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**From:** Herner, Holly <Holly.Herner@arcadis.com>  
**Sent:** Tuesday, May 12, 2020 1:16 PM  
**To:** Koster, Katherine (EGLE); EGLE-ROP  
**Cc:** Green, Tom; Perko, Matt  
**Subject:** B4364 - ROP Application Renewal

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Subject: Edw. C. Levy Co. Plant 3 Renewable Operating Permit SRN4364 MI-ROP-B4364-2015

Dear Ms. McLemore:

Enclosed is an application for renewal of ROP No. MI-ROP-B4364-2015 for Edw. C. Levy Co. (Levy) Plant 3 located at 100 East Westfield Street, Ecorse, MI 48229. Included is a cover letter, the marked up version of the current ROP, the applications forms, and supplemental information including the Fugitive Dust Plan and MAERs information. In addition to this electronic submittal, the ROP application package will also be submitted in hard copy with arrival on Friday, May 15, 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](mailto:tgreen@edwclevy.net), or Matt Perko at 313-820-4057 or [mperko@edwclevy.net](mailto:mperko@edwclevy.net).

**Holly Herner, PE, PhD** | Vice President | [holly.herner@arcadis.com](mailto:holly.herner@arcadis.com)  
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May 12, 2020

Ms. Wilhemina McLemore, 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 3  
Renewable Operating Permit  
SRN4364  
MI-ROP-B4364-2015

Dear Ms. McLemore:

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

Sincerely,

Thomas E. Green, PE

Edw. C. Levy Co.  
Director, EHS  
Mobile: 313-690-0139  
[tgreen@edwclevy.net](mailto:tgreen@edwclevy.net)

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

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

EFFECTIVE DATE: December 2, 2015

ISSUED TO

**EDW. C. LEVY CO. PLANT 3**

State Registration Number (SRN): B4364

LOCATED AT

100 Westfield, Ecorse, Michigan 48229

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B4364-2015

Expiration Date: December 2, 2020

Administratively Complete ROP Renewal Application Due  
Between June 2, 2019 and June 2, 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-B4364-2015

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

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Wilhemina McLemore, Detroit District Supervisor

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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.

## 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

1. 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))**
2. 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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ROP No: MI-ROP-B4364-2015  
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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).<sup>2</sup> **(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:"<sup>2</sup> **(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.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(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).<sup>2</sup> **(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))**

## 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))**:
- The date, location, time, and method of sampling or measurements.
  - The dates the analyses of the samples were performed.
  - The company or entity that performed the analyses of the samples.
  - The analytical techniques or methods used.
  - The results of the analyses.
  - 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))**
21. 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))**
- 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).
  - 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.
  - 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))**:
- 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.
  - 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.<sup>2</sup> **(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))**
- The applicable requirements are included and are specifically identified in the ROP.
  - 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:
- 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))**
  - 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))**
  - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- 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))**
28. 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 that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in 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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Plant 3

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Expiration Date: December 2, 2020  
PTI No: MI-PTI-B4364-2015

## 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 reclaiming, 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 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 68.10(a):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - 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.<sup>2</sup> **(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.<sup>2</sup> **(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.<sup>2</sup> **(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.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

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

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

## 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.

### 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 <sup>2</sup>	3-minute average <sup>a,b</sup>	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 <sup>2</sup>	3-minute average <sup>a</sup>	Fugitive dust from any other source	SC VI.1&2	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

<sup>a</sup>in accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

<sup>b</sup>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: Process consists of a series of equipment including grizzly/hopper feeders, screens, conveyors, 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. Units with water sprays are identified in the emission unit description.

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~~Grizzly / Feeder~~ ~~Material watered before feeding~~  
~~Conveyor # 11~~ ~~Uncovered, Water Sprays~~  
~~Screen # 4~~ ~~None~~  
~~Deister Grizzly Feeder~~ ~~None~~  
~~Stacker Conveyor # 10~~ ~~None~~

Conveyor # 9	Uncovered
Primary Jaw Crusher	None
Conveyor # 6A	Uncovered
Conveyor # 6	Uncovered
Secondary Cone Crusher	None
Screen # 3	None
Conveyor #10	None
Conveyor #5	Uncovered
Screen # 2	None
Screen # 1	None
Stacker Conveyor # 3	None
Conveyor # 16	Uncovered
Stacker Conveyor # 2	None
Conveyor # 3	Uncovered
Radial Stacker # 14	None
Stacker Conveyor # 1	Water Sprays

**(Consent Order SIP 17-1993 (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 that has the potential to emit fugitive particulate matter, or material for the landfill, 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.
  - c. All trucks transporting finished product, or material for the landfill, shall pass through the truck wheel wash before leaving the property, weather permitting.
  - d. Additional water can be added to the finished product stockpiles, with the use of portable rainbirds, if emissions from load-out exceed 5% opacity.

**(Consent Order SIP 17-1993 (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, calcium chloride, or an equivalent or more effective material to the traveled areas among the piles. If lignosulfonate is used, the application rate shall be 5 gal/100 sq. ft., the diluted ratio shall be 3:1, ~~and the~~ The application frequency for a chemical suppressant shall be once per month between March and October every three (3) weeks. The actual square footage to be controlled shall be dependent upon the amount of material in storage. If a dust suppressant other than lignosulfonate or calcium chloride is used, facility shall submit the demonstration required in SC IX.1.B.1.

**(Consent Order SIP 17-1993 (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 17-1993 (Revised 9/9/94), Exhibit A, Section 3.A)**

**B. STOCKPILE AREAS and ACTIVITIES.**

1. Raw slag shall be watered prior to transfer by front endloader 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. Water is added to the material at a rate of 4.0 gallons per ton of slag processed. Volume of water added to slag processed is estimated and proper watering is confirmed by acceptable visible emissions.

**(Consent Order SIP 17-1993 (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 17-1993 (Revised 9/9/94), Exhibit A, Section 3.B)**

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#### C. ROADWAYS AND PARKING LOTS

##### 1. Paved Roads

- a. Paved roads shall be cleaned daily during operating hours, weather permitting, with a power flush truck 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 17-1993 (Revised 9/9/94), Exhibit A, Section 3.C)

##### 2. Unpaved Roads

- a. Unpaved roads shall be treated with a lignosulfonate, calcium chloride (or equivalent) dust suppressant. If lignosulfonate is used, ~~the application frequency shall be once every three weeks at an~~ application rate shall be of 1.0 gallons per square yard and a dilution ratio of 3:1. ~~The application frequency of a chemical suppressant shall 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 SC IX.1.B.1.
- b. Speed limit on unpaved roads is 5 MPH.

(Consent Order SIP 17-1993 (Revised 9/9/94), Exhibit A, Section 3.C)

#### 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))

1. 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 record for a period of at least two years, and 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 17-1993, (Revised 9/9/94), Exhibit A, Addendum, R 336.1213(3))
2. The permittee shall perform a non-certified visible emission observation of the fugitive dust sources in SC III.A, B and C at least 5 days per week excluding non-operating days during March through October. The permittee shall initiate corrective action upon observation of visible emissions and shall keep a written record of each required observation and corrective action taken. (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))
2. 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))

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3. 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))**
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. 17-1993 (Revised 9/9/94) Exhibit A (Fugitive Dust Control Plan, Edward C. Levy Co. – Plant #3), 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 17-1993 (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))**

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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. **(R 336.1213(3))**

**Footnotes:**

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

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

### 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
EUSLAGPLANT	Processing equipment associated with a 350 ton per hour slag processing operation located at Levy Plant 3. Processing equipment includes one grizzly feeder, four screens, two crushers and up to twenty conveyors and stackers. Equipped with water spray systems for air pollution control.	01/01/1962	NA
EUFEBENEFICATION	Processing equipment associated with a 150 ton per hour FE scrap beneficiation operation located at Levy Plant 3. Metallic materials are screened into various sizes. Processing equipment includes one grizzly feeder, three screens, and up to eleven conveyors and stackers. Equipped with water spray systems for air pollution control.	07/01/1995 08/04/1998	NA
EUKISHDUMP	Kish pots are dumped at the kish pot dump station for processing after they have been saturated with water for 24 hours at the kish pot watering station. Equipped with 10 water spray system at the kish pot watering station.	01/01/1988	NA
EUBOFLAGPIT	Basic Oxygen Furnace (BOF) slag pits equipped with water spray systems for air pollution control.	1945	NA
EUCOLDCLEANERS	Cold cleaners that meet the applicable requirements of R 336.1281(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 <del>for reprocessing, to be reused by adjacent steel mill, United States Steel Great Lakes Works.</del>	1945	FGRULE290

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUDEBRISPLANT	1-200 tons per hour hopper, 1-200 tons per hour grizzly feeder and 1-200 tons per hour conveyor with 4 transfer points that compose the Debris Plant. The material is watered at the Euclid watering station prior to being fed into the debris plant for fugitive dust control.	1970	FGRULE290
EURECYCLEMATOPERATION	1-100 tons per hour hopper, and 1-100 tons per hour conveyor with 2 transfer points that compose the Recycle Materials Operation.	1990	FGRULE290
EUMATRANSFERCONVEYOR	1-200 tons per hour hopper, one conveyor with 2 transfer points that compose the Material Transfer Conveyor system (Pot Slagger)	1980	FGRULE290
EUPORTBIV	Portable process with maximum throughput of 1500 tons per day material and consists of 1 grizzly feeder, up to four conveyors, and 1 screen. This process produces agricultural products of varying particle diameter. Equipped with water sprays to be used as needed.	After 4/1/2013	FGRULE290
EUDEUTZGEN	44 hp diesel-fired generator that provides support power to portable process equipment. Exempt per Rule 285 (g) with RICE MACT applicability 5/3/2013 for existing unit at a major source.	2000	FGRICEMACT
EULIGHTGEN	Up to 25 hp leased portable diesel-fired generator that provides power to a portable light tower. Exempt per Rule 285 (g) with RICE MACT applicability 5/3/2013 for new unit at major source.	2009	FGRICEMACT
EUPROCESSGEN	Up to 300 hp leased portable diesel-fired generator that will provide support power to facility processes Rule 285 (g) with RICE MACT applicability 5/3/2013 for new unit at major source.	03/2014	FGRICEMACT

