Exhibit 1

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

217/785-1705

CERTIFIED MAIL
7012 0470 0001 3002 2506

PERMIT DENIAL

January 17, 2014

KCBX Terminals Company
Attn: Michael Estadt, Operations Manager
10730 South Burley Avenue
Chicago, Illinois 60617

Application No.:	07050082
I.D. No.:	031600GSF
Applicant's Designation:	
Received:	July 23, 2013
Construction of:	Conveyor Addition
Location:	10730 South Burley Avenue, Chicago, Cook County, 60617

The Illinois EPA has reviewed your application for Construction Permit for the above referenced project. The permit application is DENIED because Sections 9 and 39.2 of the Illinois Environmental Protection Act, and 35 Ill. Adm. Code 201.152, 201.160(a), 212.301, and 212.321 might be violated.

The following are specific reasons why the Act and the Rules and Regulations may not be met:

1a. 35 Ill. Adm. Code 201.152 specifies minimum data and information to be contained in a construction permit application. This application did not contain this information and the Illinois EPA could not determine compliance with the Illinois Environmental Protection Act (Act) and Regulations.

b. Specifically, the following information must be provided in order for the Illinois EPA to determine compliance of the ten portable conveyors, one box hopper, and one stacker with the regulations:

i. information concerning processes to which the emission unit or air pollution control equipment is related;

ii. the quantities and types of raw materials to be used in the emission unit or air pollution control equipment;

iii. the nature, specific points of emission and quantities of uncontrolled and controlled air contaminant emissions at the source that includes the emission unit or air pollution control equipment;

iv. the type, size, efficiency and specifications (including engineering drawings, plans and specifications) of the proposed emission unit or air pollution control equipment; and

v. maps, statistics and other data reasonably sufficient to describe the location of the emission unit or air pollution control equipment

2. Pursuant to 35 Ill. Adm. Code 201.160(a)(1), no construction permit shall be granted unless the applicant submits proof to the Illinois EPA that the emission unit or air pollution control equipment will be constructed or modified to operate so as not to cause a violation of the Illinois Environmental Protection Act or of Title 35: Environmental Protection, Subtitle B: Air Pollution, Chapter I: Pollution Control Board.

3. The application does not show compliance with 35 Ill. Adm. Code 212.301 (Fugitive Particulate Matter). Based upon the observations made by the Division of Air Pollution Control's field staff and citizen pollution complaint forms, emissions from the source may violate 35 Ill. Adm. Code 212.301.

4. The application does not show whether the particulate matter emissions from the ten portable conveyors, one box hopper, and one stacker will comply with 35 Ill. Adm. Code 212.321. As the application did not include data that would prove the actual emission levels, pursuant to 35 Ill. Adm. Code 201.122, or any other information that could be used to estimate emissions, the Illinois EPA could not assess whether these emission units have a particulate matter emission rate at levels below which would be allowed by this rule.

5a. Pursuant to Section 39(c) of the Act, except for those facilities owned or operated by sanitary districts organized under the Metropolitan Water Reclamation District Act, no permit for the development or construction of a new pollution control facility may be granted by the Illinois EPA unless the applicant submits proof to the Illinois EPA that the location of the facility has been approved by the County Board of the county if in an unincorporated area, or the governing body of the municipality when in an incorporated area, in which the facility is to be located in accordance with Section 39.2 of the Act. For purposes of Section 39(c) of the Act, and for purposes of Section 39.2 of the Act, the appropriate county board or governing body of the municipality shall be the county board of the county or the governing body of the municipality in which the facility is to be located as of the date when the application for siting approval is filed.

b. Pursuant to Section 3.330 of the Act, "Pollution control facility" is any waste storage site, sanitary landfill, waste disposal site, waste transfer station, waste treatment facility, or waste incinerator.

c. Based upon the observations made by the Bureau of Land's field staff, storage pile #8 was determined to be a waste pile due to vegetative growth observed during the inspection conducted on November 6, 2013.

6. The denial of this application for the stated reasons does not change the status of the previously issued permit for the equipment and operations that this application covers.

