

## Exhibit A

IBD 2/20/08 -> B. Bennett

N

414 South Main Street, Suite 600  
Ann Arbor, Michigan 48104  
Tel: 734.302.4800 Fax: 734.302-4802

**DTE Energy**



DTE Energy Resources

February 2, 2009

Mr. Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

Re: Joint Construction and Operating Permit  
Portable Conveyors  
Chicago Fuels Terminal, LLC  
ID# 031600GSF

RECEIVED

FEB 03 2009

ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR  
STATE OF ILLINOIS

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Environmental Protection Agency  
BUREAU OF AIR

Enclosed please find three copies of an Air Pollution Control Permit application to construct additional portable conveyors, stackers and a rail car unloading system and to request that a Federally Enforceable State Operating Permit (FESOP) be issued for the Chicago Fuels Terminal ID# 03100GSF.

On September 11, 2008, the Agency issued a "Notice of Incompleteness" for the construction permit application you received on August 15, 2008. We have decided to expand the construction permit request to include additional emission units which are addressed in this application. We have also enclosed an item by item response to the issues raised in the September 11, 2008 Notice of Incompleteness. For ease of review, the attached revised application replaces the August 15, 2008 application.

In regards to the FESOP request, we have included a table outlining the throughput limitations and hours of operation that we want to be made federally enforceable.

We have enclosed the revised Fee Determination for Construction Permit Application (197-FEE) form and a check for \$14,000.

If you have any questions or need additional information, please contact Don Sutton with Conestoga-Rovers & Associates at 217-717-9009.

Yours truly,

*Kimberly J. Bradford*  
Kimberly J Bradford

KJB/DES/sem/03  
Encl.

IEPA - DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

FEB 23 2012

REVIEWER RDH



## JOINT CONSTRUCTION AND OPERATING PERMIT APPLICATION

DTE CHICAGO FUELS TERMINAL, LLC  
10730 SOUTH BURLEY AVENUE  
CHICAGO, ILLINOIS

FEBRUARY 2009  
REF. NO. 052450 (1)  
This report is printed on recycled paper.

**Prepared by:**  
**Conestoga-Rovers**  
**& Associates**

1234 Centre West Drive  
Springfield, IL 62704-2173

Office: 217-717-9000  
Fax: 217-717-9001

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## 1.0 PROJECT NARRATIVE

On February 13, 2008, the Illinois Environmental Protection Agency (IEPA) Bureau of Air (Agency) issued a Joint Construction and Operating Permit to DTE Chicago Fuels Terminal, LLC (DTE), Permit #07050082, ID# 031600GSF. In this permit, the Agency determined that this facility has potential to emit more than 100 tons/year of particulate matter of less than ten microns (PM<sub>10</sub>).

In the permit application received by the IEPA on August 15, 2008 we noted that, upon review of Section 39.5 (2)(c)(ii) of the Illinois Environmental Protection Act (Act), the facility is not one of the 28 categories of stationary source listed there and is not subject to a standards promulgated under Section 111 or 112 of the Clean Air Act which would require them to include fugitive emissions. Therefore, the potential to emit does not include fugitive emissions.

A Notice of Incompleteness (NOI) was issued for the permit application on September 11, 2008. Since the issuance of the NOI, DTE has decided to install additional equipment at the facility resulting in a higher overall emission rate from the facility. A listing of all emission units, including existing and proposed emission units, is provided in Table 13 of the attached application.

The diesel fuel-fired engines are subject to 40 CFR Part 60 Subpart IIII. The source will comply with the requirements through the following:

- 40 CFR 60.4204 – Emission Standards For Non-Emergency Engines  
Manufacturer's certification.
- ✓ 40 CFR 60.4207 – Fuel Requirements For Non-Emergency Engines  
DTE will only use compliant fuels in the engines.
- ✓ 40 CFR 60.4209 – Monitoring Requirements For Non-Emergency Engines  
The use of a non-resettable hour meter.
- ✓ 40 CFR 60.4211 – Compliance Requirements For Non-Emergency Engines  
Manufacturer's certification.
- ✓ 40 CFR 60.4212 – Test Method Requirements For Non-Emergency Engines  
DTE will test the engines in a manner consistent with the requirements set forth in this regulation.
- ✓ 40 CFR 60.4214 – Notification, Reporting, and Recordkeeping Requirements For Non-Emergency Engines

DTE will track hour usage on a rolling monthly basis and track fuel quality by purchase receipts and will record routine maintenance activities.

The crushers and screeners located at the facility are not subject to the requirements set forth in 40 CFR 60 Subpart OOO because the units are rated at a maximum throughput of 140 tons per hour.

The "Potential to Emit" (PTE) calculations in Table 1 indicates that the source is major, but the limitations set forth in Table 8A support the fact that this source is a synthetic minor source. Therefore, DTE requests that a Federally Enforceable State Operating Permit be issued for this source, based on the tables listed below.

The emissions contained in Table 8A are based on the maximum facility throughput level of 11,250,000 tons of coal and petroleum coke and 250,000 tons per year of salt. Therefore, please use the emissions listed in the tables below to establish the allowable emissions for fee purposes.

**Transfer and Conveying, and Loadout**

Material Handled	Throughput		Emission Factor (lb/ton)		PM Emissions		PM10 Emissions	
	tons/month	tons/yr	PM	PM10	tons/month	tons/yr	tons/month	tons/yr
Coal & Coke	1,100,000	11,000,000	5.34E-05	2.53E-06	5.87	58.7	2.78	27.8
Salt	25,000	250,000	4.40E-05	2.00E-06	0.11	1.1	0.05	0.5
Incidental Soil Crushing/Screening	122,640	1,226,400	2.45E-06	8.15E-08	0.03	0.3	0.01	0.1

The emission factors are based on material unloading, all possible transfer points located at the facility, and loadout. The emission factors take into account a 50% control efficiency for the inherent moisture content of the materials being processed.

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**300 HP Diesel Engine Emissions (Portable Conveyors 1-5 & Portable Feed Hopper)**

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO <sub>x</sub>	0.015	1.77	1.86	18.59
CO	0.0187	2.21	2.32	23.21
SO <sub>2</sub>	0.00205	0.24	0.25	2.52
PM	0.0009	0.1	0.11	1.05
PM <sub>10</sub>	0.0009	0.1	0.11	1.05
VOM	0.00247	0.29	0.30	3.05

This Table provides the emissions for DG-(1-6). Emissions are based on 3,500 hours of operation per year for each unit, or 21,000 hr/yr total. (six units)

**400 HP Diesel Engine Emissions (Portable Diesel Feeder)**

<b>Pollutant</b>	<b>Emission Factor</b>	<b>Emissions</b>		
	<b>lb/bhp-hr</b>	<b>lb/hr</b>	<b>ton/month</b>	<b>ton/yr</b>
NO <sub>x</sub>	0.015	6	1.05	10.50
CO	0.0187	7.48	1.31	13.09
SO <sub>2</sub>	0.00205	0.82	0.14	1.44
PM	0.0009	0.35	0.06	0.61
PM <sub>10</sub>	0.0009	0.35	0.06	0.61
VOM	0.00247	0.99	0.17	1.73

This Table provides the emissions for DG-7.  
Emissions are based on 3,500 hours of operation per year.

**375 HP Diesel Engine Emissions (Portable Conveyor 6)**

<b>Pollutant</b>	<b>Emission Factor</b>	<b>Emissions</b>		
	<b>lb/bhp-hr</b>	<b>lb/hr</b>	<b>ton/month</b>	<b>ton/yr</b>
NO <sub>x</sub>	0.015	5.63	0.99	9.85
CO	0.0187	7.01	1.23	12.27
SO <sub>2</sub>	0.00205	0.77	0.13	1.35
PM	0.0009	0.33	0.06	0.58
PM <sub>10</sub>	0.0009	0.33	0.06	0.58
VOM	0.00247	0.93	0.16	1.63

This Table provides the emissions for DG-8.  
Emissions are based on 3,500 hours of operation per year.

**40 HP Diesel Engine Emissions (Rental Portable Screen)**

<b>Pollutant</b>	<b>Emission Factor</b>	<b>Emissions</b>		
	<b>lb/bhp-hr</b>	<b>lb/hr</b>	<b>ton/month</b>	<b>ton/yr</b>
NO <sub>x</sub>	0.015	0.6	0.11	1.05
CO	0.0187	0.75	0.13	1.31
SO <sub>2</sub>	0.00205	0.08	0.01	0.14
PM	0.0009	0.04	0.01	0.07
PM <sub>10</sub>	0.0009	0.04	0.01	0.07
VOM	0.00247	0.1	0.02	0.18

This Table provides the emissions for DG-9.  
Emissions are based on 3,500 hours of operation per year.

*300 HP Diesel Engine Emissions (Portable Conveyors 7-8 & Portable Crusher/Screener)*

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO <sub>x</sub>	0.015	4.5	2.36	23.63
CO	0.0187	5.61	2.95	29.45
SO <sub>2</sub>	0.00205	0.62	0.33	3.26
PM	0.0009	0.26	0.14	1.37
PM <sub>10</sub>	0.0009	0.26	0.14	1.37
VOM	0.00247	0.74	0.39	3.89

This Table provides the emissions for DG-(10-12).

Emissions are based on 3,500 hours of operation per year for each unit, 10,500 hr/yr total. (three units)

*20 HP Diesel Engine Emissions (Emergency Water Pump)*

<i>Pollutant</i>	<i>Emission Factor</i>	<i>Emissions</i>		
	<i>lb/bhp-hr</i>	<i>lb/hr</i>	<i>ton/month</i>	<i>ton/yr</i>
NO <sub>x</sub>	0.015	0.3	0.01	0.08
CO	0.0187	0.37	0.01	0.09
SO <sub>2</sub>	0.00205	0.04	0.001	0.01
PM	0.0009	0.02	0.001	0.01
PM <sub>10</sub>	0.0009	0.02	0.001	0.01
VOM	0.00247	0.05	0.001	0.01

This Table provides the emissions for DWP-1.

Emissions are based on 500 hours of operation per year.



Illinois Environmental Protection Agency  
 Division Of Air Pollution Control -- Permit Section  
 P.O. Box 19506  
 Springfield, Illinois 62794-9506

17000162 7513

<b>Construction Permit Application</b> for a <b>Proposed Project</b> at a CAAPP Source	For Illinois EPA use only
	ID No.: 031600GSF
	Appl. No.: 07050082
	Date Rec'd: 2/3/09
Chk No./Amt: 476230-914,000.00	

This form is to be used to supply general information to obtain a construction permit for a proposed project involving a Clean Air Act Permit Program (CAAPP) source, including construction of a new CAAPP source. Detailed information about the project must also be included in a construction permit application, as addressed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project	
1. Working Name of Proposed Project: Operating Permit	
2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If Yes, provide BOA ID Number: 031600GSF	
3. Does this application request a revision to an existing construction permit issued by the BOA? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If Yes, provide Permit Number: 07050082	
4. Brief Description of Proposed Project: See Section 1.0, Project Narrative.	

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Source Information		
1. Source name:* DTE Chicago Fuels Terminal, LLC		
2. Source street address:* 10730 South Burley Avenue		
3. City: Chicago	4. County: Cook	5. Zip code:* 60617
ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.		
6. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No If no, provide Township Name:		
7. Description of source and product(s) produced:		8. Primary Classification Code of source: SIC: _____ or NAICS: _____
9. Latitude (DD:MM:SS.SSSS):		10. Longitude (DD:MM:SS.SSSS):

\* Is information different than previous information?  Yes  No  
 If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Identification of Permit Applicant	
1. Who is the applicant? <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator	2. All correspondence to: (check one) <input type="checkbox"/> Source <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator
3. Applicant's FEIN: 204570538	4. Attention name and/or title for written correspondence: Kim Bradford

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Owner Information*		
1. Name: DTE Chicago Fuels Terminal, LLC		
2. Address: 414 South Main Street		
3. City: Ann Arbor	4. State: Michigan	5. Zip code: 48104

\* Is this information different than previous information?  Yes  No  
 If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Operator Information (if different from owner)*		
1. Name DTE Chicago Fuels Terminal, LLC		
2. Address: 10730 South Burley Avenue		
3. City: Chicago	4. State: Illinois	5. Zip code: 60617

\* Is this information different than previous information?  Yes  No  
 If yes, then complete Form CAAPP 273 to apply for an Administrative Change to the CAAPP Permit for the source.

Technical Contacts for Application	
1. Preferred technical contact: (check one) <input checked="" type="checkbox"/> Applicant's contact <input type="checkbox"/> Consultant	
2. Applicant's technical contact person for application: Kim Bradford	
3. Contact person's telephone number(s): 734-302-8206	4. Contact person's e-mail address: bradfordkj@dteenergy.com
5. Consultant for application: Don Sutton, Conestoga-Rovers & Associates	
6. Consultant's telephone number(s): 217-717-9009	7. Consultant's e-mail address: dsutton@craworld.com

Other Addresses for the Permit Applicant	
ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.	
1. Address for billing Site Fees for the source: <input type="checkbox"/> Source <input checked="" type="checkbox"/> Other (provide below): 414 South Main Street Ann Arbor, Michigan 48104	
2. Contact person for Site Fees: Kim Bradford	3. Contact person's telephone number: 734-913-2082
4. Address for Annual Emission Report for the source: <input checked="" type="checkbox"/> Source <input type="checkbox"/> Other (provide below):	
5. Contact person for Annual Emission Report: Kim Bradford	6. Contact person's telephone number: 734-302-8206

<b>Review Of Contents of the Application</b>	
<b>NOTE: ANSWERING "NO" TO THESE ITEMS MAY RESULT IN THE APPLICATION BEING DEEMED INCOMPLETE</b>	
1. Does the application include a narrative description of the proposed project?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Does the application clearly identify the emission units and air pollution control equipment that are part of the project?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment, along with associated existing equipment and their relationships?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4. Does the application include a general description of the source, a plot plan for the source and a site map for its location?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Material previously provided
5. Does the application include relevant technical information for the proposed project as requested on CAAPP application forms (or otherwise contain all relevant technical information)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. Does the application include relevant supporting data and information for the proposed project as provided on CAAPP forms?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7. Does the application identify and address all applicable emission standards for the proposed project, including: State emission standards (35 IAC Chapter I, Subtitle B); Federal New Source Performance Standards (40 CFR Part 60)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8. Does the application address whether the project would be a major project for Prevention of Significant Deterioration, 40 CFR 52.21?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
9. Does the application address whether the project would be a major project for "Nonattainment New Source Review," 35 IAC Part 203?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
10. Does the application address whether the proposed project would potentially be subject to federal regulations for Hazardous Air Pollutants (40 CFR Part 63) and address any emissions standards for hazardous air pollutants that would be applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A* * Source not major <input checked="" type="checkbox"/> Project not major <input checked="" type="checkbox"/>
11. Does the application include a summary of annual emission data for different pollutants for the proposed project (tons/year), including: 1) The requested permitted emissions for individual new, modified and affected existing units*, 2) The past actual emissions and change in emissions for individual modified units* and affected existing units*, and 3) Total emissions consequences of the proposed project? (* Or groups of related units)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * The project does not involve an increase in emissions from new or modified emission units.
12. Does the application include a summary of the current and requested potential emissions of the source (tons/year)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A* * Applicability of PSD, NA NSR or 40 CFR 63 to the project is not related to the source's emissions.
13. Does the application address the relationships and implications of the proposed project on the CAAPP Permit for the source?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A* * CAAPP Permit not issued
14. If the application contains information that is considered a TRADE SECRET, has it been properly marked and claimed and all requirements to properly support the claim pursuant to 35 IAC Part 130 been met? Note: "Claimed" information will not be legally protected from disclosure to the public if it is not properly claimed or does not qualify as trade secret information.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A* * No information in the application is claimed to be a TRADE SECRET
15. Are the correct number of copies of the application provided? (See Instructions for Permit Applications, Form 201)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, a check in the amount indicated on this form, and any supporting material needed to explain how the fee was determined?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Signature Block**

Authorized Signature:

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete and that I am a responsible official for the source, as defined by Section 39.5(1) of the Environmental Protection Act.

BY:

*John Grant*

AUTHORIZED SIGNATURE

*Vice President*

TITLE OF SIGNATORY

*John Grant*

TYPED OR PRINTED NAME OF SIGNATORY

*2 03 09*

DATE



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION  
 P.O. BOX 19506  
 SPRINGFIELD, ILLINOIS 62794-9506

<b>FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION</b>	<b>FOR AGENCY USE ONLY</b>	
	ID NUMBER:	031600G5F
	PERMIT #:	07050082
	COMPLETE <input checked="" type="checkbox"/> INCOMPLETE <input type="checkbox"/>	DATE COMPLETE: 2/3/09
	CHECK #: 476230	ACCOUNT NAME: DTE Chicago Fuels

THIS FORM IS TO BE USED BY ALL SOURCES TO SUPPLY FEE INFORMATION THAT MUST ACCOMPANY ALL CONSTRUCTION PERMIT APPLICATIONS. **THIS APPLICATION MUST INCLUDE PAYMENT IN FULL TO BE DEEMED COMPLETE.** MAKE CHECK OR MONEY ORDER PAYABLE TO THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY. SEND TO THE ADDRESS ABOVE. DO NOT SEND CASH. REFER TO INSTRUCTIONS (197-INST) FOR ASSISTANCE.

SOURCE INFORMATION	
1) SOURCE NAME: DTE Chicago Fuels Terminal, LLC	
2) PROJECT NAME: Transfer Terminal	3) SOURCE ID NO. (IF APPLICABLE): 031600GSF
4) CONTACT NAME: Kim Bradford	5) CONTACT PHONE NUMBER: 734-302-8206

FEE DETERMINATION		
6) FILL IN THE FOLLOWING THREE BOXES AS DETERMINED IN SECTIONS 1 THROUGH 4 BELOW:		
\$ 5,000 SECTION 1 SUBTOTAL	+ \$ 10,000 SECTION 2, 3 OR 4 SUBTOTAL	= \$*15,000 - 1,000 = 14,000 GRAND TOTAL

SECTION 1: STATUS OF SOURCE / PURPOSE OF SUBMITTAL	
7) YOUR APPLICATION WILL FALL UNDER ONLY ONE OF THE FOLLOWING SIX CATEGORIES DESCRIBED BELOW. CHECK THE BOX THAT APPLIES, ENTER THE CORRESPONDING FEE IN THE BOX TO THE RIGHT AND COPY THIS FEE INTO THE SECTION 1 SUBTOTAL BOX ABOVE. PROCEED TO APPLICABLE SECTIONS.	
<b>FOR PURPOSES OF THIS FORM:</b>	
<ul style="list-style-type: none"> <li>• <b>MAJOR SOURCE</b> IS A SOURCE THAT IS REQUIRED TO OBTAIN A CAAPP PERMIT.</li> <li>• <b>SYNTHETIC MINOR SOURCE</b> IS A SOURCE THAT HAS TAKEN LIMITS ON POTENTIAL TO EMIT IN A PERMIT TO AVOID CAAPP PERMIT REQUIREMENTS (E.G., FESOP).</li> <li>• <b>NON-MAJOR SOURCE</b> IS A SOURCE THAT IS NOT A MAJOR OR SYNTHETIC MINOR SOURCE.</li> </ul>	
<input type="checkbox"/> EXISTING SOURCE WITHOUT STATUS CHANGE OR WITH STATUS CHANGE FROM SYNTHETIC MINOR TO MAJOR SOURCE OR VICE VERSA. ENTER \$0 AND PROCEED TO SECTION 2. <input checked="" type="checkbox"/> EXISTING NON-MAJOR SOURCE THAT WILL BECOME SYNTHETIC MINOR OR MAJOR SOURCE. ENTER \$5,000 AND PROCEED TO SECTION 4. <input type="checkbox"/> EXISTING MAJOR OR SYNTHETIC MINOR SOURCE THAT WILL BECOME NON-MAJOR SOURCE. ENTER \$4,000 AND PROCEED TO SECTION 3. <input type="checkbox"/> NEW MAJOR OR SYNTHETIC MINOR SOURCE. ENTER \$5,000 AND PROCEED TO SECTION 4. <input type="checkbox"/> NEW NON-MAJOR SOURCE. ENTER \$500 AND PROCEED TO SECTION 3. <input type="checkbox"/> <b>AGENCY ERROR.</b> IF THIS IS A TIMELY REQUEST TO CORRECT AN ISSUED PERMIT THAT INVOLVES ONLY AN AGENCY ERROR AND IF THE REQUEST IS RECEIVED WITHIN THE DEADLINE FOR A PERMIT APPEAL TO THE POLLUTION CONTROL BOARD, THEN ENTER \$0. SKIP SECTIONS 2, 3 AND 4. PROCEED DIRECTLY TO SECTION 5.	\$ 5,000 SECTION 1 SUBTOTAL

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SECTION 2: SPECIAL CASE FILING FEE
8) <b>FILING FEE.</b> IF THE APPLICATION ONLY ADDRESSES ONE OR MORE OF THE FOLLOWING, CHECK THE APPROPRIATE BOXES, ENTER \$500 IN THE SECOND BOX UNDER FEE DETERMINATION ABOVE, SKIP SECTIONS 3 AND 4 AND PROCEED DIRECTLY TO SECTION 5. OTHERWISE, PROCEED TO SECTION 3 OR 4, AS APPROPRIATE.
<input type="checkbox"/> ADDITION OR REPLACEMENT OF CONTROL DEVICES ON PERMITTED UNITS <input type="checkbox"/> PILOT PROJECTS/TRIAL BURNS BY A PERMITTED UNIT <input type="checkbox"/> APPLICATIONS ONLY INVOLVING INSIGNIFICANT ACTIVITIES UNDER 35 IAC 201.210 (MAJOR SOURCES ONLY) <input type="checkbox"/> LAND REMEDIATION PROJECTS <input type="checkbox"/> REVISIONS RELATED TO METHODOLOGY OR TIMING FOR EMISSION TESTING <input type="checkbox"/> MINOR ADMINISTRATIVE-TYPE CHANGE TO A PERMIT

THIS AGENCY IS AUTHORIZED TO REQUIRE AND YOU MUST DISCLOSE THIS INFORMATION UNDER 415 ILCS 5/39. FAILURE TO DO SO COULD RESULT IN THE APPLICATION BEING DENIED AND PENALTIES UNDER 415 ILCS 5 ET SEQ. IT IS NOT NECESSARY TO USE THIS FORM IN PROVIDING THIS INFORMATION. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

\*The total includes the fees for the FESOP and the \$1,000 paid on the previous application.