**EUSLAGPLANT  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Processing equipment associated with a 350 ton per hour slag processing operation located at Levy Plant 3. Processing equipment includes one grizzly feeder, four screens, two crushers and up to 20 conveyors and stackers.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Equipped with ~~W~~water spray system for air pollution control

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	Shall not exceed the amount specified in Table 32 of R336.1331(1) <sup>2</sup>	Based on a calendar day average	EUSLAGPLANT	SC VI.2	R 336.1331, Table 32
2. Fugitive Dust	5% opacity <sup>2</sup>	3-minute average <sup>a,b</sup>	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile	SC VI.1 SC VI.4	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)
3. Fugitive Dust	20% opacity <sup>2</sup>	3-minute average <sup>a</sup>	Fugitive dust from any other source	SC VI.1	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

<sup>a</sup>in accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

<sup>b</sup>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)**

1. Raw slag delivered by Euclids-haul truck or pallet carrier from the steel mill shall be watered in the Euclids-haul truck or pallet carrier before it is stockpiled in the material handling stockpile. **(Consent Order SIP 17-1993, (Revised 9/9/94), Exhibit A, Section 3.A)**
2. The moisture content of the raw slag during transfer by front end loaders from the material handling stockpile to the grizzly that feeds the plant shall be maintained to minimize fugitive dust during transfer. range from 2 to 5 percent. **(Consent Order SIP 17-1993, (Revised 9/9/94), Exhibit A, Section 3.A)**

**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))**

1. The permittee shall perform a Method 9D certified visible emission observation of a representative operating part of EUSLAGPLANT including the grizzly feeder, crushers, screens, and all conveyors and all transfer points on conveyors at least once every two weeks for a minimum of 15 minutes during screening 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 record of each required observation and corrective action taken. **(R 336.1213(3))**
2. The permittee shall monitor and record the daily tonnage of material throughput for EUSLAGPLANT. **(R 336.1213(3))**
3. The permittee shall calculate daily PM emissions based on the daily throughput and AQD agreed upon emission factors. **(R 336.1213(3))**
4. The permittee shall sample each finished product storage pile to determine the minimum moisture content by weight on a weekly basis. Records of the minimum moisture content shall be maintained. After six weekly samples, the permittee may petition the Department to reduce the sampling frequency to monthly. This petition must be submitted in writing and approved by the appropriate AQD District Supervisor. **(R336.1213(3))**

See Appendices 3, 4, and 7

**VII. REPORTING**

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

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

**Footnotes:**

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

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

**EUFEBENEFICATION  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Processing equipment associated with a 150 ton per hour iron (Fe) scrap beneficiation operation located at Levy Plant 3. Metallic materials are screened into various sizes. Processing equipment includes one grizzly feeder, two screens, and up to eleven conveyors and stackers. ~~Equipped with water spray systems for air pollution~~

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

~~Equipped with water spray system for air pollution control~~

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	10% <sup>2</sup>	6-minute average	EUFEBENEFICATION (From any portion of the scrap beneficiation plant including all conveyors and all transfer points on conveyors)	SC VI.1&2	R 336.1201(3)
2. Fugitive Dust	5% opacity <sup>2</sup>	3-minute average <sup>a,b</sup>	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile	SC VI.7	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)
3. Fugitive Dust	20% opacity <sup>2</sup>	3-minute average <sup>a</sup>	Fugitive dust from any other source	SC VI.7	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

<sup>a</sup>in accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

<sup>b</sup>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
1. Material throughput	150 tons per hour <sup>2</sup>	Calendar day average	EUFEBENEFICATION	SC VI.3	R 336.1201(3)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2. Material throughput	624,000 tons per year <sup>2</sup>	Based on a 12 month rolling time period as determined at the end of each calendar month	EUFEBENEFICATION	SC VI.6	R 336.1201(3)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate EUFEBENEFICATION for more than 4160 hours per year based on a 12 month rolling time period.<sup>2</sup> (R 336.1201(3))
2. The permittee shall not crush or screen any asbestos tailings or asbestos containing waste materials in EUFEBENEFICATION pursuant to the National Emission Standards for Hazardous Air Pollutants 40 CFR Part 61, Subpart M.<sup>2</sup> (R 336.1201(3))
3. The permittee shall not operate EUFEBENEFICATION unless water spray bars located on the tail pulleys are installed and operating properly.<sup>2</sup> (R 336.1201(3), R 336.1910)

**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))

1. The permittee shall perform a Method 9D certified visible emission observation of a representative operating part of EUFEBENEFICATION including all conveyors and all transfer points on conveyors at least once every two weeks for a minimum of 15 minutes during screening 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 record of each required observation and corrective action taken. (R 336.1213(3))
2. The permittee shall periodically inspect the water spray bars located on the tail pulleys of EUFEBENEFICATION to determine the operational and physical condition of the water spray bars at least once per month and immediately after observing visible emissions in excess of the applicable limitation. The water spray bars will be inspected as necessary immediately after a malfunction or failure of the water spray bars or the process equipment to determine the reason for the malfunction or failure. Written records of each inspection and corrective action taken, if any, shall be maintained. (R336.1213(3))
3. The permittee shall monitor and record the daily tons of material throughput of EUFEBENEFICATION. (R 336.1213(3))
4. The permittee shall monitor and record the daily hours of operation of EUFEBENEFICATION. (R 336.1213(3))
5. The permittee shall monitor and record the monthly and 12 month rolling hours of operation of EUFEBENEFICATION as determined at the end of each calendar month. (R 336.1213(3))

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6. The permittee shall monitor and record the total material throughput of EUFEBENEFICATION on a monthly and 12-month rolling time period as determined at the end of each calendar month. **(R 336.1213(3))**

See Appendices 3, 4, and 7

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. 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))**
3. 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	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

**EUKISHPOTDUMP  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Kish pots are dumped at the kish pot dump station for processing after they have been saturated with water for 24 hours at the kish pot watering station. ~~Equipped with 10 water spray system at the kish pot watering station.~~

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

~~Equipped with ten wW~~ater spray ~~system at the Kish pot watering station for quenching and air pollution controls~~

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity	10% <sup>2</sup>	6 minute average	EUKISHPOTDUMP (Kish pot dumping area)	SC VI.1,2&3	R336.1201(3), R336.1301(1)(c)

**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)**

- The permittee shall water the kish in pots at the kish watering station for a minimum of twenty-four (24) hours before it is dumped at the kish pot dump station for processing.  
(Consent Order SIP 17-1993, (Revised 9/9/94), Exhibit A, Section 3.A)
- The permittee shall not use untreated wastewater or process water for kish pot watering makeup.<sup>2</sup>  
(R 336.1301, R 336.1331)

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

- The permittee shall not dump kish pots unless the kish pot watering system is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the kish pot watering system is defined as maintaining the visible emissions limit from the kish pot dumping area.<sup>2</sup> (R 336.1301, R 336.1331)

**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

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**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 record and keep certification from the permittee that the kish in each of the pot at the kish watering station was watered for approximately twenty four (24) hours before it was dumped at the kish pot dump station for processing. (R 336.1213(3))
2. The permittee shall perform a Method 9 certified visible emission observation of the kish pot dump station at least once every two weeks for a minimum of 15 minutes or 3 kish pot dumps totaling a cumulative duration of at least 15 minutes during the kish pot dumping operation. The permittee shall initiate corrective action upon observation of visible emissions in excess of the applicable visible emission limitation and shall keep a written record of each required observation and corrective action taken. (R 336.1213(3))
3. The permittee shall periodically inspect the water sprays at the kish pot watering station to determine the operational and physical condition of the water sprays at least once per month and immediately after observing visible emissions in excess of the applicable limitation. The water spray system will be inspected as necessary immediately after a malfunction or failure of the water sprays to determine the reason for the malfunction or failure. Written records of each inspection and corrective action taken, if any, shall be maintained. (R 336.1213(3))

See Appendices 3, 4, and 7

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. 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))
3. 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	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

<sup>2</sup>This 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 systems for fugitive dust emission control.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Equipped with wWater spray system for air pollution control

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fugitive Dust	5% opacity <sup>2</sup>	3-minute average <sup>a,b</sup>	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 <sup>2</sup>	3-minute average <sup>a</sup>	Fugitive dust from any other source	SC VI.1,2&3	Act 451, Section 5524, Paragraph (2) and Section 5525, Paragraph (j)

<sup>a</sup>in accordance with Test Method 9D at Act 451, Section 5525, Paragraph (j)

<sup>b</sup>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)**

- The permittee shall quench the dumped slag by water sprays before digging.  
(Consent Order SIP 17-1993, (Revised 9/9/94), Exhibit A, Section 3.A)

