchigan 48209

3. Summary of Source Descriptions and Control Measures:

A. Process Description

The Edward C. Levy Co. (Levy) operates a slag processing facility located at 13800 Mellon, Detroit, MI, known as Plant 6. The facility operates at a maximum 400 tph. Pot carriers transport molten slag from three separate locations; from the Rouge Steel caster operations, the BOF, and the electric arc furnace. The pots are all dumped at the same pot dump station. The slag is cooled by water sprays before digging. Front endloaders dig the slag and stockpile it at the material handling stockpile, adjacent to the process plant, where additional water is added. Front endloaders are used to transfer the material from the material handling stockpile to the grizzly that feeds the process plant.

Skulls are moved from the pot dump area to the skull breaking area to be broken by a drop ball crane into small enough pieces to be reused by the steel mill.

The process plant extracts the metals from the slag and the metals are returned to the steel mill for reuse. The slag is crushed and screened to produce three sizes of finished product.

Product Name	Moisture Content %	Passing 200 Mesh %
1/2" Down	6.3	14.50
ЗХ	1-3.5	0.20
25X	2.5	1.30

The plant consists of a grizzly/feeder, 8 conveyors, 1 crusher, 3 screens, and 3 stackers. Water sprays are located at the crusher/screen tower north of the Rouge River, at the first transfer point south of the river, and on the 1/2" Down stacker.

Moisture content of raw feed material ranges from 2 to 5 percent. Moisture content of slag aggregate ranges from 1 to 6.3 percent. Fugitive emission control is necessary only on the 1/2" Down material where the particle size

passing a 200 mesh sieve is greater than 1.5%. Control of the material is accomplished by water sprays at the end of stacker #1.

Controls on Process Equipment

Grizzly/Feeder	Material Watered Before Feeding
Conveyor #1	Uncovered, Material Still Wet
Crusher/Screen Tower	Water Sprays
Conveyor #9	Uncovered
Conveyor #10	Uncovered
Conveyor #2	Uncovered
Conveyor #3	Uncovered
Bridge Conveyor (BC)	Side Shields
Conveyor #4	Water Spray, 180 Degree Covers
Conveyor #5	Uncovered
Stacker #1	Covered, Water Spray, Scope
Stacker #2	Covered
Stacker #3	Uncovered

The finished product is loaded by front endloaders and transported by customer owned and hired trucks. To minimize the fugitive emissions from the loading of trucks and the transporting of material off-site, the following operating practices will be adhered to:

- 1. All trucks transporting finished product will be tarped before leaving the property.
- 2. Drop heights of the front endloader bucket will be no more than two (2) feet above sideboard of the trucks.

Control of emissions due to vehicle movement about the stockpiles is accomplished by applying lignosulfonate to the travelled areas among the piles. Application rate of 5 gal/100 sq. ft. will be used. The diluted ratio is 3:1, and the application frequency is once per month. The actual square footage to be controlled will be dependent upon the amount of material in storage.

Spilled material under conveyors will be attended to on an ongoing basis. Spillage on roadways will be removed daily. A truck operator who has spilled material onto the road will be notified so that appropriate action can be taken to prevent future incidences.

B. Stockpile Areas and Activities

Edward C. Levy Co. Plant 6 stockpiles both raw slag and finished slag products on the property.

Raw Slag - the raw slag, after being quenched, is dug from the pot dump area and stockpiled in the material handling stockpile adjacent to the process plant. The material is watered, and then transferred by front endloader to the grizzly/feeder at the beginning of the process plant. Finished Slag Products - the raw slag is crushed and screened to produce three sizes of finished products. Water is added to the material at a rate of 4.0 gallons per ton of slag processed (a table of the finished products with moisture contents and % passing 200 mesh sieve can be found in the Process Description). The material is stockpiled by three stackers; two of the stackers are covered, one of which has water sprays and a scope.

Load-out of finished product is by front endloader. Load-out emissions are controlled by limiting drop height of the bucket to a maximum of two (2) feet above the sideboard of the truck. All trucks transporting finished product will be tarped before leaving the property.

C. Roadways and Parking Lots

Edward C. Levy Co. Plant 6 has both paved and unpaved roads.

Paved - the paved roads will be cleaned daily, during operating hours, weather permitting, with a power flush or wet/vacuum truck. Track-out will be cleaned up daily when it occurs. Speed limit on paved roads is 15 MPH.

Unpaved - the unpaved roads will be treated with a lignosulfonate dust suppressant at a rate of 0.45 gallons of solution per square yard. The dilution ratio is 3:1. Additionally, speed limits on unpaved roads are restricted to 5 MPH.

D. Process Emissions (Crushing, Screening, Conveying, and Transfer)

Crushing/Screening Operations - water sprays.

Conveying and Transferring - covered conveyors, water sprays, side shields, scope.

Load-Out - limited drop height, trucks are tarped.

(Note: See attached DNR required Recordkeeping for Fugitive Dust Sources Addendum for additional information.)

ADDENDUM

RECORDKEEPING FOR FUGITIVE DUST SOURCES

REQUIRED RECORDS

UNPAVED ROADS/LOTS	5.	NAME OF PRODUCT APPLIED AMOUNT OF SOLUTION/WATER APPLIED DILUTION RATIO
PAVED ROADS/LOTS	1. 2. 3. 4.	DATE OF TREATMENT CONTROL MEASURE USED RESPONSIBLE PERSON'S INITIALS ROAD SEGMENT/LOT IDENTIFICATION
STORAGE PILES/MATERIAL HANDLING	3. 4.	DATE OF TREATMENT CONTROL MEASURE USED RESPONSIBLE PERSON'S INITIALS DILUTION RATIO (IF APPLICABLE) AMOUNT OF DUST SUPPRESSANT/WATER APPLIED IDENTIFICATION OF PILE/MATERIAL HANDLING OPERATION TREATED EQUIPMENT USED

OPTIONAL RECORDS

WEATHER CONDITIONS

- PRECIPITATION
 TEMPERATURE
 WIND DIRECTION AND VELOCITY

A-4 LEVY-PLANT #6 BLAST FURNACE



LEVY-BOF



LEVY-PLANT #6



A-4 LEVY-PLANT #6 DETROIT SIDE



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN	:	B4243

Section Number (if applicable):

1.	Additional Information	ID
Al	-LEVYPLANT6	

Additional Information 2. Is This Information Confidential?

Attached is PTI 5-19 issued 3-12-2019 that is proposed for inclusion in the ROP. Requested changes are included in the mark-up copy of the ROP.

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Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

March 12, 2019

PERMIT TO INSTALL 5-19

> ISSUED TO Edw. C. Levy Co.

LOCATED AT 13800 Mellon Street Detroit, Michigan

IN THE COUNTY OF Wayne

STATE REGISTRATION NUMBER B4243

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:

March 5, 2019

DATE PERMIT TO INSTALL APPROVED: March 12, 2019	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm BTU °C CO	Actual cubic feet per minute British Thermal Unit Degrees Celsius Carbon Monoxide
CO ₂ e dscf dscm °F	Carbon Dioxide Equivalent Dry standard cubic foot Dry standard cubic meter Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt Pound
lb m	Meter
	Milligram
mg mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NOx	Oxides of Nitrogen
ng	Nanogram
РМ	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
SO₂ TAC	Sulfur Dioxide Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
hð	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 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 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 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.

Edw. C. Levy Co. (B4243) Permit No. 5-19

- 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**)
- 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))	Installation Date / Modification Date	Flexible Group ID
EULEVYPLANT6	Processing equipment associated with Levy Plant 6, including a plant feeder/magnetic separator, twelve conveyors including the bridge conveyor, a screen, and a crusher. Equipped with water spray system for air pollution control. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.	01/01/1971 9/19/2006 TBD	

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.
EULEVYPLANT6 EMISSION UNIT CONDITIONS

DESCRIPTION

Processing equipment associated with Levy Plant 6, including a plant feeder/magnetic separator, twelve conveyors including the bridge conveyor, a screen and a crusher. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Water spray system

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM10	0.73 pounds per hour	Calendar day average	EULEVYPLANT6	SC VI.1,2&4	40 CFR 52.21(c)&(d)
2. PM10	0.64 tons per year	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3&5	40 CFR 52.21(c)&(d)
3. Particulate Matter	2.03 pounds per hour	Calendar day average	EULEVYPLANT6	SC VI.1,2&4	40 CFR 52.21(c)&(d)
4. Particulate Matter	1.79 tons per year	Based on a 12 month rolling time period as determined at the end of each calendar month	EULEVYPLANT6	SC VI.3&5	40 CFR 52.21(c)&(d)
5. Visible Emissions	10% opacity	6-Minute Average	Slag screening operations, conveyors or transfer points on conveyors	SC VI.7,9&10	R 336.1301(1)(c)
6. Fugitive dust	5% opacity	3-Minute Average	Roadways, parking lots, or storage piles, including any material handling activity at a storage pile	SC VI.8,9&10	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Slag processing	400 tons per	Calendar day average	EULEVYPLANT6	SC VI.1&2	40 CFR
plant raw material	hour				52.21(c)&(d)
throughput					

Meterial	l imit	Time Period /	Equipmont	Monitoring /	Underlying Applicable		
Material	Limit	Operating Scenario	Equipment	Testing Method			
2. Slag processing	704,000 tons	Based on a 12 month	EULEVYPLANT6	SC VI.3	40 CFR		
plant raw material	per year	rolling time period as			52.21(c)&(d)		
throughput		determined at the end of					
		each calendar month					
Hexavalent	Not more	Average of all samples	EULEVYPLANT6	SC V.1	R 336.1225		
chromium content	than 11	taken, not to exceed					
of raw materials	ppmw	three samples per					
(slag) processed		month ^a					
a. The permittee is r							

permittee takes more than one sample, only three samples may be taken in any month.

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall maintain a minimum moisture content of 1.5 percent by weight in the raw materials less than three quarters of an inch in diameter and finished product less than three quarters of an inch in diameter. (40 CFR 52.21(c)&(d))
- 2. The permittee shall not operate the slag processing plant unless the adjustable stacker height mechanisms and water spray systems are installed, operated, and maintained to minimize fugitive dust emissions on crushers, screen, conveyors, and at all exit points in order to meet the visible emission and fugitive dust limits in SC.1. (40 CFR 52.21(c)&(d))
- 3. The permittee shall not crush and screen asbestos tailings or asbestos containing materials, as defined by the National Emission Standards for Hazardous Air Pollutants (40 CFR, 61.143) regulations, in the crushing plant. (40 CFR 52.21(c)&(d))
- The permittee shall not operate the slag processing plant unless the program for continuous fugitive dust emissions control for the plant has been implemented and maintained. (40 CFR 52.21(c)&(d), R 336.1372, R 336.1901, Consent Order SIP 18-1993 (Revised 9/9/94))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within 60 days after permit issuance, the permittee shall verify the hexavalent chromium content of the raw materials (slag) used in EULEVYPLANT6 using method SW-846 7199 or another method acceptable to the AQD District Supervisor that is capable of accurately determining the hexavalent chromium content of the material being tested. The permittee must submit the test results to the AQD District Supervisor within 45 days of sample collection. (R 336.1225)

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall monitor and record the daily tonnage of material throughput. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&((d))
- The permittee shall monitor and record the daily hours of operation of the slag processing plant. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d), R 336.1901)

- 3. The permittee shall monitor and record the total material throughput of the slag processing plant on a monthly and 12-month rolling time period, as determined at the end of each calendar month. (40 CFR 52.21(c)&(d))
- 4. The permittee shall calculate and maintain records of the PM and PM10 hourly emissions based on the daily operating hours and daily throughput and appropriate AP-42 emission factors or other factors agreed upon by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))
- The permittee shall keep, in a satisfactory manner, calculations determining the monthly and 12-month rolling time period mass emissions of PM and PM₁₀ as determined at the end of each calendar month. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))
- The permittee shall keep records as specified in the fugitive dust control program and as required under Consent Order SIP 18-1993, (Revised 9/9/94), Exhibit A, Addendum and Appendix A of this permit. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))
- 7. The permittee shall perform a Method 9 certified visible emission observation of the plant feeder/magnetic separator, screen, crusher, or of the conveyor system at least once every two calendar weeks for a minimum of 15 minutes during representative operations. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))
- 8. The permittee shall perform a Method 9D certified visible emission observation of loading activities from a finished product storage pile into a truck at least once every two calendar weeks for a minimum of 15 minutes when the loading process is operating. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable fugitive dust emission limitation and shall keep a written or electronic record of each required observation and corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))
- 9. The permittee shall conduct periodic inspections for the purpose of determining the operational condition of the adjustable stacker height mechanisms, water spray systems, crushers, screen, conveyors and the bridge conveyor side shields (from both sides of the river), and if necessary, identify the reasons for malfunction or failure. These inspections shall be conducted immediately after observing visible emissions in excess of the visible emission limit, but not less frequently than at least once a month and the permittee shall keep a written or electronic record of each inspection and corrective action taken if any. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (40 CFR 52.21(c)&(d))
- 10. Permittee shall sample each finished product storage pile to determine the minimum moisture content by weight on a weekly basis. The sampling procedure, averaging period for determining the moisture content of each finished product, and corrective actions that will be taken if the moisture content is below the required minimum, shall be submitted to the AQD District Supervisor for review and approval. Records of minimum moisture content sampling and corrective actions taken, if applicable, shall be maintained. After six weekly samples, the permittee may petition to the Department to reduce the sampling frequency to monthly. This petition must be submitted in writing and approved by the AQD District Supervisor. (40 CFR 52.21(c)&(d))
- 11. The permittee shall keep, in a satisfactory manner, records of the hexavalent chromium content of each raw material sample used in EULEVYPLANT6. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (**R 336.1225**)

VII. <u>REPORTING</u>

 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 the crusher. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- Within 30 days of issuance of this permit, the permittee shall label the EULEVYPLANT6 equipment according to a method acceptable to the AQD District Supervisor. 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. This permit shall be terminated on and after March 12, 2021. (R 336.1201(3))

Footnotes:

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

APPENDIX A

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in Special Condition VI.6. Alternative formats must be approved by the AQD District Supervisor.