SECTION 3: FEES FOR CURRENT OR PROJECTED NON-MAJOR SOURCES		
9) IF THIS APPLICATION CONSISTS OF A SINGLE NEW EMISSION UNIT OR NO MORE THAN TWO MODIFIED EMISSION UNITS, ENTER \$500.		9)
10) IF THIS APPLICATION CONSISTS OF MORE THAN ONE NEW EMISSION UNIT OR MORE THAN TWO MODIFIED UNITS, ENTER \$1,000.		10)
11) IF THIS APPLICATION CONSISTS OF A NEW SOURCE OR EMISSION UNIT SUBJECT TO SECTION 39.2 OF THE ACT (I.E., LOCAL SITING REVIEW); A COMMERCIAL INCINERATOR OR A MUNICIPAL WASTE, HAZARDOUS WASTE, OR WASTE TIRE INCINERATOR; A COMMERCIAL POWER GENERATOR; OR AN EMISSION UNIT DESIGNATED AS A COMPLEX SOURCE BY AGENCY RULEMAKING, ENTER \$15,000.		11)
12) IF A PUBLIC HEARING IS HELD (SEE INSTRUCTIONS), ENTER \$10,000.		12)
13) SECTION 3 SUBTOTAL (ADD LINES 9 THROUGH 12) TO BE ENTERED ON PAGE 1.		13)

SECTION 4: FEES FOR CURRENT OR PROJECTED MAJOR OR SYNTHETIC MINOR SOURCES			
Application Contains Modified Emission Units Only	14) FOR THE FIRST MODIFIED EMISSION UNIT, ENTER \$2,000.	14)	
	15) NUMBER OF ADDITIONAL MODIFIED EMISSION UNITS = _____ X \$1,000.	15)	
	16) LINE 14 PLUS LINE 15, OR \$5,000, WHICHEVER IS LESS.	16)	
Application Contains New And/Or Modified Emission Units	17) FOR THE FIRST NEW EMISSION UNIT, ENTER \$4,000.	17)	\$4,000
	18) NUMBER OF ADDITIONAL NEW AND/OR MODIFIED EMISSION UNITS = 13 X \$1,000.	18)	\$13,000
	19) LINE 17 PLUS LINE 18, OR \$10,000, WHICHEVER IS LESS.	19)	\$10,000
Application Contains Netting Exercise	20) NUMBER OF INDIVIDUAL POLLUTANTS THAT RELY ON A NETTING EXERCISE OR CONTEMPORANEOUS EMISSIONS DECREASE TO AVOID APPLICATION OF PSD OR NONATTAINMENT NSR = _____ X \$3,000.	20)	
Additional Supplemental Fees	21) IF THE NEW SOURCE OR EMISSION UNIT IS SUBJECT TO SECTION 39.2 OF THE ACT (I.E., SITING); A COMMERCIAL INCINERATOR OR OTHER MUNICIPAL WASTE, HAZARDOUS WASTE, OR WASTE TIRE INCINERATOR; A COMMERCIAL POWER GENERATOR; OR ONE OR MORE OTHER EMISSION UNITS DESIGNATED AS A COMPLEX SOURCE BY AGENCY RULEMAKING, ENTER \$25,000.	21)	
	22) IF THE SOURCE IS A NEW MAJOR SOURCE SUBJECT TO PSD, ENTER \$12,000.	22)	
	23) IF THE PROJECT IS A MAJOR MODIFICATION SUBJECT TO PSD, ENTER \$6,000.	23)	
	24) IF THIS IS A NEW MAJOR SOURCE SUBJECT TO NONATTAINMENT (NAA) NSR, ENTER \$20,000.	24)	
	25) IF THIS IS A MAJOR MODIFICATION SUBJECT TO NAA NSR, ENTER \$12,000.	25)	
	26) IF APPLICATION INVOLVES A DETERMINATION OF CLEAN UNIT STATUS AND THEREFORE IS NOT SUBJECT TO BACT OR LAER, ENTER \$5,000 PER UNIT FOR WHICH A DETERMINATION IS REQUESTED OR OTHERWISE REQUIRED. _____ X \$5,000.	26)	
	27) IF APPLICATION INVOLVES A DETERMINATION OF MACT FOR A POLLUTANT AND THE PROJECT IS NOT SUBJECT TO BACT OR LAER FOR THE RELATED POLLUTANT UNDER PSD OR NSR (E.G., VOM FOR ORGANIC HAP), ENTER \$5,000 PER UNIT FOR WHICH A DETERMINATION IS REQUESTED OR OTHERWISE REQUIRED. _____ X \$5,000.	27)	
	28) IF A PUBLIC HEARING IS HELD (SEE INSTRUCTIONS), ENTER \$10,000.	28)	
29) SECTION 4 SUBTOTAL (ADD LINES 16 AND LINES 19 THROUGH 28) TO BE ENTERED ON PAGE 1.			29) \$10,000

SECTION 5: CERTIFICATION	
NOTE: APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED INCOMPLETE.	
30) I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE INFORMATION CONTAINED IN THIS FEE APPLICATION FORM IS TRUE, ACCURATE AND COMPLETE.	
BY: _____	_____
SIGNATURE	TITLE OF SIGNATORY
John Grantham	Vice President
TYPED OR PRINTED NAME OF SIGNATORY	DATE
	2, 03, 09



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION  
 P.O. BOX 19506  
 SPRINGFIELD, ILLINOIS 62794-9506

**FOR APPLICANT'S USE**

Revision #: \_\_\_\_\_  
 Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_  
 Page \_\_\_\_ of \_\_\_\_  
 Source Designation: \_\_\_\_\_

<b>PROCESS EMISSION UNIT DATA AND INFORMATION</b>	<b>FOR AGENCY USE ONLY</b>
	ID NUMBER: _____
	EMISSION POINT #: _____
DATE: _____	

<b>SOURCE INFORMATION</b>	
1) SOURCE NAME: DTE Chicago Fuels Terminal, LLC	
2) DATE FORM PREPARED: _____	3) SOURCE ID NO. (IF KNOWN): 031600GSF

<b>GENERAL INFORMATION</b>	
4) NAME OF EMISSION UNIT: Material Handling	
5) NAME OF PROCESS: Material Handling	
6) DESCRIPTION OF PROCESS: Handling of coal, pet coke, and salt.	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Material transfer station	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT: See figures 2 & 3	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): To Be Determined	
10) MODEL NUMBER (IF KNOWN): To Be Determined	11) SERIAL NUMBER (IF KNOWN): To Be Determined
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR): Upon issuance of permit
	b) OPERATION (MONTH/YEAR): Upon issuance of permit
	c) LATEST MODIFICATION (MONTH/YEAR): N/A
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE): N/A	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

**FOR APPLICANT'S USE**

052450-01-220-CAAPP

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION?  YES  NO  
 IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 220-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):  
 None

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION?  YES  NO  
 IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):  
 The source has limited their material throughput per year to obtain a FESOP.

**OPERATING INFORMATION**

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 220-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS	HOURS/DAY: 8	DAYS/WEEK: 5	WEEKS/YEAR: 52	
b) TYPICAL OPERATING HOURS	HOURS/DAY: 8	DAYS/WEEK: 5	WEEKS/YEAR: 52	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

**MATERIAL USAGE INFORMATION**

21a) RAW MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR
See Tables 5 & 6				

21b) PRODUCTS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR

21c) BY-PRODUCT MATERIALS	MAXIMUM RATES		TYPICAL RATES	
	LBS/HR	TONS/YEAR	LBS/HR	TONS/YEAR

FUEL USAGE DATA		
22a) MAXIMUM FIRING RATE (MILLION BTU/HR):	b) TYPICAL FIRING RATE (MILLION BTU/HR):	c) DESIGN CAPACITY FIRING RATE (MILLION BTU/HR):
d) FUEL TYPE: <input type="checkbox"/> NATURAL GAS <input type="checkbox"/> FUEL OIL: GRADE NUMBER _____ <input type="checkbox"/> COAL <input type="checkbox"/> OTHER _____ IF MORE THAN ONE FUEL IS USED, ATTACH AN EXPLANATION AND LABEL AS EXHIBIT 220-2.		
e) TYPICAL HEAT CONTENT OF FUEL (BTU/LB, BTU/GAL OR BTU/SCF):	f) TYPICAL SULFUR CONTENT (WT %, NA FOR NATURAL GAS):	
g) TYPICAL ASH CONTENT (WT %, NA FOR NATURAL GAS):	h) ANNUAL FUEL USAGE (SPECIFY UNITS, E.G., SCF/YEAR, GAL/YEAR, TON/YEAR):	
23) ARE COMBUSTION EMISSIONS DUCTED TO THE SAME STACK OR CONTROL AS PROCESS UNIT EMISSIONS? <input type="checkbox"/> YES <input type="checkbox"/> NO IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:		

See Narrative, Section 1.0.

<b>APPLICABLE RULES</b>		
<b>24) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., VOM, IAC 218.204(j)(4), 3.5 LBS/GAL):</b>		
REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>
<b>25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:</b>		
REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>
<b>26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:</b>		
REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>
<b>27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:</b>		
REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>
<b>28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :</b>		
REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>

29) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE?  YES  NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 220-3, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

**COMPLIANCE INFORMATION**

30) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?  YES  NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

31) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:

See Narrative, Section 1.0.

32) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:

See Narrative, Section 1.0.

**TESTING, MONITORING, RECORDKEEPING AND REPORTING**

33a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Visible Emissions	Percent Opacity	Method 9	Once

33b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Throughput	Log Book		

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS?  YES  NO

IF NO, EXPLAIN:

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST?  YES  NO

IF NO, EXPLAIN:

34a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

N/A

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., VOM EMISSIONS TO ATMOSPHERE)?

N/A

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR 3 FEET FROM EXIT):

N/A

34d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?  YES  NO

IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:  
N/A

---

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?  YES  NO

IF NO, EXPLAIN:  
N/A

---

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION?  YES  NO

IF NO, EXPLAIN:  
N/A

---

35) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
	N/A			

---

36) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Emissions	Annual Emissions Report	Annually

See Tables 1-13.

(37) EMISSION INFORMATION											
REGULATED AIR POLLUTANT		<input type="checkbox"/> <sup>1</sup> ACTUAL EMISSION RATE <input type="checkbox"/> <sup>1</sup> UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			<sup>2</sup> PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	<sup>3</sup> OTHER TERMS	<sup>3</sup> OTHER TERMS	<sup>4</sup> DM	<sup>5</sup> RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER ≤ 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY:	MAXIMUM:						( )				
	TYPICAL:						( )				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-5.

- <sup>1</sup>CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
- <sup>2</sup>PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
- <sup>3</sup>PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
- <sup>4</sup>DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
- <sup>5</sup>RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.



<b>EXHAUST POINT INFORMATION</b>		
THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.		
39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT: See figures 2 & 3.		
40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS. Emissions are fugitive.		
41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT): Emissions are fugitive.		
42) DISCHARGE HEIGHT ABOVE GRADE (FT): Emissions are fugitive.		
43) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
44) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA.		
45) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM): N/A	b) TYPICAL (ACFM): N/A
46) EXIT GAS TEMPERATURE	a) MAXIMUM (°F): N/A	b) TYPICAL (°F): N/A
47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD): Emissions are fugitive.		
48) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:		
NAME		FLOW DIAGRAM DESIGNATION
a) See Table 13		
b)		
c)		
d)		
e)		
THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.		
49a) LATITUDE:		b) LONGITUDE:
50) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL - PERMIT SECTION  
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 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE	
Revision #:	_____
Date:	____ / ____ / ____
Page	_____ of _____
Source Designation:	_____

<b>STATIONARY INTERNAL                  COMBUSTION ENGINE OR TURBINE                  DATA AND INFORMATION</b>	FOR AGENCY USE ONLY
	ID NUMBER:
	EMISSION POINT #:
DATE:	

SOURCE INFORMATION	
1) SOURCE NAME: DTE Chicago Fuels Terminal, LLC	
2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN): 031600GSF

GENERAL INFORMATION	
4) NAME OF EMISSION UNIT: Diesel Fuel-Fired Engines	
5) NAME OF PROCESS: Diesel Fuel-Fired Engines	
6) DESCRIPTION OF PROCESS: Production of power from diesel fuel-fired engines	
7) DESCRIPTION OF ITEM OR MATERIAL PRODUCED OR ACTIVITY ACCOMPLISHED: Production of electricity and power to operate machinery	
8) FLOW DIAGRAM DESIGNATION OF EMISSION UNIT: See figures 2 & 3.	
9) MANUFACTURER OF EMISSION UNIT (IF KNOWN): To be determined	
10) MODEL NUMBER (IF KNOWN): To be determined	11) SERIAL NUMBER (IF KNOWN): To be determined
12) DATES OF COMMENCING CONSTRUCTION, OPERATION AND/OR MOST RECENT MODIFICATION OF THIS EMISSION UNIT (ACTUAL OR PLANNED)	a) CONSTRUCTION (MONTH/YEAR): To be determined
	b) OPERATION (MONTH/YEAR): To be determined
	c) LATEST MODIFICATION (MONTH/YEAR): N/A
13) DESCRIPTION OF MODIFICATION (IF APPLICABLE):	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

FOR APPLICANT'S USE
052450-01-270-CAAPP

14) DOES THE EMISSION UNIT HAVE MORE THAN ONE MODE OF OPERATION?  YES  NO  
 IF YES, EXPLAIN AND IDENTIFY WHICH MODE IS COVERED BY THIS FORM (NOTE: A SEPARATE PROCESS EMISSION UNIT FORM 270-CAAPP MUST BE COMPLETED FOR EACH MODE):

15) PROVIDE THE NAME AND DESIGNATION OF ALL AIR POLLUTION CONTROL EQUIPMENT CONTROLLING THIS EMISSION UNIT, IF APPLICABLE (FORM 260-CAAPP AND THE APPROPRIATE 260-CAAPP ADDENDUM FORM MUST BE COMPLETED FOR EACH ITEM OF AIR POLLUTION CONTROL EQUIPMENT):  
 N/A

16) WILL EMISSIONS DURING STARTUP EXCEED EITHER THE ALLOWABLE EMISSION RATE PURSUANT TO A SPECIFIC RULE, OR THE ALLOWABLE EMISSION LIMIT AS ESTABLISHED BY AN EXISTING OR PROPOSED PERMIT CONDITION?  YES  NO  
 IF YES, COMPLETE AND ATTACH FORM 203-CAAPP, "REQUEST TO OPERATE WITH EXCESS EMISSIONS DURING STARTUP OF EQUIPMENT".

17) PROVIDE ANY LIMITATIONS ON SOURCE OPERATION AFFECTING EMISSIONS OR ANY WORK PRACTICE STANDARDS (E.G., ONLY ONE UNIT IS OPERATED AT A TIME):  
 None

**OPERATING INFORMATION**

18) ATTACH THE CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSION RELATED, FROM WHICH THE FOLLOWING OPERATING INFORMATION, MATERIAL USAGE INFORMATION AND FUEL USAGE DATA WERE BASED AND LABEL AS EXHIBIT 270-1. REFER TO SPECIAL NOTES OF FORM 202-CAAPP.

19a) MAXIMUM OPERATING HOURS	HOURS/DAY: 12	DAYS/WEEK: 5	WEEKS/YEAR: 52
b) TYPICAL OPERATING HOURS	HOURS/DAY: 8	DAYS/WEEK: 5	WEEKS/YEAR: 52
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25 SEP-NOV(%): 25

**FIRING RATE INFORMATION**

21) DESCRIPTION (CHECK AS MANY AS APPLY):  
 INTERNAL COMBUSTION ENGINE  SPARK IGNITED ENGINE  RECIPROCATING ENGINE  
 COMBINED CYCLE TURBINE  STATIONARY TURBINE  SIMPLE CYCLE TURBINE  
 REGENERATIVE CYCLE TURBINE  LARGE BORE ENGINE

22) AIR CHARGING:  NATURALLY ASPIRATED  BLOWER SCAVENGED  TURBOCHARGED

23) NO. OF CYLINDERS PER ENGINE:

24a) RATED OR DESIGN HEAT INPUT CAPACITY (MILLION BTU/HR):

24b) IS MORE THAN ONE FUEL FIRED AT A TIME? <span style="float:right"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>				
IF YES, EXPLAIN:				
	NATURAL GAS	FUEL OIL	COAL	OTHER
c) SINGLE FUEL (MAXIMUM - MILLION BTU/HOUR)				
d) SINGLE FUEL (TYPICAL - MILLION BTU/HOUR)				
e) COMBINED FUEL (TYPICAL - MILLION BTU/HOUR) (IF APPLICABLE)				
25a) BASE LOAD (KW):		b) TIME SPENT AT THIS LOAD (%):		
26a) PEAK LOAD (KW):		b) TIME SPENT AT THIS LOAD (%):		
27a) OTHER LOAD (KW):		b) TIME SPENT AT THIS LOAD (%):		

NATURAL GAS FIRING		
28a) CURRENT ORIGIN OF NATURAL GAS:		
<input type="checkbox"/> PIPELINE (FIRM CONTRACT)	<input type="checkbox"/> BY-PRODUCT, SPECIFY ORIGIN:	
<input type="checkbox"/> PIPELINE (INTERRUPTIBLE SUPPLY CONTRACT)	<input type="checkbox"/> OTHER, - SPECIFY:	
b) TYPICAL HEAT CONTENT (BTU/SCF):		
c) MAXIMUM CONSUMPTION	SCF/MONTH:	SCF/YEAR:
d) TYPICAL CONSUMPTION	SCF/MONTH:	SCF/YEAR:

OIL FIRING		
29a) OIL TYPE (CHECK ONE):		
<input type="checkbox"/> NO. 1	<input checked="" type="checkbox"/> NO. 2	<input type="checkbox"/> NO. 4
<input type="checkbox"/> NO. 5	<input type="checkbox"/> NO. 6	<input type="checkbox"/> OTHER, SPECIFY (INCLUDE GENERATOR OR SUPPLIER):
b) TYPICAL HEAT CONTENT: <u>137,000</u>		c) IS OIL USED ONLY AS A RESERVE FUEL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<input type="checkbox"/> BTU/LB - OR - <input checked="" type="checkbox"/> BTU/GAL		
d) TYPICAL SULFUR CONTENT AS FIRED (WT %): Typical for diesel fuel		e) TYPICAL ASH CONTENT AS FIRED (WT %): Typical for diesel fuel
f) MAXIMUM CONSUMPTION	GAL/MONTH:	GAL/YEAR:
g) TYPICAL CONSUMPTION	GAL/MONTH:	GAL/YEAR:
h) FIRING DIRECTION:		
<input type="checkbox"/> HORIZONTAL	<input type="checkbox"/> TANGENTIAL	<input type="checkbox"/> OTHER, SPECIFY:

<b>OTHER FUEL FIRING</b>		
30a) OTHER FUEL FIRING	TYPE	SUPPLIER
a)	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>
b)	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>
b) TYPICAL HEAT CONTENT (SPECIFY UNITS):		c) TYPICAL NITROGEN CONTENT AS FIRED (WT %):
d) TYPICAL SULFUR CONTENT AS FIRED (WT %):		e) TYPICAL ASH CONTENT AS FIRED (WT %):
f) MAXIMUM CONSUMPTION	(SPECIFY UNITS):	(SPECIFY UNITS):
g) TYPICAL CONSUMPTION	(SPECIFY UNITS):	(SPECIFY UNITS):

<b>COMBUSTION CONTROL INFORMATION</b>		
31a) IS THERE ANY TYPE OF INTERNAL CONTROL USED TO REDUCE EMISSIONS ? (A 260-CAAPP FORM MUST BE COMPLETED FOR EXTERNAL CONTROLS)		
		<input type="checkbox"/> YES <input type="checkbox"/> NO
IF NO, GO TO ITEM 33.		
b) TOTAL % REDUCTION IN EMISSIONS:	<input type="checkbox"/> NO <sub>x</sub> _____ %	<input type="checkbox"/> CO _____ %
	<input type="checkbox"/> PM <sub>10</sub> _____ %	<input type="checkbox"/> VOM _____ %
	<input type="checkbox"/> PM _____ %	<input type="checkbox"/> SO <sub>2</sub> _____ %
c) CHECK THE FOLLOWING THAT APPLY:	<input type="checkbox"/> WATER INJECTION WATER TO FUEL RATIO: _____	<input type="checkbox"/> FLUE GAS RECIRCULATION % RECIRCULATED _____
	<input type="checkbox"/> OXYGEN TRIM AIR TO FUEL RATIO: _____	<input type="checkbox"/> REDUCED RESIDENCE TIME (SPECIFY SEC): _____
	<input type="checkbox"/> REDUCED TEMPERATURE (SPECIFY DEGREES F): _____	<input type="checkbox"/> FUEL INJECTION RETARD (SPECIFY DEGREES): _____
	<input type="checkbox"/> (NON)SELECTIVE CATALYTIC REDUCTION (260-CAAPP)	<input type="checkbox"/> OTHER, EXPLAIN: _____
d) MAXIMUM START-UPS IN A YEAR?	e) TIME FROM START UP TO STEADY LOAD (MINUTES OR HOURS):	

See Narrative, Section 1.0.