The Illinois EPA will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.152, this reapplication may incorporate by reference the data and information submitted to the Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Three copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

If you have any questions on this, please call Michael Dragovich at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: 1/17/14

REP:MJD:psj

cc: Illinois EPA FOS, Region 1
Eric Jones, Illinois EPA Compliance Section

Exhibit 2

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE -- RENEWAL

PERMITTEE

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

Application No.: 95050167 I.D. No.: 031600AHI
Applicant's Designation: REV10/07 Date Received: July 14, 2011
Subject: Bulk Solid Materials Terminal
Date Issued: April 5, 2012 Expiration Date: April 5, 2022
Location: 3259 East 100th Street, Chicago, Cook County, 60617

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a bulk solid materials terminal, including unloading of materials from railcars, trucks and barges, conveying and transferring materials to/from storage piles, storage piles, loading to ships/barges, railcars, and trucks, and associated dust suppression systems as described in the above-referenced application as follows:

Texmarc Box Hopper;
555' Barge Line Conveyor;
35' Box Hopper;
300' Conveyor;
Shaker Building with Receiving Hoppers for Railcars and 300' Conveyor;
South Collector Belt #1;
South Incline Belt #2;
30' Shuttle Conveyor;
Crossover Conveyor and Rock Chute;
South Highline Belt #3;
South Shiploader Tripper and Belt #4;
South Shiploader Pan, Spout and Trimmer;
Carter Box Hopper (portable);
Ten (10) Portable Conveyors;
Stacker - American Bin;
Kolberg Screen Plant;
Stacker/Conveyor on Screen Plant;
760 hp Diesel-Powered Generator;
750 hp Diesel-Powered Generator;
Thirteen (13) Gasoline/Diesel-Powered Engines (each less than 35 hp); and
Nineteen (19) Diesel/Kerosene-Fired Heaters (each less than or equal to 0.6 mmBtu/hour)

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Nitrogen Oxides (NO_x) and Particulate Matter with an aerodynamic diameter less than or equal to 10 micrometers (PM_{10})). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.

b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

c. This permit supersedes all operating permit(s) for this location.

d. This permit is effective only upon the withdrawal of Consolidated Permit Appeal PCB Nos. 2010-110 and 2011-043.

2a. The Kolberg Screen Plant and Stacker/Conveyor on the Screen Plant are subject to the New Source Performance Standard (NSPS) for Coal Preparation and Processing Plants, 40 CFR 60, Subparts A and Y. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.250(b), the provisions in 40 CFR 60.251, 40 CFR 60.252(a), 40 CFR 60.253(a), 40 CFR 60.254(a), 40 CFR 60.255(a), and 40 CFR 60.256(a) are applicable to any of the following affected facilities that commenced construction, reconstruction or modification after October 27, 1974, and on or before April 28, 2008: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), and coal storage systems, transfer and loading systems.

b. Pursuant to 40 CFR 60.254(a), on and after the date on which the performance test is conducted or required to be completed under 40 CFR 60.8, whichever date comes first, an owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified on or before April 28, 2008, gases which exhibit 20 percent opacity or greater.

3a. 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 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 meter (1000 foot) 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 212.304(a), all storage piles of materials with uncontrolled emissions of fugitive particulate matter in excess of 45.4 Mg per year (50 T/year) which are located within a source whose potential particulate emissions from all emission units exceeds 90.8 Mg/year (100 T/year) shall be protected by a cover or sprayed with a surfactant solution or water on a regular basis, as needed, or treated by an equivalent method, 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 212.305, all conveyor loading operations to storage piles specified in 35 Ill. Adm. Code 212.304 shall utilize spray systems, telescopic chutes, stone ladders or equivalent methods 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 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 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.

g. Pursuant to 35 Ill. Adm. Code 212.308, crushers, grinding mills, screening operations, bagging operations, bucket elevators, conveyor transfer points, conveyors, 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.

   i. Conveyor loadout to trucks and railcars shall be conducted with sleeves extending to at least 6 inches below the sides and the receiving vehicle, except for topping off.

   ii. Conveyor loadout sleeves shall be inspected for proper operation while such loadout to trucks or railcars is occurring, at least once each week when such loadout to trucks or railcars is performed.

h. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 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 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.

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.

l. 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, except that the opacity shall not exceed 5 percent at quarries with a capacity to produce more than 1 million tons/year of aggregate.

m. Pursuant to 35 Ill. Adm. Code 212.316(d), no person shall cause or allow fugitive particulate matter emissions from any storage pile to exceed an opacity of 10 percent, to be measured four feet from the pile surface.