4.1 Required Records for Fugitive Dust Sources

- A. Unpaved Roads / Lots
 - 1. Date of Treatment
 - 2. Control Measure Used
 - 3. Responsible Person's Initial
 - 4. Name of Product Applied
 - 5. Amount of Solution / Water Applied
 - 6. Dilution Ratio
 - 7. Road Segment / Lot Identification
- B. Paved Roads / Lots
 - 1. Date of Treatment
 - 2. Control Measure Used
 - 3. Responsible Person's Initial
 - 4. Road Segment / Lot Identification
- C. Storage Piles / Material Handling
 - 1. Date of Treatment
 - 2. Control Measure Used
 - 3. Responsible Person's Initial
 - 4. Dilution Ratio
 - 5. Amount of Dust Suppressant / Water Applied
 - 6. Identification of Pile / Material Handling Operation Treated
 - 7. Equipment Used

D. Optional Records

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

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN:	B4243

Section Number (if applicable):

1.	Additional Information ID	
A	-DEISTERSCREEN	

Additional Information					
2. Is This Information Confidential?	🗌 Yes 🛛 No				
ttached is PTI 45-20 issued 5-29-2020 that is proposed for inclusion in the ROP. Requested changes are included in ne mark-up copy of the ROP.					

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Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division



PERMIT TO INSTALL

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COMMON ACRONYMS

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm BTU $^{\circ}$ C CO CO ₂ e dscf dscm $^{\circ}$ F gr HAP Hg hr HP H2S kW Ib m mg mm MM MM MW NMOC NO _x ng PM PM10	Actual cubic feet per minute British Thermal Unit Degrees Celsius Carbon Monoxide Carbon Dioxide Equivalent Dry standard cubic foot Dry standard cubic meter Degrees Fahrenheit Grains Hazardous Air Pollutant Mercury Hour Horsepower Hydrogen Sulfide Kilowatt Pound Meter Milligram Millimeter Million Megawatts Non-Methane Organic Compounds Oxides of Nitrogen Nanogram Particulate Matter Particulate Matter
PM2.5 pph	Particulate Matter equal to or less than 2.5 microns in diameter Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight Pounds per square inch absolute
psia psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp THC	Temperature Total Hydrocarbons
tpy	Tons per year
hð	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))	Installation Date / Modification Date	Flexible Group ID
EUDEISTERSCREEN	A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and three knuckle conveyors. All but two conveyors are located downstream of the screen. Equipped with water spray system and adjustable stacker height mechanism for air pollution control.	04/17/1995 / 04/2020	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.

EUDEISTERSCREEN EMISSION UNIT CONDITIONS

DESCRIPTION

A 350 Ton Per Hour Deister Screen designed to separate slag and related materials into various finished product sizes. This emission unit includes nine conveyors and three knuckle conveyors. All but two conveyors are located downstream of the screen.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Equipped with water spray system and adjustable stacker height mechanism for air pollution control.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible emissions	10% opacity	6-Minute Average	EUDEISTERSCREEN	SC VI.4, SC VI.5	R 336.1301(1)(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Material throughput	350 tons per hour	Hourly	EUDEISTERSCREEN	SC VI.1, SC VI.2	R 336.1301
2. Material throughput	616,000 tons per year	12-month rolling time period as determined at the end of each calendar month	EUDEISTERSCREEN	SC VI.3	R 336.1205

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Materials shall be wetted with water sprays to minimize the fugitive emissions prior to entering the screening operations of EUDEISTERSCREEN. (R 336.1301(1)(c)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUDEISTERSCREEN with water sprays for fugitive dust control. (R 336.1205, R 336.1301(1)(c))

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 monitor and record the hourly tonnage of material throughput for EUDEISTERSCREEN. (R 336.1205, R 336.1301)
- 2. The permittee shall monitor and record the daily hours of operation of EUDEISTERSCREEN. (R 336.1205, R 336.1301)
- 3. The permittee shall monitor and record the total material throughput of EUDEISTERSCREEN on a monthly and 12-month rolling time period as determined at the end of each calendar month. (R 336.1205)
- 4. The permittee shall perform a Method 9 certified visible emission observation of a representative operating conveyor of EUDEISTERSCREEN at least once every two calendar weeks for a minimum of 15 minutes during screening operation. The permittee shall initiate corrective action upon observation of visible emissions in excess of the visible emission limitation in SC I.1 and shall keep a written or electronic record of each required observation and corrective action taken. (R 336.1205, R 336.1301)
- 5. The permittee shall activate the water sprays if visible emissions are observed during the regular noncertified visible emissions observations that are required to occur at least 5 days per week during representative operations, excluding non-operating days, during March through October. The permittee shall keep a record of corrective actions taken, if other than water sprays. **(R 336.1205, R 336.1301)**

VII. <u>REPORTING</u>

NA

- VIII. STACK/VENT RESTRICTION(S)
- NA
- IX. OTHER REQUIREMENT(S)

NA

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: B4243	Section Number (if applicable):
1. Additional Information ID AI-COMBUSTION		
Additional Information		

2. Is This Information Confidential?

🗌 Yes 🖾 No

The facility has the following small non-emergency, portable compression ignition engines at the facility that are exempt from permitting per Rule 285 (g), but units have RICE MACT applicability. The facility proposes that all units be included in a flex group called FGRICEMACT. A description of each unit with its Potential to Emit (PTE) is summarized in Table 1 - 5 below. All units have PTE based on 8,760 hrs per year and usage of ultra-low sulfur diesel fuel. Units installed in 2019.

Table 1. Engine Description

UNIT NAME	DESCRIPTION
EURICECRUSHER	300 hp diesel-fired tier 3 generator that provides support power to portable crusher. Exempt per Rule 285 (g) with RICE MACT applicability. Exempt per Rule 285 (g) with RICE MACT applicability. Installed in 2019 and reported to MAERS.
EUFEEDERSTACKERGEN	100 hp portable diesel-fired tier 4 engine that provides support power to facility processes (Detroit side feeder-stacker). Exempt per Rule 285 (g) with RICE MACT applicability.
EUFEEDERMAGSEPARATORGEN	150 hp portable diesel-fired tier 3 engine that provides support power to facility processes (Levy Plant 6). Exempt per Rule 285 (g) with RICE MACT applicability.
EUSLAGCONVEYORGEN1	74 hp portable diesel-fired tier 4 engine that provides support power to facility processes (Slag plant side conveyor). Exempt per Rule 285 (g) with RICE MACT applicability.
EUSLAGCONVEYORGEN2	74 hp portable diesel-fired tier 4 engine that provides support power to facility processes (Slag plant side conveyor). Exempt per Rule 285 (g) with RICE MACT applicability.
EULIGHTGENS	7 - 27 hp portable diesel-fired engines that provides support portable light towers. Exempt per Rule 285 (g) with RICE MACT applicability.
EUSLAGSTACKERGEN	100 hp portable diesel-fired tier 4 engine that provides support power to facility processes (Slag plant side stacker). Exempt per Rule 285 (g) with RICE MACT applicability.
EUSLAGSCREENGEN	111 hp portable diesel-fired tier 4 engine that provides support power to facility processes (Slag plant side screen). Exempt per Rule 285 (g) with RICE MACT

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

EGLE

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

		SRN: B4243	Section Number (if applicable):
1. Additional Information ID AI-COMBUSTION			
Additional Information			
2. Is This Information Cor	fidential?		🗌 Yes 🛛 No
UNIT NAME	DESCRIPTION		
Table 2. Engine Size and	Tier		
			Engine Detaile

	Engine Details			
ROP Name	Location	Levy Name	Size (hp)	Tier
EUFEEDERSTACKERGEN	Detroit Side	Edge FTS65	100	4
EUFEEDERMAGSEPARATOR	Debris Processing		150	3
GEN	(Slag Plant)	CEC Feeder	150	3
EULIGHTGENS	Light Stands	Light Rigs (7 units)	189 total	4
EURICECRUSHER	Slag Plant	Metso Crusher	300	3
EUSLAGCONVEYGEN1	Slag Plant	McCloskey ST100	74	4
EUSLAGSCREENGEN	Slag Plant	Finlay Screen 684	111	4
EUSLAGSTACKERGEN	Slag Plant	Edge FTS Stacker	100	4
EUSLAGCONVEYGEN2	Slag Plant	McCloskey ST100	74	4

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division



This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: B4243	Section Number (if applicable):
1. Additional Information ID AI-COMBUSTION		

Additional Information

2. Is This Information Confidential?

🗌 Yes 🖾 No

Table 3. Emission Factor Summary

ENGINES				Emission Factors (g/KW-hr) ¹				
ROP Name	Location	Levy Name	NOx	СО	PM10	PM2.5	SO2	VOC
EUFEEDERSTACKERGEN	Detroit Side	Edge FTS65	0.40	3.50	0.02	0.02	0.007	0.19
EUFEEDERMAG SEPARATORGEN	Debris Processing (Slag Plant)	CEC Feeder	4.00	5.00	0.30	0.30	0.007	1.50
EULIGHTGENS	Light Stands	Light Rigs (7 units)	0.40	3.50	0.02	0.02	0.007	0.19
EURICECRUSHER	Slag Plant	Metso Crusher	4.00	5.00	0.30	0.30	0.007	1.50
EUSLAGCONVEYGEN1	Slag Plant	McCloskey ST100	0.40	3.50	0.02	0.02	0.007	0.19
EUSLAGSCREENGEN	Slag Plant	Finlay Screen 684	0.40	3.50	0.02	0.02	0.007	0.19
EUSLAGSTACKERGEN	Slag Plant	Edge FTS Stacker	0.40	3.50	0.02	0.02	0.007	0.19
EUSLAGCONVEYGEN2	Slag Plant	McCloskey ST100	0.40	3.50	0.02	0.02	0.007	0.19

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

EGLE

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN:	B4243

Section Number (if applicable):

1.	Additional Information	ID
AI	-COMBUSTION	

Additional Information

2. Is This Information Confidential?

🗌 Yes 🖾 No

Table 4. Potential to Emit Summary

ENGINES			Annual Potential To Emit (Tons/Year)					
ROP Name	Location	Levy Name	NOx	CO	PM10	PM2.5	SO2	VOC
EUFEEDERSTACKERGEN	Detroit Side	Edge FTS65	0.3	2.5	0.01	0.01	0.01	0.1
EUFEEDERMAG SEPARATORGEN	Debris Processing (Slag Plant)	CEC Feeder	4.3	5.4	0.3	0.3	0.01	1.6
EULIGHTGENS	Light Stands	Light Rigs (7 units – 27 hp each)	0.5	4.7	0.027	0.027	0.010	0.26
EURICECRUSHER	Slag Plant	Metso Crusher	8.6	10.8	0.6	0.6	0.016	3.2
EUSLAGCONVEYGEN1	Slag Plant	McCloskey ST100	0.2	1.9	0.01	0.01	0.004	0.1
EUSLAGSCREENGEN	Slag Plant	Finlay Screen 684	0.3	2.8	0.02	0.02	0.01	0.2
EUSLAGSTACKERGEN	Slag Plant	Edge FTS Stacker	0.3	2.5	0.01	0.01	0.01	0.1
EUSLAGCONVEYGEN2	Slag Plant	McCloskey ST100	0.2	1.9	0.01	0.01	0.00	0.1

1. All engines assume operation up to 8,760 hours per year.

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division



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SRN: B4243

Section Number (if applicable):

1. Additional Information ID AI-COMBUSTION

Additional Information

2. Is This Information Confidential?

🗌 Yes 🖾 No

EI	Annual HAP Potential To Emit (Tons/Year)							
ROP Name	Location	Size (hp)	Benzene	Toluene	Xylene	Formaldehyde	Acetalde hyde	Total PAH
EUFEEDERSTACKERGEN	Detroit Side	100	6.53E-04	2.86E-04	2.00E-04	8.26E-04	5.37E-04	5.37E- 04
EUFEEDERMAG SEPARATORGEN	Debris Processing (Slag Plant)	150	9.80E-04	4.29E-04	2.99E-04	1.24E-03	8.05E-04	8.05E- 04
EULIGHTGENS	Light Stands (7)	189	1.23E-03	5.41E-04	3.77E-04	1.56E-03	1.01E-03	1.01E- 03
EURICECRUSHER	Slag Plant	300	1.96E-03	8.59E-04	5.99E-04	2.48E-03	1.61E-03	1.61E- 03
EUSLAGCONVEYGEN1	Slag Plant	74	4.83E-04	2.12E-04	1.48E-04	6.11E-04	3.97E-04	3.97E- 04
EUSLAGSCREENGEN	Slag Plant	111	7.25E-04	3.18E-04	2.21E-04	9.17E-04	5.96E-04	5.96E- 04
EUSLAGSTACKERGEN	Slag Plant	100	6.53E-04	2.86E-04	2.00E-04	8.26E-04	5.37E-04	5.37E- 04
EUSLAGCONVEYGEN2	Slag Plant	74	4.83E-04	2.12E-04	1.48E-04	6.11E-04	3.97E-04	3.97E- 04
Total		1098	0.007	0.003	0.002	0.009	0.006	0.006

1. All engines assume operation up to 8,760 hrs per yr.

2. Assume 7,000 BTU/hp-hr.

Hazardous Air	Emission Factor ¹
Pollutants	(Ib/ MMBTU)
Benzene	0.000933
Toluene	0.000409
Xylene	0.000285
Formaldehyde	0.00118
Acetaldehyde	0.000767
Total PAH	0.000168