<b>APPLICABLE RULES</b>		
32) PROVIDE ANY SPECIFIC EMISSION STANDARD(S) AND LIMITATION(S) SET BY RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT (E.G., SULFUR DIOXIDE , CFR SUBPART GG, 0.015% BY VOL. AT 15% O <sub>2</sub> ):		
REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
33) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
34) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
35) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:		
REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
36) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :		
REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>
<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>	<input style="width: 100%; height: 15px;" type="text"/>

37) DOES THE EMISSION UNIT QUALIFY FOR AN EXEMPTION FROM AN OTHERWISE APPLICABLE RULE?  YES  NO

IF YES, THEN LIST BOTH THE RULE FROM WHICH IT IS EXEMPT AND THE RULE WHICH ALLOWS THE EXEMPTION. PROVIDE A DETAILED EXPLANATION JUSTIFYING THE EXEMPTION. INCLUDE DETAILED SUPPORTING DATA AND CALCULATIONS. ATTACH AND LABEL AS EXHIBIT 270-2, OR REFER TO OTHER ATTACHMENT(S) WHICH ADDRESS AND JUSTIFY THIS EXEMPTION.

**COMPLIANCE INFORMATION**

38) IS THE EMISSION UNIT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS?  YES  NO

IF NO, THEN FORM 294-CAAPP "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE -- ADDENDUM FOR NON COMPLYING EMISSION UNITS" MUST BE COMPLETED AND SUBMITTED WITH THIS APPLICATION.

39) EXPLANATION OF HOW INITIAL COMPLIANCE IS TO BE, OR WAS PREVIOUSLY, DEMONSTRATED:  
See Narrative, Section 1.0.

40) EXPLANATION OF HOW ONGOING COMPLIANCE WILL BE DEMONSTRATED:  
See Narrative, Section 1.0.

**TESTING, MONITORING, RECORDKEEPING AND REPORTING**

41a) LIST THE PARAMETERS THAT RELATE TO AIR EMISSIONS FOR WHICH RECORDS ARE BEING MAINTAINED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE UNIT OF MEASUREMENT, THE METHOD OF MEASUREMENT, AND THE FREQUENCY OF SUCH RECORDS (E.G., HOURLY, DAILY, WEEKLY):

PARAMETER	UNIT OF MEASUREMENT	METHOD OF MEASUREMENT	FREQUENCY
Operation	Hours	Hours of operation	Daily

41b) BRIEFLY DESCRIBE THE METHOD BY WHICH RECORDS WILL BE CREATED AND MAINTAINED. FOR EACH RECORDED PARAMETER INCLUDE THE METHOD OF RECORDKEEPING, TITLE OF PERSON RESPONSIBLE FOR RECORDKEEPING, AND TITLE OF PERSON TO CONTACT FOR REVIEW OF RECORDS:

PARAMETER	METHOD OF RECORDKEEPING	TITLE OF PERSON RESPONSIBLE	TITLE OF CONTACT PERSON
Operation	Log Book		

c) IS COMPLIANCE OF THE EMISSION UNIT READILY DEMONSTRATED BY REVIEW OF THE RECORDS?  YES  NO

IF NO, EXPLAIN:  
N/A

d) ARE ALL RECORDS READILY AVAILABLE FOR INSPECTION, COPYING AND SUBMITTAL TO THE AGENCY UPON REQUEST?  YES  NO

IF NO, EXPLAIN:  
N/A

42a) DESCRIBE ANY MONITORS OR MONITORING ACTIVITIES USED TO DETERMINE FEES, RULE APPLICABILITY OR COMPLIANCE:

N/A

b) WHAT PARAMETER(S) IS(ARE) BEING MONITORED (E.G., OPACITY)?

N/A

c) DESCRIBE THE LOCATION OF EACH MONITOR (E.G., IN STACK MONITOR):

N/A

42d) IS EACH MONITOR EQUIPPED WITH A RECORDING DEVICE?  YES  NO  
 IF NO, LIST ALL MONITORS WITHOUT A RECORDING DEVICE:  
 N/A

---

e) IS EACH MONITOR REVIEWED FOR ACCURACY ON AT LEAST A QUARTERLY BASIS?  YES  NO  
 IF NO, EXPLAIN:  
 N/A

---

f) IS EACH MONITOR OPERATED AT ALL TIMES THE ASSOCIATED EMISSION UNIT IS IN OPERATION?  YES  NO  
 IF NO, EXPLAIN:  
 N/A

---

43) PROVIDE INFORMATION ON THE MOST RECENT TESTS, IF ANY, IN WHICH THE RESULTS ARE USED FOR PURPOSES OF THE DETERMINATION OF FEES, RULE APPLICABILITY OR COMPLIANCE. INCLUDE THE TEST DATE, TEST METHOD USED, TESTING COMPANY, OPERATING CONDITIONS EXISTING DURING THE TEST AND A SUMMARY OF RESULTS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 220-4:

TEST DATE	TEST METHOD	TESTING COMPANY	OPERATING CONDITIONS	SUMMARY OF RESULTS
	N/A			

---

44) DESCRIBE ALL REPORTING REQUIREMENTS AND PROVIDE THE TITLE AND FREQUENCY OF REPORT SUBMITTALS TO THE AGENCY:

REPORTING REQUIREMENTS	TITLE OF REPORT	FREQUENCY
Emissions	Annual Emissions Report	Annually

See Table 7.

(45)EMISSION INFORMATION											
REGULATED AIR POLLUTANT		<input type="checkbox"/> <sup>1</sup> ACTUAL EMISSION RATE <input type="checkbox"/> <sup>1</sup> UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			<sup>2</sup> PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	<sup>3</sup> OTHER TERMS	<sup>3</sup> OTHER TERMS	<sup>4</sup> DM	<sup>5</sup> RATE (UNITS)	APPLICABLE RULES	TONS PER YEAR (TONS/YR)	RATE (UNITS)	TONS PER YEAR (TONS/YR)
CARBON MONOXIDE (CO)	MAXIMUM:						( )				
	TYPICAL:						( )				
LEAD	MAXIMUM:						( )				
	TYPICAL:						( )				
NITROGEN OXIDES (NOx)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER (PART)	MAXIMUM:						( )				
	TYPICAL:						( )				
PARTICULATE MATTER <= 10 MICROMETERS (PM10)	MAXIMUM:						( )				
	TYPICAL:						( )				
SULFUR DIOXIDE (SO2)	MAXIMUM:						( )				
	TYPICAL:						( )				
VOLATILE ORGANIC MATERIAL (VOM)	MAXIMUM:						( )				
	TYPICAL:						( )				
OTHER, SPECIFY:	MAXIMUM:						( )				
	TYPICAL:						( )				
EXAMPLE: PARTICULATE MATTER	MAXIMUM:	5.00	21.9	0.3 GR/DSCF		1	6.0 (LBS/HR)	212.321	26.28	5.5 LBS/HR	22
	TYPICAL:	4.00	14.4	0.24 GR/DSCF		4	5.5 (LBS/HR)	212.321	19.80		

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 270-3.

- <sup>1</sup>CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
- <sup>2</sup>PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
- <sup>3</sup>PLEASE PROVIDE ANY OTHER EMISSION RATE WHICH IS COMMONLY USED, REQUIRED BY A SPECIFIC LIMITATION OR THAT WAS MEASURED (E.G. PPM, GR/DSCF, ETC.)
- <sup>4</sup>DM - DETERMINATION METHOD: 1) STACK TEST, 2) MATERIAL BALANCE, 3) STANDARD EMISSION FACTOR (AP-42 OR AIRS), 4) ENGINEERING ESTIMATE, 5) SPECIAL EMISSION FACTOR (NOT AP-42 OR AIRS)
- <sup>5</sup>RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.



<b>EXHAUST POINT INFORMATION</b>		
<small>THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.</small>		
47) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT: See figures 2 & 3.		
48) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS. Stack		
49) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT): Various		
50) DISCHARGE HEIGHT ABOVE GRADE (FT): Various		
51) GOOD ENGINEERING PRACTICE (GEP) HEIGHT, IF KNOWN (FT):		
52) DIAMETER OF EXHAUST POINT (FT): NOTE: FOR A NON CIRCULAR EXHAUST POINT, THE DIAMETER IS 1.128 TIMES THE SQUARE ROOT OF THE AREA. Various		
53) EXIT GAS FLOW RATE	a) MAXIMUM (ACFM):	b) TYPICAL (ACFM):
54) EXIT GAS TEMPERATURE	a) MAXIMUM (°F):	b) TYPICAL (°F):
55) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD): Vertical		
56) LIST ALL EMISSION UNITS AND CONTROL DEVICES SERVED BY THIS EXHAUST POINT:		
NAME	FLOW DIAGRAM DESIGNATION	
a) See Table 13		
b)		
c)		
d)		
e)		
<small>THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.</small>		
57a) LATITUDE:	b) LONGITUDE:	
58) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
 DIVISION OF AIR POLLUTION CONTROL -- PERMIT SECTION  
 P.O. BOX 19506  
 SPRINGFIELD, ILLINOIS 62794-9506

FOR APPLICANT'S USE	
Revision #:	_____
Date:	___ / ___ / ___
Page	_____ of _____
Source Designation:	Chicago Fuels Terminal,

<b>COMPLIANCE PLAN/                  SCHEDULE OF COMPLIANCE                  FOR CAAPP PERMIT</b>	FOR AGENCY USE ONLY
	ID NUMBER:
	PERMIT #:
	DATE:

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT THE APPLICANT SUBMIT A COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR ALL EMISSION UNITS AT THE CAAPP SOURCE, REGARDLESS OF THE COMPLIANCE STATUS OF EACH INDIVIDUAL EMISSION UNIT. THIS FORM REQUIRES THAT THE COMPLIANCE STATUS BE STATED FOR EACH EMISSION UNIT. APPLICATION FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON-COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EACH EMISSION UNIT NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF SUBMITTAL.

SOURCE INFORMATION	
1) SOURCE NAME: Chicago Fuels Terminal, LLC	
2) DATE FORM PREPARED:	3) SOURCE ID NO. (IF KNOWN): 031600GSF

SOURCE COMPLIANCE INFORMATION	
4) DESCRIBE THE COMPLIANCE STATUS OF THE SOURCE WITH ALL APPLICABLE REQUIREMENTS (E.G., "SOURCE IS IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS"); N/A	
5) IF IN COMPLIANCE, WILL THE SOURCE CONTINUE TO COMPLY WITH ALL APPLICABLE REQUIREMENTS? <input type="checkbox"/> YES <input type="checkbox"/> NO  IF NO, EXPLAIN: N/A	
6) WILL THE SOURCE MEET, ON A TIMELY BASIS, APPLICABLE REQUIREMENTS WHICH BECOME EFFECTIVE DURING THE PERMIT TERM? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO  IF NO, EXPLAIN	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER ILLINOIS REVISED STATUTES, 1991, AS AMENDED 1992, CHAPTER 111 1/2, PAR. 1039.5. DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION. FAILURE TO DO SO MAY PREVENT THIS FORM FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMENT CENTER.

FOR APPLICANT'S USE	
052450-01-293-CAAP	

**EMISSION UNITS COMPLIANCE INFORMATION**

**7) EMISSION UNITS IN COMPLIANCE**

THE FOLLOWING EMISSION UNITS ARE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AND WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-1:

DESIGNATION ID NUMBER	EMISSION UNIT
See Table 13	



9a) **EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE TO BE ACHIEVED PRIOR TO PERMIT ISSUANCE**  
 THE FOLLOWING EMISSION UNITS ARE NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT APPLICATION. HOWEVER, THESE EMISSION UNITS WILL ACHIEVE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS PRIOR TO PERMIT ISSUANCE AND WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-3:

DESIGNATION ID NUMBER	EMISSION UNIT	FUTURE COMPLIANCE DATE (MONTH/DAY/YEAR)		
N/A				

b) THE FOLLOWING IS A NARRATIVE DESCRIPTION OF THE MEANS BY WHICH COMPLIANCE WILL BE ACHIEVED FOR EACH OF THE EMISSION UNITS LISTED IN 9a) ABOVE. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-4:

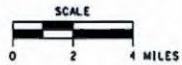
N/A

10) **EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE WILL NOT BE ACHIEVED PRIOR TO PERMIT ISSUANCE**  
 THE FOLLOWING EMISSION UNITS WILL NOT BE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING EMISSION UNITS," MUST BE SUBMITTED FOR EMISSION UNITS NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP IS SUBMITTED FOR THE FOLLOWING EMISSION UNITS. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-5:

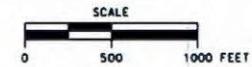
DESIGNATION ID NUMBER	EMISSION UNIT	DATE COMPLIANCE SCHEDULED TO BE ACHIEVED (MONTH/DAY/YEAR)		
N/A				



**REGIONAL MAP**



**SITE MAP**



ISSUE DATE  
11-25-2008

figure 1

SITE LOCATION MAP  
OPERATING PERMIT APPLICATION  
DTE Chicago Fuels Terminal, LLC