**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 perform a Method 9D certified visible emission observation of a representative slag dumping or digging operation at least once every two weeks for a minimum of 15 minutes during dumping or digging operation. 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 record of each required observation and corrective action taken. (R 336.1213(3))
2. 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 two weeks 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 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 slag pit dumping areas, including 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 a month and shall keep a written record of each inspection and corrective action taken if any. (R 336.1213(3))

See Appendices 3, 4, and 7

**VII. REPORTING**

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

**Footnotes:**

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

<sup>2</sup>This 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
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, EUDEBRISPLANT, EURECYCLEMATOPE, EUMATTRANSFERCONVEYOR, EUPORTBIV
FGRICEMACT	New and existing emission units that meet the R336.1285(g) exemption criteria and are subject to the RICE MACT.	EUPROCESSGEN, EUDEUTZGEN, EULIGHTGEN

<b>FG-COLD CLEANERS FLEXIBLE GROUP CONDITIONS</b>
---

**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))**
3. 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))**

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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:
  - 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**

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))**

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))**
2. 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))**

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3. 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

**Footnotes:**

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

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

**FGRULE 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, EUDEBRISPLANT, EURECYCLEMATOPERATION, EUMATRANSFERCONVEYOR, EUPORTBIV

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

1. 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))**
2. 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))**
3. 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**

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))**

- 1. 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))**
2. 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))**
3. 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

**Footnotes:**

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

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

**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:** EUDEUTZGEN, EULIGHTGEN, EUPROCESSGEN

**POLLUTION CONTROL EQUIPMENT**

NA

**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 SO<sub>2</sub> 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)**

1. 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))**
2. 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

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maintenance plan for existing stationary RICE which must provide to the extent practicable for the 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 ZZZZ 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;<sup>1</sup>
  - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
  - 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)**

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))**

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 CFR 63.6605(b), 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))**
3. 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))**
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	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

<sup>2</sup>This 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).

## APPENDICES

### Appendix 1. Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

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 <sub>2e</sub>	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	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H <sub>2</sub> S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO <sub>x</sub>	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO <sub>2</sub>	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B4364-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B4364-2015 is being reissued as Source-Wide PTI No. MI-PTI-B4364-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

### 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.



## 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 B4364	SIC Code 3295	NAICS Code 327992	Existing ROP Number MI-ROP-B4364-2015	Section Number (if applicable)
Source Name Edw. C. Levy Co. Plant 3				
Street Address 100 Westfield				
City Ecorse	State MI	ZIP Code 48229	County Wayne	
Section/Town/Range (if address not available)				
Source Description Edw. C. Levy Co. operates a steel furnace slag processing plant, a scrap beneficiation plant, and a debris plant at 100 Westfield, Ecorse, Michigan, known as Plant 3. All of the plant's operations are entirely dependent on United States Steel Great Lakes Work's (USSGLW) slag for their raw material.				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

#### OWNER INFORMATION

Owner Name Edw. C. Levy Co.	Section Number (if applicable)			
Mailing address ( <input type="checkbox"/> check if same as source address) 8800 Dix Ave.				
City Detroit	State MI	ZIP Code 48209	County Wayne	Country USA

<input type="checkbox"/> Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.
---

**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 Matt Perko		Title Environmental Engineer		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address) 8800 Dix Ave.				
City Detroit	State MI	ZIP Code 48209	County Wayne	Country USA
Phone number 313-820-4057		E-mail address mperko@edwclevy.net		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> 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 ( <input type="checkbox"/> check if same as source address) 8800 Dix Ave.				
City Detroit	State MI	ZIP Code 48209	County Wayne	Country USA
Phone number 260-417-6331		E-mail address kwalker@edwclevy.net		

Responsible Official 2 Name (optional) Russell Burke		Title Director Steel Mill Services		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address) 8800 Dix Ave.				
City Detroit	State MI	ZIP Code 48209	County Wayne	Country USA
Phone number 313-429-2601		E-mail address rburke@edwclevy.net		

<input type="checkbox"/> 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.

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

**Compliance Statement**

This source is 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, 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, and other applicable requirements not currently contained in the existing ROP.  Yes  No

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

5-11-2020

Date

**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 <b>all</b> 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 <b>not</b> been reported in MAERS for the most recent emissions reporting year? If <b>Yes</b> , 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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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) If <b>Yes</b> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C4.	Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , VOC, lead) emissions? If <b>Yes</b> , 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. If <b>No</b> , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5.	Has this stationary source <b>added or modified</b> 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? If <b>Yes</b> , 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 <b>must</b> be included in HAP emission calculations. If <b>No</b> , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <b>Yes</b> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7.	Are any emission units subject to the federal Acid Rain Program? If <b>Yes</b> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <b>Yes</b> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan 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? 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
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? If <b>Yes</b> , then a copy must be submitted as part of the ROP renewal application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <b>Yes</b> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-FDP		



**PART E: EXISTING ROP INFORMATION**

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

<p>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? If <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>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>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If <u>Yes</u>, complete Part F with the appropriate information.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>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.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>Comments:</p> <p>Facility fugitive emissions are regulated under the source-wide conditions listed in B. of the ROP and include fugitive emissions from stockpiles, loading and unloading of material, and paved and unpaved roadways and areas. Requirements are also captured in the Fugitive Dust Control plan (<b>Consent Order SIP 17-1993 (Revised 9/9/94), .Exhibit A</b>) included in <b>AI FDP</b>. A summary of requested updates to the ROP are included in <b>AI SUMMARY</b>.</p>	
<p><input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: AI-FDP, AI-SUMMARY</p>	

**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 **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table.  Yes  No  
 If No, go to Part G.

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

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP.  Yes  No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP.  Yes  No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identify the stack(s) that were not reported on the applicable MAERS form(s).  Yes  No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form.  Yes  No

Comments:

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 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 Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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 and 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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? 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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 Group Tables in the mark-up of the ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The Consent Order, Attachment A (FDP) is included in the current ROP. However, Levy is requesting updates to the FDP as indicated in AI-FDP.	
H6. Does the source propose to add, change and/or delete <b>source-wide</b> 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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
See AI SUMMARY of the requested changes to the existing ROP and AI-FDP that includes the existing FDP and proposed FDP. The requested changes also reflect modification to description of Process controls in B Source Wide III.A.1., fugitive dust controls in B Source Wide III A.3, clarification for watering Stockpile areas and Activities in B. Source-Wide Conditions III.B.1., and updates to paved road cleaning in C.1.a and watering of unpaved roads both in C.2.a, Roadways and Parking Lots.	
H7. Are you proposing to <b>streamline</b> 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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, 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 Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, 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.

H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, 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 Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

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

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, 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 Yes, 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 Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

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



## 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: B4364

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 marked up copy of the ROP.

Page of

**AI-Summary Plant 3 - 100 Westfield, Ecorse, Michigan (E.1, C.9)**

Emission Unit ID	Emission Unit Description	Installation/ Modification Date	Flexible Group ID	E.1 Additions, changes or deletions to terms, conditions, & underlying applicable requirements	C.9 Plan required to be Submitted
<b>SOURCE-WIDE CONDITIONS</b>					
	Update B. III. A. 1 Description of Process equipment.	1/1/1962	NA	Yes – see Part H	Yes - see AI - FDP
<b>EUSLAGPLANT</b>					
	Processing equipment associated with a 350 ton per hour slag processing operation located at Levy Plant 3.				
	Processing equipment includes one grizzly feeder, four screens, two crushers and up to twenty conveyors and stackers.	1/1/1962	NA	NA	Yes- see AI - FDP
<b>EUFEBENEFICATION</b>					
	Processing equipment associated with a 150 ton per hour FE scrap beneficiation operation located at Levy Plant 3.				
	Metallic materials are screened into various sizes. Processing equipment includes one grizzly feeder, three screens, and up to eleven conveyors and stackers. Equipped with water spray systems for air pollution control.	7/1/1995 (8/4/1998)	NA	NA	NA
<b>EUKISHDUMP</b>					
	Kish pots are dumped at the kish pot dump station for processing after they have been saturated with water for 24 hours at the kish pot watering station. Equipped with 10 water spray system at the kish pot watering station.	1/1/1988	NA	NA	NA

Emission Unit ID	Emission Unit Description	Installation/ Modification Date	Flexible Group ID	E.1 Additions, changes or deletions to terms, conditions, & underlying applicable requirements	C.9 Plan required to be Submitted
EUBOFSLAGPIT	Basic Oxygen Furnace (BOF) slag pits equipped with water spray systems for air pollution control.	1945	NA	NA	NA
EUCOLDCLEANERS	Cold cleaners that meet the applicable requirements of R336.1281(h)	After 7/1/1979	FGCOLDCLEANERS	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 by adjacent steel mill, United States Steel Great Lakes Works.	1945	FGRULE290	NA	NA
EUDEBRISPLANT	1-200 tons per hour hopper, 1-200 tons per hour grizzly feeder and 1-200 tons per hour conveyor with 4 transfer points that compose the Debris Plant. The material is watered at the Euclid watering station prior to being fed into the debris plant for fugitive dust control.	1970	FGRULE290	NA	NA
EURECYCLEMATOPERATION	1-100 tons per hour hopper, and 1-100 tons per hour conveyor with 2 transfer points that compose the Recycle Materials Operation.	1990	FGRULE290	NA	NA
EUMATRANSFERCONVEYOR	1-200 tons per hour hopper, one conveyor with 2 transfer points that compose the Material Transfer Conveyor system (Pot Slagger)	1980	FGRULE290	NA	NA