1. Emission factors from AP-42 Table 3.3.2 for diesel-fired (SCC 2-02-001-02) source.



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	SRN: B4243	Section Number (if applicable):
1. Additional Information ID AI-MAERS		
Additional Information		
2. Is This Information Confidential?		🗌 Yes 🛛 No
3. Narrative Emissions for 2019 were not submitted to MAERS for report following exempt engines: EUFEEDERSTACKERGEN, EUFEEDERMAGSEPARATORGEN, EULIGHTGENS, EU EUSLAGSCREENGEN, EUSLAGSTACKERGEN, EUSLA Emissions were not required to be reported because the un Rule 285 (g) and are less than 300 hp. Emissions for 2019 these PTI and MAERS exempt engines on MAERS E-101	SLAGCONVEYGI GCONVEYGEN2 nits are exempt pe 9 are included for	EN1, er
Attached are the following MAERS documents: - MAERS Report for RY 2019 - Hard copy MAERS emissions forms for: - EUFEEDERSTACKERGEN - EUFEEDERMAGSEPARATORGEN - EULIGHTGENS - EUSLAGCONVEYGEN1 - EUSLAGSCREENGEN - EUSLAGSTACKERGEN - EUSLAGCONVEYGEN2		



Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

2019 Source Form

FORM REFER	ENCE							
Form Type	Source		AQD Source	ID (SRN) B4	243			
SOURCE IDEN	ITIFICATION							
Source Name	EDW (C LEVY CO PLAN	IT 6					
NAICS Code	327992		Portable	No)			
Physical Addres	ess (Street Address 1)		I	13800 MELLON AVE				
Physical Addres	ess (Street Address 2)							
County	WAYNE	City	DETROIT	Zip Code	48217-			
Latitude	42.2912 Decima	I Degrees	Longitude	-83	3.158725 Decimal Degrees			
Horizontal Colle	ction Method	001						
Source Map Sca	ale Number		Horizontal Ac	curacy Measure	20 Meters			
Horizontal Refer	rence Datum Code	03	Reference P	oint Code	102			
Principal Produ	uct SLAG		I	Number of Emp	loyees 50			
Employer Fede	eral Identification Numb	ier 381	253012					
OWNER INFOR	RMATION							
Owner Name	Edw.	C. Levy Co.						
Mailing Address	s (Street Address 1)		8800 Dix					
Mailing Address	s (Street Address 2)							

City	Detroit	State/Pro vince	MI
Country	USA	Zip or Postal Code	48209-



Michigan Air Emissions Reporting System (MAERS)

2019 Contact Form

FORM REFERENCE								
Form Type	Contact	AQD Source ID (SRN)		B4243				
EMISSION INVENTORY CO	NTACT (PRIMARY) I	NFORMATI	ON					
Contact First Name, Middle Initial		Matt		Contact L	Contact Last Name Perko			
Contact Title	Environmental Engineer							
Mailing Address (Street Addres		13800 MELLON AVE						
Mailing Address (Street Addres	ss 2)							
City Detroit	State/Province	МІ	Country	USA	Zip Code	48217		
E-Mail Address (if available)	mperko	o@edwclev	y.net					
Telephone Number (313) 8204057 Telephone Extension								
Fax Number	0		· ·					

EMISSION	INVENTORY CO	NTACT (SECOND	ARY) INFORI	MATION				
Contact First Name, Middle Initial Thomas			Thomas		Contact I	Contact Last Name Green		
Contact Tit	le	Director of EHS						
Mailing Add	Mailing Address (Street Address 1) 51445 W. 12 Mile Road							
Mailing Add	dress (Street Addres	is 2)						
City	Wixom	State/Province	МІ	Country	USA	Zip Code	48393	
E-Mail Add	ress (if available)	tgree	en@edwclevy	/.net		•		
Telephone	Number	(313) 6900139 Telephone Extension						
Fax Numbe	er	(248) 3499007						



Michigan Air Emissions Reporting System (MAERS)

2019 Contact Form

FORM REFERENCE									
Form Type	Contact	AQD Source ID (SRN)		B4243					
FEE INVOICE CONTACT INI	FORMATION (Fee S	ubject Faci	lities Only)						
Contact First Name, Middle Initial		Thomas		Contact La	Contact Last Name Green				
Contact Title	Director of EHS								
Mailing Address (Street Addres	s 1)		51445 W. 12 Mile Road						
Mailing Address (Street Addres	is 2)								
City Wixom	State/Province	МІ	Country	USA	Zip Code	48393			
E-Mail Address (if available) aramsdell@edwclevy.net									
Telephone Number		Telephone Extension							
Fax Number	(248) 3499007		•						



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFER	RENCE					
Form Type	Emissio	on Unit	AQD S	Source ID (SRN)	B4243	
EMISSION UNI	T IDENTIFIC/	ATION				
AQD Emission	Unit ID	EU0001	EU ID)	EULEVYP	LANT6
NAICS Code (i	if different fror	m Source Form)	32799	2		
Installation Date MM/DD/YYYY 07/01/1997			Dismantle I	Dismantle Date MM/DD/YYYY		
Emission Unit Description - (Include Process Equipment and Control Devices)			including a a crusher. pollution c	Processing equipment associated with Levy Plant 6, including a grizzly feeder, seven conveyors, two screens and a crusher. Equipped with water spray system for air pollution control. It does not include equipment associated with EUCONVEYORSYSTEM and EUDEISTERSCREEN.		
Emission Unit Type			Other proc	Other process equipment		
Is this a combu	ustion source?	?		Ν		
Is this combust	tion source us	sed to generate e	lectricity?			
Design Capaci	ty		Design Capaci	ty Numerator		Design Capacity Denominator
Maximum Nam	neplate Capad	city				Megawatts
RULE 201 A	PPLICABI	LITY				
Grandfathered	?	Ν				
Exempt from R	Rule 201?	N	If Yes	, Rule Number		
If Rule 201 Exe	empt, Is Throu	ughput Below Re	porting Threshole	ds?		
Permit?	Y		If Yes	, Enter the Permit N	lumber	MI-ROP-B4243-2009
Is This Emissic	on Unit Requi	red To Report En	nissions To MAE	RS For This Report	ing Year?	Y
			CON		(S)	
21. Control Dev	vice Code	DUST S	JP			
			EWIGG	ON UNIT STAC	CK(S)	
			Linioo			



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERE	ENCE						
Form Type	Emissio	n Unit		AQD Sourc	e ID (SRN)	B4243	
EMISSION UNIT	IDENTIFICA	TION					
AQD Emission U	Init ID	EU0005		EU ID		EUCONVE	YORSYSTEM
NAICS Code (if o	different from	Source Form)					
Installation Date MM/DD/YYYY 09/19/2006			Dismantle Date MM/DD/YYYY				
Emission Unit Description - (Include Process Equipment and Control Devices)			nt and	Five conveyors, located downstream of the Deister Screen (EUDEISTERSCREEN)), designed to transfer slag and related materials to finished product stockpiles. Equipped with water spray system for air pollution control. Additional conveyors located downstream of the Deister Screen are not part of this emission unit.			
Emission Unit Ty	/pe				Conveyor		
Is this a combustion source?					Ν		
Is this combustion	on source use	ed to generate e	lectricity?				
Design Capacity			Design (Capacity Nu	merator	nerator Design Capacity Denominator	
Maximum Name	plate Capaci	ty					Megawatts
RULE 201 AP	PLICABIL	ITY					
Grandfathered?		Ν					
Exempt from Rul	le 201?	N		If Yes, Rule	e Number		
If Rule 201 Exem	npt, Is Throu	ghput Below Re	porting Th	resholds?			
Permit?	Y			If Yes, Ente	er the Permit Nu	mber	MI-ROP-B4243-2009
Is This Emission	Unit Require	ed To Report Err	nissions To	D MAERS F	or This Reporting	g Year?	Y
				CONTR		•	
21. Control Devic	e Code	DUST SI		CUNTR	OL DEVICE(S	<i>)</i>	
21. Control Devic	e Coue	D031 3	UP				
			E	MISSION	UNIT STACK	<(S)	



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFEREN	CE						
	 Emission Ur	it	AQD Sour	ce ID (SRN)	B4243		
- 7 1				(-)			
EMISSION UNIT ID		1					
AQD Emission Unit			EU ID		FUDFIOTE		
		J0006	EUID		EUDEISTE	RSCREEN	
NAICS Code (if diff							
Installation Date MI	Μ/DD/ΥΥΥΥ	04/17	/1995	Dismantle L	ate MM/DD/YY	ΥY	
Emission Unit Description - (Include Process Equipment and Control Devices)				and related This emiss knuckle co downstrear	materials intention unit inclue nveyors all bunn of the scree	er Screen designed to separate slag o various finished product sizes. des seven conveyors and four ut one conveyor is located en. Equipped with water spray and t mechanism for air pollution	
Emission Unit Type				Screen	Screen		
Is this a combustion	n source?			Ν			
Is this combustion	source used to	generate electrici	ty?				
Design Capacity		Desi	gn Capacity N	merator		Design Capacity Denominator	
Maximum Namepla	te Capacity			Megawatts			
RULE 201 APPL	ICABILITY						
Grandfathered?	Ν						
Exempt from Rule 2	201? N		lf Yes, Ru	le Number			
If Rule 201 Exempt	, Is Throughpu	t Below Reporting	Thresholds?				
Permit?	Y		lf Yes, En	ter the Permit N	umber	MI-ROP-B4243-2009	
Is This Emission U	nit Required To	Report Emission	s To MAERS I	For This Reporti	ng Year?	Y	
			CONTR	OL DEVICE(S)		
21. Control Device	Code	DUST SUP					
			FMISSION	NUNIT STAC	·K(S)		



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERENCE						
Form Type Emission Unit	AQD Sour	rce ID (SRN)	B4243			
EMISSION UNIT IDENTIFICATION						
AQD Emission Unit ID EU0007	EU ID		EUBOFSLA	GPIT		
NAICS Code (if different from Source Form)						
Installation Date MM/DD/YYYY 04/17/1995 Dismantle Date MM/DD/YYYY						
Emission Unit Description - (Include Process Equipment and Control Devices) Basic Oxygen Furnace (BOF) slag pits equipped with water spray system for air pollution control.						
Emission Unit Type		Unclassified				
Is this a combustion source? N						
Is this combustion source used to generate e	electricity?					
Design Capacity	Design Capacity N	umerator		Design Capacity Denominator		
Maximum Nameplate Capacity	•			Megawatts		
RULE 201 APPLICABILITY						
Grandfathered? N						
Exempt from Rule 201? N	If Yes, Ru	le Number				
If Rule 201 Exempt, Is Throughput Below Re	porting Thresholds?					
Permit? Y	If Yes, Er	nter the Permit Num	nber	MI-ROP-B4243-2009		
Is This Emission Unit Required To Report Er	nissions To MAERS	For This Reporting	Year?	Y		
	CONTR)			
21. Control Device Code DUST S	UP					
	EMISSIO	N UNIT STACK	((S)			



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

				15 (051)				
Form Type	Emission Unit		AQD Sour	ce ID (SRN)	B4243			
EMISSION UNI	T IDENTIFICATION							
AQD Emission	AQD Emission Unit ID EU0008 EU ID EUCOLDCLEANERS							
NAICS Code (i	if different from Source I	Form)						
Installation Date MM/DD/YYYY 07/01/1979 Dismantle Date MM/DD/YYYY								
Emission Unit Description - (Include Process Equipment and Control Devices) Cold cleaners that meet the applicable requirements of R336.1281(h).								
Emission Unit Type Degreaser								
Is this a combustion source? N								
Is this combus	tion source used to gene	erate electricity	?					
Design Capaci	ign Capacity Design Capacity Nu			umerator		Design Capacity Denominator		
Maximum Nam	neplate Capacity					Megawatts		
RULE 201 A	PPLICABILITY							
Grandfathered	? N							
Exempt from R	Rule 201? Y		If Yes, Ru	ile Number	Rule 28	31(h)		
If Rule 201 Exe	empt, Is Throughput Bel	ow Reporting T	hresholds?		Y			
Permit?	Y		If Yes, En	ter the Permit	Number	MI-ROP-B4243-20	09	
Is This Emissio	on Unit Required To Rep	oort Emissions	To MAERS	For This Repo	orting Year?	Y		
					E (0)			
			CONTR	OL DEVIC	E(S)			
			EMISSION					



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERENCE							
Form Type Emission	i Unit	AQD Source	e ID (SRN)	B4243			
EMISSION UNIT IDENTIFICATION							
AQD Emission Unit ID	EU0009	EU ID		EUDROPB	ALLCRANE		
NAICS Code (if different from	Source Form)						
Installation Date MM/DD/YYYY 04/17/1995 Dismantle Date MM/DD/YYYY							
Emission Unit Description - (Include Process Equipment and Control Devices) This process consists of dropping a large steel ball from a crane onto scrap steel to break it into small pieces to be reused by adjacent steel mill, SeverStal NA.							
Emission Unit Type			Other proce	ss equipmen	t		
Is this a combustion source? N							
Is this combustion source use	d to generate electricity	?					
Design Capacity	Design	Capacity Nur	nerator		Design Capacity Denominator		
Maximum Nameplate Capacity	y				Megawatts		
RULE 201 APPLICABILI	ТҮ						
Grandfathered?	Ν						
Exempt from Rule 201?	Y	If Yes, Rule	Number	Rule 290			
If Rule 201 Exempt, Is Throug	hput Below Reporting T	hresholds?		Y			
Permit? Y		If Yes, Ente	r the Permit Nu	mber	MI-ROP-B4243-2009		
Is This Emission Unit Required	d To Report Emissions	To MAERS Fo	or This Reporting	g Year?	Y		
		CONTRO		~			
		CONTRO	DL DEVICE(S	>)			
		EMISSION	UNIT STAC	K(S)			