Source: DTE Chicago Fuels Terminal

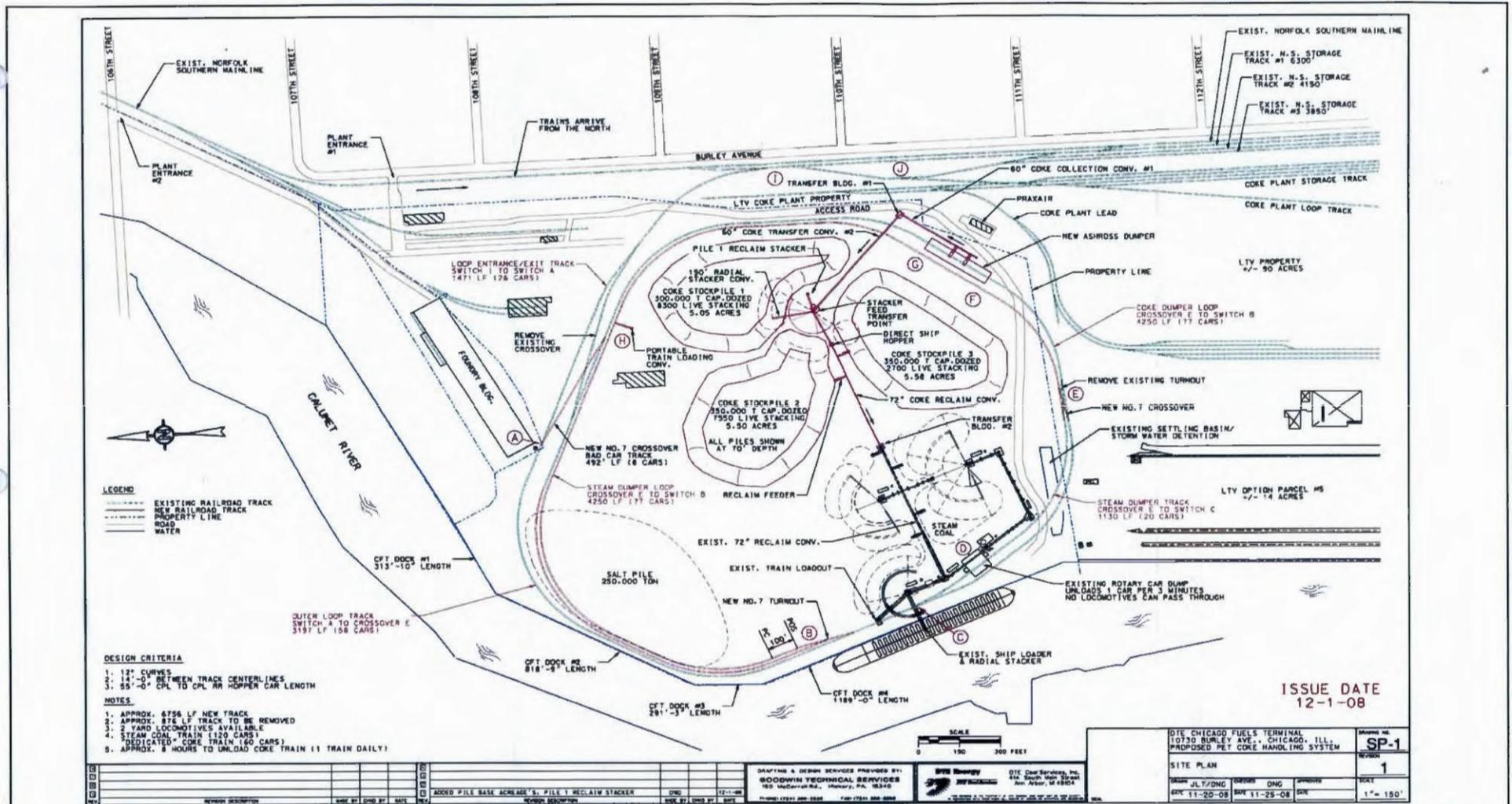


figure 2



Source: DTE Chicago Fuels Terminal

SITE LAYOUT MAP  
OPERATING PERMIT APPLICATION  
DTE Chicago Fuels Terminal, LLC

DTE CFT Naming Convention  
& Existing Pile Layout

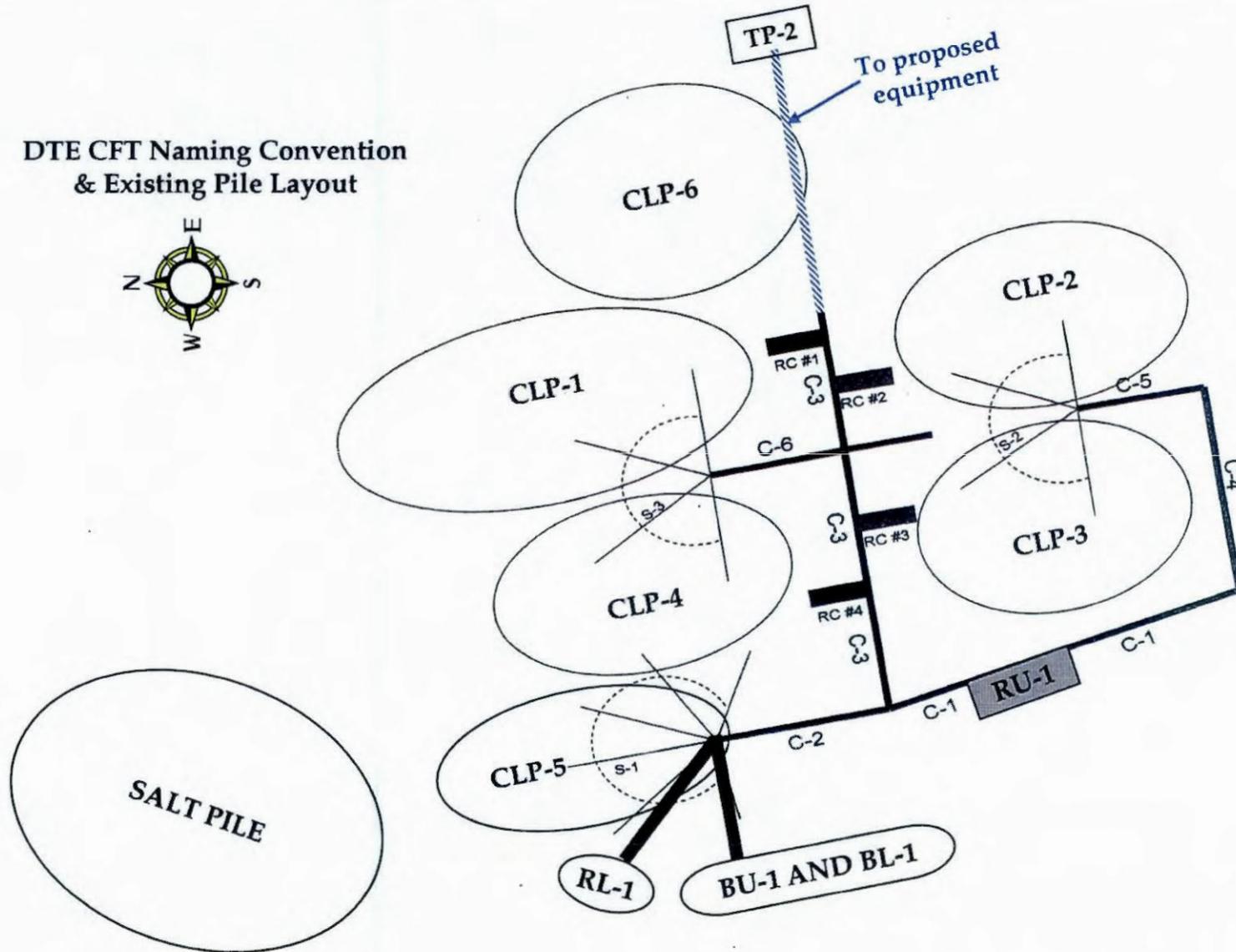
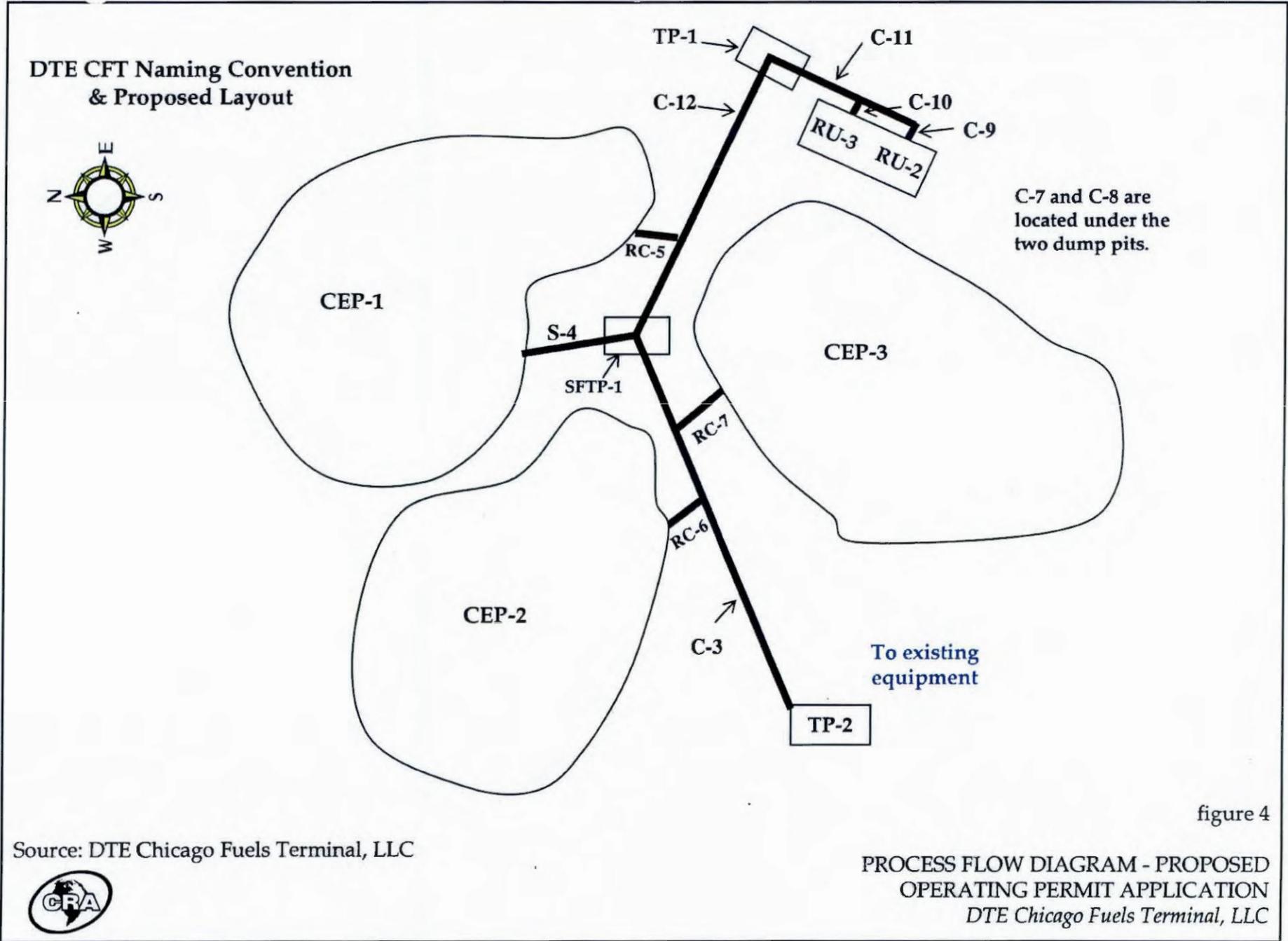


figure 3

Source: DTE Chicago Fuels Terminal, LLC



PROCESS FLOW DIAGRAM - EXISTING  
DTE Chicago Fuels Terminal, LLC



C-7 and C-8 are located under the two dump pits.

To existing equipment

figure 4

Source: DTE Chicago Fuels Terminal, LLC



PROCESS FLOW DIAGRAM - PROPOSED  
OPERATING PERMIT APPLICATION  
DTE Chicago Fuels Terminal, LLC

TABLE 1  
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<b>Unloading Emissions</b>													
BU-1 to SP-1 (Salt)	3,500	30,660,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	20.94	3.82	9.90	1.81
BU-1 to C-(1-6) (Petcoke)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.59	0.29	0.75	0.14
RU-1 to C-1 (Petcoke)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.59	0.29	0.75	0.14
TU-1 to C-(1-6) (Petcoke)	252	2,207,520	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.51	0.28	0.71	0.13
RU-1 to C-1 (Coal)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Baghouse	90.0%	0.32	0.06	0.15	0.03
BU-1 to C-(1-6) (Coal)	266	2,330,160	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.59	0.29	0.75	0.14
TU-1 to C-(1-6) (Coal)	252	2,207,520	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.51	0.28	0.71	0.13
RU-1 to C-7 (Coal)	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
RU-2 to C-8 (Coal)	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
<b>Emissions From Unloading : Total&gt;&gt;</b>										<b>53.0</b>	<b>9.7</b>	<b>25.1</b>	<b>4.6</b>
<b>Conveyor Transfer Point Emissions</b>													
C-1 to C-2	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-2 to S-1	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
C-3 to C-2	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
C-6 to S-3	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-1 to C-4	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-4 to C-5	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
C-5 to S-2	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
RC-1 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-2 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-3 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55

TABLE 1  
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
RC-4 to C-3	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
C-7 to C-9	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-8 to C-10	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-9 to C-11	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-10 to C-11	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-11 to TP-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
TP-1 to C-12	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
C-12 to SFTP-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
SFTP-1 to S-4	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
DSH-1 to C-13	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
RC-5 to C-13	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
RC-6 to C-13	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
RC-7 to C-13	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
C-13 to TP-2	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
<i>Emissions From Transfer Points Total&gt;&gt;</i>										344.0	62.8	162.7	29.7
<i>Portable Equipment Emissions</i>													
PC-1 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-2 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-3 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-4 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-5 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65

TABLE 1  
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
PC-6 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-7 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PC-8 Drop Point	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PFH-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
PF-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
RPS-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
RPCS-1 to PC-(1-8)	2,500	10,950,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	1.36	7.07	0.65
RPS-1	140	613,200	1.000	0.500	0.00067	0.00034	lbs/ton	Moisture Content	50.0%	1.13	0.10	0.57	0.05
RPCS-1	140	613,200	4.900	1.500	0.00330	0.00101	lbs/ton	Moisture Content	50.0%	5.55	0.51	1.70	0.15
<i>Emissions From Portable Conveyor Transfer Points Total&gt;&gt;</i>										186.2	17.0	87.2	8.0
<i>Stacker Emissions</i>													
S-1 to CLP-5	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
S-1 CLP-4	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07
S-2 to CLP-2	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-2 CLP-3	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-3 to CLP-1	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-3 to CLP-4	2,500	21,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	14.96	2.73	7.07	1.29
S-4 to CEP-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
S-4 to CEP-2	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
S-4 to CEP-3	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
S-4 to DSH-1	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
<i>Stacker Emissions: Total&gt;&gt;</i>										155.5	28.4	73.6	13.4

TABLE 1  
PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE		
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy	
<i>Loadout Emissions</i>														
Salt Loadout to TL-1	550	4,818,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	3.29	0.60	1.56	0.28	
Coal Loadout to RL-1	475	4,161,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.84	0.52	1.34	0.25	
Coal Loadout to BL-1	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07	
Coal Loadout to TL-2	550	4,818,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	3.29	0.60	1.56	0.28	
Coke Loadout to BL-1	4,000	35,040,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	23.93	4.37	11.32	2.07	
<i>Loadout Emissions: Total&gt;&gt;</i>										57.3	10.5	27.1	4.9	
<i>Facility Total&gt;&gt;</i>										795.9	128.3	375.6	60.6	

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 24 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservative in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

Assumptions:

**BACKGROUND DATA**

- Coal moisture content (weighted average) : 18.3%
- Silt content of coal = 5.0%
- Operating Schedule = 24 hours/day
- Operating Schedule = 365 days/year
- Operating Schedule = 8,760 hours/year
- Mean wind speed = 16.4 mph

TABLE 2

FUGITIVE POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<b>Storage Pile Emissions</b>													
CLP-1 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-2 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-3 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-4 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-5 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-6 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-1	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-2	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-3	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
SP-1 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	33.89	6.18	16.94	3.09
<b>Storage Pile Emissions: Total&gt;&gt;</b>										<b>1253.8</b>	<b>228.8</b>	<b>626.9</b>	<b>114.4</b>
<b>Reclaim Belt Loading Emissions</b>													
RC-1 Loaded by Dozer <sup>4</sup>	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-2 Loaded by Dozer/End Loader <sup>4</sup>	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-3 Loaded by Dozer <sup>4</sup>	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
RC-4 Loaded by Dozer <sup>4</sup>	3,000	26,280,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	17.95	3.28	8.49	1.55
Front End Loader <sup>5</sup> Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	254.65	46.47	65.69	11.99
Front End Loader <sup>5</sup> Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	254.65	46.47	65.69	11.99
RC-5 Loaded by Dozer <sup>4</sup>	2,000	17,520,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	2.18	5.66	1.03
RC-6 Loaded by Dozer <sup>4</sup>	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
RC-7 Loaded by Dozer <sup>4</sup>	1,000	8,760,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.09	2.83	0.52
<b>Reclaim Belt Loading Emissions: Total&gt;&gt;</b>										<b>605.0</b>	<b>110.4</b>	<b>176.7</b>	<b>32.2</b>

TABLE 2

## FUGITIVE POTENTIAL TO EMIT CALCULATIONS

Roadway Emissions													
Inbound Coal Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	0.0	0.0	lbs/VMT	Fugitive Dust Management Plan	75.0%	0.00	0.00	0.00	0.00
Outbound Coal Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	0.0	lbs/VMT	Fugitive Dust Management Plan	75.0%	1244.31	227.09	0.00	0.00
Outbound Salt Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	0.0	lbs/VMT	Fugitive Dust Management Plan	75.0%	1244.31	227.09	0.00	0.00
<i>Roadway Emissions: Total&gt;&gt;</i>										2488.6	454.2	0.0	0.0
<i>Facility Total&gt;&gt;</i>										4347.5	793.4	803.6	146.7

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 24 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Mean Wind Speed (U) (estimate).
4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
5. Emission factor for unpaved road emissions calculated per Equation AP-42 Section 13.2.2, Unpaved Roads.
6. From National Weather Service (estimate).
7. From Air Pollution Engineering Manual and References.

TABLE 2

## FUGITIVE POTENTIAL TO EMIT CALCULATIONS

Assumptions:**COAL BACKGROUND DATA**

Coal moisture content (weighted average) = 18.3%  
 Silt content of coal = 5.0%

**END LOADER/DOZER OPERATIONS**

Front End Loaders/Dozer (Storage Piles) = 24 hours/day  
 Front End Loaders/Dozer (Reclaim) = 24 hours/day  
 Operating Schedule = 24 hours/day  
 Operating Schedule = 365 days/year  
 Operating Schedule = 8,760 hours/year

Front End Loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 120.0 miles

VMT of Front End Loader/Dozer (Reclaim) = 120.0 miles

Front End Loader/Dozer Average Weight (Cat 980) = 39 tons

**STORAGE PILE INFORMATION**

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Salt) = 10.0 acres

Days in storage pile = 365 days

Number of days<sup>6</sup> with rain > 0.01 inch = 117 days

Mean wind speed<sup>3</sup> = 16.4 mph

Percent of time<sup>7</sup> winds > 12 mph = 34.0%

**INBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility input= 35,040,000 tons/year

Maximum truck loadout= 4,415,040 tons/year

Number of coal trucks= 315,360 trucks/year

Miles per trip= 0.8 miles

Miles per day= 101.4 miles/day

Miles per year= 252,288 miles/year

**OUTBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 35,040,000 tons/year

Maximum truck delivery= 4,818,000 tons/year

Number of coal trucks= 344,143 trucks/year

Miles per trip= 0.8 miles

Miles per day= 754.3 miles/day

Miles per year= 275,314 miles/year

**SALT HAULING TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 4,818,000 tons/year

Maximum truck loading= 4,818,000 tons/year

Number of coal trucks= 344,143 trucks/year

Miles per trip= 0.8 miles

Miles per day= 754.3 miles/day

Miles per year= 275,314 miles/year

TABLE 3

**POTENTIAL TO EMIT CALCULATIONS  
DIESEL GENERATORS**

Unit	Prime Power (hp)	Maximum Material Handling Rate (tons/hr)	Emission Factor (lb/hp-hr)					
			NOx <sup>a</sup>	CO <sup>a</sup>	SO <sub>2</sub> <sup>a</sup>	PM <sup>a</sup>	PM <sub>10</sub> <sup>d</sup>	VOM <sup>b</sup>
			0.015	0.01870	0.00205	0.0009	0.0009	0.00247
Emissions (lbs/hr)								
Portable Conveyor 1 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 2 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 3 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 4 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 5 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Feed Hopper (Skid mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Diesel Feeder (Track Mounted)	400	2,500	6.00	7.48	0.82	0.35	0.35	0.99
Portable Conveyor (Skid Mounted)	375	2,500	5.63	7.01	0.77	0.33	0.33	0.93
Rental Portable Screen (Wheel Mounted)	40	140	0.60	0.75	0.08	0.04	0.04	0.10
Rental Portable Crusher/Screen (Track Mounted)	300	140	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Diesel Water Pump	20	N/A	0.30	0.37	0.04	0.02	0.02	0.05
<b>Emissions (tons/yr)<sup>c</sup></b>			<b>159.27</b>	<b>198.55</b>	<b>21.77</b>	<b>9.34</b>	<b>9.34</b>	<b>26.23</b>

## Maximum Emissions Assumptions:

<sup>a</sup> Calculated using NSPS emission factors for stationary combustion sources<sup>b</sup> Calculated using low sulfur diesel fuel (20 ppm) and emission factor from AP-42 Section 3.3, Gasoline and Diesel industrial Engines, Table 3.3-1.<sup>c</sup> Hours of operation  
8,760 hr/yr  
500 hr/yr (For emergency diesel water pump only.)<sup>d</sup> It is assumed that PM<sub>10</sub> emissions are equal to PM.

TABLE 3A

POTENTIAL TO EMIT HAP CALCULATIONS  
DIESEL GENERATORS

CAS No.	Pollutant	Diesel Engines		
		Emission Factor <sup>a</sup> (lb/hp-hr)	Emission Rate <sup>b</sup> (lb/hr)	Emission Rate <sup>c</sup> (ton/yr)
71-43-2	Benzene	6.56E-06	1.60E-02	7.02E-02
108-88-3	Toluene	2.88E-06	7.02E-03	3.08E-02
1330207	Xylene	2.00E-06	4.89E-03	2.14E-02
106-99-0	1,3-Butadiene	2.75E-07	6.71E-04	2.94E-03
50-00-0	Formaldehyde	8.29E-06	2.03E-02	8.88E-02
75070	Acetaldehyde	5.39E-06	1.32E-02	5.77E-02
107028	Acrolein	6.50E-07	1.59E-03	6.96E-03
91-20-3	Naphthalene	5.96E-07	1.46E-03	6.38E-03
HAP Totals:			6.51E-02	2.85E-01

<sup>a</sup> AP-42, Fifth Edition, Volume I, Section 3.3, Gasoline and Industrial Engines (October 1996)

<sup>b</sup> Diesel Fuel-Fired Engines maximum heat input 2443 Horsepower

<sup>c</sup> Diesel Fuel-Fired Engines maximum hours of operation 8760 hr/yr

Emission Factor Conversion Factor 0.007

Calculated by dividing the emission factor for Nox (lb/hp-hr) into the Nox emission factor (lb/MMBtu). This provides a conversion factor for use with HAP emission calculation.

$0.031 \text{ lb/hp-hr} / 4.41 \text{ lb/MMBtu} = 0.007$

TABLE 4

## PTE EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (tpy)</i>					
	<i>NO<sub>x</sub></i>	<i>CO</i>	<i>SO<sub>2</sub></i>	<i>PM</i>	<i>PM<sub>10</sub></i>	<i>VOM</i>
Process				128.27	60.59	
Generator	159.27	198.55	21.77	9.34	9.34	26.23
Total	159.27	198.55	21.77	137.62	69.93	26.23

TABLE 5  
MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<b>Unloading Emissions</b>													
BU-1 to SP-1 (Salt)	3,500	250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	10.47	0.03	4.95	0.01
BU-1 to C-(1-6) (Petcoke)	266	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.23	0.38	0.11
RU-1 to C-1 (Petcoke)	266	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.23	0.38	0.11
TU-1 to C-(1-6) (Petcoke)	252	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.23	0.36	0.11
RU-1 to C-1 (Coal)	266	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Baghouse	90.0%	0.16	0.05	0.08	0.02
BU-1 to C-(1-6) (Coal)	0	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.00	0.23	0.00	0.11
TU-1 to C-(1-6) (Coal)	252	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.23	0.36	0.11
RU-1 to C-7 (Coal)	2,000	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.23	2.83	0.11
RU-2 to C-8 (Coal)	2,000	1,833,333	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.23	2.83	0.11
<b>Emissions From Unloading : Total&gt;&gt;</b>										<b>25.7</b>	<b>1.7</b>	<b>12.2</b>	<b>0.8</b>
<b>Conveyor Transfer Point Emissions</b>													
C-1 to C-2	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-2 to S-1	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
C-3 to C-2	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
C-6 to S-3	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-1 to C-4	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-4 to C-5	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
C-5 to S-2	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
RC-1 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66
RC-2 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66
RC-3 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66

TABLE 5  
MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tonsihr	tonsiyear	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
RC-4 to C-3	3,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	1.40	4.24	0.66
C-7 to C-9	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-8 to C-10	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-9 to C-11	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-10 to C-11	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-11 to TP-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
TP-1 to C-12	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
C-12 to SFIP-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
SFIP-1 to S-4	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
DSH-1 to C-13	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
RC-5 to C-13	1,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	1.40	1.41	0.66
RC-6 to C-13	1,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	1.40	1.41	0.66
RC-7 to C-13	1,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	1.40	1.41	0.66
C-13 to TP-2	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
<b>Emissions From Transfer Points Total&gt;&gt;</b>										<b>172.0</b>	<b>33.7</b>	<b>81.3</b>	<b>15.9</b>
<b>Portable Conveyor Emissions</b>													
PC-1 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-2 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-3 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-4 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-5 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-6 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32

TABLE 5  
MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tonslhr	tonslyear	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
PC-7 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PC-8 Drop Point	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PFH-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
PF-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
RPS-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
RPCS-1 to PC-(1-8)	2,500	5,475,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.68	3.54	0.32
RPS-1	140	306,600	1.000	0.500	0.00067	0.00034	lbs/ton	Moisture Content	50.0%	0.57	0.05	0.28	0.03
RPCS-1	140	306,600	4.900	1.500	0.00330	0.00101	lbs/ton	Moisture Content	50.0%	2.77	0.25	0.85	0.08
<b>Emissions From Portable Conveyor Transfer Points Total&gt;&gt;</b>										<b>93.1</b>	<b>8.5</b>	<b>43.6</b>	<b>4.0</b>
<b>Stacker Emissions</b>													
S-1 to CLP-5	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
S-1 CLP-4	4,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	1.40	5.66	0.66
S-2 to CLP-2	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-2 CLP-3	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-3 to CLP-1	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-3 to CLP-4	2,500	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	1.40	3.54	0.66
S-4 to CEP-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
S-4 to CEP-2	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
S-4 to CEP-3	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
S-4 to DSH-1	2,000	11,250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	1.40	2.83	0.66
<b>Stacker Emissions: Total&gt;&gt;</b>										<b>77.8</b>	<b>14.0</b>	<b>36.8</b>	<b>6.6</b>

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<i>Loadout Emissions Emissions</i>													
Salt Loadout to TL-1	550	250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.03	0.78	0.01
Coal Loadout to RL-1	475	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.42	0.34	0.67	0.16
Coal Loadout to BL-1	4,000	7,150,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.89	5.66	0.42
Coal Loadout to TL-2	550	1,100,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.14	0.78	0.06
Coke Loadout to BL-1	4,000	7,150,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.89	5.66	0.42
<i>Loadout Emissions: Total&gt;&gt;</i>										28.6	2.3	13.5	1.1
<i>Facility Total&gt;&gt;</i>										397.2	60.1	187.4	28.4

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 12 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservartive in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

The facility throughput is limited to the amount in the construction permit.  
This application requests that these limits be included in the FESOP.