Emission Unit ID	Emission Unit Description	Installation/ Modification Date	Flexible Group ID	E.1 Additions, changes or deletions to terms, conditions, & underlying applicable requirements	C.9 Plan required to be Submitted
EUPORTBIV	Portable process with maximum throughput of 1500 tons per day material and consists of 1 grizzly feeder, up to four conveyors, and 1 screen. This process produces agricultural products of varying particle diameter. Equipped with water sprays to be used as needed.	After 4/1/2013	FGRULE290	NA	NA
EUDEUTZGEN	44 hp diesel-fired generator that provides support power to portable process equipment. Exempt per Rule 285 (g) with RICE MACT applicability 5/3/2013 for existing unit at a major source.	2000	FGRICEMACT	NA	NA
EULIGHTGEN	Up to 25 hp leased portable diesel-fired generator that provides power to a portable light tower. Exempt per Rule 285 (g) with RICE MACT applicability 5/3/2013 for new unit at major source.	2009	FGRICEMACT	NA	NA
EUPROCESSGEN	Up to 300 hp leased portable diesel-fired generator that will provide support power to facility processes Rule 285 (g) with RICE MACT applicability 5/3/2013 for new unit at major source.	2014	FGRICEMACT	NA	NA

**AI-Summary Plant 3 - 100 Westfield, Ecorse, Michigan (H.2, H.5, H.6, H.10)**

Emission Unit ID	H.2. Administrative Changes to EU Names, descriptions, or control devices	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	Update B. III. A. 1 description to match nomenclature of equipment in process.	Yes – See AI FDP	Update B.III. A.3, C.1 & C.2 to reflect requested changes to chemical suppressant type and application frequency.	Update B.III. A.3, C.1 & C.2 to reflect requested changes to chemical suppressant type and application frequency.
EUSLAGPLANT	Update description of air pollution control device for C. Emission Unit Conditions for EUSLAGPLANT to proposed language. Update description of slag hauling equipment used for delivering raw slag from the mill to the Levy site in C.III.1.	Yes – See AI FDP. Update C.III.2 to reflect proposed changes to moisture content and fugitive dust controls.	NA	Update C.III.2 to reflect proposed changes to moisture content and fugitive dust controls.
EUFEBENEFICATION	Update description of emission unit and air pollution control device for C. Emission Unit Conditions for EUBENEFICATION to proposed language.	NA	NA	NA
EUKISHDUMP	Update description of emission unit and air pollution control device for C. Emission Unit Conditions for EUKISHDUMP to proposed language.	NA	NA	Update C.III.1 to reflect proposed change to watering duration.
EUBOFLAGPIT	Update description of air pollution control device for C. Emission Unit	NA	NA	NA

Emission Unit ID	H.2. Administrative Changes to EU Names, descriptions, or control devices	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
Conditions for EUBOFLAGPIT to proposed language.				
EUCOLDCLEANERS	NA	NA	NA	NA
EUDROPBALLCRANE	Update description in C. Emission Unit Summary Table: This process consists of dropping a large steel ball from a crane onto scrap steel to break it into small pieces for reprocessing.	NA	NA	NA
EUDEBRISPLANT	NA	NA	NA	NA
EURECYCLEMATOPE RATION	NA	NA	NA	NA
EUMATRANSFERCON VEYOR	NA	NA	NA	NA
EUPORTBIV	NA	NA	NA	NA
EUDEUTZGEN	NA	NA	NA	NA
EULIGHTGEN	NA	NA	NA	NA
EUPROCESSGEN	NA	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: BR4364

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 (FDP), Consent Order SIP 17-1993 (Revised 9/9/94), Exhibit A and the proposed, updated FDP submitted to EGLE for review and approval.

STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF THE DIRECTOR

\_\_\_\_\_)  
In the matter of administrative proceedings )  
involving the EDWARD C. LEVY CO., PLANT #3, )  
a corporation organized under the laws )  
of the State of Michigan and doing business )  
at 100 Westfield in the City of Ecorse, )  
County of Wayne, State of Michigan. )  
\_\_\_\_\_)

SIP No. 17-1993  
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 et seq., 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.

The Edward C. Levy Co. ("Company") owns and operates Levy Plant #3 ("Plant"), which is a slag processing facility, located at 100 Westfield, City of Ecorse, 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.

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

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 et seq., 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. Process Change

(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.

- (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. Control Program Revision

- (1) 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.

- \* - Demonstrations made pursuant to 13(B)(1)(a) involving chemical dust suppressant 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 #3, 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:

EDWARD C. LEVY CO. PLANT 3

EDWARD C. LEVY CO., PLANT #3

By: [Signature]

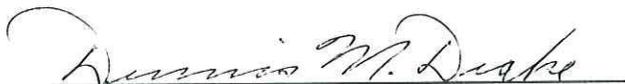
Dated: 9-28-94

The above signatory subscribed and sworn to before me this 23rd day of September, 1994.

[Signature]  
Notary Public

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

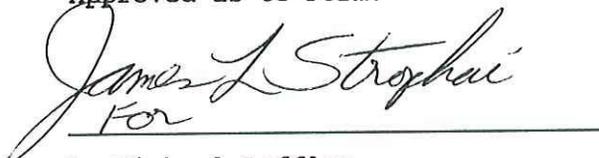
Approved as to Content:



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

Dated: 10/12/94

Approved as to Form:

  
For

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

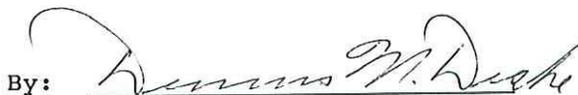
Dated: 10/11/94

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:   
Dennis M. Drake, Acting Chief  
Air Quality Division

Dated: 10/12/94

EXHIBIT A  
FUGITIVE DUST CONTROL PLAN  
EDWARD C. LEVY CO. - PLANT #3

1. Facility Name and Address:

Edward C. Levy Co.  
Plant #3  
100 Westfield  
Ecorse, Michigan 48229

2. Name and Address of Responsible Person:

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

3. Summary of Source Descriptions and Control Measures:

A. Process Description

The Edward C. Levy Co. (Levy) operates a steel furnace slag processing plant, a kish-debris plant, and a mill scale plant located at 100 Westfield, Ecorse, MI, known as Plant 3.

The steel furnace (SF) processing plant operates at a maximum 350 tph. Pot carriers transport molten slag from Great Lakes Steel (GLS) to the 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 SF processing plant. Euclids also deliver raw slag from the mill. The material is watered in the Euclids before it is stockpiled in the material handling stockpile adjacent to the SF processing plant. Front endloaders are used to transfer the material from the material handling stockpile to the grizzly that feeds the plant. The moisture content of the raw slag ranges from 2 to 5 percent.

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 recycled by the steel mill.

The SF processing plant extracts the metallics from the slag and the metallics are returned to the steel mill for recycling. The slag is crushed and screened to produce four sizes of finished product.

Product Name	Moisture Content %	Passing 200 Mesh %
12X	0.1 - 1.3	0.4
3X - 5G	0.2 - 1.5	0.6
25X	0.3 - 4.1	1.5
22X	3.1 - 10.1	12.0

The plant consists of a grizzly/feeder, 7 conveyors, 2 crushers, 5 screens, and 6 stackers. Water sprays are located at the material handling stockpile, conveyor #11, and conveyor #1.

Moisture content of the finished SF slag products ranges from 0.1 to 10.1 percent. Fugitive emission control is necessary only on the 22X 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 #11	Uncovered, Water Sprays
Screen #4	None
Screen #5	None
Stacker Conveyor #10	None
Conveyor #9	Uncovered
Primary Jaw Crusher	None
Conveyor #6A	Uncovered
Conveyor #6	Uncovered
Secondary Cone Crusher	None
Screen #3	None
Conveyor #4	None
Conveyor #5	Uncovered
Screen #2	None
Screen #1	None
Stacker Conveyor #3	None
Conveyor #12	Uncovered
Stacker Conveyor #2	None
Conveyor #13	Uncovered
Radial Stacker #14	None
Stacker Conveyor #1	Water Sprays

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, or material for the landfill, 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.
- 3) All trucks transporting finished product or material for the landfill pass through the truck wheel wash before leaving the property, weather permitting.
- 4) Additional water can be added to the finished product stockpiles, with the use of portable rainbirds, if emissions from load-out exceed 5% opacity.

Control of emissions due to vehicle movement about the stockpiles is accomplished by applying a lignosulfonate dust suppressent to the travelled areas among the piles. Application rate of 5 gal/100 sq. ft. will be used. The dilution ratio is 3:1, and the application frequency is once every three (3) weeks. 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.

The kish-debris plant operates at a maximum of 100 tph. Kish is transported in pots from the steel mill to the kish watering station where they are watered for twenty-four (24) hours. Then they are dumped at the kish pot dump station. Front endloaders remove the kish to a stockpile for processing through the magnetic separation and screening plant (kish-debris plant).

Debris is transported from the steel mill by Euclids. The material is watered in the Euclids before dumping in a stockpile, also for processing through the magnetic separation and screening plant (kish-debris plant). The surge pile can be watered by portable rainbirds should emissions become a problem.

Covered Euclids transport precipitator dust from GLS to Plant 3 where it is mixed with water to insure thorough wetting.

Approximately 70% of the kish is reclaimed and returned to GLS or sold. The remaining 30% is mixed with the waste debris and wet precipitator dust and transported to the landfill for proper disposal.

The kish-debris plant consists of 1 vibrating feeder, 1 conveyor, 1 stacker, and 1 screen. Emissions from this plant are negligible since the kish pots are watered for 24 hours before processing.