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERENCE								
Form Type Emissio	n Unit	AQD Source	e ID (SRN)	B4243				
EMISSION UNIT IDENTIFICA	TION							
AQD Emission Unit ID	AQD Emission Unit ID EU0010 EU ID EUPROCESS#2							
NAICS Code (if different from	n Source Form)							
Installation Date MM/DD/YYYY 05/11/2004 Dismantle Date MM/DD/YYYY								
Emission Unit Description - (Include Process Equipment and Control Devices) 1-100 tons per hour hopper and 1-100 tons per hour conveyor used for recycling slag materials back into the screening portion of the existing slag processing plant.								
Emission Unit Type Conveyor								
Is this a combustion source?	Is this a combustion source? N							
Is this combustion source use	ed to generate electricity	?						
Design Capacity	Design Capacity Design Capacity Numerator				Design Capacity Denominator			
Maximum Nameplate Capaci	ty				Megawatts			
RULE 201 APPLICABIL	ITY							
Grandfathered?	Ν							
Exempt from Rule 201?	Y	If Yes, Rule	Number	Rule 290				
If Rule 201 Exempt, Is Throu	ghput Below Reporting T	hresholds?		Y				
Permit? Y		If Yes, Ente	r the Permit Nu	Imber	MI-ROP-B4243-2009			
Is This Emission Unit Require	ed To Report Emissions	To MAERS Fo	or This Reportin	ig Year?	Y			
		CONTRO		2)				
		CONTRO	DEVICE(5)				
		EMISSION	UNIT STAC	K(S)				



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERENCE								
Form Type	Emission	Unit		AQD Source	e ID (SRN)	B4243		
EMISSION UNIT IDENTIFICATION								
AQD Emission Unit ID EU0011 EU ID EUUNPAVEDROADS								
NAICS Code (if	different from	Source Form)						
Installation Date	MM/DD/YYY	Y	01/01/19	971	Dismantle I	Date MM/DD/YY	YY	
Emission Unit Decontrol Devices)	escription - (Ir	clude Process	Equipme	nt and	Unpaved r	oadways		
Emission Unit Ty	vpe				Other fugit	ive		
Is this a combus	tion source?				Ν			
Is this combustic	on source use	d to generate e	lectricity?)				
Design Capacity Design Capac			Capacity Nun	nerator		Design Capacity Denominator		
Maximum Name	Maximum Nameplate Capacity Megawatts							
RULE 201 AP	PLICABILI	ТҮ						
Grandfathered?		Ν						
Exempt from Ru	le 201?	Ν		If Yes, Rule	Number			
If Rule 201 Exen	npt, Is Throug	hput Below Re	porting TI	nresholds?				
Permit?	Y			If Yes, Ente	r the Permit N	lumber	MI-ROP-B4243-2016	
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y								
				CONTRO		(9)		
21. Control Device Code DUST SUP								
	EMISSION UNIT STACK(S)							



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERENCE									
Form Type	Emission	Unit		AQD Source	e ID (SRN)	B4243			
EMISSION UNIT IDENTIFICATION									
AQD Emission l	Jnit ID	EU0012		EU ID		EUSTOCK	PILES		
NAICS Code (if	different from	Source Form)							
Installation Date	MM/DD/YYY	Y	01/01/19	071	Dismantle [Date MM/DD/YY)	ſΥ		
Emission Unit D Control Devices)	escription - (Ir	clude Process	Equipmer	nt and	Slag Stock	piles			
Emission Unit T	уре				Open Stora	age Pile			
Is this a combus	tion source?				Ν				
Is this combustion	Is this combustion source used to generate electricity?								
Design Capacity Design Capa			Capacity Numerator			Design Capacity Denominator			
Maximum Name	Maximum Nameplate Capacity Megawatts								
RULE 201 AP	PLICABILI	ТҮ							
Grandfathered?		Ν							
Exempt from Ru	le 201?	N		If Yes, Rule	Number				
If Rule 201 Exer	If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?								
Permit?	Y			If Yes, Ente	r the Permit N	umber	MI-ROP-B4243-2009		
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y									
				CONTRO		(9)			
21. Control Device Code DUST SUP									
			01						
	EMISSION UNIT STACK(S)								



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERENCE							
Form Type Emission Unit		AQD Source ID (SRN)	B4243				
EMISSION UNIT IDENTIFICATION							
AQD Emission Unit ID EU00)13	EU ID	EUBULKLC	DADING			
NAICS Code (if different from Source	Form)						
Installation Date MM/DD/YYYY	01/01/19	971 Dismantle	Date MM/DD/YYY	ΎΥ			
Emission Unit Description - (Include F Control Devices)	Process Equipme	nt and Slag bulk	loading				
Emission Unit Type		Other fug	itive				
Is this a combustion source?		Ν					
Is this combustion source used to get	nerate electricity?						
Design Capacity	Capacity Numerator	Dacity Numerator Design Capacity Denominator					
Maximum Nameplate Capacity				Megawatts			
RULE 201 APPLICABILITY							
Grandfathered? N							
Exempt from Rule 201? N		If Yes, Rule Number					
If Rule 201 Exempt, Is Throughput Be	elow Reporting Th	hresholds?					
Permit? Y		If Yes, Enter the Permit I	Number	MI-ROP-B4243-2009			
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y							
		CONTROL DEVICE	E(S)				
21. Control Device Code D	OUST SUP		_				
	F	MISSION UNIT STA					



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

Form Type Emission Unit AQD Source ID (SRN) B4243 EMISSION UNIT IDENTIFICATION AQD Emission Unit ID EU0014 EU ID EURICE-Crusher NAICS Code (if different from Source Form) 327992 Dismantle Date MM/DD/YYYY 03/12/2019 Dismantle Date MM/DD/YYYY Emission Unit Description - (Include Process Equipment and Control Devices) RICE Engine for Portable Crusher Emission Unit Type Reciprocating IC Engine Is this a combustion source? Y Is this combustion source used to generate electricity? N Design Capacity Joseph Capacity Numerator HP Design Capacity 300 Design Capacity Numerator Megawatts RULE 201 APPLICABILITY Grandfathered? N Megawatts Rice To Prove the exporting Thresholds? Y Y Permit? If Yes, Rule Number Rule 285(g) If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y CONTROL DEVICE(S)	FORM REFER	ENCE					
AQD Emission Unit ID EU0014 EU ID EURICE-Crusher NAICS Code (if different from Source Form) 327992 Installation Date MM/DD/YYYY 03/12/2019 Dismantle Date MM/DD/YYYY Emission Unit Description - (Include Process Equipment and Control Devices) RICE Engine for Portable Crusher Emission Unit Type Reciprocating IC Engine Is this a combustion source? Y Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity Numerator Maximum Nameplate Capacity Megawatts RULE 201 APPLICABILITY If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	Form Type	Emissio	n Unit	AQD Sourc	e ID (SRN)	B4243	
AQD Emission Unit ID EU0014 EU ID EURICE-Crusher NAICS Code (if different from Source Form) 327992 Installation Date MM/DD/YYYY 03/12/2019 Dismantle Date MM/DD/YYYY Emission Unit Description - (Include Process Equipment and Control Devices) RICE Engine for Portable Crusher Emission Unit Type Reciprocating IC Engine Is this a combustion source? Y Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity Numerator Maximum Nameplate Capacity Megawatts RULE 201 APPLICABILITY If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y							
NAICS Code (if different from Source Form) 327992 Installation Date MM/DD/YYYY 03/12/2019 Dismantle Date MM/DD/YYYY Emission Unit Description - (Include Process Equipment and Control Devices) RICE Engine for Portable Crusher Emission Unit Type Reciprocating IC Engine Is this a combustion source? Y Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity Numerator HP Design Capacity Megawatts RULE 201 APPLICABILITY Megawatts Grandfathered? N Exempt from Rule 201? Y If Yes, Rule Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	EMISSION UNIT	IDENTIFICA	TION				
Installation Date MM/DD/YYYY 03/12/2019 Dismantle Date MM/DD/YYYY Emission Unit Description - (Include Process Equipment and Control Devices) RICE Engine for Portable Crusher Emission Unit Type Reciprocating IC Engine Is this a combustion source? Y Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity Numerator HP Design Capacity Denominator Maximum Nameplate Capacity Megawatts Megawatts RULE 201 APPLICABILITY If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	AQD Emission	Jnit ID	EU0014	EU ID		EURICE-	Crusher
Emission Unit Description - (Include Process Equipment and Control Devices) RICE Engine for Portable Crusher Emission Unit Type Reciprocating IC Engine Is this a combustion source? Y Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity Numerator HP Design Capacity Denominator Maximum Nameplate Capacity Megawatts Megawatts RULE 201 APPLICABILITY Megawatts Grandfathered? N If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Y Permit? N If Yes, Enter the Permit Number If See, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	NAICS Code (if	different from	Source Form)	327992			
Control Devices) Reciprocating IC Engine Emission Unit Type Reciprocating IC Engine Is this a combustion source? Y Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity Numerator HP Design Capacity Denominator Maximum Nameplate Capacity Megawatts Megawatts RULE 201 APPLICABILITY Megawatts Megawatts Grandfathered? N If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y CONTROL DEVICE(S)	Installation Date	9 MM/DD/YYY	Υ 03/1	2/2019	Dismantle D	Date MM/DD/Y	ΫΥΥ
Is this a combustion source? Is this a combustion source used to generate electricity? Y Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity N Maximum Nameplate Capacity Megawatts RULE 201 APPLICABILITY Grandfathered? N Exempt from Rule 201? Y If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	Emission Unit D Control Devices)	escription - (I	nclude Process Equip	oment and	RICE Engir	ne for Portal	ble Crusher
Is this combustion source used to generate electricity? N Design Capacity 300 Design Capacity Numerator HP Design Capacity Denominator Maximum Nameplate Capacity Megawatts RULE 201 APPLICABILITY Grandfathered? N Exempt from Rule 201? Y If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Trresholds? Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y CONTROL DEVICE(S)	Emission Unit T	уре			Reciprocat	ing IC Engir	ne
Design Capacity 300 Design Capacity Numerator HP Design Capacity Denominator Maximum Nameplate Capacity Megawatts RULE 201 APPLICABILITY Grandfathered? N Exempt from Rule 201? Y If Yes, Rule Number Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	Is this a combus	stion source?			Y		
Maximum Nameplate Capacity Megawatts RULE 201 APPLICABILITY Grandfathered? N Exempt from Rule 201? Y If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	Is this combusti	on source use	ed to generate electric	city?	Ν		
RULE 201 APPLICABILITY Grandfathered? N Exempt from Rule 201? Y If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	Design Capacity	Design Capacity 300 Design Capacity Numerator HP Design Capacity Denominator					
Grandfathered? N Exempt from Rule 201? Y If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y CONTROL DEVICE(S)	Maximum Name	eplate Capacit	ty				Megawatts
Exempt from Rule 201? Y If Yes, Rule Number Rule 285(g) If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y CONTROL DEVICE(S)	RULE 201 AP	PLICABIL	ITY				
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds? Y Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y CONTROL DEVICE(S)	Grandfathered?		Ν				
Permit? N If Yes, Enter the Permit Number Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y	Exempt from Ru	ıle 201?	Y	If Yes, Rul	e Number	Rule 285	(g)
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year? Y CONTROL DEVICE(S)	If Rule 201 Exe	mpt, Is Throu	ghput Below Reportin	g Thresholds?		Y	
CONTROL DEVICE(S)	Permit?	Ν		If Yes, Ent	er the Permit N	umber	
	Is This Emissior	n Unit Require	d To Report Emissio	ns To MAERS F	or This Reporti	ng Year?	Y
				CONTR	OL DEVICE	(S)	



Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

FORM REFERENCE							
Form Type Emission U	nit	AQD Source ID (SRN)	B4243				
EMISSION UNIT IDENTIFICATIO	N						
AQD Emission Unit ID E	U0015	EU ID	EUPAVED	ROADS			
NAICS Code (if different from So	urce Form)						
Installation Date MM/DD/YYYY	01/01/1	971 Dismant	e Date MM/DD/YY	ΥY			
Emission Unit Description - (Inclu Control Devices)	ide Process Equipme	ent and Paved ro	oadways				
Emission Unit Type		Other fu	gitive				
Is this a combustion source?		Ν					
Is this combustion source used to	o generate electricity	?					
Design Capacity	Capacity Numerator		Design Capacity Denominator				
Maximum Nameplate Capacity Megawatts							
RULE 201 APPLICABILITY	,						
Grandfathered?							
Exempt from Rule 201?		If Yes, Rule Number					
If Rule 201 Exempt, Is Throughpoint	ut Below Reporting T	hresholds?					
Permit? Y		If Yes, Enter the Perm	t Number	MI-ROP-B4243-2016			
Is This Emission Unit Required T	o Report Emissions	To MAERS For This Rep	orting Year?	Y			
		CONTROL DEVIC	E(S)				
21. Control Device Code	DUST SUP						
		EMISSION UNIT ST					
	•						



Michigan Air Emissions Reporting System (MAERS)

2019 Reporting Group Form

Authorized under 1994 P.A. 451, as amended. Completion of this form is optional.

FORM REFERENCE								
Form Type Reporting Group		AQD So	ource ID (SRN)	B4243				
REPORTING	GROUP IDENTIFI	CATION						
AQD Reporting Group ID		RG0002	0002 Reporting		RGRULE290			
Reporting Grou	p Description	New ar	nd existing emis	ssion units tha	t meet R336.1290 exempt criteria.			
REPORTING	GROUP EMISSIO	N UNITS						
7. Emission Unit ID EUDROPBALLCRA			E					
7. Emission Uni	t ID	EUPROCESS#2						


Michigan Air Emissions Reporting System (MAERS)

2019 Reporting Group Form

Authorized under 1994 P.A. 451, as amended. Completion of this form is optional.