Assumptions:

**BACKGROUND DATA**

- Coal moisture content (weighted average) : 18.3%
- Silt content of coal = 5.0%
- Operating Schedule = 12 hours/day
- Operating Schedule = 365 days/year
- Operating Schedule = 4,380 hours/year
- Mean wind speed = 16.4 mph

TABLE 6

MAXIMUM FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<b>Storage Pile Emissions</b>													
CLP-1 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-2 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-3 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-4 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-5 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-6 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-1	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-2	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-3	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
SP-1 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	33.89	6.18	16.94	3.09
<b>Storage Pile Emissions: Total&gt;&gt;</b>										<b>1253.8</b>	<b>228.8</b>	<b>626.9</b>	<b>114.4</b>
<b>Reclaim Belt Loading Emissions</b>													
RC-1 Loaded by Dozer <sup>4</sup>	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
RC-2 Loaded by Dozer/End Loader <sup>4</sup>	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
RC-3 Loaded by Dozer <sup>4</sup>	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
RC-4 Loaded by Dozer <sup>4</sup>	3,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.34	4.24	0.16
Front End Loader <sup>5</sup> Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	23.24	32.85	5.99
Front End Loader <sup>5</sup> Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	23.24	32.85	5.99
RC-5 Loaded by Dozer <sup>4</sup>	2,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.34	2.83	0.16
RC-6 Loaded by Dozer <sup>4</sup>	1,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.34	1.41	0.16
RC-7 Loaded by Dozer <sup>4</sup>	1,000	2,750,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.34	1.41	0.16
<b>Reclaim Belt Loading Emissions: Total&gt;&gt;</b>										<b>302.5</b>	<b>48.9</b>	<b>88.3</b>	<b>13.1</b>

Roadway Emissions													
Inbound Coal Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	284.09	51.85	73.29	13.37
Outbound Coal Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	284.09	51.85	73.29	13.37
Outbound Salt Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	64.57	11.78	16.66	3.04
Roadway Emissions: Total>>										632.7	115.5	163.2	29.8
Facility Total>>										2189.1	393.2	878.5	157.3

1. The hourly rate is determined from the annual rate divided by 365 days. This number is then divided by an 12 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Mean Wind Speed (U) (estimate).
4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
5. Emission factor for unpaved road emissions calculated per Equation AP-42 Section 13.2.2, Unpaved Roads.
6. From National Weather Service (estimate).
7. From Air Pollution Engineering Manual and References.

**Assumptions:**

**COAL BACKGROUND DATA**

Coal moisture content (weighted average) : 18.3%  
Silt content of coal = 5.0%

**END LOADER/DOZER OPERATIONS**

Front End Loaders/Dozer (Storage Piles) = 12 hours/day  
Front End Loaders/Dozer (Reclaim) = 12 hours/day  
Operating Schedule = 12 hours/day  
Operating Schedule = 365 days/year  
Operating Schedule = 4,380 hours/year

Front End Loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 60.0 miles

VMT of Front End Loader/Dozer (Reclaim) = 60.0 miles

Front End Loader/Dozer Average Weight (Cat 980) = 39 tons

**STORAGE PILE INFORMATION**

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Salt) = 10.0 acres

Days in storage pile = 365 days

Number of days<sup>6</sup> with rain > 0.01 inch = 117 days

Mean wind speed<sup>3</sup> = 16.4 mph

Percent of time<sup>7</sup> winds > 12 mph = 34.0%

**INBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility input= 11,000,000 tons/year

Maximum truck loadout= 1,100,000 tons/year

Number of coal trucks= 78,571 trucks/year

Miles per trip= 0.8 miles

Miles per day= 172.2 miles/day

Miles per year= 62,857 miles/year

**OUTBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 11,000,000 tons/year

Maximum truck delivery= 1,100,000 tons/year

Number of coal trucks= 78,571 trucks/year

Miles per trip= 0.8 miles

Miles per day= 172.2 miles/day

Miles per year= 62,857 miles/year

**SALT HAULING TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 250,000 tons/year

Maximum truck loading= 250,000 tons/year

Number of coal trucks= 17,857 trucks/year

Miles per trip= 0.8 miles

Miles per day= 39.1 miles/day

Miles per year= 14,286 miles/year

TABLE 7

MAXIMUM EMISSION CALCULATIONS  
DIESEL GENERATORS

1.6/1.3  
2.17 x 5 = 3

Unit	Prime Power (hp)	Maximum Material Handling Rate (tons/hr)	Emission Factor (lb/hp-hr)					
			NOx <sup>a</sup>	CO <sup>a</sup>	SO <sub>2</sub> <sup>a</sup>	PM <sup>b</sup>	PM <sub>10</sub> <sup>d</sup>	VOM <sup>b</sup>
			0.015	0.01870	0.00205	0.0009	0.0009	0.00247
Emissions (lbs/hr)								
Portable Conveyor 1 (Wheel Mounted)	118	2,500	1.77 <sup>3500</sup>	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 2 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 3 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 4 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 5 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Feed Hopper (Skid mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Diesel Feeder (Track Mounted)	400	2,500	6.00	7.48	0.82	0.35	0.35	0.99
Portable Conveyor (Skid Mounted)	375	2,500	5.63	7.01	0.77	0.33	0.33	0.93
Rental Portable Screen (Wheel Mounted)	40	140	0.60	0.75	0.08	0.04	0.04	0.10
Rental Portable Crusher/Screen (Track Mounted)	300	140	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50 <sup>3500</sup>	5.61	0.62	0.26	0.26	0.74
Diesel Water Pump	20	N/A	0.30 <sup>500</sup>	0.37	0.04	0.02	0.02	0.05
Emissions (tons/yr) <sup>c</sup>			63.68	79.39	8.70	3.74	3.74	10.49

Maximum Emissions Assumptions:

- <sup>a</sup> Calculated using NSPS emission factors for stationary combustion sources
- <sup>b</sup> Calculated using low sulfur diesel fuel (20 ppm) and emission factor from AP-42 Section 3.3, Gasoline and Diesel Industrial Engines, Table 3.3-1.
- <sup>c</sup> Hours of operation  
3,500 hr/yr  
500 hr/yr (For emergency diesel water pump only.)
- <sup>d</sup> It is assumed that PM<sub>10</sub> emissions are equal to PM.

TABLE 8

## MAXIMUM EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (tpy)</i>					
	<i>NO<sub>x</sub></i>	<i>CO</i>	<i>SO<sub>2</sub></i>	<i>PM</i>	<i>PM<sub>10</sub></i>	<i>VOM</i>
Process				60.14	28.40	
Fugitive				393.17	157.33	
Generator	63.68	79.39	8.70	3.74	3.74	10.49
<b>Total</b>	<b>63.68</b>	<b>79.39</b>	<b>8.70</b>	<b>457.05</b>	<b>189.46</b>	<b>10.49</b>

TABLE 8A

FESOP REQUESTED LIMITATION AND  
FEE ALLOWABLE EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (tpy)</i>					
	<i>NO<sub>x</sub></i>	<i>CO</i>	<i>SO<sub>2</sub></i>	<i>PM</i>	<i>PM<sub>10</sub></i>	<i>VOM</i>
Process				60.14	28.40	
Generator	63.68	79.39	8.70	3.74	3.74	10.49
<b>Total</b>	<b>63.68</b>	<b>79.39</b>	<b>8.70</b>	<b>63.87</b>	<b>32.14</b>	<b>10.49</b>

Based on limiting diesel engine operation to 4,000 hours per year of operation.

TABLE 9  
TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<b>Unloading Emissions</b>													
BU-1 to SP-1 (Salt)	3,500	175,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	10.47	0.02	4.95	0.01
BU-1 to C-(1-6) (Petcoke)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.10	0.38	0.05
RU-1 to C-1 (Petcoke)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.10	0.38	0.05
TU-1 to C-(1-6) (Petcoke)	252	786,240	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.10	0.36	0.05
RU-1 to C-1 (Coal)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Baghouse	90.0%	0.16	0.02	0.08	0.01
BU-1 to C-(1-6) (Coal)	266	829,920	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.80	0.10	0.38	0.05
TU-1 to C-(1-6) (Coal)	252	786,240	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	0.75	0.10	0.36	0.05
RU-1 to C-7 (Coal)	2,000	6,240,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.78	2.83	0.37
RU-2 to C-8 (Coal)	2,000	6,240,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.78	2.83	0.37
<b>Emissions From Unloading : Total&gt;&gt;</b>										<b>26.5</b>	<b>2.1</b>	<b>12.5</b>	<b>1.0</b>
<b>Conveyor Transfer Point Emissions</b>													
C-1 to C-2	2,500	7,800,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.97	3.54	0.46
C-2 to S-1	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
C-3 to C-2	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
C-6 to S-3	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
C-1 to C-4	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
C-4 to C-5	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
C-5 to S-2	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
RC-1 to C-3	3,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12
RC-2 to C-3	3,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12
RC-3 to C-3	3,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12

TABLE 9  
TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
RC-4 to C-3	3,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.25	4.24	0.12
C-7 to C-9	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-8 to C-10	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-9 to C-11	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-10 to C-11	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-11 to TP-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
TP-1 to C-12	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
C-12 to SFTIP-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
SFTIP-1 to S-4	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
DSH-1 to C-13	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
RC-5 to C-13	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
RC-6 to C-13	1,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.25	1.41	0.12
RC-7 to C-13	1,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.25	1.41	0.12
C-13 to TP-2	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
<i>Emissions From Transfer Points Total&gt;&gt;</i>										175.0	6.7	82.8	3.2
<i>Portable Conveyor Emissions</i>													
PC-1 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-2 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-3 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-4 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-5 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
PC-6 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-7 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
PC-8 Drop Point	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
FFH-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
FF-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
RPS-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
RPCS-1 to PC-(1-8)	2,500	3,900,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.49	3.54	0.23
RPS-1	140	218,400	1.000	0.500	0.00067	0.00034	lbs/ton	Moisture Content	50.0%	0.57	0.04	0.28	0.02
RPCS-1	140	218,400	4.900	1.500	0.00330	0.00101	lbs/ton	Moisture Content	50.0%	2.77	0.18	0.85	0.06
<b>Emissions From Portable Conveyor Transfer Points Total&gt;&gt;</b>										<b>93.1</b>	<b>6.0</b>	<b>43.6</b>	<b>2.8</b>
<b>Stacker Emissions</b>													
S-1 to CLP-5	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
S-1 CLP-4	4,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.25	5.66	0.12
S-2 to CLP-2	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-2 CLP-3	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-3 to CLP-1	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-3 to CLP-4	2,500	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	7.48	0.25	3.54	0.12
S-4 to CEP-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
S-4 to CEP-2	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
S-4 to CEP-3	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
S-4 to DSH-1	2,000	2,000,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.25	2.83	0.12
<b>Stacker Emissions: Total&gt;&gt;</b>										<b>77.8</b>	<b>2.5</b>	<b>36.8</b>	<b>1.2</b>

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS <sup>3</sup>			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tons/hr	tons/year	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Loadout Emissions Emissions													
Salt Loadout to TL-1	550	250,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.03	0.78	0.01
Coal Loadout to RL-1	475	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.42	0.06	0.67	0.03
Coal Loadout to BL-1	4,000	1,300,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.16	5.66	0.08
Coal Loadout to TL-2	550	200,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	1.65	0.02	0.78	0.01
Coke Loadout to BL-1	4,000	1,300,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	11.96	0.16	5.66	0.08
<b>Loadout Emissions: Total&gt;&gt;</b>										<b>28.6</b>	<b>0.4</b>	<b>13.5</b>	<b>0.2</b>
<b>Facility Total&gt;&gt;</b>										<b>401.0</b>	<b>17.8</b>	<b>189.2</b>	<b>8.4</b>

1. The hourly rate is determined from the annual rate divided by 260 days. This number is then divided by an 8 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.

The coal and petcoke that are received at the facility have numerous ways of being conveyed through the facility. To be conservative in calculating the emissions, the portable conveyors were chosen as the main method of moving the materials from the receiving areas.

**Assumptions:**

**BACKGROUND DATA**

- Coal moisture content (weighted average) : 18.3%
- Silt content of coal = 5.0%
- Operating Schedule = 12 hours/day
- Operating Schedule = 260 days/year
- Operating Schedule = 3,120 hours/year
- Mean wind speed = 16.4 mph

TABLE 10  
TYPICAL FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE <sup>1</sup>		PARTICLE SIZE MULTIPLIER <sup>2</sup>		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM <sub>10</sub> EMISSION RATE	
	tonslhr	tonsiyear	PM	PM <sub>10</sub>	PM	PM <sub>10</sub>	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
<i>Storage Pile Emissions</i>													
CLP-1 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-2 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-3 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-4 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-5 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CLP-6 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-1	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-2	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
CEP-3	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	135.55	24.74	67.77	12.37
SP-1 <sup>7</sup>	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Moisture Content	75.0%	33.89	6.18	16.94	3.09
<i>Storage Pile Emissions: Total&gt;&gt;</i>										1253.8	228.8	626.9	114.4
<i>Reclaim Belt Loading Emissions</i>													
RC-1 Loaded by Dozer <sup>4</sup>	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
RC-2 Loaded by Dozer/End Loader <sup>4</sup>	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
RC-3 Loaded by Dozer <sup>4</sup>	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
RC-4 Loaded by Dozer <sup>4</sup>	3,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	8.97	0.06	4.24	0.03
Front End Loader <sup>5</sup> Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	16.55	32.85	4.27
Front End Loader <sup>5</sup> Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Spray	75.0%	127.32	16.55	32.85	4.27
RC-5 Loaded by Dozer <sup>4</sup>	2,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	5.98	0.06	2.83	0.03
RC-6 Loaded by Dozer <sup>4</sup>	1,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.06	1.41	0.03
RC-7 Loaded by Dozer <sup>4</sup>	1,000	500,000	0.740	0.350	0.00050	0.00024	lbs/ton	Moisture Content	50.0%	2.99	0.06	1.41	0.03
<i>Reclaim Belt Loading Emissions: Total&gt;&gt;</i>										302.5	33.5	88.3	8.7

TABLE 10

TYPICAL FUGITIVE EMISSIONS CALCULATIONS

Roadway Emissions														
Inbound Coal Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	72.51	9.43	18.71	2.43	
Outbound Coal Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	72.51	9.43	18.71	2.43	
Outbound Salt Truck Traffic <sup>5</sup>	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	63.45	8.25	16.37	2.13	
<b>Roadway Emissions: Total&gt;&gt;</b>										<b>208.5</b>	<b>27.1</b>	<b>53.8</b>	<b>7.0</b>	
<b>Facility Total&gt;&gt;</b>										<b>1764.8</b>	<b>289.5</b>	<b>769.0</b>	<b>130.2</b>	

1. The hourly rate is determined from the annual rate divided by 260 days. This number is then divided by an 8 hour work day to derive the hour rate.
2. Aerodynamic Particulate Size Multiplier (k) per AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles, 11/06
3. Mean Wind Speed (U) (estimate).
4. Emission factor for material handling emissions calculated per Equation 1 of AP-42 Section 13.2.4.3, Aggregate Handling and Storage Piles.
5. Emission factor for unpaved road emissions calculated per Equation AP-42 Section 13.2.2, Unpaved Roads.
6. From National Weather Service (estimate).
7. From Air Pollution Engineering Manual and References.

TABLE 10

## TYPICAL FUGITIVE EMISSIONS CALCULATIONS

Assumptions:**COAL BACKGROUND DATA**

Coal moisture content (weighted average) : 18.3%

Silt content of coal = 5.0%

**END LOADER/DOZER OPERATIONS**

Front End Loaders/Dozer (Storage Piles) = 12 hours/day

Front End Loaders/Dozer (Reclaim) = 12 hours/day

Operating Schedule = 12 hours/day

Operating Schedule = 260 days/year

Operating Schedule = 3,120 hours/year

Front End Loader/Dozer speed = 5.0 mph

VMT of Front End Loader/Dozer (Storage Piles) = 60.0 miles

VMT of Front End Loader/Dozer (Reclaim) = 60.0 miles

Front End Loader/Dozer Average Weight (Cat 980) = 39 tons

**STORAGE PILE INFORMATION**

Surface area of storage piles (Coal) = 40.0 acres

Surface area of storage piles (Coke) = 40.0 acres

Surface area of storage piles (Salt) = 10.0 acres

Days in storage pile = 365 days

Number of days<sup>a</sup> with rain > 0.01 inch = 117 daysMean wind speed<sup>b</sup> = 16.4 mphPercent of time<sup>c</sup> winds > 12 mph = 34.0%**INBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility input= 2,000,000 tons/year

Maximum truck loadout= 200,000 tons/year

Number of coal trucks= 14,286 trucks/year

Miles per trip= 0.8 miles

Miles per day= 44.0 miles/day

Miles per year= 11,429 miles/year

**OUTBOUND COAL TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 2,000,000 tons/year

Maximum truck delivery= 200,000 tons/year

Number of coal trucks= 14,286 trucks/year

Miles per trip= 0.8 miles

Miles per day= 44.0 miles/day

Miles per year= 11,429 miles/year

**SALT HAULING TRUCK BACKGROUND DATA**

Delivery truck tare weight= 15 tons

Maximum full truck weight= 29 tons

Average truck weight= 22 tons

Maximum facility output= 175,000 tons/year

Maximum truck loading= 175,000 tons/year

Number of coal trucks= 12,500 trucks/year

Miles per trip= 0.8 miles

Miles per day= 38.5 miles/day

Miles per year= 10,000 miles/year

TABLE 11

TYPICAL EMISSION CALCULATIONS  
DIESEL GENERATORS

Unit	Prime Power (hp)	Maximum Material Handling Rate (tons/hr)	Emission Factor (lb/hp-hr)					
			NOx <sup>a</sup>	CO <sup>a</sup>	SO <sub>2</sub> <sup>a</sup>	PM <sup>a</sup>	PM <sub>10</sub> <sup>d</sup>	VOM <sup>b</sup>
			0.015	0.01870	0.00205	0.0009	0.0009	0.00247
Emissions (lbs/hr)								
Portable Conveyor 1 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 2 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 3 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 4 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Conveyor 5 (Wheel Mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Feed Hopper (Skid mounted)	118	2,500	1.77	2.21	0.24	0.10	0.10	0.29
Portable Diesel Feeder (Track Mounted)	400	2,500	6.00	7.48	0.82	0.35	0.35	0.99
Portable Conveyor (Skid Mounted)	375	2,500	5.63	7.01	0.77	0.33	0.33	0.93
Rental Portable Screen (Wheel Mounted)	40	140	0.60	0.75	0.08	0.04	0.04	0.10
Rental Portable Crusher/Screen (Track Mounted)	300	140	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Portable Conveyor (Wheel Mounted)	300	500	4.50	5.61	0.62	0.26	0.26	0.74
Diesel Water Pump	20	N/A	0.30	0.37	0.04	0.02	0.02	0.05
Emissions (tons/yr) <sup>c</sup>			27.30	34.03	3.73	1.60	1.60	4.49

Maximum Emissions Assumptions:

<sup>a</sup> Calculated using NSPS emission factors for stationary combustion sources

<sup>b</sup> Calculated using low sulfur diesel fuel (20 ppm) and emission factor from AP-42 Section 3.3, Gasoline and Diesel industrial Engines, Table 3.3-1.

<sup>c</sup> Hours of operation 1,500 hr/yr

250 hr/yr (For emergency diesel water pump only.)

<sup>d</sup> It is assumed that PM<sub>10</sub> emissions are equal to PM.