The mill scale plant operates at a maximum of 100 tph. Mill scale is transported by semi-trucks to the plant from an 80" mill, the wet scale, and #5 yard areas at GLS. The material is processed, the coarse fraction (6" x 1/4") is sent to Zug Island by truck, and the fine scale is stockpiled and sold by GLS.

The mill scale plant consists of 1 feeder, 2 conveyors, and 2 screens.

#### B. Stockpile Areas and Activities

Edward C. Levy Co. Plant 3 stockpiles both raw slag and finished slag products, kish-debris, and mill scale 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 four 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 six stackers.

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 are tarped before leaving the property.

C. Roadways and Parking Lots

Edward C. Levy Co. Plant 3 has both paved and unpaved roads.

Paved - the paved roads will be cleaned 2 times daily, during operating hours, weather permitting, with a power flush truck. Track-out will be cleaned up daily when it occurs. Speed limits on paved roads is 15 MPH.

Unpaved - the unpaved roads will be treated with a lignosulfonate dust suppressent once every three weeks at an application rate of 1.0 gallons per square yard and a dilution ration of 3:1. Additionally, speed limits on unpaved roads are restricted to 5 miles per hour.

**(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

1. DATE OF TREATMENT
2. CONTROL MEASURE USED
3. RESPONSIBLE PERSON'S INITIALS
4. NAME OF PRODUCT APPLIED
5. AMOUNT OF SOLUTION/WATER APPLIED
6. DILUTION RATIO
7. ROAD SEGMENT/LOT IDENTIFICATION

PAVED ROADS/LOTS

1. DATE OF TREATMENT
2. CONTROL MEASURE USED
3. RESPONSIBLE PERSON'S INITIALS
4. ROAD SEGMENT/LOT IDENTIFICATION

STORAGE PILES/MATERIAL  
HANDLING

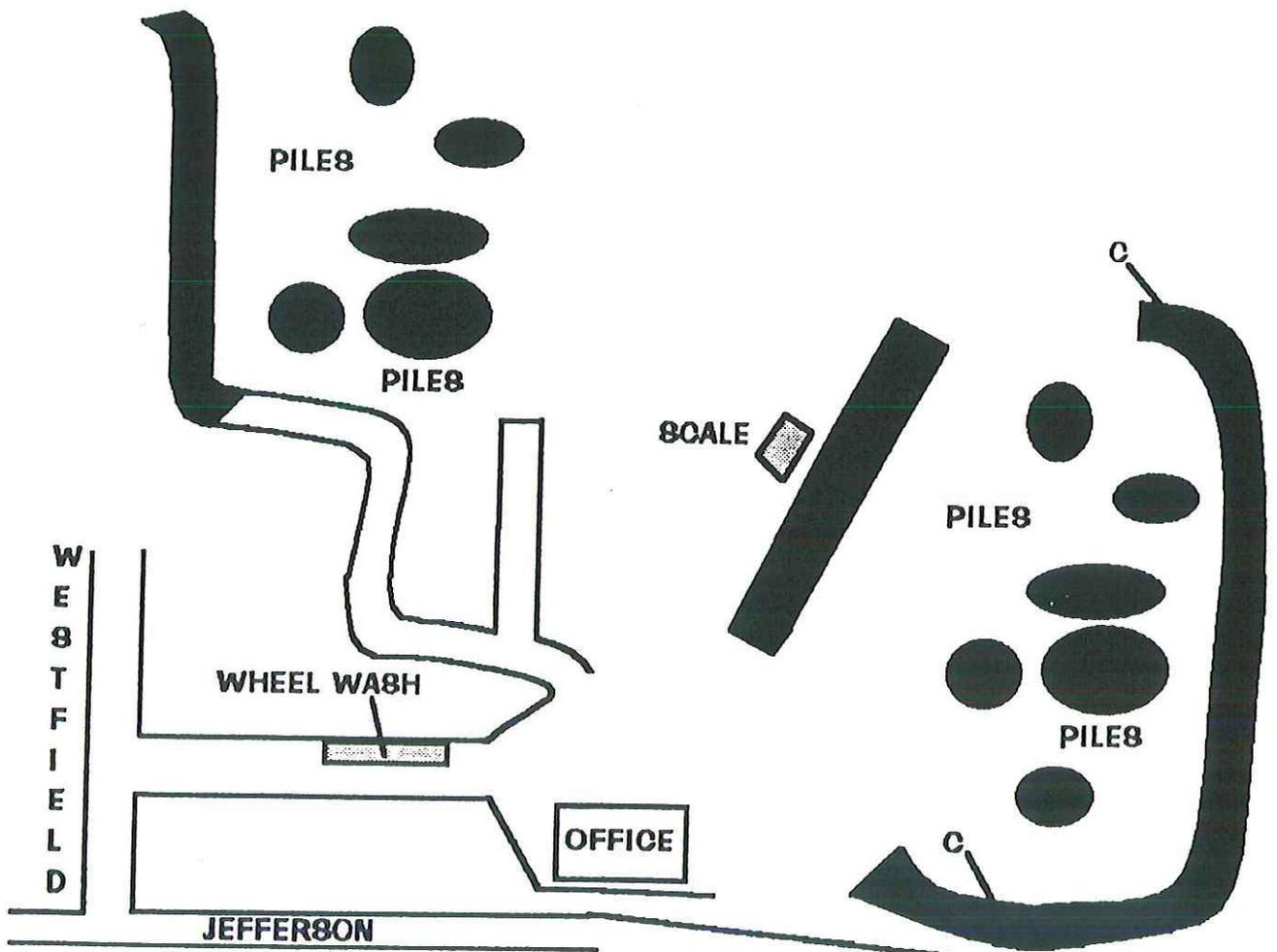
1. DATE OF TREATMENT
2. CONTROL MEASURE USED
3. RESPONSIBLE PERSON'S INITIALS
4. DILUTION RATIO (IF APPLICABLE)
5. AMOUNT OF DUST SUPPRESSANT/WATER  
APPLIED
6. IDENTIFICATION OF PILE/MATERIAL  
HANDLING OPERATION TREATED
7. EQUIPMENT USED

OPTIONAL RECORDS

WEATHER CONDITIONS

1. PRECIPITATION
2. TEMPERATURE
3. WIND DIRECTION AND VELOCITY

# LEVY-PLANT #3





May 12, 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 3  
Consent Order SIP 17-1993 (Revised 1994), Exhibit A  
Fugitive Dust Control Plan Update Request  
SRN4364  
MI-ROP-B4364-2015

Dear Ms. Koster:

The Edw. C. Levy Co. (Levy) operates a slag processing plant (Plant 3) located at 100 East Westfield Street, Ecorse, MI 48229. The facility operates under both an ROP (MI-ROP-B4364-2015) and a Fugitive Dust Control Plan (Consent Order SIP 17-1993 (Revised 9/9/1994), 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 3 and the fugitive dust controls had minor updates since the Consent Order was issued. 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 B4364, 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 17-1993 (Revised 9/9/1994), 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](mailto:tgreen@edwclevy.net) or Matt Perko, Environmental Engineer, at 313-820-4057 or [mperko@edwclevy.net](mailto:mperko@edwclevy.net).

Sincerely,

A handwritten signature in black ink that reads 'Thomas E. Green'.

Thomas E. Green, PE

Edw. C. Levy Co.  
Director, EHS  
Mobile: 313-690-0139  
[tgreen@edwclevy.net](mailto:tgreen@edwclevy.net)

**EXHIBIT A**  
**FUGITIVE DUST CONTROL PLAN**  
**EDW. C. LEVY CO. – PLANT #3**

**May 2020**

**1. Facility Name and Address**

Edw. C. Levy Co.  
Plant #3  
100 Westfield Street  
Ecorse, Michigan 48229

**2. Name and Address of Responsible Person**

<RESPONSIBLE OFFICIAL>  
Edw. C. Levy Co.  
9300 Dix Avenue  
Dearborn, Michigan 48120

**3. Facility Process Summary and Controls**

**A. Source Process Description**

Edw. C. Levy Co. (Levy) operates a slag processing facility that includes three primary processes at the Ecorse, Michigan facility known as Plant #3. Primary operations include processing of steel furnace slag, kish/desulfurization slag, and debris. The attached Figures illustrate the general layout of Levy Plant #3 and the process areas.

Steel Furnace Slag Processing – Pot carriers transport molten steel furnace slag from U.S. Steel Great Lakes Works to the slag dump station at Plant #3. 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 adjacent to the steel furnace slag processing plant (Slag Plant). This stockpiled slag is the primary raw feed for the Slag Plant. Water sprays are used on the raw feed stockpile as necessary to control fugitive dust. Raw slag directly from the steel mill is also delivered to the raw feed stockpile by pallet boxes. This slag is watered in the pallet boxes prior to delivery to the raw feed stockpile. Front end loaders transfer raw feed from the stockpile to the grizzly feeder, the first processing step in the Slag plant. The Slag Plant operates at a maximum rate of 350 tph.

Skulls, the steel/slag crust that forms inside a slag pot, are removed from the slag pots at the slag dump station. After cooling, these 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 processed through the Slag Plant.

Metallic material extracted by the Slag Plant is also returned to the steel mill for recycling. Non-metallic slag is crushed and screened by the Slag Plant to produce various finished aggregate

products. Finished products are loaded into customer trucks by front end loaders for transport off-site.

Processing equipment associated with the Slag Plant includes a grizzly feeder, screens, a crusher, and multiple conveyors and stackers.