FORM REFER	ENCE			
Form Type	Reporting Group	AQD Source	ce ID (SRN) B4243	
REPORTING G	ROUP IDENTIFICAT	ION		
AQD Reporting	Group ID	RG0004	Reporting Group ID	RGFACILITY
Reporting Group	Description	Facility er	nissions for roadways, bulk	loading, slag pit and stockpiles.
REPORTING G	ROUP EMISSION UI	WIS .		
7. Emission Unit	ID EL	IBULKLOADING		
7. Emission Unit	ID EL	IBOFSLAGPIT		
7. Emission Unit	ID EL	ISTOCKPILES		
7. Emission Unit	ID EL	IUNPAVEDROADS		



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type Activity	AQD Sour	ce ID (SRN)	B4243	EU ID		EULEVYPLANT6
ACTIVITY INFORMATION	1					
Source Classification Cod	le(SCC)	30502503				
SCC Comment						
SEASONAL MATERIAL USA	GE SCHEDU	LE, IF THROUGHPUT I	S > 0, THEN SE	ASONAL PER	CENTA	GES MUST TOTAL 100%
Winter (Jan,Feb, Dec)	Spring (Ma	ar-May)	Summer (Jun-	-Aug)		Fall (Sep-Nov)
18	29		20			33
OPERATING SCHEDULE						
Hours per Day		Days per Week			Days p	er Year
8		5	220			
MATERIAL INFORMATION		·				
Material Code		Material Throughput	Unit Co			ode
SAND & GRAVL		450704			TON	
Material Description		STEEL FURNACE	SLAG			
VOC Content (coatings or so	olvent)	% by Weight		Density		
BTUs (fuel)						
Sulfur Content (fuel)	% by Wei	ght	Ash Content (1	fuel)	% by V	Veight

ATTACHMENT:

Document Name:

EULEVYPLANT6 EF Justification

File Name: 2019 EF - EULEVYPLANT6.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFER	ENCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EULEVYPLANT6

ACTIVITY INFORMATIC	DN						
Source Classification Code(SCC) 30502511							
SCC Comment Screening							
SEASONAL MATERIAL U	SAGE SCHED	ULE, IF THROUGHPUT	IS > 0, THEN SE	ASONAL P	ERCENTA	GES MUST TOTAL 100%	
Winter (Jan,Feb, Dec)	Ninter (Jan,Feb, Dec) Spring (Mar-May)		Summer (Jun-	Aug)		Fall (Sep-Nov)	
18	29		20			33	
OPERATING SCHEDULE							
Hours per Day Days per Week		Days per Week			Days per Year		
8		5	220		220	0	
MATERIAL INFORMATION	I						
Material Code		Material Throughput	t		Unit Co	ode	
SAND & GRAVL		450704			ΤΟΝ		
Material Description		STEEL FURNACE	SLAG				
VOC Content (coatings or	solvent)	% by Weight		Density			
BTUs (fuel)							
Sulfur Content (fuel)	% by We	eight	Ash Content (f	fuel)	% by \	Weight	

ATTACHMENT:

Document Name: EULEVYPLANT6 EF Justification

File Name: 2019 EF - EULEVYPLANT6.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	ENCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EULEVYPLANT6

ACTIVITY INFORMATIC							
Source Classification Code(SCC)		30502510					
SCC Comment CRUSHING		CRUSHING					
SEASONAL MATERIAL U	SAGE SCHED	ULE, IF THROUGHPU	T IS > 0, THEN SE	ASONAL	PERCENTA	GES MUST TOTAL 100%	
Winter (Jan, Feb, Dec)	Spring (Mar-May)		Summer (Jun-	-Aug)		Fall (Sep-Nov)	
18 29		20			33		
OPERATING SCHEDULE							
Hours per Day Days per W		Days per Week	Week		Days p	per Year	
8	8 5		220		220	220	
MATERIAL INFORMATION	1						
Material Code		Material Throughp	out		Unit C	ode	
SAND & GRAVL		450704			TON		
Material Description		STEEL FURNAC	E SLAG				
VOC Content (coatings or solvent) % by Weight			Density	/			
BTUs (fuel)							
Sulfur Content (fuel)	% by W	eiaht	Ash Content (fuel)	% by	Weight	

ATTACHMENT:

Document Name: EULEVYPLANT6 EF Justification

File Name: 2019 EF - EULEVYPLANT6.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFER	ENCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EUCONVEYORSYSTEM

ACTIVITY INFORMATIC	DN							
Source Classification Code(SCC)		30502503	30502503					
SCC Comment Conveyor System		l						
SEASONAL MATERIAL US	SAGE SCHED	ULE, IF THROUGHPUT	IS > 0, THEN SE		ERCENTAGES MUST TOTAL 100%			
Winter (Jan,Feb, Dec) Spring (Mar-May)		/lar-May)	Summer (Jun-	-Aug)	Fall (Sep-Nov)			
18	29		20		33			
OPERATING SCHEDULE					•			
Hours per Day	Days per Week				Days per Year			
8		5			220			
MATERIAL INFORMATION	1	I			•			
Material Code		Material Throughpu	t		Unit Code			
SAND & GRAVL		233038			TON			
Material Description		STEEL FURNACE	SLAG					
VOC Content (coatings or	solvent)	% by Weight		Density				
BTUs (fuel)								
Sulfur Content (fuel)	% by We	eight	Ash Content (fuel) % by		% by Weight			

ATTACHMENT:

Document Name:

EUCONVEYORSYS EF Justification File Name: 2019 EF - EUCONVEYORSYS.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFER	ENCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EUDEISTERSCREEN

ACTIVITY INFORMATIC	ON						
Source Classification C	ode(SCC)	30502511					
SCC Comment Screen							
SEASONAL MATERIAL U	SAGE SCHED	ULE, IF THROUGHPU	T IS > 0, THEN SE	ASONAL	PERCENTA	GES MUST TOTAL 100%	
Winter (Jan,Feb, Dec)	(Jan,Feb, Dec) Spring (Mar-May)		Summer (Jun-	Aug)		Fall (Sep-Nov)	
18	29	20				33	
OPERATING SCHEDULE							
Hours per Day Days per Week		Days per Week			Days I	per Year	
8		5					
MATERIAL INFORMATIO	N						
Material Code		Material Throughp	ut		Unit C	ode	
SAND & GRAVL		233038			ΤΟΝ		
Material Description		STEEL FURNAC	E SLAG		ł		
VOC Content (coatings or	solvent)	% by Weight		Density	,		
BTUs (fuel)							
Sulfur Content (fuel)	% by We	eight	Ash Content (fuel)		% by `	% by Weight	

ATTACHMENT:

Document Name:

EUDEISTERSCREEN EF Justification File Name: 2019 EF - EUDEISTERSCREEN.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFER	ENCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EUDEISTERSCREEN

ACTIVITY INFORMATIC	DN						
Source Classification C	ode(SCC)	30502503					
SCC Comment Conveying							
SEASONAL MATERIAL U	SAGE SCHEDU	ILE, IF THROUGHPUT	IS > 0, THEN SE	ASONAL P	ERCENTA	GES MUST TOTAL 100%	
Winter (Jan,Feb, Dec)	Spring (M	ar-May)	Summer (Jun-	Aug)		Fall (Sep-Nov)	
18	29		20			33	
OPERATING SCHEDULE							
Hours per Day Days per Week		Days per Week			Days per Year		
8		5	220		220	20	
MATERIAL INFORMATION	1						
Material Code		Material Throughpu	t		Unit Co	ode	
SAND & GRAVL		233038			ΤΟΝ		
Material Description		STEEL FURNACE	SLAG		•		
VOC Content (coatings or	solvent)	% by Weight		Density			
BTUs (fuel)				•			
Sulfur Content (fuel)	% by We	ight	Ash Content (fuel) % by		% by \	Weight	

ATTACHMENT:

Document Name:

EUDEISTERSCREEN EF Justification File Name: 2019 EF - EUDEISTERSCREEN.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

FORM REFER	ENCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EUCOLDCLEANERS

ACTIVITY INFORMATION						
Source Classification Code	e(SCC)	49099998				
SCC Comment		Parts Washing				
SEASONAL MATERIAL USAC	GE SCHEDUL	.E, IF THROUGHPUT I	S > 0, THEN SE	ASONAL PE	RCENTA	GES MUST TOTAL 100%
Winter (Jan, Feb, Dec)	Spring (Ma	r-May)	Summer (Jun-	Aug)		Fall (Sep-Nov)
25	25		25			25
OPERATING SCHEDULE						I
Hours per Day	Days per Week				Days p	er Year
8		5			220	
MATERIAL INFORMATION						
Material Code		Material Throughput			Unit Co	ode
SOLVENTS		140			GAL	
Material Description		TRIMETHYL BENZ	ENE			
VOC Content (coatings or solv	vent)	3 % by Weight		Density		1 LB/FT3
BTUs (fuel)						
Sulfur Content (fuel)	% by Weig	ght	Ash Content (f	ⁱ uel)	% by V	Veight



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE					
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	RGRULE290

ACTIVITY INFORMATIO	N					
Source Classification Co	ode(SCC)	30502503				
SCC Comment		EUPROCESS#2				
SEASONAL MATERIAL US	AGE SCHEDU	ILE, IF THROUGHPUT I	S > 0, THEN SE	ASONAL PE	RCENTA	GES MUST TOTAL 100%
Winter (Jan,Feb, Dec)	Spring (M	ar-May)	Summer (Jun-	Aug)		Fall (Sep-Nov)
18	29		20			33
OPERATING SCHEDULE						
Hours per Day Days per Wee		Days per Week	ek			er Year
8		5			220	
MATERIAL INFORMATION					-	
Material Code		Material Throughput			Unit Co	ode
SAND & GRAVL		6000			TON	
Material Description		STEEL FURNACE	SLAG		•	
VOC Content (coatings or	solvent)	% by Weight		Density		
BTUs (fuel)						
Sulfur Content (fuel)	% by We	ight	Ash Content (f	fuel)	% by V	Veight

ATTACHMENT:

Document Name: EUPROCESS#2 EF Justification

File Name: 2019 EF - EUPROCESSNo2.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	ENCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	RGRULE290

ACTIVITY INFORMATIC	N					
Source Classification C	ode(SCC)	39999999				
SCC Comment		DROPBALL CRAN	IE			
SEASONAL MATERIAL U	SAGE SCHEDU	ILE, IF THROUGHPUT	IS > 0, THEN SE		ERCENTAGES MUST TOTAL 10	0%
Winter (Jan,Feb, Dec)	Spring (N	ar-May)	Summer (Jun-	-Aug)	Fall (Sep-Nov)	
28	22		21		29	
OPERATING SCHEDULE						
Hours per Day	Days per Week				Days per Year	
8		5			220	
MATERIAL INFORMATIO	N				I	
Material Code		Material Throughput	t		Unit Code	
MATERIAL		77754			тол	
Material Description		Miscellaneous sci	rap and slag			
VOC Content (coatings or	solvent)	% by Weight		Density		
BTUs (fuel)				,		
Sulfur Content (fuel)	% by We	ight	Ash Content (fuel)	% by Weight	

ATTACHMENT:

Document Name:

EUDROPBALLCRANE Justification File Name: 2019 EF - EUDROPBALLCRANE.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	NCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	RGFACILITY

ACTIVITY INFORMATIC	DN					
Source Classification C	ode(SCC)	30502506				
SCC Comment		Truck loading and	Slag Pit			
SEASONAL MATERIAL US	SAGE SCHED	ULE, IF THROUGHPUT	S > 0, THEN SE	ASONAL F	PERCENTAGES MUST TOTAL 10)0%
Winter (Jan,Feb, Dec)	Spring (N	/ar-May)	Summer (Jun-	-Aug)	Fall (Sep-Nov)	
18	29		20		33	
OPERATING SCHEDULE			•			
Hours per Day	Days per We		Week		Days per Year	
8		5			220	
MATERIAL INFORMATION	1					
Material Code		Material Throughput			Unit Code	
SAND & GRAVL		456704			τον	
Material Description		STEEL FURNACE	SLAG			
VOC Content (coatings or	solvent)	% by Weight		Density		
BTUs (fuel)				•		
Sulfur Content (fuel)	% by W	eight	Ash Content (fuel)	% by Weight	

ATTACHMENT:

Document Name: Bulk Loading Justification

File Name: 2019 EF - Bulk Loading.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	NCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	RGFACILITY

ACTIVITY INFORMATIC	DN .					
Source Classification C	ode(SCC)	30502505				
SCC Comment		Slag Stockpiles				
SEASONAL MATERIAL U	SAGE SCHED	ULE, IF THROUGHPUT	IS > 0, THEN SE		PERCENTAGES MUST TOTAL 100%	
Winter (Jan,Feb, Dec)	Spring (N	/lar-May)	Summer (Jun-	-Aug)	Fall (Sep-Nov)	
18	29		20		33	
OPERATING SCHEDULE			1		•	
Hours per Day		Days per Week			Days per Year	
8		5			220	
MATERIAL INFORMATION	N	l				
Material Code		Material Throughpu	t		Unit Code	
SAND & GRAVL		495284			TON	
Material Description		STEEL FURNACE	SLAG		•	
VOC Content (coatings or	solvent)	% by Weight		Density		
BTUs (fuel)				•		
Sulfur Content (fuel)	% by W	eight	Ash Content (fuel)	% by Weight	

ATTACHMENT:

Document Name: Stockpile Justification

File Name: 2019 EF - Stockpiles.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	NCE				
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	RGFACILITY

ACTIVITY INFORMATIC	ON					
Source Classification C	ode(SCC)	30502504				
SCC Comment			WAYS			
SEASONAL MATERIAL U	SAGE SCHED	ULE, IF THROUGHPUT	IS > 0, THEN SE		ERCENTAGES MUST TOTAL 100%	
Winter (Jan,Feb, Dec)	Spring (I	Mar-May)	Summer (Jun-	-Aug)	Fall (Sep-Nov)	
18	29		20		33	
OPERATING SCHEDULE			•			
Hours per Day	Days per Week				Days per Year	
8		5			220	
MATERIAL INFORMATIO	N	I				
Material Code		Material Throughput	t		Unit Code	
DEVICE		1733			MILE	
Material Description		STEEL FURNACE	SLAG			
VOC Content (coatings or	solvent)	% by Weight		Density		
BTUs (fuel)				•		
Sulfur Content (fuel)	% by W	eight	Ash Content (fuel)	% by Weight	