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 Part 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 212.321(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.321(c) shall be determined by using the equation:

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

where

P = Process weight rate; and
E = Allowable emission rate; and,

i. Up to process weight rates of 408 MG/hour (450 T/hour):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

ii. For process weight rate greater than or equal to 408 Mg/hour (450 T/hour):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

q. The affected emission units subject 35 Ill. Adm. Code 212.322 include the Shaker Building with Receiving Hoppers for Railcars and 300' Conveyor; South Collector Belt #1; South Incline Belt #2; South

Highline Belt #3; South Shiploader Tripper and Belt #4; and South Shiploader Pan, Spout and Trimmer. Pursuant to 35 Ill. Adm. Code 212.322(a) and except as further provided in 35 Ill. Adm. Code 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.322(c).

r. Pursuant to 35 Ill. Adm. Code 212.322(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.322(c) shall be determined by using the equation:

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

where

P = Process weight rate; and
E = Allowable emission rate; and,

i. Up to process weight rates of 27.2 MG/hour (30 T/hour):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

ii. For process weight rate greater than or equal to 27.2 Mg/hour (30 T/hour):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

s. Pursuant to 35 Ill. Adm. Code 212.700(a), 35 Ill. Adm. Code 212 Subpart U (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.

4a. 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 source 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 Subparts B through F (i.e., 35 Ill. Adm. Code 214.122(b)).

5. This permit is issued based on the coal storage systems (as defined in 40 CFR 60.251(h) to be any facility used to store coal except for open storage piles) and the open coal storage piles (as defined in 40 CFR 60.251(m) to be any facility, including storage area, that is not enclosed that is used to store coal, including the equipment used in the loading, unloading, and conveying operations of the facility) associated with the Kolberg Screen Plant and Stacker/Conveyor on the Screen Plant not being subject to the requirements of 40 CFR 60.254(c) because the Kolberg Screen Plant and Stacker/Conveyor on the Screen Plant and the associated coal storage systems and open coal storage piles were constructed prior to the applicability date of May 27, 2009 and have not been reconstructed or modified since installation.

6a. Pursuant to 35 Ill. Adm. Code 212.304(b), 35 Ill. Adm. Code 212.304(a) shall not apply to a specific storage pile if the owner or operator of that pile proves to the Illinois EPA that fugitive particulate emissions from that pile do not cross the property line either by direct wind action or reentrainment.

b. 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.

c. Pursuant to 35 Ill. Adm. Code 212.323, 35 Ill. Adm. Code 212.321 and 212.322 shall not apply to emission units, such as stockpiles of particulate matter, to which, because of the disperse nature of such emission units, such rules cannot reasonably be applied.

d. 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, 35 Ill. Adm.

Code 212.324(d) is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).

7a. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

b. 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.

8a. 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 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 U shall prepare contingency measure plans reflecting the PM_{10} 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 U 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 U 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 U 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 U 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_{10} 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_{10} 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 U 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_{10} 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.

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 ug/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 ug/m^3.

9a. Except as provided in Condition 9(b), the moisture content of the bulk solid material handled by the source shall be at least 1.3% by weight. The Permittee shall show compliance with this requirement by recording the moisture content of each lot of bulk solid material received at the source as provided by the supplier of the bulk solid material. If the moisture content of a bulk solid material received at the source is below 3.0% by weight as documented by the supplier, then the Permittee shall:

i. Utilize wet suppression on the material handling operations (e.g., material transfer and screening) associated with bulk solid materials having a moisture content below 3.0% by weight to reduce particulate matter emissions and to maintain compliance with the applicable visible emissions standards for each affected material handling operation; or

ii. Follow the testing requirements of Condition 9(d).

b. Notwithstanding the requirements in Condition 9(a), the Permittee may receive and off-load bulk solid material with a moisture content of less than 1.3% by weight (i.e., low-moisture material), so long as the Permittee:

i. Receives the low-moisture material by rail car and off-loads the low-moisture material in the Shaker Building;

ii. Applies water or dust suppressant to the low-moisture material during non-freezing conditions before the material is stockpiled or discharged from the initial receiving conveyor; and

iii. Blends the low-moisture material with a higher-moisture bulk solid material before the material is stockpiled or discharged from the initial receiving conveyor.

c. If the Permittee relies on Condition 9(a)(i) to demonstrate compliance with Condition 9(a) with regard to bulk solid material with a moisture content below 3.0% by weight as documented by the supplier, the Permittee shall monitor the equipment used for wet suppression as follows during non-freezing conditions:

i. The water supply to the equipment used for wet suppression shall be equipped with a master metering device used to determine water usage for the control of particulate matter emissions.