Kish/Desulfurization Slag Processing – Kish/Desulfurization slag is transported in slag pots from the steel mill to the kish watering station, where the pots are watered for a minimum of 24 hours. After watering, the kish pots are dumped at the kish pot dump station. Front end loaders transport kish from the dump station to the Iron Benefication Plant for processing. Larger pieces may first be broken using a drop ball crane prior to being taken to the Iron Benefication Plant. The primary function of the Iron Benefication Plant is to sort the metallic material by size to facilitate recycling. The 150 tph Iron Benefication Plant includes a grizzly feeder, screens, and multiple conveyors and stackers.

Debris Processing –Industrial debris from the steel mill is processed to remove iron scrap at the Debris Plant. The debris plant consists of a hopper, grizzly feeder, magnets and conveyors. The Debris Plant is permitted to operate at 200 tph.

## **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. Material Processing Plants:

#### Slag Plant

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. Slag transported in pallet boxes is watered in a pallet box watering station prior to delivery to the raw feed stockpile at the Slag Plant.
- Water sprays are located at the slag raw feed stockpile, prior to initial screening operation (Conveyor #11), prior to secondary screening operation (Conveyor #6A) and after the secondary screening operations (Conveyor #1). These water sprays are used as necessary to minimize fugitive emissions.

#### Iron Benefication Plant

- Kish/Desulfurization slag is watered in the pot for a minimum of 24 hours prior to processing.
- Water sprays are located prior to the Iron Benefication Plant screens. These water sprays are used as necessary to minimize fugitive emissions.

### Debris Plant

- Debris is watered prior to processing.

### II. Material Stockpiling and Transport:

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:

- Raw materials are watered to maintain product moisture specifications and for fugitive dust control purposes.
- Material spilled beneath conveyors is managed on an ongoing basis.
- Trucks transporting finished product that has the potential to emit fugitive emissions or materials destined for disposal 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.
- Trucks transporting finished product or other materials off-site will pass through the truck wheel wash before leaving the property, weather permitting.
- 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 Figure shows the unpaved and paved road areas that are maintained as detailed below.

#### Paved:

- Paved roads are inspected daily and cleaned as necessary during operating hours, weather permitting with a power flush truck or wet/vacuum truck.
- Track out on paved roads are 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), water, or equivalent, 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

## **Demonstration of Fugitive Dust and Particulate Emission Equivalent Controls**

This demonstration shows that the updated Fugitive Dust Control Plan (FDP) for Levy Plant 3 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 17-1993 (Revised 9/9/1994), 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 3 and described in the FDP are consistent between the existing FDP and the updated version. The facility operates the following basic processes: the slag plant and the kish-debris plant. The existing FDP describes the kish-debris plant with inclusion of the kish dump, the recovery or recycling of metal (iron beneficiation), and debris processing. The updated FDP describes the processes with more detail and consistent with the renewable operating permit (ROP B4364).

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
- 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 3 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.



## Michigan Department of Environmental Quality - Air Quality Division

## Michigan Air Emissions Reporting System (MAERS)

## 2019 Source Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Source</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>SOURCE IDENTIFICATION</b>				
Source Name	<b>EDW C LEVY CO PLANT 3</b>			
NAICS Code	<b>327992</b>	Portable	<b>No</b>	
Physical Address (Street Address 1)	<b>100 WESTFIELD</b>			
Physical Address (Street Address 2)				
County	<b>WAYNE</b>	City	<b>ECORSE</b>	
		Zip Code	<b>48229-</b>	
Latitude	<b>42.24519551 Decimal Degrees</b>		Longitude	<b>-83.13810182 Decimal Degrees</b>
Horizontal Collection Method	<b>001</b>			
Source Map Scale Number		Horizontal Accuracy Measure	<b>20 Meters</b>	
Horizontal Reference Datum Code	<b>03</b>	Reference Point Code	<b>102</b>	
Principal Product	<b>SLAG</b>	Number of Employees	<b>50</b>	
Employer Federal Identification Number	<b>381253012</b>			

<b>OWNER INFORMATION</b>			
Owner Name	<b>Edw. C. Levy Co.</b>		
Mailing Address (Street Address 1)	<b>8800 Dix</b>		
Mailing Address (Street Address 2)			
City	<b>Detroit</b>	State/Province	<b>MI</b>
Country	<b>USA</b>	Zip or Postal Code	<b>48209-</b>



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Contact Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Contact</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION INVENTORY CONTACT (PRIMARY) INFORMATION</b>							
Contact First Name, Middle Initial	<b>Matt</b>	Contact Last Name	<b>Perko</b>				
Contact Title	<b>Environmental Engineer</b>						
Mailing Address (Street Address 1)	<b>100 EAST WESTFIELD</b>						
Mailing Address (Street Address 2)							
City	<b>Ecorse</b>	State/Province	<b>MI</b>	Country	<b>USA</b>	Zip Code	<b>48229</b>
E-Mail Address (if available)	<b>mperko@edwclevy.net</b>						
Telephone Number	<b>(313) 8204057</b>	Telephone Extension					
Fax Number	<b>()</b>						

<b>EMISSION INVENTORY CONTACT (SECONDARY) INFORMATION</b>							
Contact First Name, Middle Initial	<b>Thomas</b>	Contact Last Name	<b>Green</b>				
Contact Title	<b>Director of EHS</b>						
Mailing Address (Street Address 1)	<b>51445 W. 12 Mile Road</b>						
Mailing Address (Street Address 2)							
City	<b>Wixom</b>	State/Province	<b>MI</b>	Country	<b>USA</b>	Zip Code	<b>48393</b>
E-Mail Address (if available)	<b>tgreen@edwclevy.net</b>						
Telephone Number	<b>(313) 6900139</b>	Telephone Extension					
Fax Number	<b>(248) 3499007</b>						



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Contact Form

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<b>FORM REFERENCE</b>			
Form Type	<b>Contact</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>FEE INVOICE CONTACT INFORMATION (Fee Subject Facilities Only)</b>							
Contact First Name, Middle Initial	<b>Thomas</b>	Contact Last Name	<b>Green</b>				
Contact Title	<b>Director of EHS</b>						
Mailing Address (Street Address 1)	<b>51445 W. 12 Mile Road</b>						
Mailing Address (Street Address 2)							
City	<b>Wixom</b>	State/Province	<b>MI</b>	Country	<b>USA</b>	Zip Code	<b>48393</b>
E-Mail Address (if available)	<b>tgreen@edwclevy.net</b>						
Telephone Number	<b>(313) 6900139</b>	Telephone Extension					
Fax Number	<b>(248) 3499007</b>						



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	Emission Unit	AQD Source ID (SRN)	B4364

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	EU0001	EU ID	EUSLAGPLANT
NAICS Code (if different from Source Form)	327992		
Installation Date MM/DD/YYYY	01/08/1973	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)	SLAG CRUSHING PLANT		
Emission Unit Type	Other process equipment		
Is this a combustion source?	N		
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity	Megawatts		

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	N		
Exempt from Rule 201?	N	If Yes, Rule Number	
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?			
Permit?	Y	If Yes, Enter the Permit Number	MI-ROP-B4364-2009
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			Y

<b>CONTROL DEVICE(S)</b>			
21. Control Device Code	DUST SUP		

<b>EMISSION UNIT STACK(S)</b>			



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0002</b>	EU ID	<b>EUFEBENEFICATION</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>08/04/1998</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Iron scrap benefication operation</b>	
Emission Unit Type		<b>Screen</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>N</b>	If Yes, Rule Number	
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?			
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>	
21. Control Device Code	<b>DUST SUP</b>

<b>EMISSION UNIT STACK(S)</b>	



**Michigan Department of Environmental Quality - Air Quality Division**

**Michigan Air Emissions Reporting System (MAERS)**

**2019 Emission Unit Form**

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0003</b>	EU ID	<b>EUKISHPOTDUMP</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1988</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Kish pot dump station</b>	
Emission Unit Type		<b>Unclassified</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>Y</b>	If Yes, Rule Number	<b>Rule 290</b>
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?		<b>Y</b>	
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>	
21. Control Device Code	<b>DUST SUP</b>

<b>EMISSION UNIT STACK(S)</b>	



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0004</b>	EU ID	<b>EUBOFSLAGPIT</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1962</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Basic Oxygen Furnace slag pit dump station</b>	
Emission Unit Type		<b>Unclassified</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>N</b>	If Yes, Rule Number	
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?			
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>N</b>

<b>CONTROL DEVICE(S)</b>

<b>EMISSION UNIT STACK(S)</b>



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0005</b>	EU ID	<b>EUCOLDCLEANERS</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>07/01/1979</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Cold cleaners that meet the applicable requirements of R336.1281(h).</b>	
Emission Unit Type		<b>Degreaser</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>Y</b>	If Yes, Rule Number	<b>Rule 281(h)</b>
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?		<b>Y</b>	
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>

<b>EMISSION UNIT STACK(S)</b>



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0006</b>	EU ID	<b>EUDROPBALLCRANE</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1962</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Crane dropped steel ball for scrap steel breaking</b>	
Emission Unit Type		<b>Unclassified</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>Y</b>	If Yes, Rule Number	<b>Rule 290</b>
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?		<b>Y</b>	
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>

<b>EMISSION UNIT STACK(S)</b>



**Michigan Department of Environmental Quality - Air Quality Division**

**Michigan Air Emissions Reporting System (MAERS)**

**2019 Emission Unit Form**

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0007</b>	EU ID	<b>EUDEBRISPLANT</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1962</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Material separation operation</b>	
Emission Unit Type		<b>Screen</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>Y</b>	If Yes, Rule Number	<b>Rule 290</b>
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?		<b>Y</b>	
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>	
21. Control Device Code	<b>DUST SUP</b>