ATTACHMENT:

Document Name: Unpaved Roads Justification

File Name: 2019 EF - Unpaved Roads.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE							
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EURICE-Crusher		

ACTIVITY INFORMATION	I						
Source Classification Cod	le(SCC)	20300401					
SCC Comment		RICE Engine for Po	ortable Crushe	er			
SEASONAL MATERIAL USA	GE SCHEDU	LE, IF THROUGHPUT I	S > 0, THEN SE	ASONAL PE		UST TOTAL 100%	
Winter (Jan,Feb, Dec)	Spring (Ma	ar-May)	Summer (Jun-	-Aug)	Fall (Sep-Nov)	
0	50		50		0		
OPERATING SCHEDULE							
Hours per Day		Days per Week		Days per Year			
8		5		20			
MATERIAL INFORMATION					1		
Material Code		Material Throughput			Unit Code		
DESCRIBE Material		700			EACH-YR		
Material Description		Gallons of diesel f	uel		•		
VOC Content (coatings or solvent)		% by Weight Der		Density			
BTUs (fuel)				•			
Sulfur Content (fuel)	% by Wei	ght	Ash Content (f	fuel)	% by Weight	t	

ATTACHMENT:

Document Name: RICE MACT EF Justification

File Name: 2019 EF - FGRICEMACT.pdf



Michigan Air Emissions Reporting System (MAERS)

2019 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type	Activity	AQD Source ID (SRN)	B4243	EU ID	EUPAVEDROADS	

ACTIVITY INFORMATION	1						
Source Classification Code(SCC)		30502504					
SCC Comment		HAULING ON PAVED ROADS					
SEASONAL MATERIAL USA	GE SCHEDU	_E, IF THROUGHPUT I	S > 0, THEN SE	ASONAL PE	RCENTA	GES MUST TOTAL 100%	
Winter (Jan,Feb, Dec)	Spring (Ma	ır-May)	Summer (Jun-	Aug)		Fall (Sep-Nov)	
18	29		20			33	
OPERATING SCHEDULE						•	
Hours per Day		Days per Week			Days per Year		
8		5			220		
MATERIAL INFORMATION							
Material Code		Material Throughput			Unit Code		
DEVICE		3513			MILE		
Material Description		STEEL FURNACE	SLAG				
VOC Content (coatings or solvent)		% by Weight Density		Density			
BTUs (fuel)				-			
Sulfur Content (fuel) % by Weight			Ash Content (fuel) % by Weigh		Veight		

ATTACHMENT:

Document Name: Paved Roads Justification

File Name: 2019 EF - Paved Roads.pdf



Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS) 2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (SRN) B4	243	EU ID	EULEVYPLANT6		
SCC	30502503		Material Code		SAND & GRAVL			

EMISSION INFORMATION							
Pollutant Code	PM10,FLTRBLE	Annual Emissions	105 LB				
Emission Basis	EPA EF	•					
List Emission Factor	4.60	Exponent	-5				
Emission Factor Unit Code	LB / TON	Control Efficiency	%				
Comment		•					



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (SRN) B42	43 EU ID	EULEVYPLANT6			
SCC	30502511		Material Code	SAND &	GRAVL			

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	317 LB	
Emission Basis	EPA EF	•		
List Emission Factor	7.40	Exponent	-4	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment		·		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (SRN) B42	43 EU ID	EULEVYPLANT6			
SCC	30502510		Material Code	SAND &	GRAVL			

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	152 LB	
Emission Basis	EPA EF	·		
List Emission Factor	5.40	Exponent	-4	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment		·		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (SRN) B424	3 EU ID	EUCONVEYORSYSTEM			
SCC	30502503		Material Code	SAND & GF	RAVL			

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	34 LB	
Emission Basis	EPA EF	•		
List Emission Factor	4.60	Exponent	-5	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment		•		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (S	GRN) B4243	EU ID	EUDEISTERSCREEN			
SCC	30502511		Material Code	SAND & GRA	VL			

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	49 LB	
Emission Basis	EPA EF	•		
List Emission Factor	7.40	Exponent	-4	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment				



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (S	SRN) B4243	EU ID	EUDEISTERSCREEN			
SCC	30502503		Material Code	SAND & GR	AVL			

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	172 LB	
Emission Basis	EPA EF			
List Emission Factor	4.60	Exponent	-5	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment		•		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (S	GRN) B4243	EU ID	EUCOLDCLEANERS			
SCC	49099998		Material Code	SOLVENTS				

EMISSION INFORMATION					
Pollutant Code	VOC		Annual Emissions	28 LB	
Emission Basis		MAERS EF			
List Emission Factor	7.36		Exponent	0	
Emission Factor Unit Code		LB / GAL-V%	Control Efficiency	%	
Comment					



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID (SRN) B4243	EU ID	RGRULE290		
SCC	30502503		Material Code	SAND & G	RAVL		

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	1 LB	
Emission Basis	EPA EF	•		
List Emission Factor	4.60	Exponent	-5	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment		·		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID (S	SRN) B4243	EU ID	RGRULE290		
SCC	39999999		Material Code	MATERIAL			

EMISSION INFORMATION			
Pollutant Code	PM10,FLTRBLE	Annual Emissions	7778
Emission Basis	Other		
List Emission Factor	1.00	Exponent	-1
Emission Factor Unit Code		Control Efficiency	%
Comment			



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID ((SRN)	B4243	EU ID	RGFACILITY	
SCC	30502506		Material C	ode	SAND & GR	AVL	

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	913 LB	
Emission Basis	EPA EF	•		
List Emission Factor	2.40	Exponent	-3	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment		•		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID (SRN) B4243	EU ID	RGFACILITY		
SCC	30502505		Material Code	SAND & G	RAVL		

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	991 LB	
Emission Basis	EPA EF			
List Emission Factor	2.00	Exponent	-4	
Emission Factor Unit Code	LB / TON	Control Efficiency	%	
Comment		·		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID (S	SRN) B4243	EU ID	RGFACILITY		
SCC	30502504		Material Code	DEVICE			

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	1006 LB	
Emission Basis	EPA EF	•		
List Emission Factor	2.90	Exponent	0	
Emission Factor Unit Code	LB / MILE	Control Efficiency	80 %	
Comment		÷		



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE								
Form Type	Emissions	AQD Source ID (SRN)	B4243	EU ID	EURICE-Crusher		
SCC	20300401		Material Code		DESCRIBE	Material		

EMISSION INFORMATION				
Pollutant Code	CO	Annual Emissions	242 LB	
Emission Basis	EPA EF			
List Emission Factor	3.50	Exponent	0	
Emission Factor Unit Code		Control Efficiency	%	
Comment				

EMISSION INFORMATION						
Pollutant Code	ΝΟΧ	Annual Emissions	276 LB			
Emission Basis	EPA EF					
List Emission Factor	4.00	Exponent	0			
Emission Factor Unit Code		Control Efficiency	%			
Comment						

EMISSION INFORMATION				
Pollutant Code	PM10,FLTRBLE	Annual Emissions	14 LB	
Emission Basis	EPA EF			
List Emission Factor	0.20	Exponent	0	
Emission Factor Unit Code		Control Efficiency	%	
Comment				

EMISSION INFORMATION						
Pollutant Code	SO2	Annual Emissions	1 LB			
Emission Basis	EPA EF					
List Emission Factor	0.01	Exponent	0			
Emission Factor Unit Code		Control Efficiency	%			
Comment						



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID (SRN) B	4243	EU ID	EURICE-Crusher	
SCC	20300401		Material Code		DESCRIBE	Material	

EMISSION INFORMATION				
Pollutant Code	VOC		Annual Emissions	90 LB
Emission Basis		EPA EF		
List Emission Factor	1.30		Exponent	0
Emission Factor Unit Code			Control Efficiency	%
Comment				



Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

FORM REFE	RENCE				
Form Type	Emissions	AQD Source ID (S	SRN) B4243	EU ID	EUPAVEDROADS
SCC	30502504		Material Code	DEVICE	

EMISSION INFORMATION						
Pollutant Code	PM10,FLTRBLE	Annual Emissions	694 LB			
Emission Basis	EPA EF	•				
List Emission Factor	1.23	Exponent	0			
Emission Factor Unit Code	LB / MILE	Control Efficiency	84 %			
Comment		·				



Preparer's Reporting Group or Emission Unit ID

Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Preparer Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	NCE		
Form Type	Preparer	AQD Source ID (SRN)	B4243

PREPARER'S INFORM	ATION				
Preparer's First Name, Mi	ddle Initial	Matthew		Preparer's Last Name	Perko
Preparer's Title	Environn	nental Engineer			
Mailing Address (Street A	ddress 1)		51445 W. Tw	elve Mile Road	
Mailing Address (Street A	ddress 2)				
City Wixo	m	State/Province	MI		
Country USA		Zip Code	48393		
E-Mail Address (if availab	le)	mperko@edwcle	vy.net		
Telephone Number	(313) 820	4057	Telephone Ex	tension	
Fax Number	0				
PREPARER'S ID (only	complete this	s area if you nave m	ore than one pi	reparer)	
Preparer's Reporting Grou	up or Emission l	Jnit ID EULE	VYPLANT6		
Preparer's Reporting Grou	up or Emission l	Jnit ID EUCO	NVEYORSYST	EM	
Preparer's Reporting Grou	up or Emission l	Jnit ID EUDE	ISTERSCREEN		
Preparer's Reporting Group or Emission Unit ID EUCOLDCLEANERS					
Preparer's Reporting Grou	up or Emission l	Jnit ID RGRU	LE290		

RGFACILITY



Michigan Air Emissions Reporting System (MAERS)

2019 Submittal Form

(Required Form)

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFER	RENCE						
Form Type	Submittal	AQD Source ID (SRN)	B4243			
SOURCE IDEN	ITIFICATION						
Source Name	EDW C LE	VY CO PLANT 6					
Mailing Address	s (Street Address 1)			13800 MELL	ON AVE		
Mailing Address	s (Street Address 2)						
County	WAYNE	City	DETROIT		Zip Code	48217-	
Submittal Metho	d Electronic	•			Amended Su	ıbmittal	
PRIMARY PREPARER'S AUTHORIZATION							
Based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate, and complete.							
Primary Prepare	er						

Telephone Number	Telephone Extension
E-Mail Address (if available)	
Signature	Date

Certification Receipt:

- Submission ID:
- Submission Received Date:
- Certifier's (Primary Preparer) full name:
- Certifier's Address:
- Email Address:
- Certification Statement:
- Security Question:
- Answer to the security question: Encrypted on file
- PIN used: Encrypted on file
- Submitter's IP address:

Attachment Details:

Document Name	File Name	File Size	Description
Bulk Loading Justification	2019 EF - Bulk Loading.pdf	174363	Bulk Loading Justification
EUCONVEYORSYS EF Justification	2019 EF - EUCONVEYORSYS.pdf	184509	EUCONVEYORSYS EF Justification
EUDEISTERSCREEN EF Justification	2019 EF - EUDEISTERSCREEN.pdf	155889	EUDEISTERSCREEN EF Justification
EUDEISTERSCREEN EF Justification	2019 EF - EUDEISTERSCREEN.pdf	155889	EUDEISTERSCREEN EF Justification
EUDROPBALLCRANE Justification	2019 EF - EUDROPBALLCRANE.pdf	145383	EUDROPBALLCRANE Justification
EULEVYPLANT6 EF Justification	2019 EF - EULEVYPLANT6.pdf	177606	EULEVYPLANT6 EF Justification
EULEVYPLANT6 EF Justification	2019 EF - EULEVYPLANT6.pdf	177606	EULEVYPLANT6 EF Justification
EULEVYPLANT6 EF Justification	2019 EF - EULEVYPLANT6.pdf	177606	EULEVYPLANT6 EF Justification
EUPROCESS#2 EF Justification	2019 EF - EUPROCESSNo2.pdf	147630	EUPROCESS#2 EF Justification
Paved Roads Justification	2019 EF - Paved Roads.pdf	128687	Paved Roads Justification
RICE MACT EF Justification	2019 EF - FGRICEMACT.pdf	100835	RICE MACT EF Justification
Stockpile Justification	2019 EF - Stockpiles.pdf	174900	Stockpile Justification
Unpaved Roads Justification	2019 EF - Unpaved Roads.pdf	129368	Unpaved Roads Justification

2019

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division 1. Michigan Air Emissions Reporting System (MAERS)