TABLE 12

## TYPICAL EMISSIONS SUMMARY

<i>Emission Point</i>	<i>Emissions (tpy)</i>					
	<i>NOx</i>	<i>CO</i>	<i>SO<sub>2</sub></i>	<i>PM</i>	<i>PM<sub>10</sub></i>	<i>VOM</i>
Process				17.79	8.39	
Generator	27.30	34.03	3.73	1.60	1.60	4.49
<b>Total</b>	<b>27.30</b>	<b>34.03</b>	<b>3.73</b>	<b>19.40</b>	<b>9.99</b>	<b>4.49</b>

TABLE 13

## LISTING OF EMISSION UNITS

<i>Process Equipment</i>	<i>Unit Designation</i>	<i>DTE Designation</i>	<i>Submittal</i>
<b><i>Unloading Operations</i></b>			
Barge Unloader	BU-1		Existing
Rail Unloader 1	RU-1		Existing
Truck Unloader	TU-1		Existing
Rail Unloader 2	RU-2	Railcar 1 Unloading	Proposed
Rail Unloader 3	RU-3	Railcar 2 Unloading	Proposed
<b><i>Conveyor Operations</i></b>			
Conveyor 1	C-1		Existing
Conveyor 2	C-2		Existing
Conveyor 3	C-3		Existing
Conveyor 4	C-4		Existing
Conveyor 5	C-5		Existing
Conveyor 6	C-6		Existing
Conveyor 7	C-7	Railcar 1 Conveyor Belt	Proposed
Conveyor 8	C-8	Railcar 2 Conveyor Belt	Proposed
Conveyor 9	C-9	Perpendicular Conveyor Belt 1	Proposed
Conveyor 10	C-10	Perpendicular Conveyor Belt 2	Proposed
Conveyor 11	C-11	Conveyor Belt 1	Proposed
Conveyor 12	C-12	Conveyor Belt 2	Proposed
Conveyor 13	C-13	Conveyor 3 (72" Coke Reclaim)	Proposed
Reclaim Conveyor 1	RC-1		Existing
Reclaim Conveyor 2	RC-2		Existing
Reclaim Conveyor 3	RC-3		Existing
Reclaim Conveyor 4	RC-4		Existing
Reclaim Conveyor 5	RC-5	Reclaim Feeder 1	Proposed
Reclaim Conveyor 6	RC-6	Reclaim Feeder 2	Proposed
Reclaim Conveyor 7	RC-7	Reclaim Feeder 3	Proposed
Portable Conveyor 1	PC-1		Proposed
Portable Conveyor 2	PC-2		Proposed
Portable Conveyor 3	PC-3		Proposed
Portable Conveyor 4	PC-4		Proposed
Portable Conveyor 5	PC-5		Proposed
Portable Conveyor 6	PC-6	Portable Conveyor (Skid Mounted)	Proposed
Portable Conveyor 7	PC-7	Portable Conveyor (Wheel Mounted)	Proposed
Portable Conveyor 8	PC-8	Portable Conveyor (Wheel Mounted)	Proposed
<b><i>Transfer Hopper Operations</i></b>			
Direct Ship Hopper 1	DSH-1	Direct Ship Hopper	Proposed
Portable Feed Hopper	PFH-1	Portable Feed Hopper	Proposed
Portable Feeder	PF-1	Portable Feeder	Proposed
Rental Portable Screen	RP5-1	Rental Portable Screen	Proposed
Rental Portable Crusher/Screen	RPCS-1	Rental Portable Crusher/Screen	Proposed
Transfer Point 1	TP-1	Transfer Point 1	Proposed
Transfer Point 2	TP-2	Transfer Point 2	Proposed
Stacker Feed Transfer Point	SFTP-1	Stacker Feed Transfer Point	Proposed

TABLE 13

## LISTING OF EMISSION UNITS

<i>Process Equipment</i>	<i>Unit Designation</i>	<i>DTE Designation</i>	<i>Submittal</i>
<b><u>Stacker Operations</u></b>			
Stacker 1	S-1		Existing
Stacker 2	S-2		Existing
Stacker 3	S-3		Existing
Stacker 4	S-4	150' Radial Stacker Conveyor	Proposed
<b><u>Loadout Operations</u></b>			
Salt Loadout to Truck	TL-1		Existing
Coal Loadout to Rail	RL-1		Existing
Coal Loadout to Barge	BL-1		Existing
Coal Loadout to Truck	TL-1		Existing
<b><u>Storage Pile Operations</u></b>			
Coal Pile 1	CLP-1		Existing
Coal Pile 2	CLP-2		Existing
Coal Pile 3	CLP-3		Existing
Coal Pile 4	CLP-4		Existing
Coal Pile 5	CLP-5		Existing
Coal Pile 6	CLP-6		Existing
Salt Pile 1	SP-1		Existing
Coke Pile 1	CEP-1		Proposed
Coke Pile 2	CEP-2		Proposed
Coke Pile 3	CEP-3		Proposed
<b><u>Diesel Generators</u></b>			
Diesel Generator - 118 HP (1)	DG-1	Portable Conveyor 1	Proposed
Diesel Generator - 118 HP (2)	DG-2	Portable Conveyor 2	Proposed
Diesel Generator - 118 HP (3)	DG-3	Portable Conveyor 3	Proposed
Diesel Generator - 118 HP (4)	DG-4	Portable Conveyor 4	Proposed
Diesel Generator - 118 HP (5)	DG-5	Portable Conveyor 5	Proposed
Diesel Generator - 118 HP (6)	DG-6	Portable Feed Hopper	Proposed
Diesel Generator - 400 HP (7)	DG-7	Portable Diesel Feeder	Proposed
Diesel Generator - 375 HP (8)	DG-8	Portable Conveyor 6	Proposed
Diesel Generator - 40 HP (9)	DG-9	Rental Portable Screen	Proposed
Diesel Generator - 300 HP (10)	DG-10	Rental Portable Crusher/Screen	Proposed
Diesel Generator - 300 HP (11)	DG-11	Portable Conveyor 7	Proposed
Diesel Generator - 300 HP (12)	DG-12	Portable Conveyor 8	Proposed
Diesel Water Pump	DWP-1	Diesel Water Pump	Proposed

APPENDIX A

NOTICE OF INCOMPLETENESS COMMENTS AND RESPONSES

January 21, 2009

Ref. No. 052450

RESPONSES TO SEPTEMBER 11, 2008  
ILLINOIS EPA COMMENTS ON THE  
NOTICE OF INCOMPLETENESS

1. IEPA Comment

*Detailed narrative description and presentation of all the production/material handling processes, emission units, and pollution control equipment at the source that the revised permit will need to address, including any proposed processes/revisions that includes but is not limited to the following:*

Response

The narrative that describes the operations conducted at the facility is located in Section 1 of the application.

1a. IEPA Comment

*A process flow diagram that at a minimum illustrates the location of all existing and proposed process equipment, emission units, pollution control equipment, emission points, and the process flow of materials handled/processed;*

Response

The process flow diagram is contained in the application as Figure 2.

1b. IEPA Comment

*A detailed list and description of all existing and proposed process equipment, emission units, and pollution control equipment (indicate what emission unit(s) the equipment controls), including size and maximum manufacturer's rated capacity and date of construction/installation and modification of each;*

Response

A listing of all equipment is found in Table 13. The capacities of the process equipment excluding the diesel fuel-fired generators are located in Tables 1 and 2. The capacities of the diesel fuel-fired generators are located in Table 3.

1c. IEPA Comment

*A detailed description, quantification and justification of the anticipated maximum actual annual and short-term operating emissions (e.g., tons/year, pounds/hour, etc.) to be emitted from all the emission units at your source that you would propose to include*

*as annual and short-term emission limits in your permit for the criteria pollutants (e.g., PM, PM<sub>10</sub>, etc.) to be emitted, including emission factors to be used to estimate emissions;*

*Justify the PM and PM<sub>10</sub> emission factors used and indicate why the emission factor for coal truck loading in AP-42 Table 11.9-1 was not used. Show calculations for the emission factors used if calculated with equation and justify the use of the variable values used in the equation. Document and justify the 50% control efficiency for moisture content control.*

**Response**

The emission rates for the facility are located in Tables 1 and 2 and a summary of emissions. Truck loading emissions for coal were calculated in the manner they are because the trucks are loaded via end loaders and the emission factors for coal truck loading at western surface coal mines, contained in AP-42 Table 11.9-1, are based on conventional truck loading operations.

**1d. IEPA Comment**

*A detailed listing, presentation and justification of proposed maximum actual operating limitations on the annual and short-term throughput or usage (e.g., tons/year, pounds/hour, etc.) of criteria pollutant-containing material(s) to be processed/produced at your source that you would propose to include in your permit, including proposed limitations on the criteria pollutant content (e.g., weight percent, pounds per ton, etc.) of the criteria pollutant containing material(s) to be processed/produced associated with your proposed maximum actual annual and short-term operating emissions;*

**Response**

The facility will process 11,250,000 tons of coal and petroleum coke and 250,000 tons of salt per year.

**1e. IEPA Comment**

*Please note that in order for the Illinois EPA to develop enforceable permit conditions related to emission limits, the application must provide/identify a measurable and verifiable methodology (e.g., use of appropriate emission factors, material pollutant-content characterization and throughput/usage record-keeping, recording durations of operations, etc.) to correlate the amount and rate of criteria pollutant-containing material throughput/usage and durations of operations proposed in d. above to the emission limits proposed in c. above; and*

**Response**

The narrative, Section 1 of the application, addresses this question.

1f. IEPA Comment

*A detailed listing and description of activities/equipment at the source that are claimed as being exempt from permitting pursuant to the permitting exemptions in 35 Ill. Adm. Code 201.146.*

Response

There will be 13 aboveground diesel storage tanks no larger than 500 gallons at the facility for the associated diesel fuel-fired engines. The storage tanks are exempt from permitting under 35 IAC 201.146 (n) (3).

2. IEPA Comment

*Pursuant to 35 Ill. Adm. Code 201.160 and Section 39(a) of the Illinois Environmental Protection Act (Act), a clear and thorough presentation including information and data to either confirm non-applicability of or demonstrate compliance with potentially applicable regulatory requirements including, but not limited to, 35 Ill. Adm. Code Parts 201 and 212, and 40 CFR Part 60 Subpart IIII. This includes, but is not limited to, listing the sections of the regulations (e.g., 212.123, 212.301, 212.302 through 212.310, 212.312, 212.316, 212.321, 212.324, 40 CFR 60.4204, .4207, .4209, .4211, .4212, and .4214 etc.) that the source's activities/equipment are subject to and then submitting documentation necessary to demonstrate that the emission units or air pollution control equipment will not cause a violation of the applicable regulations. Pursuant to 35 Ill. Adm. Code 201.160 and Section 39(a) of the Act, the Agency shall not issue a construction or operating permit unless the applicant submits proof to the Agency that the emission unit(s) or air pollution control equipment has been constructed or modified to operate so as not to cause a violation of the Act or of regulations hereunder.*

Response

212.123 – Visible Emissions Limitations for All Other Emission Units  
The source will achieve compliance through the Fugitive Dust Plan.

35 IAC Section 212.301 – Fugitive Particulate Matter  
The source will not allow fugitive particulate matter to leave the source's boundaries. This will be accomplished through control practices discussed in this Fugitive Dust Plan.

35 IAC Section 212.302 – Fugitive Particulate Matter  
The source is located in Cook County, Illinois therefore it is subject to 35 IAC Sections 212.304 – 212.310 and 212.312.

35 IAC Section 212.304 – Storage Piles  
The storage piles located at the source will be sprayed with water via a water cannon to control fugitive dust emissions. The piles will be sprayed on an as needed basis. Figure 2 indicates the locations of the water cannons.

35 IAC Section 212.305 – Conveyor Loading Operations

The inherent moisture content of the coal and telescoping chutes will provide adequate control for particulate matter emissions.

35 IAC Section 212.306 – Traffic Areas

The source operates a water truck for dust suppression on traffic areas. The traffic areas will be sprayed with water on an as needed basis.

35 IAC Section 212.307 – Materials Collected By Pollution Control Equipment

The source will recycle the coal dust collected in the dust collectors located at the facility.

35 IAC Section 212.308 – Spraying or Choke-Feeding Required

The inherent moisture content of the coal will provide adequate control for particulate matter emissions for all of the emission points at the facility except for the coke rail unloading operations which will employ choke loading to reduce particulate matter emissions.

35 IAC Section 212.309 – Operating Program

This Fugitive Dust Plan is in response to this requirement.

35 IAC Section 212.310 – Minimum Operating Program

The data is included in this Fugitive Dust Plan.

35 IAC Section 212.312 – Amendment to Operating Program

Attached is the most current Fugitive Dust Plan. If the source changes their operating scenario an amendment to the Operating Program will be submitted to the Agency.

35 IAC Section 212.316– Emission Limitations for Emission Units in Certain Areas

The source, which is subject to the requirements set forth in this Section, will, as discussed in this Fugitive Dust Plan, maintain compliance with the limitations in this Section. Regarding the crushing and screening operations, it has been stated that the inherent moisture content of the materials being processed will provide adequate control of particulate matter emissions. The roadways will be sprayed with water on an as needed basis to control fugitive dust emissions. Water cannons will be used to control fugitive particulate matter emissions from the storage piles. The source will maintain records and provide reports as outlined in 35 IAC Section 212.316 (g).

35 IAC Section 212.321 – Process Emission Units for Which Construction or Modification Commenced on or After April 14, 1972.

To show compliance with the process weight rate rule a sample calculation is contained below using the throughput of a single transfer point.

$$E = A(P)^B$$

Where:

P = Process Weight Rate; and

E = Allowable Emission Rate

$$E = 2.54(4000)^{0.534}$$

E = 212.97 pounds per hour

The actual emissions from this transfer point are 1 pound per hour. Therefore, the source is in compliance with the Process Weight Rate Rule.

35 IAC Section 212.324 – Process Emission Units in Certain Areas

The source is subject to the requirements in this section. See the response to 35 IAC Section 212.316.

40 CFR 60.4204 – Emission Standards For Non-Emergency Engines  
Manufacturer's certification.

40 CFR 60.4207 – Fuel Requirements For Non-Emergency Engines  
DTE will only use compliant fuels in the engines.

40 CFR 60.4209 – Monitoring Requirements For Non-Emergency Engines  
The use of a non-resettable hour meter.

40 CFR 60.4211 – Compliance Requirements For Non-Emergency Engines  
Manufacturer's certification.

40 CFR 60.4212 – Test Method Requirements For Non-Emergency Engines  
DTE will test the engines in a manner consistent with the requirements set forth in this regulation.

40 CFR 60.4214 – Notification, Reporting, and Recordkeeping Requirements For Non-Emergency Engines  
DTE will track hour usage on a rolling monthly basis and track fuel quality by purchase receipts and will record routine maintenance activities.

3. **IEPA Comment**

*A clear and thorough presentation, including detailed calculations, of the potential to emit (PTE) for the entire source (including any proposed revisions) including, but not limited to, particulate matter (PM, PM<sub>10</sub>), volatile organic materials (VOM), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and hazardous air pollutants (HAP):*

**Response**

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application.

3a. IEPA Comment

*PTE shall be calculated based on the maximum potential usage of raw materials with the maximum allowable criteria pollutant content, at the maximum potential production rate, and year round (8,760 hours/year) operation of all processes including the diesel generators and emission units at the source.*

Response

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application.

3b. IEPA Comment

*Be specific in describing the maximum content (e.g., weight percent, pounds per gallon, pounds per ton, etc.) and name and type of criteria pollutant (e.g., PM, PM<sub>10</sub>, etc.) in each of the raw materials, wastes and products handled and/or generated at the source when presenting your calculations.*

Response

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application.

3c. IEPA Comment

*Provide documentation and references for emission factors and other input data to the PTE calculations that support their use as representative of activities to be conducted at this source. Justify the PM and PM<sub>10</sub> emission factors used and indicate why the emission factor for coal truck loading in AP-42 Table 11.9-1 was not used. Show calculations for the emission factors used if calculated with equations and justify the use of the variable values used in the equations.*

Response

The PTE calculations for the facility are located in Tables 1, 2, and 3 of the application. The emission factors used are justified in the response to comment 1c.

3d. IEPA Comment

*Please note that PTE calculations can not include emission reductions associated with pollution control equipment (e.g., baghouse, filters, scrubbers, etc.) unless the use of pollution control equipment is specifically required by regulations applicable to the subject process/activity, or if emission reductions are required to a certain percentage in order to comply with an applicable emission rate limitation such as 35 Ill. Adm. Code 212.321. If you believe emission reductions due to controls are applicable for your PTE calculations, please clearly identify those reductions and justify them by referencing the applicable regulations/requirements. Justify the use of controls in PTE calculations.*

Response

The moisture content of the coal and petroleum coke and the bag houses associated with the coke railcar unloading operations are inherent to the process. The moisture content is based on the product as received.

3e. IEPA Comment

*Please note that emissions from emission units claimed to be exempt from permitting pursuant to 35 Ill. Adm. Code 201.146 need to be identified and included in the PTE calculations.*

Response

See response to comment 1f.

APPENDIX B

FUGITIVE DUST PLAN

DTE Chicago Fuels Terminal, LLC  
10730 South Burley Avenue  
Chicago, Illinois 60617  
Facility I.D. No.: 031600GSF

FUGITIVE DUST PLAN

DTE Chicago Fuels Terminal, LLC (DTE) is submitting this Fugitive Dust Plan in accordance to 35 IAC Section 212.310. DTE is owner of the source and is responsible for the execution of this Fugitive Dust Plan operating program. A map of the source showing emission sources and, if applicable, their related control equipment, as set forth in 35 IAC Section 212.310 (c) and (d), is contained in this plan as Figure 1.

A detailed description of the best management practices utilized by the source to achieve compliance is contained below.

**Storage Piles** – The ten storage piles at the facility, which have uncontrolled emissions of fugitive particulate matter in excess of 50 tons per year that are located within a source whose potential particulate emissions from all emission units exceeds 100 tons per year, are controlled by dust suppression water spray (water cannon). The piles are sprayed with water on an as needed basis depending upon weather conditions. When the temperatures are below freezing water suppression will not be used to control fugitive emissions because this would cause the coal products to freeze, therefore not allowing the coal to be processed throughout the facility as necessary. Records of each dust suppression event on the storage piles will be recorded in a logbook and kept at the source at all times.

**Traffic Areas** – All of the normal traffic pattern access areas surrounding the storage piles and all normal traffic pattern roads and parking facilities which are located on the property shall be treated with water (water truck). The roadways are sprayed with water on an as needed basis depending upon weather conditions. When temperatures are below freezing (32° F or equivalent) water will not be used for dust suppression purposes. While temperatures are below freezing, if dust suppression is needed, a chemical dust suppression agent will be used on an as needed basis. Records of each dust suppression event on the roadways will be recorded in a logbook and kept at the source at all times.

**Conveyor Loading Operations** – All conveyor loading operations to storage piles are controlled by telescoping chutes and the inherent moisture content of the coal product. The coal, when delivered, has an inherently high moisture content. The inherent high

moisture content coupled with the water applied to the storage piles for fugitive dust suppression provides more than adequate fugitive dust suppression for the conveyor loading operations.

Materials Collected by Pollution Control Equipment – All unloading and transporting operations of materials collected by the railcar unloading bag houses will be recycled back to the railcar unloading system. Fugitive dust suppression consisting of water spray may be used when the filter bag is unloaded depending upon moisture content of the coal dust in the filter bag. Records of each dust suppression event on the filter bag unloading will be recorded in a logbook and kept at the source at all times.