<b>EMISSION UNIT STACK(S)</b>	



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0008</b>	EU ID	<b>EURECMATOPERAT</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1962</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Recycle materials operation</b>	
Emission Unit Type		<b>Conveyor</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>Y</b>	If Yes, Rule Number	<b>Rule 290</b>
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?		<b>Y</b>	
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>

<b>EMISSION UNIT STACK(S)</b>



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0009</b>	EU ID	<b>EUMATTRANSCONV</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1962</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Material transfer conveyor system</b>	
Emission Unit Type		<b>Conveyor</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>Y</b>	If Yes, Rule Number	<b>Rule 290</b>
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?		<b>Y</b>	
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>

<b>EMISSION UNIT STACK(S)</b>



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0010</b>	EU ID	<b>EUUNPAVEDROADS</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1962</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Unpaved facility roadways</b>	
Emission Unit Type		<b>Other fugitive</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity		Megawatts	

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>N</b>	If Yes, Rule Number	
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?			
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>N</b>

<b>CONTROL DEVICE(S)</b>	
21. Control Device Code	<b>DUST SUP</b>

<b>EMISSION UNIT STACK(S)</b>	



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emission Unit Form

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

<b>FORM REFERENCE</b>			
Form Type	<b>Emission Unit</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>EMISSION UNIT IDENTIFICATION</b>			
AQD Emission Unit ID	<b>EU0011</b>	EU ID	<b>EUPAVEDROADS</b>
NAICS Code (if different from Source Form)			
Installation Date MM/DD/YYYY	<b>01/01/1962</b>	Dismantle Date MM/DD/YYYY	
Emission Unit Description - (Include Process Equipment and Control Devices)		<b>Paved facility roadways.</b>	
Emission Unit Type		<b>Other fugitive</b>	
Is this a combustion source?		<b>N</b>	
Is this combustion source used to generate electricity?			
Design Capacity	Design Capacity Numerator	Design Capacity Denominator	
Maximum Nameplate Capacity	Megawatts		

<b>RULE 201 APPLICABILITY</b>			
Grandfathered?	<b>N</b>		
Exempt from Rule 201?	<b>N</b>	If Yes, Rule Number	
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?			
Permit?	<b>Y</b>	If Yes, Enter the Permit Number	<b>MI-ROP-B4364-2009</b>
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?			<b>Y</b>

<b>CONTROL DEVICE(S)</b>			
21. Control Device Code	<b>DUST SUP</b>		

<b>EMISSION UNIT STACK(S)</b>			
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Michigan Department of Environmental Quality - Air Quality Division

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 Source ID (SRN)	<b>B4364</b>
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**REPORTING GROUP IDENTIFICATION**

AQD Reporting Group ID	<b>RG0001</b>	Reporting Group ID	<b>RGRULE290</b>
Reporting Group Description	<b>Emission units exempt from Rule 201 per Rule 290</b>		

**REPORTING GROUP EMISSION UNITS**

7. Emission Unit ID	<b>EUMATTRANSCONV</b>
7. Emission Unit ID	<b>EURECMATOPERAT</b>
7. Emission Unit ID	<b>EUDEBRISPLANT</b>
7. Emission Unit ID	<b>EUDROPBALLCRANE</b>



Michigan Department of Environmental Quality - Air Quality Division

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 Source ID (SRN)	B4364
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**REPORTING GROUP IDENTIFICATION**

AQD Reporting Group ID	RG0004	Reporting Group ID	RGFACILITY
Reporting Group Description	Roadways (unpaved), bulk loading, slag pits, stockpiles		

**REPORTING GROUP EMISSION UNITS**

7. Emission Unit ID	EUBOFSLAGPIT
7. Emission Unit ID	EUUNPAVEDROADS



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Reporting Group Form

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

<b>FORM REFERENCE</b>			
Form Type	Reporting Group	AQD Source ID (SRN)	<b>B4364</b>

<b>REPORTING GROUP IDENTIFICATION</b>			
AQD Reporting Group ID	<b>RG0006</b>	Reporting Group ID	<b>RGPAVEDROADS</b>
Reporting Group Description	<b>Roadways (paved), Kish Pot Dump</b>		

<b>REPORTING GROUP EMISSION UNITS</b>	
7. Emission Unit ID	<b>EUPAVEDROADS</b>
7. Emission Unit ID	<b>EUKISHPOTDUMP</b>



**Michigan Department of Environmental Quality - Air Quality Division**

**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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUSLAGPLANT</b>

**ACTIVITY INFORMATION**

Source Classification Code(SCC)	<b>30502503</b>
SCC Comment	<b>Conveyors</b>

**SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS > 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%**

Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

**OPERATING SCHEDULE**

Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

**MATERIAL INFORMATION**

Material Code	Material Throughput	Unit Code
<b>SAND &amp; GRAVL</b>	<b>367512</b>	<b>TON</b>
Material Description	<b>STEEL FURNACE SLAG</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>

**ATTACHMENT:**

Document Name: **EUSLAGPLANT Justification**

File Name: **2019 - EUSLAGPLANT.pdf**



**Michigan Department of Environmental Quality - Air Quality Division**

**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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUSLAGPLANT</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>30502510</b>
SCC Comment	<b>Crushing</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>SAND &amp; GRAVL</b>	<b>367512</b>	<b>TON</b>
Material Description	<b>SLAG CRUSHING</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>

**ATTACHMENT:**

Document Name: **EUSLAGPLANT Justification**

File Name: **2019 - EUSLAGPLANT.pdf**



**Michigan Department of Environmental Quality - Air Quality Division**

**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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUSLAGPLANT</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>30502511</b>
SCC Comment	<b>Screening</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>SAND &amp; GRAVL</b>	<b>367512</b>	<b>TON</b>
Material Description	<b>SLAG SCREENING</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>



**Michigan Department of Environmental Quality - Air Quality Division**

**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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUFEBENEFICATION</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>30488801</b>
SCC Comment	<b>Screening and Conveying</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>PRODUCT</b>	<b>55199</b>	<b>TON</b>
Material Description	<b>IRON SCRAP BENEFICATION - SCREENING AND CONVEYING</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>

**ATTACHMENT:**

Document Name: **EUFEBENEFICATION Justification**

File Name: **2019 - EUFEBENEFICATION.pdf**



**Michigan Department of Environmental Quality - Air Quality Division**

**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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUCOLDCLEANERS</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>49099998</b>
SCC Comment	

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>25</b>	<b>25</b>	<b>25</b>	<b>25</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>			
Material Code	Material Throughput	Unit Code	
<b>SOLVENTS</b>	<b>140</b>	<b>GAL</b>	
Material Description	<b>TRIMETHYL BENZENE</b>		
VOC Content (coatings or solvent)	<b>3 % by Weight</b>	Density	<b>1 LB/FT3</b>
BTUs (fuel)			
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel)	<b>% by Weight</b>



## Michigan Department of Environmental Quality - Air Quality Division

## 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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGRULE290</b>

<b>ACTIVITY INFORMATION</b>			
Source Classification Code(SCC)	<b>30502501</b>		
SCC Comment	<b>EUDEBRISPLANT, EURECYCLEMATOPERATION, EUMATRANSFERCONVEYORS</b>		
<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>
<b>OPERATING SCHEDULE</b>			
Hours per Day	Days per Week	Days per Year	
<b>8</b>	<b>5</b>	<b>255</b>	
<b>MATERIAL INFORMATION</b>			
Material Code	Material Throughput	Unit Code	
<b>SAND &amp; GRAVL</b>	<b>108461</b>	<b>TON</b>	
Material Description	<b>SLAG PROCESSING</b>		
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density	
BTUs (fuel)			
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel)	<b>% by Weight</b>

**ATTACHMENT:**Document Name: **EUDEBRISPLANT Justification**File Name: **2019 - EUDEBRISPLANT.pdf**Document Name: **EURECYCLEMATOPERATION Justification**File Name: **2019 - EURECYCLEMATOPER.pdf**Document Name: **EUMATRANSCONVEYORS Justification**File Name: **2019 - EUMATRANSCONVEYOR.pdf**



**Michigan Department of Environmental Quality - Air Quality Division**

**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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGRULE290</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>39999999</b>
SCC Comment	<b>EUDROPBALLCRANE</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>MATERIAL</b>	<b>37253</b>	<b>TON</b>
Material Description	<b>Scrap Steel, Skulls, Kish and Tundish</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>

**ATTACHMENT:**

Document Name: **EUDROPBALLCRANE Justification**

File Name: **2019 - EUDROPBALLCRANE.pdf**



Michigan Department of Environmental Quality - Air Quality Division

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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGFACILITY</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>30502504</b>
SCC Comment	<b>Unpaved Roadways</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>DEVICE</b>	<b>5475</b>	<b>MILE</b>
Material Description	<b>SLAG HAULING</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>

**ATTACHMENT:**

Document Name: **Unpaved Roads Justification**

File Name: **2019 - Unpaved Roads.pdf**



# Michigan Department of Environmental Quality - Air Quality Division

## 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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGFACILITY</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>30502506</b>
SCC Comment	<b>Truck Loading and Slag Pit</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>SAND &amp; GRAVL</b>	<b>462908</b>	<b>TON</b>
Material Description	<b>Slag</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>

**ATTACHMENT:**

Document Name: **Bulk Loading Justification**

File Name: **2019 - Bulk Loading.pdf**



**Michigan Department of Environmental Quality - Air Quality Division**

**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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGFACILITY</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>30502505</b>
SCC Comment	<b>Slag Stockpiling</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>SAND &amp; GRAVL</b>	<b>519147</b>	<b>TON</b>
Material Description	<b>Slag</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>

**ATTACHMENT:**

Document Name: **Stockpile Justification**

File Name: **2019 - Stockpiles.pdf**



Michigan Department of Environmental Quality - Air Quality Division

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.