E-101 EMISSIONS

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE						
2. Form Type	3. AQD Source ID (SRN)			Reporting Group (R	G) ID	
E-101	B4243	EUSLAGS	TACKERG	ΞN		
5. Source Classification	n Code (SCC)	•	6. Material	Code		
20300101			Die	sel		
EMISSION INFO	RMATION		Chan	ae	Add	Delete
7A. Pollutant Code			7B. Annua			
CO			989.7		Pound	s
8. Emission Basis	CEM Stack Tes	t 🗖 PE		Mass Balance	Tank Model	Landfill Model
(Please check one)		mission Factor		Other (Attach Des	cription)	
9A. List Emission Factor	or 9B. Exponent 9C.	Emission Factor g/KW-hr	Unit Code		10. Control Efficiency	Weight Percent
		9/100-111				
EPA Emission Ea	actor for Tier 4 RICE; 75 k	w (100 hn) and	estimated	1 720 hours run i	n 2019	
		(100 hp) and	ootimatoa	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	2010	
EMISSION INFO	RMATION		Chan	0e	Add	Delete
7A. Pollutant Code			7B. Annua	ž	- //00	
			113.1		Downed	
NOX		_			Pound	
	CEM Stack Tes		M 🛛	Mass Balance	Tank Model	Landfill Model
(Please check one) 9A. List Emission Factor		mission Factor Emission Factor		Other (Attach Des	10. Control Efficiency	1
_0_4_		g/KW-hr				Weight Percent
11. Comment		0				
EPA Emission Fa	ctor for Tier 4 RICE; 75 k	w (100 hp) and	estimated 1	,720 hours run ir	n 2019	
EMISSION INFO	RMATION		Chan	ge	Add	Delete
7A. Pollutant Code			7B. Annua	Emissions		
PM 10 FLTRBLE	Ē		5.7		Pound	s
8. Emission Basis	CEM Stack Tes	t 🗖 PE	M	Mass Balance	Tank Model	Landfill Model
	-		X			
9A. List Emission Factor		mission Factor Emission Factor		Other (Attach Des	10. Control Efficiency	1
0.0 2		g/KW-hr				Weight Percent
11. Comment		0				
EPA Emission Fa	ctor for Tier 4 RICE; 75 kv	w (100 hp) and	estimated 1	,720 hours run ir	n 2019	
EMISSION INFO	RMATION		Chan	ge	Add	Delete
7A. Pollutant Code			7B. Annua	0		
SO2			2.1		Pound	S
8. Emission Basis	CEM Stack Tes	t 🗖 PE	м	Mass Balance	Tank Model	Landfill Model
(Please check one)	MAERS E	mission Factor	X	Other (Attach Des	cription)	
9A. List Emission Facto		Emission Factor	Unit Code	,	10. Control Efficiency	
<u>0.0 0 7</u>	_0	g/KW-hr				Weight Percent
11. Comment EPA Emission Fa	ctor for Tier 4 RICE; 75 kv	w (100 hp) and	estimated 1	720 hours run in	2019: Low Sulfur Diesel	
	$\frac{1}{10} + \frac{1}{10} $		Commated 1			EQP 5753 (Rev 10/



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2019

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division 1. Michigan Air Emissions Reporting System (MAERS)

E-101 EMISSIONS

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFEREN	VCE					
2. Form Type	3. AQD Source ID (SF	(N) 4. Emission U	nit (EU) OR Reporting Group ((RG) ID		
E-101	B4243	EUSLAGS	STACKERGEN			
5. Source Classification	Code (SCC)		6. Material Code			
20300101			Diesel			
EMISSION INFO	RMATION		Change	Add	Delete	
7A. Pollutant Code			7B. Annual Emissions			
VOC			53.7	Pound	IS	
8. Emission Basis	CEM Stack	< Test DE	Mass Balance	Tank Model	Landfill Model	
(Please check one)		RS Emission Factor	Other (Attach De	escription)		
9A. List Emission Facto		9C. Emission Factor		10. Control Efficiency	ý	
<u> 0.1 9 </u>	0	g/K\	W-hr	•••	Weight Percent	
11. Comment						
EPA Emission Factor for Tier 4 RICE; 75 kw (100 hp) and estimated 1,720 hours run in 2019						

2019

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division 1. Michigan Air Emissions Reporting System (MAERS)

E-101 EMISSIONS

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE					
2. Form Type	3. AQD Source ID (SRN)	4. Emission U	nit (EU) OR Report	ing Group (RG) ID	
E-101	B4243	EUFEEDE	RMAGSEPARA	FORGEN	
5. Source Classificatio	n Code (SCC)		6. Material Code		
20300101			Diesel		
EMISSION INFO	RMATION		Change	Add	Delete
7A. Pollutant Code CO			7B. Annual Emis 2120.7	sions	Pounds
8. Emission Basis	CEM Stack Tes		_	Balance Tank Mod	el 🔲 Landfill Model
(Please check one) 9A. List Emission Fact		mission Factor Emission Factor	Unit Code	r (Attach Description) 10. Control E	Efficiency
<u></u>	0 9B. Exponent 9C.	g/KW-hr	Unit Code		Weight Percent
11. Comment		g,			
EPA Emission E	actor for Tier 3 RICE; 112	kw (150 hp) ar	nd estimated 1.72	0 hours run in 2019	
	,	(
EMISSION INFC	RMATION				
			Change	Add	Delete
7A. Pollutant Code			7B. Annual Emis	SIONS	
NOX			1696.6		Pounds
8. Emission Basis	CEM Stack Tes		_	Balance Tank Mode	el 🔲 Landfill Model
(Please check one) 9A. List Emission Fact		mission Factor		r (Attach Description)	
	or 9B. Exponent 9C. 0	Emission Factor g/KW-hr	Unit Code	10. Control E	Weight Percent
11. Comment		9/1007111			
EPA Emission Fa	actor for Tier 3 RICE; 112	kw (150 hp) an	d estimated 1,72) hours run in 2019	
EMISSION INFO	RMATION		Change	Add	Delete
7A. Pollutant Code			7B. Annual Emis		
	_		127.2	310113	- .
PM 10 FLTRBL				_	Pounds
8. Emission Basis	CEM Stack Tes	it 🗖 PE	M 🗖 Mass	Balance 🔲 Tank Mod	el 🛛 🗖 Landfill Model
(Please check one)	MAERS E	mission Factor	X Othe	r (Attach Description)	
9A. List Emission Fact	or 9B. Exponent 9C.	Emission Factor		10. Control E	•
0.3	_0	g/KW-hr			Weight Percent
11. Comment					
EPA Emission Fa	actor for Tier 3 RICE; 112	kw (150 hp) an	d estimated 1,72) hours run in 2019	
EMISSION INFO	RMATION		Change	Add	Delete
7A. Pollutant Code			7B. Annual Emis		
SO2			3.1		Pounds
8. Emission Basis	CEM Stack Tes	t 🗖 PE		Balance Tank Mode	
(Please check one)		mission Factor	Othe	(Attach Description)	
9A. List Emission Fact		Emission Factor		10. Control E	Efficiency
	_0	g/KW-hr			Weight Percent
11. Comment		-			
EPA Emission Fa	actor for Tier 3 RICE; 112	kw (150 hp) an	d estimated 1,720) hours run in 2019; Low Sulf	
					EQP 5753 (Rev 10



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2019

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division 1. Michigan Air Emissions Reporting System (MAERS)

E-101 EMISSIONS

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE							
2. Form Type	3. AQD Source ID (SRN	3. AQD Source ID (SRN) 4. Emission Unit (EU) OR Reporting Group (RG) ID					
E-101	B4243	EUFEEDE	RMAGSEPARATORGEN				
5. Source Classification	Code (SCC)		6. Material Code				
20300101			Diesel				
EMISSION INFO	RMATION		Change	Add	Delete		
7A. Pollutant Code VOC			7B. Annual Emissions 637.2	Pound	ls		
8. Emission Basis	CEM Stack T	est 🛛 PE	M Mass Balance	Tank Model	Landfill Model		
(Please check one)		Emission Factor	Other (Attach De	scription)			
9A. List Emission Facto	or 9B. Exponent 90	C. Emission Factor	Unit Code	10. Control Efficiency	/		
<u> 1.5 </u>	0	g/KW-hr		•••	Weight Percent		
11. Comment							
EPA Emission Factor for Tier 3 RICE; 112 kw (150 hp) and estimated 1,720 hours run in 2019							

2019

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division 1. Michigan Air Emissions Reporting System (MAERS)

E-101 EMISSIONS

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFEREI	VCE					
2. Form Type E-101	3. AQD Source ID (SRN) B4243	4. Emission U EULIGHT		porting Group (RG)) ID	
5. Source Classification	Code (SCC)	1	6. Material C	ode		
20300101			Diese	el		
EMISSION INFO	RMATION		Chang	e	Add	Delete
7A. Pollutant Code CO			7B. Annual E 265.4	missions	Pounds	
8. Emission Basis	CEM Stack Tes		_	lass Balance	Tank Model	Landfill Model
(Please check one) 9A. List Emission Factor 3.5 11. Comment		mission Factor Emission Factor g/KW-hr	Unit Code	ther (Attach Descr	iption) 10. Control Efficiency	Weight Percent
	actor for Tier 4 RICE; 7 lig	ht units at 20 k	w (27 hp) eac	h and estimated	1,720 hours run in 2019	
EMISSION INFO	RMATION		Chang	е	Add	Delete
7A. Pollutant Code			7B. Annual E	missions		
NOX			30.3		Pounds	
8. Emission Basis	CEM Stack Tes			lass Balance	Tank Model	Landfill Model
(Please check one) 9A. List Emission Factor _0_4		mission Factor Emission Factor g/KW-hr	Unit Code	ther (Attach Descr	10. Control Efficiency	Weight Percent
	ctor for Tier 4 RICE; 7 ligh	it units at 20 kv	v (27 hp) each			
EMISSION INFO	RMATION		Change		Add	Delete
7A. Pollutant Code			7B. Annual E	missions		
PM 10 FLTRBLE			1.5		Pounds	
8. Emission Basis	CEM Stack Tes			lass Balance	Tank Model	Landfill Model
(Please check one) 9A. List Emission Factor		mission Factor Emission Factor	-	ther (Attach Descr	10. Control Efficiency	
0.02	_0	g/KW-hr				Weight Percent
11. Comment EPA Emission Factor for Tier 4 RICE; 7 light units at 20 kw (27 hp) each and estimated 1,720 hours run in 2019						
EMISSION INFO	RMATION		Chang	e	Add	Delete
7A. Pollutant Code SO2			7B. Annual E 0.6	missions	Pounds	
8. Emission Basis	CEM Stack Tes			lass Balance	Tank Model	Landfill Model
(Please check one) 9A. List Emission Factor 0-0 0 7		mission Factor Emission Factor g/KW-hr		other (Attach Descr	iption) 10. Control Efficiency	Weight Percent
11. Comment FPA Emission Fa	ctor for Tier 4 RICE; 7 ligh	nt units at 20 kg	N (27 hn) each	and estimated ?	1 720 hours run in 2010.	low sulfur diesel
					,, 20 Hours full in 2018,	EQP 5753 (Rev 10/1



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2019

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division 1. Michigan Air Emissions Reporting System (MAERS)

E-101 EMISSIONS

Authorized under 1994 PA 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE							
2. Form Type	3. AQD Source ID (S	3. AQD Source ID (SRN) 4. Emission Unit (EU) OR Reporting Group (RG) ID					
E-101	B4243	EULIGHT	GENS				
5. Source Classification	Code (SCC)		6. Material Code				
20300101			Diesel				
EMISSION INFO	RMATION		Change	Add	Delete		
7A. Pollutant Code			7B. Annual Emissions	5			
VOC			14.4	Pound	ds		
8. Emission Basis	CEM Stac	k Test 🛛 🗖 PE	M Mass Balance	Tank Model	Landfill Model		
(Please check one)		RS Emission Factor	Other (Attach D	Description)			
9A. List Emission Facto		9C. Emission Factor	Unit Code	10. Control Efficiency	у		
<u> 0.1 9 </u>	0	g/K	W-hr	•••	Weight Percent		
11. Comment							
EPA Emission Factor for Tier 4 RICE; 7 light units at 20 kw (27 hp) each and estimated 1,720 hours run in 2019							

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FORM REFEREI	VCE						
2. Form Type	3. AQD Source ID (SRN)	4. Emission Un	it (EU) OR Re	porting Group (RG	i) ID		
E-101	B4243 EUSLAGCONVEYGEN1						
5. Source Classification	5. Source Classification Code (SCC)						
20300101		Diese	el				
EMISSION INFO	RMATION		Chang	е	Add	Delete	
7A. Pollutant Code CO			7B. Annual E 732.4	missions	Pound	s	
8. Emission Basis	CEM Stack Tes	t DPEN	и 🗖 м	lass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor	🖾 c	ther (Attach Desc	ription)		
9A. List Emission Facto		Emission Factor L	Unit Code		10. Control Efficiency		
<u>3.5</u> 11. Comment	0	g/KW-hr			·•	Weight Percent	
		<i></i>					
EPA Emission Fa	actor for Tier 4 RICE; 55 k	w (74 hp) and e	stimated 1,7	20 hours run in 2	2019		
EMISSION INFO	RMATION		Chang	e	Add	Delete	
7A. Pollutant Code			7B. Annual E				
NOX			83.7		Pound	s	
	CEM Stack Tes	it 🗖 PEN		lass Balance	Tank Model	Landfill Model	
(Please check one)	MAERS E	mission Factor	🖾 c	ther (Attach Desc	ription)		
9A. List Emission Factor		Emission Factor U g/KW-hr	Unit Code	, , , , , , , , , , , , , , , , , , ,	10. Control Efficiency	Weight Percent	
11. Comment	i	•			·		
EPA Emission Fa	ctor for Tier 4 RICE; 55 k	w (74 hp) and es	stimated 1,72	20 hours run in 2	019		
EMISSION INFO	RMATION		Chara				
			Chang		Add	Delete	
7A. Pollutant Code			7B. Annual E	missions			
PM 10 FLTRBLE			4.2		Pound	S	
8. Emission Basis	CEM Stack Tes		_	lass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor		other (Attach Desc	ription)		
9A. List Emission Factor		Emission Factor l g/KW-hr	Unit Code		10. Control Efficiency	Weight Percent	
		g/RVV-III					
	ctor for Tier 4 RICE; 55 k	w (74 hp) and es	stimated 1 72	0 hours run in 2	019		
u							
EMISSION INFO	RMATION		Chang	е	Add	Delete	
7A. Pollutant Code			7B. Annual E				
SO2			1.5		Pound	S	
8. Emission Basis	CEM Stack Tes	it 🗖 PEN	и 🗖 м	lass Balance	Tank Model	Landfill Model	
(Please check one)	MAERS E	mission Factor	Xc	ther (Attach Desc			
9A. List Emission Facto	or 9B. Exponent 9C.	Emission Factor l	Unit Code		10. Control Efficiency		
	_0	g/KW-hr				Weight Percent	
11. Comment	otor for Tion 4 DIOC. EC 1	w (71 hn) and	stimated 4 70		010. Low Sulfur Disse		
EFA EMISSION FA	ctor for Tier 4 RICE; 55 k	w (74 np) and es			UTS, LOW SUIIUI DIESEI		
						EQP 5753 (Rev 10/	