## Exhibit B

<p>1 BEFORE THE ILLINOIS POLLUTION CONTROL BOARD</p> <p>2 KCBX TERMINALS COMPANY, )</p> <p>3 Petitioner, )</p> <p>4 vs. ) PCB 14-116</p> <p>5 ILLINOIS ENVIRONMENTAL ) (Pursuit Appeal-Air)</p> <p>6 PROTECTION AGENCY, )</p> <p>7 Respondent. )</p> <p>8</p> <p>9 Discovery Deposition of NICHAEU DRAGOVICH,</p> <p>10 taken at the instance of the Petitioner, on April</p> <p>11 9, 2014, scheduled for the hour of 9:00 a.m., at</p> <p>12 3150 Roland Avenue, Springfield, Illinois, before</p> <p>13 Donna M. Dodd, Certified Shorthand Reporter and</p> <p>14 Notary Public, pursuant to the attached</p> <p>15 stipulation.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 DONNA M. DODD, CSR</p> <p>22 donnododd@att.net</p> <p>23 (217) 452-2474</p> <p>24 (217) 487-7715</p>	<p style="text-align: right;">3</p> <p style="text-align: center;"><u>INDEX</u></p> <p style="text-align: center;"><u>PAGE</u></p> <p>3 Direct Examination by Mr. Dwyer 4</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 <u>EXHIBITS</u> <span style="float: right;"><u>MARKED</u></span></p> <p>11 Deposition Exhibit Nos. 1-13 4</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 (Exhibits retained by Mr. Dwyer.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: center;">2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 EDWARD W. DWYER</p> <p>4 KATHERINE D. HODGE</p> <p>5 MATTHEW C. READ</p> <p>6 Hodge, Dwyer &amp; Driver</p> <p>7 Attorneys at Law</p> <p>8 3150 Roland Avenue</p> <p>9 Springfield, Illinois 62701</p> <p>10 edwyer@hddattorneys.com</p> <p>11</p> <p>12 Appeared on behalf of the Petitioner,</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17 KATHRYN A. PAMENTER</p> <p>18 CHRISTOPHER J. GRANT</p> <p>19 Assistant Attorney Generals</p> <p>20 Attorney General's Office</p> <p>21 68 West Washington Street, 18th Floor</p> <p>22 Chicago, Illinois 60602</p> <p>23 (312) 814-0608</p> <p>24 kpamenter@stg.state.il.us</p> <p>Appeared on behalf of the Respondent.</p> <p>ALSO PRESENT:</p> <p>Mr. James Lee Morgan, IEPA</p> <p>Mr. Jeff Culver, Koch Companies</p>	<p style="text-align: right;">4</p> <p>1 (Deposition Exhibit Nos.</p> <p>2 1-13 were marked for</p> <p>3 identification prior to the</p> <p>4 start of the deposition.)</p> <p>5 IT IS HEREBY STIPULATED AND AGREED by and</p> <p>6 between Counsel for the Petitioner and Counsel for</p> <p>7 the Respondent that this deposition may be taken in</p> <p>8 shorthand by DONNA M. DODD, an Illinois Certified</p> <p>9 Shorthand Reporter and Notary Public, and</p> <p>10 afterwards transcribed into typewriting, and the</p> <p>11 signature of the Witness is waived by agreement.</p> <p>12 (The witness was sworn by the Reporter.)</p> <p>13 MICHAEL DRAGOVICH,</p> <p>14 called as a witness herein, at the instance of the</p> <p>15 Petitioner, having been duly sworn upon his oath,</p> <p>16 testified as follows:</p> <p>17 DIRECT EXAMINATION</p> <p>18 BY MR. DWYER:</p> <p>19 Q. Mike, my name is Ed Dwyer. I'm an</p> <p>20 attorney representing KCBX Terminals. I want to</p> <p>21 let the record reflect that this is the discovery</p> <p>22 deposition of Mr. Mike Dragovich taken pursuant to</p> <p>23 notice to all parties and in accordance with the</p> <p>24 Rules of the Pollution Control Board, the Code of</p>

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1 construction permit application.  
 2 Q. And following that document, would you  
 3 look at the record on page 191? Have you seen that  
 4 document before?  
 5 A. Yes.  
 6 Q. Okay. And what do you understand that  
 7 document to be?  
 8 A. A Construction Permit Application. It's a  
 9 Fee Form.  
 10 Q. And, to your knowledge, were those  
 11 documents filed with the agency on July 23rd, 2013?  
 12 A. Yes. It's stamped July 23rd, 2013.  
 13 Q. Okay. Now, Mike, were you assigned to  
 14 review this permit?  
 15 A. Yes.  
 16 Q. Okay. If you would tell me, please, just  
 17 generally, describe the process in the Bureau of  
 18 Air when a permit application like the permit we're  
 19 talking about right now arrives at the agency, and  
 20 tell me what happens from there to the final  
 21 decision.  
 22 A. The permit in this case looks like it was  
 23 hand-delivered to the agency. Somebody stamped in  
 24 the permit for July 23rd. From there, what I know

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1 about, it would go to a, probably like a file room  
 2 clerk, and she might have possibly stamped this  
 3 thing in. I don't know.  
 4 The application is probably read and  
 5 decided to figure out what they're kind of asking  
 6 about. In this case they asked for a revised  
 7 construction permit. And on there is a permit  
 8 number, so they're asking for revise construction  
 9 permit 07050082, and it has an ID Number 031600GSF.  
 10 Q. Okay. What I asked you was to tell me  
 11 what happens in that process.  
 12 You've described that it came in and  
 13 what the application was requesting. What happens  
 14 with the application after that?  
 15 A. The file clerk tries to put together a  
 16 file she requests from the file room, and there is  
 17 an existing file for this place because it's a  
 18 revision, so it comes together in a big file.  
 19 She would take it to a Unit Manager  
 20 within a certain period of time. I don't recall  
 21 how long. Once we got the file, it could be that  
 22 day, it could be a couple of days. I don't know.  
 23 Depending on --  
 24 Q. Go ahead. And what happens after that,

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1 Mike?  
 2 A. She's basically going to give it to a Unit  
 3 Manager.  
 4 Q. All right. And what happens with it once  
 5 it gets to the Unit Manager?  
 6 A. The Unit Manager, we have a database  
 7 system. He would look at this application and he  
 8 would assign it to a Permit Engineer, and there's a  
 9 database system that tracks who he's assigning it  
 10 to.  
 11 Q. Okay. And what happens once it's assigned  
 12 to a Permit Engineer?  
 13 A. It's dropped off in -- we have an in-house  
 14 basket assigned to me.  
 15 MR. DWYER: And then, you know, let me  
 16 take a break. I apologize. We'll take five  
 17 minutes.  
 18 (Whereupon there was a recess  
 19 taken.)  
 20 BY MR. DWYER:  
 21 Q. Mike, before we took a short break I was  
 22 asking you about the process of what happens when a  
 23 permit comes in, and you had indicated that the  
 24 application is received, a record person gathers

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1 the file, and then that's brought to your inbox.  
 2 Is that --  
 3 A. The -- usually a Unit Manager will.  
 4 Q. And so your Unit Manager is the person who  
 5 assigns the permit application to you?  
 6 A. Yes.  
 7 Q. Okay. And at the time that you received  
 8 this permit, who was your Unit Manager, if you  
 9 recall?  
 10 A. Baleriy Brodsky was Acting.  
 11 Q. And do you recall, was it Baleriy who  
 12 assign the permit to you, the permit application?  
 13 I'm sorry.  
 14 A. He could have assigned it. I'm sure he  
 15 was Acting.  
 16 Q. Do recall?  
 17 A. Either Baleriy or Bob. I don't really  
 18 recall.  
 19 Q. Okay. Do you recall when you received the  
 20 permit application and was assigned it?  
 21 A. Not the exact date, I mean.  
 22 Q. Roughly, your best guess?  
 23 A. It wasn't -- it wasn't on the 23rd of  
 24 July. It was in July.

<p style="text-align: right;">81</p> <p>1 was it after that?</p> <p>2 <b>A. After.</b></p> <p>3 <b>Q.</b> Okay. And do you recall approximately</p> <p>4 when? Was it in September or was it in October?</p> <p>5 <b>A. Probably more in October.</b></p> <p>6 <b>Q.</b> Okay. And did anyone else -- did you have</p> <p>7 a conversation with anyone else at the agency about</p> <p>8 taking a closer look at the application besides Mr.</p> <p>9 Brodsky?</p> <p>10 <b>A. Not at the time, no.</b></p> <p>11 <b>Q.</b> Okay. But later?</p> <p>12 <b>A. He was my unit manager.</b></p> <p>13 <b>Q.</b> Did you have, in October or November, any</p> <p>14 conversations with anyone else who had requested</p> <p>15 you take a closer look at the application?</p> <p>16 <b>A. Not that I remember.</b></p> <p>17 <b>Q.</b> Okay.</p> <p>18 <b>A. Can I use the bathroom?</b></p> <p>19 <b>Q.</b> Absolutely. Let's take a break.</p> <p>20 (Whereupon there was a recess</p> <p>21 taken.)</p> <p>22 BY MR. DWYER:</p> <p>23 <b>Q.</b> Mike, we were talking before the break</p> <p>24 about your decision to review the application</p>	<p style="text-align: right;">83</p> <p>1 refer to it as, did you review any permits or</p> <p>2 permit applications for the North facility?</p> <p>3 <b>A. I looked at them, yes.</b></p> <p>4 <b>Q.</b> Okay. And did you look at them in any</p> <p>5 further detail after your discussions with Mr.</p> <p>6 Bernoteit about this North and South facility</p> <p>7 confusion that you were trying to clarify?</p> <p>8 <b>A. I looked at them again.</b></p> <p>9 <b>Q.</b> Okay. If we look now in the record,</p> <p>10 again, Mike, at the record page 010.</p> <p>11 <b>A. Ten?</b></p> <p>12 <b>MS. PAMENTER:</b> Yes, it's ten.</p> <p>13 BY MR. DWYER:</p> <p>14 <b>Q.</b> It's page 10. I'm sorry.</p> <p>15 <b>A. All right.</b></p> <p>16 <b>Q.</b> And that's called a permit review traveler</p> <p>17 sheet. Did you prepare that or tell me what you do</p> <p>18 with that document.</p> <p>19 <b>A. Okay. This document is part of the permit</b></p> <p>20 <b>application. It's inside of a file. It's inside</b></p> <p>21 <b>of a manila folder, basically like that, along with</b></p> <p>22 <b>the -- with whatever information is in the</b></p> <p>23 <b>application. It's stapled inside of it. It goes</b></p> <p>24 <b>along with the file, and I prepared the -- my name</b></p>
<p style="text-align: right;">82</p> <p>1 submitted by KCBX in more detail.</p> <p>2 You said you talked with Bob Bernoteit</p> <p>3 about that, and you also talked with Mr. Brodsky</p> <p>4 about it. And you said that during your discussion</p> <p>5 with Mr. Bernoteit you talked about issues between</p> <p>6 the KCBX North and South facility, and that they</p> <p>7 were bringing this equipment -- they were seeking</p> <p>8 to have this equipment from North permitted under</p> <p>9 this permit reviewing to operate the South</p> <p>10 facility, is that correct?</p> <p>11 <b>A. Yes. Yes.</b></p> <p>12 <b>Q.</b> Okay. And in the course of this further</p> <p>13 review of the application, did you review any other</p> <p>14 permits or permit applications for the North</p> <p>15 facility?</p> <p>16 <b>A. Did I review any, no.</b></p> <p>17 <b>Q.</b> So you didn't review any documents --</p> <p>18 <b>A. Oh -- --</b></p> <p>19 <b>Q.</b> -- any permit documents related to the</p> <p>20 North facility?</p> <p>21 <b>A. Before August? Go ahead.</b></p> <p>22 <b>Q.</b> Well, let me ask it more broadly.</p> <p>23 In the process of reviewing the permit</p> <p>24 application or the request for revision is what I</p>	<p style="text-align: right;">84</p> <p>1 as an analyst right here. I wrote that.</p> <p>2 <b>Q.</b> And so on this document, again, page 10 of</p> <p>3 the record, it -- does that basically, you know, a</p> <p>4 number of -- there are a number of categories on</p> <p>5 it. They're not all filled in. Did you fill in</p> <p>6 all of the information that is on it?</p> <p>7 <b>A. No.</b></p> <p>8 <b>Q.</b> Who would have -- who else would have</p> <p>9 filled in anything on this permit traveler sheet?</p> <p>10 <b>A. The clerk, BD, Beth Davenport.</b></p> <p>11 <b>Q.</b> And are those her initials at the bottom</p> <p>12 of the document?</p> <p>13 <b>A. I recognize them, yes. That's her --</b></p> <p>14 <b>would be her initials.</b></p> <p>15 <b>Q.</b> Okay. And on this document, Mike, at the</p> <p>16 bottom it's dated January 17th, 2014. Is that the</p> <p>17 day that this document was completed and filed</p> <p>18 out?</p> <p>19 <b>A. Yes.</b></p> <p>20 <b>Q.</b> So of the entries on it would have been</p> <p>21 made on that date, January 17th?</p> <p>22 <b>A. I could only speak for the ones that I</b></p> <p>23 <b>entered.</b></p> <p>24 <b>Q.</b> Okay. But I think that you said the only</p>

## Exhibit C

217/782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT - NSPS SOURCE

PERMITTEE

DTE Chicago Fuels Terminal, LLC  
Attn: Kim Bradford  
414 South Main Street  
Ann Arbor, Michigan 48104

Application No.: 07050082

I.D. No.: 031600GSF

Applicant's Designation:

Date Received: February 3, 2009

Subject: New Materials Transloading Facility

Date Issued: May 21, 2009

Expiration Date: May 21, 2010

Location: 10730 South Burley Avenue, Chicago, 60617

Permit is here by granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and/or air pollution control equipment consisting of the following:

Two (2) Rail Unloaders (RU-2 and RU-3);  
Seven (7) Conveyors (C-7, C-8, C-9, C-10, C-11, C-12, and C-13);  
Three (3) Reclaim Conveyors (RC-5, RC-6, and RC-7);  
Eight (8) Portable Conveyors (PC-1, PC-2, PC-3, PC-4, PC-5, PC-6, PC-7, and PC-8);  
Direct Ship Hopper 1 (DSH-1);  
Portable Feed Hopper (PFH-1);  
Portable Feeder (PF-1);  
Rental Portable Screen (RES-1);  
Rental Portable Crusher/Screen (RPCS-1);  
Two (2) Transfer Points (TP-1 and TP-2);  
Stacker Feed Transfer Point (SFTP-1);  
Stacker 4 (S-4);  
Three (3) Coke Piles (CEP-1, CEP-2, and CEP-3);  
Six (6) 118 HP Diesel-Powered Generators (DG-1, DG-2, DG-3, DG-4, DG-5, and DG-6)  
One (1) 400 HP Diesel-Powered Generator (7) (DG-7);  
One (1) 375 HP Diesel-Powered Generator (8) (DG-8);  
One (1) 40 HP Diesel-Powered Generator (9) (DG-9);  
Three (3) 300 HP Diesel Generators (DG-10, DG-11, and DG-12); and  
One (1) 20HP Diesel-Powered Water Pump (DWP-1)

and OPERATE emission source(s) and/or air pollution control equipment consisting of:

Barge Unloader (BU-1);  
Rail Unloader (RU-1);  
Truck Unloader (TU-1);  
Six (6) Conveyors (C-1, C-2, C-3, C-4, C-5, and C-6);  
Four (4) Reclaim Conveyors (RC-1, RC-2, RC-3, and RC-4);  
Three (3) Stackers (S-1, S-2, and S-3);  
Salt Loadout to Truck (TL-1);  
Coal Loadout to Rail (RL-1);

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Coal Loadout to Barge (BL-1);  
Coal Loadout to Truck (TL-1);  
Six (6) Coal Piles (CLP-1, CLP-2, CLP-3, CLP-4, CLP-5, and CLP-6); and  
Salt Pile 1 (SP-1)

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

1. This Permit is issued based on the modification of the materials transloading system (to increase the permitted throughput) and diesel generators not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Nitrogen Oxides (NO<sub>x</sub>) and Particulate Matter less than 10 microns (PM<sub>10</sub>) from the above-listed equipment below the levels that would trigger the applicability of these rules.
- 2a. The 20 hp diesel-powered water pump, the 40 hp, 118 hp, 300 hp, 375 hp, and 400 hp diesel-powered generators sets are subject to the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60 Subparts A and IIII. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.4201(a), stationary CI internal combustion engine manufacturers must certify their 2007 model year and later non-emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 kilowatt (KW) (3,000 horsepower (HP)) and a displacement of less than 10 liters per cylinder to the certification emission standards for new nonroad CI engines in 40 CFR 89.112, 40 CFR 89.113, 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same model year and maximum engine power.
- c. Pursuant to 40 CFR 60.4204(b), owners and operators of 2007 model year and later non-emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with the emission standards for new CI engines in 40 CFR 60.4201 for their 2007 model year and later stationary CI ICE as applicable.
- d. Pursuant to 40 CFR 60.4206, owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4204 according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.

- 3a. Pursuant to 40 CFR 89.112(a), exhaust emission from nonroad engines to which 40 CFR 89 Subpart B is applicable shall not exceed the applicable exhaust emission standards contained in Table 1, as follows:

Table 1.—Emission Standards (g/kW-hr)

Rated Power (kW)	Tier	Model Year <sup>1</sup>	NO <sub>x</sub>	HC	NMHC + NO <sub>x</sub>	CO	PM
75 ≤ kW < 130	Tier 1	1997	9.2	--	--	--	--
	Tier 2	2003	--	--	6.6	5.0	0.30
	Tier 3	2007	--	--	4.0	5.0	--
kW>560	Tier 1	2000	9.2	1.3	--	11.4	0.54
	Tier 2	2006	--	--	6.4	3.5	0.20

<sup>1</sup> The model years listed indicates the model years for which the specified tier of standards take effect.

- b. Pursuant to 40 CFR 89.112(d), in lieu of the NO<sub>x</sub> standards, NMHC + NO<sub>x</sub> standards, and PM standards specified in 40 CFR 89.112(a), manufacturers may elect to include engine families in the averaging, banking, and trading program, the provisions of which are specified in 40 CFR 89 Subpart C. The manufacturer must set a family emission limit (FEL) not to exceed the levels contained in Table 2. The FEL established by the manufacturer serves as the standard for that engine family. Table 2 follows:

Table 2.—Upper Limit for Family Emission Limits (g/kW-hr)

Rated Power (kW)	Tier	Model Year <sup>1</sup>	NO <sub>x</sub> FEL	NMHC+NO <sub>x</sub> FEL	PM FEL
75 ≤ kW < 130	Tier 1	1997	14.6	--	1.2
	Tier 2	2003	--	11.5	--
	Tier 3	2007	--	6.6	--
kW>560	Tier 1	2000	14.6	--	--
	Tier 2	2006	--	10.5	0.54

<sup>1</sup> The model years listed indicates the model years for which the specified tier of standards take effect.

- c. Pursuant to 40 CFR 89.112(e), naturally aspirated nonroad engines to which 40 CFR 89 Subpart B is applicable shall not discharge crankcase emissions into the ambient atmosphere, unless such crankcase emissions are permanently routed into the exhaust and included in all exhaust emission measurements. This provision applies to all Tier 2 engines and later models. This provision does not apply to engines using turbochargers, pumps, blowers, or superchargers for air induction.
- d. Pursuant to 40 CFR 89.113(a), exhaust opacity from compression-ignition nonroad engines for which 40 CFR 89 Subpart B is applicable must not exceed:

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- i. 20 percent during the acceleration mode;
  - ii. 15 percent during the lugging mode; and
  - iii. 50 percent during the peaks in either the acceleration or lugging modes.
- 4a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.305, all conveyor loading operations to storage piles specified in 35 Ill. Adm. Code 212.304 shall utilize spray systems, telescopic chutes, stone ladders or other equivalent methods in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- e. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- f. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.

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- g. Pursuant to 35 Ill. Adm. Code 212.308, crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program.
- h. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- i. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
- i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- j. Pursuant to 35 Ill. Adm. Code 212.313, if particulate collection equipment is operated pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 212.312, emissions from such equipment shall not exceed 68 mg/dscm (0.03 gr/dscf).
- k. Pursuant to 35 Ill. Adm. Code 212.316(b), no person shall cause or allow fugitive particulate matter emissions generated by the crushing or screening of slag, stone, coke or coal to exceed an opacity of 10 percent.

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1. Pursuant to 35 Ill. Adm. Code 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent.
- m. Pursuant to 35 Ill. Adm. Code 212.316(e)(1), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area located at a slag processing facility or integrated iron and steel manufacturing plant to exceed an opacity of 5 percent.
- n. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter,  $PM_{10}$ , or fugitive particulate matter emissions limitation elsewhere in 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code 212 Subparts R or S, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.
- o. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- p. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of  $PM_{10}$  from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.
- q. Pursuant to 35 Ill. Adm. Code 212.700(a), 35 Ill. Adm. Code 212 Subpart UU (Additional Control Measures) shall apply to those sources in the areas designated in and subject to 35 Ill. Adm. Code 212.324(a)(1) or 212.423(a) and that have actual annual source-wide emissions of  $PM_{10}$  of at least fifteen (15) tons per year.
- 5a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).
- b. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.
- c. Pursuant to 35 Ill. Adm. Code 214.304, the emissions from the burning of fuel at process emission sources located in the Chicago or St. Louis (Illinois) major metropolitan areas shall comply with applicable 35 Ill. Adm. Code 214 Subparts B through F (i.e., 35 Ill. Adm. Code 214.122).

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6. This permit is issued based on the conveyors, crushers, and screens at this source not being subject to the New Source Performance Standards (NSPS) for Coal Preparation Plants, 40 CFR 60 Subpart Y, because no machinery at this source facility is used to reduce the size of coal or to separate coal from refuse.
- 7a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- b. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).
8. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 9a. Pursuant to 40 CFR 60.4207(a), beginning October 1, 2007, owners and operators of stationary CI ICE subject to 40 CFR 60 Subpart IIII that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).
- b. Pursuant to 40 CFR 60.4207(b), beginning October 1, 2010, owners and operators of stationary CI ICE subject to 40 CFR 60 Subpart IIII 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.
- 10a. Pursuant to 40 CFR 80.510(a), beginning June 1, 2007. Except as otherwise specifically provided in 40 CFR 80 Subpart I, all NRLM diesel fuel is subject to the following per-gallon standards:
  - i. Sulfur content. 500 parts per million (ppm) maximum.