<b>FORM REFERENCE</b>					
Form Type	<b>Activity</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGPAVEDROADS</b>

<b>ACTIVITY INFORMATION</b>	
Source Classification Code(SCC)	<b>30502504</b>
SCC Comment	<b>SLAG HAULING</b>

<b>SEASONAL MATERIAL USAGE SCHEDULE, IF THROUGHPUT IS &gt; 0, THEN SEASONAL PERCENTAGES MUST TOTAL 100%</b>			
Winter (Jan, Feb, Dec)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sep-Nov)
<b>26.8</b>	<b>35.4</b>	<b>19.3</b>	<b>18.5</b>

<b>OPERATING SCHEDULE</b>		
Hours per Day	Days per Week	Days per Year
<b>8</b>	<b>5</b>	<b>255</b>

<b>MATERIAL INFORMATION</b>		
Material Code	Material Throughput	Unit Code
<b>DEVICE</b>	<b>3047</b>	<b>MILE</b>
Material Description	<b>Slag</b>	
VOC Content (coatings or solvent)	<b>% by Weight</b>	Density
BTUs (fuel)		
Sulfur Content (fuel)	<b>% by Weight</b>	Ash Content (fuel) <b>% by Weight</b>



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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

<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUSLAGPLANT</b>
SCC	<b>30502503</b>	Material Code	<b>SAND &amp; GRAVL</b>		

<b>EMISSION INFORMATION</b>				
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>113 LB</b>	
Emission Basis	<b>MAERS EF</b>			
List Emission Factor	<b>6.40</b>	Exponent	<b>-3</b>	
Emission Factor Unit Code	<b>LB / TON</b>	Control Efficiency	<b>%</b>	
Comment				



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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

<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUSLAGPLANT</b>
SCC	<b>30502510</b>	Material Code	<b>SAND &amp; GRAVL</b>		

<b>EMISSION INFORMATION</b>				
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>26 LB</b>	
Emission Basis	<b>MAERS EF</b>			
List Emission Factor	<b>2.40</b>	Exponent	<b>-3</b>	
Emission Factor Unit Code	<b>LB / TON</b>	Control Efficiency	<b>%</b>	
Comment				



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUSLAGPLANT</b>
SCC	<b>30502511</b>	Material Code	<b>SAND &amp; GRAVL</b>		

<b>EMISSION INFORMATION</b>				
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>556 LB</b>	
Emission Basis	<b>MAERS EF</b>			
List Emission Factor	<b>1.20</b>	Exponent	<b>-1</b>	
Emission Factor Unit Code	<b>LB / TON</b>	Control Efficiency	<b>%</b>	
Comment				



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUFEBENEFICATION</b>
SCC	<b>30488801</b>	Material Code	<b>PRODUCT</b>		

<b>EMISSION INFORMATION</b>			
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>56 LB</b>
Emission Basis	<b>EPA EF</b>		
List Emission Factor	<b>7.86</b>	Exponent	<b>-4</b>
Emission Factor Unit Code		Control Efficiency	<b>%</b>
Comment			



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>EUCOLDCLEANERS</b>
SCC	<b>49099998</b>	Material Code	<b>SOLVENTS</b>		

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



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGRULE290</b>
SCC	<b>30502501</b>	Material Code	<b>SAND &amp; GRAVL</b>		

<b>EMISSION INFORMATION</b>				
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>10.92 LB</b>	
Emission Basis	<b>EPA EF</b>			
List Emission Factor	<b>4.60</b>	Exponent	<b>-5</b>	
Emission Factor Unit Code	<b>LB / TON</b>	Control Efficiency	<b>%</b>	
Comment	<b>Total PM for 3 units - debris, recycle material (Finlay Plant), pot slagger. 3 separate justifications are attached.</b>			



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGRULE290</b>
SCC	<b>39999999</b>	Material Code	<b>MATERIAL</b>		

<b>EMISSION INFORMATION</b>				
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>3725 LB</b>	
Emission Basis	<b>EPA EF</b>			
List Emission Factor	<b>1.00</b>	Exponent	<b>-1</b>	
Emission Factor Unit Code		Control Efficiency	<b>%</b>	
Comment				



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGFACILITY</b>
SCC	<b>30502504</b>	Material Code	<b>DEVICE</b>		

<b>EMISSION INFORMATION</b>			
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>3178 LB</b>
Emission Basis	<b>EPA EF</b>		
List Emission Factor	<b>2.90</b>	Exponent	<b>0</b>
Emission Factor Unit Code	<b>LB / MILE</b>	Control Efficiency	<b>84 %</b>
Comment			



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGFACILITY</b>
SCC	<b>30502506</b>	Material Code	<b>SAND &amp; GRAVL</b>		

<b>EMISSION INFORMATION</b>				
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>926 LB</b>	
Emission Basis	<b>EPA EF</b>			
List Emission Factor	<b>2.40</b>	Exponent	<b>-3</b>	
Emission Factor Unit Code	<b>LB / TON</b>	Control Efficiency	<b>%</b>	
Comment				



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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

<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGPAVEDROADS</b>
SCC	<b>30502504</b>	Material Code	<b>DEVICE</b>		

<b>EMISSION INFORMATION</b>			
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>602 LB</b>
Emission Basis	<b>EPA EF</b>		
List Emission Factor	<b>1.23</b>	Exponent	<b>0</b>
Emission Factor Unit Code	<b>LB / MILE</b>	Control Efficiency	<b>84 %</b>
Comment			



Michigan Department of Environmental Quality - Air Quality Division

Michigan Air Emissions Reporting System (MAERS)

2019 Emissions Form

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

<b>FORM REFERENCE</b>					
Form Type	<b>Emissions</b>	AQD Source ID (SRN)	<b>B4364</b>	EU ID	<b>RGFACILITY</b>
SCC	<b>30502505</b>	Material Code	<b>SAND &amp; GRAVL</b>		

<b>EMISSION INFORMATION</b>				
Pollutant Code	<b>PM10,FLTRBLE</b>	Annual Emissions	<b>1038 LB</b>	
Emission Basis	<b>EPA EF</b>			
List Emission Factor	<b>2.40</b>	Exponent	<b>-3</b>	
Emission Factor Unit Code	<b>LB / TON</b>	Control Efficiency	<b>%</b>	
Comment				



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.

<b>FORM REFERENCE</b>			
Form Type	<b>Preparer</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>PREPARER'S INFORMATION</b>			
Preparer's First Name, Middle Initial	<b>Matthew</b>	Preparer's Last Name	<b>Perko</b>
Preparer's Title	<b>Environmental Engineer</b>		
Mailing Address (Street Address 1)	<b>51445 W. Twelve Mile Road</b>		
Mailing Address (Street Address 2)			
City	<b>Wixom</b>	State/Province	<b>MI</b>
Country	<b>USA</b>	Zip Code	<b>48393</b>
E-Mail Address (if available)	<b>mperko@edwclevy.net</b>		
Telephone Number	<b>(313) 8204057</b>	Telephone Extension	
Fax Number	<b>()</b>		

<b>PREPARER'S ID (only complete this area if you have more than one preparer)</b>



Michigan Department of Environmental Quality - Air Quality Division

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.

<b>FORM REFERENCE</b>			
Form Type	<b>Submittal</b>	AQD Source ID (SRN)	<b>B4364</b>

<b>SOURCE IDENTIFICATION</b>			
Source Name	<b>EDW C LEVY CO PLANT 3</b>		
Mailing Address (Street Address 1)	<b>100 WESTFIELD</b>		
Mailing Address (Street Address 2)			
County	<b>WAYNE</b>	City	<b>ECORSE</b>
		Zip Code	<b>48229-</b>
Submittal Method	<b>Electronic</b>		Amended Submittal

<b>PRIMARY PREPARER'S AUTHORIZATION</b>	
Based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate, and complete.	
Primary Preparer	
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 - Bulk Loading.pdf	175619	Bulk Loading Justification
EUDEBRISPLANT Justification	2019 - EUDEBRISPLANT.pdf	148554	EUDEBRISPLANT Justification
EUDROPBALLCRANE Justification	2019 - EUDROPBALLCRANE.pdf	145625	EUDROPBALLCRANE Justification
EUFEBENEFICATION Justification	2019 - EUFEBENEFICATION.pdf	155990	2019 - EUFEBENEFICATION
EUMATTRANSCONVEYORS Justification	2019 - EUMATTRANSCONVEYOR.pdf	147315	EUMATTRANSCONVEYORS Justification
EURECYCLEMATOPERATION Justification	2019 - EURECYCLEMATOPER.pdf	147319	EURECYCLEMATOPERATION Justification
EUSLAGPLANT Justification	2019 - EUSLAGPLANT.pdf	167576	EUSLAGPLANT Justification
EUSLAGPLANT Justification	2019 - EUSLAGPLANT.pdf	167576	EUSLAGPLANT Justification
Stockpile Justification	2019 - Stockpiles.pdf	176282	
Unpaved Roads Justification	2019 - Unpaved Roads.pdf	132762	Unpaved Roads Justification