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FORM REFEREN	VCE						
2. Form Type	3. AQD Source ID (SRN) 4. Emission Unit (EU) OR Reporting Group (RG) ID						
E-101	B4243	EUSLAGC	SON)	VEYGEN1			
5. Source Classification	Code (SCC)	I	6.	Material Code			
20300101				Diesel			
EMISSION INFORMATION Change Add Delete						Delete	
7A. Pollutant Code			7B.		Pound	de	
VOC				39.8		13	
8. Emission Basis	CEM Stack	k Test 🔲 PE	M	Mass Balance	Tank Model	Landfill Model	
(Please check one)		RS Emission Factor		Other (Attach De	scription)		
9A. List Emission Facto		9C. Emission Factor	Unit	Code	10. Control Efficiency	у	
<u> 0. 1 9 </u>	0	g/K\	W-hr		· · · · · · · · · · · · · · · · · · ·	Weight Percent	
11. Comment							
EPA Emission Fa	ctor for Tier 4 RICE;	55 kw (74 hp) and e	estim	nated 1,720 hours run ir	n 2019		

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FORM REFERENCE							
2. Form Type E-101	3. AQD Source ID (SRN) B4243		nit (EU) OR R CREENGEI	eporting Group (R	(G) ID		
	5. Source Classification Code (SCC)						
20300101	6. Material Dies						
20300101			Die	Sei			
EMISSION INFO	RMATION		Chan	ge	Add	Delete	
7A. Pollutant Code CO			7B. Annual 1098.5		Pound	s	
8. Emission Basis	CEM Stack Tes	st 🔲 PE		Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor		Other (Attach Des			
9A. List Emission Facto	or 9B. Exponent 9C.	Emission Factor g/KW-hr	Unit Code		10. Control Efficiency		
<u>3.5</u> 11. Comment		g/Kvv-III			••••••	Weight Percent	
	actor for Tier 4 RICE; 83 I	(w (111 hn) and	l estimated 1	720 bours run i	in 2019		
ET A ETTISSION T		(TTTTP) and	estimated	1,720 110013 1011	112013		
EMISSION INFO	RMATION		Chan	ae	Add	Delete	
7A. Pollutant Code			7B. Annual	0			
NOX			125.5	i	Pound	s	
	CEM Stack Tes	st 🗖 PE	м	Mass Balance	Tank Model	Landfill Model	
(Please check one)		Emission Factor	X	Other (Attach Des	scription)		
9A. List Emission Facto		Emission Factor	Unit Code		10. Control Efficiency		
0_•_4 11. Comment	_0	g/KW-hr				Weight Percent	
	ctor for Tier 4 RICE; 83 k	w (111 hp) and	estimated 1	,720 hours run i	n 2019		
	DMATION		_		_		
EMISSION INFO	RIVIATION		Chan	0	Add	Delete	
7A. Pollutant Code			7B. Annual	Emissions			
PM 10 FLTRBLE			6.3		Pound	S	
8. Emission Basis	CEM Stack Tes		_	Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor		Other (Attach Des			
9A. List Emission Facto 0 . 0 2	or 9B. Exponent 9C.	Emission Factor g/KW-hr	Unit Code		10. Control Efficiency	/ Weight Percent	
		9/RVV-III					
	ctor for Tier 4 RICE; 83 k	w (111 hp) and	estimated 1	,720 hours run i	n 2019		
	•	,					
EMISSION INFO	RMATION		Chan		Add	Delete	
7A. Pollutant Code			7B. Annual	Emissions			
SO2			2.3		Pound	s	
8. Emission Basis	CEM Stack Tes	st 🗖 PE		Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor		Other (Attach Des			
9A. List Emission Facto		Emission Factor	Unit Code		10. Control Efficiency		
0007 11. Comment		g/KW-hr			••••••••	Weight Percent	
	ctor for Tier 4 RICE: 83 k	w (111 hp) and	estimated 1	,720 hours run ii	n 2019; Low Sulfur Diesel		
		\		,	,	EQP 5753 (Rev 10/1	



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FORM REFEREN	ICE						
2. Form Type	3. AQD Source ID (SI	3. AQD Source ID (SRN) 4. Emission Unit (EU) OR Reporting Group (RG) ID					
E-101	B4243	EUSLAGS	CREENGEN				
5. Source Classification	Code (SCC)		6. Material Code				
20300101			Diesel				
EMISSION INFO	RMATION		Change	Add	Delete		
7A. Pollutant Code VOC			7B. Annual Emissions 59.6	Pour	nds		
8. Emission Basis	8. Emission Basis CEM Stack Test PEM Mass Balance Tank Model Landfill Model						
(Please check one)		RS Emission Factor	Other (Attach De	escription)			
9A. List Emission Facto	9A. List Emission Factor 9B. Exponent 9C. Emission Factor			10. Control Efficience	су		
<u> 0.1 9 </u>		g/K\	W-hr	•••••••	Weight Percent		
11. Comment							
EPA Emission Fa	ctor for Tier 4 RICE;	83 kw (111 hp) and	l estimated 1,720 hours run	in 2019			

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FORM REFEREI	NCE						
2. Form Type	3. AQD Source ID (SRN)	4. Emission Ur	nit (EU) OR R	eporting Group (R	G) ID		
E-101	B4243 EUFEEDERSTACKERGEN						
5. Source Classification	5. Source Classification Code (SCC)						
20300101	Dies	sel					
EMISSION INFO	RMATION		Chang	ge	Add	Delete	
7A. Pollutant Code CO			7B. Annual 989.7	Emissions	Pounds		
8. Emission Basis	CEM Stack Tes	st 🗖 PEI	M	Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor	L L	Other (Attach Des	cription)		
9A. List Emission Facto	or 9B. Exponent 9C.	Emission Factor	Unit Code		10. Control Efficiency		
<u>3.5</u> 11. Comment		g/KW-hr			•••	Weight Percent	
	eter for Tion 4 DIOE, 75 L		a attima a ta al d	700 hours mus	- 0040		
EPA Emission Fa	ictor for Tier 4 RICE; 75 k	w (100 np) and	estimated 1	,720 nours run I	n 2019		
EMISSION INFO	RMATION		Chang	ge	Add	Delete	
7A. Pollutant Code			7B. Annual				
NOX			113.1		Pound	ls.	
	CEM Stack Tes	st 🗖 PEI		Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor	_	Other (Attach Des			
9A. List Emission Facto		Emission Factor	Unit Code	Other (Attach Desi	10. Control Efficiency	/	
0.4	0	g/KW-hr				Weight Percent	
11. Comment							
EPA Emission Fa	ctor for Tier 4 RICE; 75 k	w (100 hp) and	estimated 1	,720 hours run ir	n 2019		
EMISSION INFO			-		-	-	
	RIMATION		Chang		Add	Delete	
7A. Pollutant Code			7B. Annual	Emissions			
PM 10 FLTRBLE			5.7		Pound	IS	
8. Emission Basis	CEM Stack Tes	st 🗖 PEI	м	Mass Balance	Tank Model	Landfill Model	
(Please check one)	MAERS E	mission Factor	X	Other (Attach Des	cription)		
9A. List Emission Factor		Emission Factor	Unit Code		10. Control Efficiency		
<u>0.0</u> 2	_0	g/KW-hr			•••	Weight Percent	
11. Comment	ator for Tion 4 DIOE, 75 k	(100 hr) and	a ation at a d d	700 having mus in	2010		
EPA Emission Fa	ctor for Tier 4 RICE; 75 k	w (100 np) and	estimated 1,	720 nours run ir	12019		
EMISSION INFO	RMATION		Chan	20	Add	Delete	
7A. Pollutant Code			7B. Annual	5	🖬 Auu		
SO2			7Б. Аппиал 2.1	L1119910119	Pound	ls.	
8. Emission Basis	CEM Stack Tes	st 🗖 PEI	_	Mass Balance	Tank Model	Landfill Model	
(Please check one)	MAFRS F	mission Factor	X	Other (Attach Des	cription)		
9A. List Emission Facto		Emission Factor			10. Control Efficiency	!	
	_0	g/KW-hr				Weight Percent	
11. Comment							
EPA Emission Fa	ctor for Tier 4 RICE; 75 k	w (100 hp) and	estimated 1,	720 hours run ir	n 2019; Low Sulfur Diesel		
						EQP 5753 (Rev 10/	



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FORM REFEREN	VCE						
2. Form Type	3. AQD Source ID (SRN) 4. Emission Unit (EU) OR Reporting Group (RG) ID						
E-101	B4243	EUFEEDE	ERSTACKERGEN	N			
5. Source Classification	Code (SCC)		6. Material Code				
20300101			Diesel				
EMISSION INFO	EMISSION INFORMATION Change Add Delete						
7A. Pollutant Code			7B. Annual Emis	sions	Durate		
VOC			53.7		Pounds		
8. Emission Basis	CEM Stack	Test 🔲 PE	M Mass	Balance 🔲 Tank M	odel 🔲 Landfill Model		
(Please check one)	MAEF	RS Emission Factor	🔽 Othe	r (Attach Description)			
9A. List Emission Facto		9C. Emission Factor		10. Contro	ol Efficiency		
<u>0.1 9</u>	0	g/K\	W-hr		Weight Percent		
11. Comment							
EPA Emission Fa	actor for Tier 4 RICE; 7	75 kw (100 hp) and	sestimated 1,720	hours run in 2019			

2019

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division 1. Michigan Air Emissions Reporting System (MAERS)

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E-101 EMISSIONS

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FORM REFEREN	ICE						
2. Form Type	3. AQD Source ID (SRN)			Reporting Group (F	RG) ID		
E-101	B4243 EUSLAGCONVEYGEN2						
5. Source Classification	5. Source Classification Code (SCC)						
20300101			Die	sel			
EMISSION INFO	RMATION		Char	ge	Add	Delete	
7A. Pollutant Code			7B. Annua				
CO			732.4		Pounds	6	
8. Emission Basis	CEM Stack Tes		_	Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor		Other (Attach De	scription)		
9A. List Emission Facto	r 9B. Exponent 9C.	Emission Factor g/KW-hr	Unit Code		10. Control Efficiency	Weight Percent	
11. Comment		9/10/11			· · · ·		
FPA Emission Fa	ctor for Tier 4 RICE; 55 k	w (74 hp) and (estimated 1	720 hours run i	n 2019		
				72011001010101	12010		
EMISSION INFO	RMATION		Char	ae	Add	Delete	
7A. Pollutant Code			7B. Annua	-			
NOX			83.7		Pounds		
		-	·				
8. Emission Basis	CEM Stack Tes		_	Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor		Other (Attach De			
9A. List Emission Facto 0 . 4	r 9B. Exponent 9C. 0	Emission Factor g/KW-hr	Unit Code		10. Control Efficiency	Weight Percent	
<u>4</u> 11. Comment		g/Rvv-III					
	ctor for Tier 4 RICE; 55 k	w (74 hp) and e	estimated 1.	720 hours run ir	n 2019		
			, , , , , , , , , , , , , , , , , , ,		0.0		
EMISSION INFO	RMATION		Char	ne	Add	Delete	
7A. Pollutant Code			7B. Annua	0			
			4.2		Dound		
PM 10 FLTRBLE		-			Pounds		
8. Emission Basis	CEM Stack Tes	t 🗖 PE	M	Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor	X	Other (Attach De			
9A. List Emission Facto		Emission Factor	Unit Code		10. Control Efficiency		
<u>0.0</u> 2 11. Comment		g/KW-hr				Weight Percent	
	ctor for Tier 4 RICE; 55 k	w (74 hp) and e	estimated 1	720 hours run ir	0 2019		
			Sumated 1,	2011001310111	12013		
EMISSION INFO	RMATION		Cher	20		Dolota	
7A. Pollutant Code			7B. Annua	0	Add	Delete	
SO2			7B. Annua 1.5				
		_			Pounds	-	
8. Emission Basis	CEM Stack Tes	t 🗖 PE		Mass Balance	Tank Model	Landfill Model	
(Please check one)		mission Factor	X	Other (Attach De			
9A. List Emission Facto		Emission Factor	Unit Code		10. Control Efficiency		
<u>0.0</u> 70 11. Comment		g/KW-hr				Weight Percent	
	ctor for Tier 4 RICE; 55 kv	v (74 hp) and e	estimated 1.	720 hours run in	2019; Low Sulfur Diesel		
	,,				-,	EQP 5753 (Rev 10/1	



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FORM REFEREN	VCE						
2. Form Type	3. AQD Source ID (SRN) 4. Emission Unit (EU) OR Reporting Group (RG) ID						
E-101	B4243	EUSLAGC	SON)	VEYGEN2			
5. Source Classification	Code (SCC)		6.	Material Code			
20300101				Diesel			
EMISSION INFORMATION Change Add Delete						Delete	
7A. Pollutant Code			7B.		Pound	de	
VOC				39.8		13	
8. Emission Basis	CEM Stack	k Test 🔲 PE	M	Mass Balance	Tank Model	Landfill Model	
(Please check one)		RS Emission Factor		Other (Attach De	scription)		
9A. List Emission Facto	Emission Factor 9B. Exponent 9C. Emission Factor Unit Co				10. Control Efficiency	у	
<u> 0. 1 9 </u>	0	g/K\	W-hr	•	· · · · · · · · · · · · · · · · · · ·	Weight Percent	
11. Comment							
EPA Emission Fa	ctor for Tier 4 RICE;	55 kw (74 hp) and e	estim	nated 1,720 hours run ir	n 2019		