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- ii. Cetane index or aromatic content, as follows:
  - A. A minimum cetane index of 40; or
  - B. A maximum aromatic content of 35 volume percent.
- b. Pursuant to 40 CFR 80.510(b), beginning June 1, 2010. Except as otherwise specifically provided in 40 CFR 80 Subpart I, all NR and LM diesel fuel is subject to the following per-gallon standards:
  - i. Sulfur content 15 ppm maximum for NR diesel fuel.
  - ii. Cetane index or aromatic content, as follows:
    - A. A minimum cetane index of 40; or
    - B. A maximum aromatic content of 35 volume percent.
- 11a. Pursuant to 40 CFR 60.4211(a), if you are an owner or operator and must comply with the emission standards specified in 40 CFR 60 Subpart IIII, you must operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those settings that are permitted by the manufacturer. You must also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.
- b. Pursuant to 40 CFR 60.4211(c), if you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in 40 CFR 60.4204(b) or 40 CFR 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to 40 CFR 60 Subpart IIII and must comply with the emission standards specified in 40 CFR 60.4205(c), you must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4204(b), or 40 CFR 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's specifications.
- 12a. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 Ill. Adm. Code 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in this 35 Ill. Adm. Code 212.324 shall be met at all times. 35 Ill. Adm. Code 212.324 shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:
  - i. Visual inspections of air pollution control equipment;

- ii. Maintenance of an adequate inventory of spare parts; and
  - iii. Expeditious repairs, unless the emission unit is shutdown.
- b. Pursuant to 35 Ill. Adm. Code 212.701(a), those sources subject to 35 Ill. Adm. Code 212 Subpart UU shall prepare contingency measure plans reflecting the PM<sub>10</sub> emission reductions set forth in 35 Ill. Adm. Code 212.703. These plans shall become federally enforceable permit conditions. Such plans shall be submitted to the Illinois EPA by November 15, 1994. Notwithstanding the foregoing, sources that become subject to the provisions of 35 Ill. Adm. Code 212 Subpart UU after July 1, 1994, shall submit a contingency measure plan to the Illinois EPA for review and approval within ninety (90) days after the date such source or sources became subject to the provisions of 35 Ill. Adm. Code 212 Subpart UU or by November 15, 1994, whichever is later. The Illinois EPA shall notify those sources requiring contingency measure plans, based on the Illinois EPA's current information; however, the Illinois EPA's failure to notify any source of its requirement to submit contingency measure plans shall not be a defense to a violation of 35 Ill. Adm. Code 212 Subpart UU and shall not relieve the source of its obligation to timely submit a contingency measure plan.
- c. Pursuant to 35 Ill. Adm. Code 212.703(a), all sources subject to 35 Ill. Adm. Code 212 Subpart UU shall submit a contingency measure plan. The contingency measure plan shall contain two levels of control measures:
- i. Level I measures are measures that will reduce total actual annual source-wide fugitive emissions of PM<sub>10</sub> subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 15%.
  - ii. Level II measures are measures that will reduce total actual annual source-wide fugitive emissions of PM<sub>10</sub> subject to control under 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 by at least 25%.
- d. Pursuant to 35 Ill. Adm. Code 212.703(b), a source may comply with 35 Ill. Adm. Code 212 Subpart UU through an alternative compliance plan that provides for reductions in emissions equal to the level of reduction of fugitive emissions as required at 35 Ill. Adm. Code 212.703(a) and which has been approved by the Illinois EPA and USEPA as federally enforceable permit conditions. If a source elects to include controls on process emission units, fuel combustion emission units, or other fugitive emissions of PM<sub>10</sub> not subject to 35 Ill. Adm. Code 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 at the source in its alternative control plan, the plan must include a reasonable schedule for implementation of such controls, not to exceed two (2) years. This implementation schedule is subject to Illinois EPA review and approval.

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- e. Pursuant to 35 Ill. Adm. Code 212.704(b), if there is a violation of the ambient air quality standard for  $PM_{10}$ , as determined in accordance with 40 CFR Part 50, Appendix K, the Illinois EPA shall notify the source or sources the Illinois EPA has identified as likely to be causing or contributing to one or more of the exceedences leading to such violation, and such source or sources shall implement Level I or Level II measures, as determined pursuant to 35 Ill. Adm. Code 212.704(e). The source or sources so identified shall implement such measures corresponding to fugitive emissions within ninety (90) days after receipt of a notification and shall implement such measures corresponding to any nonfugitive emissions according to the approved schedule set forth in such source's alternative control plan. Any source identified as causing or contributing to a violation of the ambient air quality standard for  $PM_{10}$  may appeal any finding of culpability by the Illinois EPA to the Illinois Pollution Control Board pursuant to 35 Ill. Adm. Code 106 Subpart J.
- f. Pursuant to 35 Ill. Adm. Code 212.704(e), the Illinois EPA shall require that sources comply with the Level I or Level II measures of their contingency measure plans, pursuant 35 Ill. Adm. Code 212.704(b), as follows:
  - i. Level I measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, is less than or equal to  $170 \mu\text{g}/\text{m}^3$ .
  - ii. Level II measures shall be required when the design value of a violation of the 24-hour ambient air quality standard, as computed pursuant to 40 CFR 50, Appendix K, exceeds  $170 \mu\text{g}/\text{m}^3$ .
- 13a. Pollution control devices associated with the emission units being modified under this permit shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.
- b. The transloading facility shall be operated in accordance with good operating practices to minimize particulate matter emissions including the following.
  - i. Enclosures shall be maintained in good condition and wet suppressant shall be applied as needed whenever materials are being moved past a point of application; and
  - ii. Remedial actions shall be taken if visible emissions are observed beyond the property line.
- c. This permit is issue based on the handling of only coal, petroleum coke, and like materials, and salt at the plant. The handling of any other material at the source requires that the Permittee first obtain a construction permit from the Illinois EPA.

- d. The water pump and the generator sets shall only be operated with distillate fuel oil as the fuel. The use of any other fuel in the water pump or the generator sets requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- e. The Permittee shall not keep, store, or use distillate fuel oil (Grades No. 1 and 2) at this source with a sulfur content greater than the larger of the following values:
  - i. 0.28 weight percent, or
  - ii. The Wt. percent given by the formula: Maximum Wt. percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).
- f. Organic liquid by-products or waste materials shall not be used in the diesel generator sets without written approval from the Illinois EPA.
- g. The Illinois EPA shall be allowed to sample fuel stored at the source associated with the diesel generator set.
- 14a. The total amount of materials handled through the transloading facility shall not exceed 1.13 million tons/month and 11.25 million tons/year.
  - b. Materials handled by truck shall not exceed 175,000 tons/month and 1,750,000 tons per year (includes coal inbound/outbound via truck and salt outbound via truck).
  - c. Emissions and operation of the transloading facility shall not exceed the following limits:

i. Material Storage Piles and Transfer and Conveying, and Loadout:

Process	Material Throughput		PM Emissions			PM <sub>10</sub> Emissions		
	(Ton/Mo)	(Ton/Yr)	(lb/Ton)	(T/Mo)	(T/Yr)	(lb/Ton)	(T/Mo)	(T/Yr)
Coal & Coke *	1,100,000	11,000,000	0.0005	5.87	58.71	0.00024	2.82	28.18
Salt	25,000	250,000	0.0005	0.10	1.00	0.00024	0.05	0.48
Incidental Soil Crushing *	30,660	306,600	0.0033	0.03	0.25	0.00101	0.01	0.08
Incidental Soil Screening *	30,660	306,600	0.00067	0.01	0.05	0.00034	0.01	0.03
				Totals	60.01			28.77

\* 50 % control for wet suppression

- iii. These limits are based on the maximum materials throughput of 11.25 million tons per year with at most 1,750,000 tons/year handled by trucks, and standard emission factors (Table 13.2.4, AP 42, Fifth Edition, Volume I, November 2006 with U = 16.4 and M = 18.3).

iv. The above limitations contain revisions to previously issued Permits 03100038 and 06040012. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the aforementioned permit. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the construction permit application contains the most current and accurate information for the source. Specifically, the source's permitted annual throughput is being increase from 11.0 million tons per year to 12.25 million tons per year and the permitted emissions of PM<sub>10</sub> are being increases from 12.5 tons per year to 28.41 tons per year.

- d. Emissions and operation of the 15 kW (20 HP) diesel-powered emergency water pump will not exceed the following:
- i. The diesel-powered emergency water pump runtime shall not exceed 150 hours/month and 500 hours/year.
  - ii. Emissions from the diesel-powered emergency water pump shall not exceed:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u> <u>(lb/HP-hr)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.01079	0.02	0.05
Nitrogen Oxides (NO <sub>x</sub> )	0.015	0.03	0.08
Particulate Matter (PM)	0.0013	0.01	0.01
Particulate Matter-10 (PM <sub>10</sub> )	0.0013	0.01	0.01
Sulfur Dioxide (SO <sub>2</sub> )	**	0.01	0.01
Volatile Organic Material (VOM)	0.00062	0.01	0.01

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO<sub>x</sub>, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

\*\* SO<sub>2</sub> emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

500 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.01 tpy

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e. Emissions and operation of the 30 kW (40 HP) diesel-powered generator will not exceed the following:

- i. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
- ii. Emissions from the diesel-powered generator shall not exceed:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u> <u>(lb/HP-hr)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.00903	0.06	0.63
Nitrogen Oxides (NO <sub>x</sub> )	0.015	0.11	1.05
Particulate Matter (PM)	0.001	0.01	0.07
Particulate Matter-10 (PM <sub>10</sub> )	0.001	0.01	0.07
Sulfur Dioxide (SO <sub>2</sub> )	**	0.01	0.06
Volatile Organic Material (VOM)	0.00062	0.01	0.04

These limits are based on the emission factors for units with power rating of less than 500 HP, and the emission factors for CO, NO<sub>x</sub>, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

\*\* SO<sub>2</sub> emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.  
 $3,500 \text{ hr/yr} \times 10 \text{ gal/hr} \times 7.1 \text{ lbs/gal} \times 0.05\% \text{ S} / 2,000 \text{ lb/gal} = 0.06 \text{ tpy}$

f. Emissions and operation of the 88 kW (118 HP) diesel-powered generators combined will not exceed the following:

- i. The diesel-powered generators runtime shall not exceed 2,100 hours/month and 21,000 hours/year.
- ii. Emissions from the six diesel-powered generators combined shall not exceed:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u> <u>(lb/HP-hr)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.00815	1.01	10.10
Nitrogen Oxides (NO <sub>x</sub> )	0.015	1.86	18.59
Particulate Matter (PM)	0.0005	0.06	0.62
Particulate Matter-10 (PM-10)	0.0005	0.06	0.62
Sulfur Dioxide (SO <sub>2</sub> )	**	0.04	0.37
Volatile Organic Material (VOM)	0.00033	0.04	0.41

These limits are based on the emission factors for units with power rating of less than 500 HP, and the emission factors for CO, NO<sub>x</sub>, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1.

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Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

\*\* SO<sub>2</sub> emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

21,000 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.37 tpy

- g. Emissions and operation of the 224 kW (300 HP) diesel-powered generators combined will not exceed the following:
- i. The diesel-powered generators runtime shall not exceed 1,050 hours/month and 10,500 hours/year.
  - ii. Emissions from the three diesel-powered generators combined shall not exceed:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u> <u>(lb/HP-hr)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.00573	0.90	9.02
Nitrogen Oxides (NO <sub>x</sub> )	0.015	2.36	23.63
Particulate Matter (PM)	0.0003	0.05	0.47
Particulate Matter-10 (PM <sub>10</sub> )	0.0003	0.05	0.47
Sulfur Dioxide (SO <sub>2</sub> )	**	0.02	0.19
Volatile Organic Material (VOM)	0.00033	0.05	0.52

These limits are based on the emission factors for units with power rating of less than 600 HP, and the emission factors for CO, NO<sub>x</sub>, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

\*\* SO<sub>2</sub> emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

10,500 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.19 tpy

- h. Emissions and operation of the 280 kW (375 HP) diesel-powered generator will not exceed the following:
- iii. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
  - iv. Emissions from the diesel-powered generator shall not exceed:

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<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.00573	0.38	3.76
Nitrogen Oxides (NO <sub>x</sub> )	0.015	0.98	9.84
Particulate Matter (PM)	0.0003	0.02	0.20
Particulate Matter-10 (PM <sub>10</sub> )	0.0003	0.02	0.20
Sulfur Dioxide (SO <sub>2</sub> )	**	0.01	0.06
Volatile Organic Material (VOM)	0.00033	0.02	0.22

These limits are based on the emission factors for units with power rating of less than 600 HP; and the emission factors for CO, NO<sub>x</sub>, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

\*\* SO<sub>2</sub> emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.  
 $3,500 \text{ hr/yr} \times 10 \text{ gal/hr} \times 7.1 \text{ lbs/gal} \times 0.05\% \text{ S} / 2,000 \text{ lb/gal} = 0.06 \text{ tpy}$

- i. Emissions and operation of the 298 kW (400 HP) diesel-powered generator will not exceed the following:
- i. The diesel-powered generator runtime shall not exceed 350 hours/month and 3,500 hours/year.
  - ii. Emissions from the diesel-powered generator shall not exceed:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	0.00573	0.40	4.01
Nitrogen Oxides (NO <sub>x</sub> )	0.015	1.05	10.50
Particulate Matter (PM)	0.0003	0.02	0.21
Particulate Matter-10 (PM <sub>10</sub> )	0.0003	0.02	0.21
Sulfur Dioxide (SO <sub>2</sub> )	**	0.01	0.06
Volatile Organic Material (VOM)	0.000033	0.02	0.23

These limits are based on the emission factors for units with power rating less than 600 HP, and the emission factors for CO, NO<sub>x</sub>, VOM, and PM are based on the allowable rates in 40 CFR 89.112(a), table 1. Emission totals shall be calculated by multiplying the diesel generator set runtime and the emission factors for each pollutant.

\*\* SO<sub>2</sub> emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

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3,500 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.06 tpy

- j. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 months total).
15. This permit is issued based on the potential to emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
- 16a. Pursuant to 40 CFR 60.8(a), within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Illinois EPA or USEPA under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Illinois EPA or USEPA a written report of the results of such performance test(s).
- b. Pursuant to 40 CFR 60.8(b), performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart of 40 CFR Part 60 unless the Illinois EPA or USEPA:
- i. Specifies or approves, in specific cases, the use of a reference method with minor changes in methodology;
  - ii. Approves the use of an equivalent method;
  - iii. Approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific source is in compliance;
  - iv. Waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected facility is in compliance with the standard; or
  - v. Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under section 114 of the Clean Air Act.
- c. Pursuant to 40 CFR 60.8(c), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of the

performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

- d. Pursuant to 40 CFR 60.8(d), the owner or operator of an affected facility shall provide the Illinois EPA or USEPA at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Illinois EPA or USEPA the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Illinois EPA or USEPA as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Illinois EPA or USEPA by mutual agreement.
- e. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
  - i. Sampling ports adequate for test methods applicable to such facility. This includes:
    - A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test 1 methods and procedures; and
    - B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
  - ii. Safe sampling platform(s).
  - iii. Safe access to sampling platform(s).
  - iv. Utilities for sampling and testing equipment.
- f. Pursuant to 40 CFR 60.8(f), unless otherwise specified in the applicable subpart of 40 CFR Part 60, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard under 40 CFR Part 60. For the purpose of determining compliance with an applicable standard under 40 CFR Part 60, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train,

extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Illinois EPA's or USEPA's approval, be determined using the arithmetic mean of the results of the two other runs.

- 17a. Pursuant to 40 CFR 60.4212(a), the performance test must be conducted according to the in-use testing procedures in 40 CFR Part 1039, Subpart F.
- b. Pursuant to 40 CFR 60.4212(c), exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD})$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in 40 CFR 60.4213, as appropriate.

- 18a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the

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emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

- b. Testing required by Condition 19 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 19a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. 35 Ill. Adm. Code 212 Subpart A shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
- o. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
- d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
- e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 20a. Within 60 days after achieving the maximum production rate at which the diesel-powered generators will be operated, the emissions and opacity

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of the diesel-powered generators shall be measured during conditions which are representative of maximum emissions. These tests shall determine compliance with 40 CFR 60.4204(b), 40 CFR 89.112(a), 40 CFR 89.112(d), and 40 CFR 89.113(a).

- b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR Part 1039, Subpart F for USEPA test methods.
- 21a. At least 30 days prior to the actual date of testing, the Permittee shall submit a written test plan to the Illinois EPA, Compliance Section. This plan shall include as a minimum:
- i. The name (or other identification) of the emission unit(s) to be tested and the name and address of the facility at which they are located;
  - ii. The name and address of the independent testing service(s) performing the tests, with the names of the individuals who may be performing sampling and analysis and their experience with similar tests;
  - iii. The specific determinations of emissions and/or performance which are intended to be made, including the site(s) in the ductwork or stack at which sampling will occur;
  - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, minimum control performance, the levels of operating parameters for the emission unit, including associated control equipment, at or within which compliance is intended to be shown, and the means by which the operating parameters will be determined;
  - v. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control procedures which will be used, with an identification of the standard methods upon which they are based;
  - vi. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification;
  - vii. Any proposed use of an alternative test method, with detailed justification; and
  - viii. The format and content of the Source Test Report.
- b. The Permittee shall provide the Illinois EPA with written notification of testing at least thirty (30) days prior to testing to enable the Illinois EPA to have an observer present. This notification shall

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include the name of emission unit(s) to be tested, scheduled date and time, and contact person with telephone number.

- c. If testing is delayed, the Permittee shall promptly notify the Illinois EPA by facsimile, at least 5 days prior to the scheduled date of testing or immediately, if the delay occurs in the 5 days prior to the scheduled date. This notification shall also include the new date and time for testing, if set, or a separate notification shall be sent with this information when it is set.
- d. The Permittee shall submit the Final Test Report(s) for these tests accompanied by a cover letter stating whether or not compliance was shown, to the Illinois EPA without delay, within 30 days after the results are compiled, but no later than 60 days after the date of testing or sampling. The Final Report shall include as a minimum:
  - i. General information describing the test, including the name and identification of the emission source which was tested, date of test, names of personnel performing the tests, and Illinois EPA observers, if any;
  - ii. A summary of results;
  - iii. Description of test procedures and method(s), including description and map of emission units and sampling points, sampling train, testing and analysis equipment, and test schedule;
  - iv. Detailed description of test conditions, including:
    - A. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information (i.e., mode(s) of operation, process rate/throughput, fuel or raw material consumption rate, and heat content of the fuels);
    - B. Control equipment information (i.e., equipment condition and operating parameters) during testing; and
    - C. A discussion of any preparatory actions taken (i.e., inspections, maintenance and repair).
  - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration. Identification of the applicable regulatory standards that the testing was performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards, and a statement whether the test(s) demonstrated compliance with the applicable standards;
  - vi. An explanation of any discrepancies among individual tests, failed tests or anomalous data;

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- vii. The results and discussion of all quality control evaluation data, including a copy of all quality control data; and
  - viii. The applicable operating parameters of the pollution control device(s) during testing (temperature, pressure drop, scrubant flow rate, etc.), if any.
- e. Satisfactory completion of this test so as to demonstrate compliance with applicable emission standards is a prerequisite to issuance of an operating permit, pursuant to 35 Ill. Adm. Code 201.160(a), (b) and (c).
- 22a. Pursuant to 40 CFR 60.4209, if you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in 40 CFR 60.4211.
- b. Pursuant to 40 CFR 60.4209(b), If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.
- 23a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
24. Pursuant to 40 CFR 60.4214(c), if the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.
- 25a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be

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retained for at least three (3) years after the date a test is performed.

- b. i. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code 212.316 and shall submit to the Illinois EPA an annual report containing a summary of such information.
  - ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(2), the records required under 35 Ill. Adm. Code 212.316(g) shall include at least the following:
    - A. The name and address of the source;
    - B. The name and address of the owner and/or operator of the source;
    - C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;
    - D. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day; and
    - E. A log recording incidents when control measures were not used and a statement of explanation.
  - iii. Pursuant to 35 Ill. Adm. Code 212.316(g)(3), the records required under 35 Ill. Adm. Code 212.316 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
  - iv. Pursuant to 35 Ill. Adm. Code 212.316(g)(4), the records required under 35 Ill. Adm. Code 212.316(g) shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- c. i. Pursuant to 35 Ill. Adm. Code 212.324(g)(1), written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).
  - ii. Pursuant to 35 Ill. Adm. Code 212.324(g)(2), the owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to

cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.

- iii. Pursuant to 35 Ill. Adm. Code 212.324(g)(3), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
  - iv. Pursuant to 35 Ill. Adm. Code 212.324(g)(5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- 26a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the dust suppression systems associated with the materials transloading system:
    - A. Records for periodic inspection of the dust suppression systems with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. Name and total amount of each material shipped (tons/month and tons/year);
  - iii. Name and amount of each material shipped by truck (tons/month and tons/year);
  - iv. Amount of each material that is deposited on storage piles (tons/month and tons/year);
  - v. Diesel generator sets runtime (hours/month, hours/year);
  - vi. Certification from the fuel supplier of weight percent sulfur content of each fuel shipment received;
  - vii. Amount of fuel used (gallons/month, gallons/year);
  - viii. An inspection, maintenance and repair log of the generators listing each activity performed with date; and
  - iv. Monthly and annual emissions of NO<sub>x</sub>, CO, SO<sub>2</sub>, PM, PM<sub>10</sub> and VOM from the source with supporting calculations (tons/month, tons/year).

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- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 27a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and USEPA and the owner or operator of a source, electronic notification, as follows:
- i. A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
  - ii. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
  - iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.
- 28a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- b.
    - i. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
    - ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a

listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of 35 Ill. Adm. Code 212.316. This report shall be submitted to the Illinois EPA thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

iii. Pursuant to 35 Ill. Adm. Code 212.324(g)(6), upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

29a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

It should be noted that during the analysis of this permit application, it was determined that your facility has the potential to emit more than 100 tons/year of nitrogen oxides (NO<sub>x</sub>) and particulate matter of less than ten microns (PM<sub>10</sub>) and will be classified as a major source under the Clean Air Act Permit Program (CAAPP). To avoid the CAAPP permitting requirements, if eligible, you may want to consider immediately applying for a Federally

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Enforceable State Operating Permit (FESOP), if your actual emissions of particulate matter of less than ten microns are less than major threshold levels. A FESOP is an operating permit, which contains enforceable limits in the form of permit conditions, which effectively restrict the potential emissions of a source to below major source thresholds, thereby excluding the source from the CAAPP.

A FESOP is an operating permit containing federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source thresholds, thereby excluding the source from the CAAPP. The necessary application forms are available on the Illinois EPA's website at <http://www.epa.state.il.us/air/caapp/permit-forms.html>.

If you have any questions on this, please call Mike Dragovich at 217/782-2113.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:MJD:jws

cc: Region 1