ii. The equipment used for wet suppression shall be inspected at least once per week for proper operation (i.e., maintaining adequate flow, clogging of flow lines, etc.) when this equipment is being utilized.

d. If the Permittee relies on Condition 9(a)(ii) to demonstrate compliance with Condition 9(a) with regard to bulk solid material with a moisture content below 3.0% by weight as documented by the supplier or by testing conducted by the Permittee, the Permittee shall measure the moisture content of a representative sample of such bulk solid material at least once per week using ASTM Procedure D 3302 for coal and ASTM Procedure D 3172 and D 4931 for petroleum coke. Samples shall be collected when wet suppression systems covering the affected bulk solid material are not active. The Permittee may utilize wet suppression on such bulk solid material as needed until three consecutive tests at the source, taken at least 24 hours apart, show moisture contents of 3.0% or greater by weight, after which this testing shall no longer be required for the subject bulk solid material.

e. The Permittee may test the moisture content of any lot of bulk solid material at any time. For purposes of calculating monthly PM and PM_{10} emissions using the formula in Condition 10(a)(i), the moisture content from the most recent analysis of each bulk solid material, either as documented by the supplier or as determined from testing by the Permittee, shall be used to calculate the monthly average moisture content, except as provided in Condition 9(f).

f. The Permittee shall separately calculate the PM and PM_{10} emissions from receiving bulk solid material with a moisture content below 1.3 percent by weight as documented by the supplier, for the initial transfer (material drop) associated with off-loading. Such separately calculated emissions shall be added to the monthly PM and PM_{10} emissions calculated using the formula of Condition 10(a)(i).

g. The above limitations contain revisions to previously issued Construction permit 07100090. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the aforementioned permit.

h. The engines, generators and heaters shall only be operated with distillate fuel oil, gasoline or kerosene as the fuel. The use of any other fuel in the engines, generators or heaters 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.

i. 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 two values:

i. 0.28 weight percent, or

ii. The wt. percent given by the formula: Maximum wt. percent sulfur = (0.00015) x (Gross heating value of oil, Btu/lb).

j. Organic liquid by-products or waste materials shall not be used in any emission unit at this source without written approval from the Illinois EPA.

k. The Illinois EPA shall be allowed to sample all fuels stored at the source.

10a. The emissions from and the operation of all activities at source shall not exceed the following limits:

PM_{10} Emission		PM emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
9.2	92.0	22.5	225.0

These limits are based on the amount of bulk solid material transferred and screened; operation of generators, engine and heaters; and standard emission factors (Tables 1.3-1 and 1.3-3, AP-42, Fifth Edition, Volume I, Supplement E September 1999, corrected May 2010; Table 3.3-1, AP-42, Fifth Edition, Volume I, Supplement B, October 1996; Table 3.4-1, AP 42, Fifth Edition, Volume I, Supplement B, October 1996; Table 11.9-1, AP-42, Volume I, Fifth Edition, Supplement E, October 1998; Table 11.19.2-2, AP-42, Volume I, Fifth Edition, Update 2004, August 2004; Section 13.2.2, AP-42, Volume I, Fifth Edition, November 2006; and Section 13.2.4, AP-42, Volume I, Fifth Edition, November 2006).

i. PM_{10} and PM emissions shall be calculated and recorded using the equation:

$$E = [(T_u \times F_u) + (T_e \times N_e \times F_e) + (S \times F_s) + (A_p \times F_p) + (T_v \times D_v \times F_v) + \sum(H_d \times Z_d \times F_d) + \sum(R \times F_f)]/2000$$

Where:

E = Total PM_{10} or PM emissions, (tons);

T_u = Amount of bulk solid material transferred in unenclosed area, (tons);

$F_u = (k * 0.0032 * N_u) * [((U/5)^{1.3}) / ((M/2)^{1.4})]$;

Where:

k = 0.35 for PM_{10};
= 0.74 for PM;

N_u = Number of bulk solid material transfers (drop points);

U = mean wind speed, (miles/hour);

M = material moisture content, (%);

T_e = Amount of bulk solid material transferred in enclosed areas, (tons);

F_e = 0.00055 lb PM_{10}/Ton for bulk solid material with < 1.3% moisture;
= 0.000023 lb PM_{10}/Ton for bulk solid material with $\geq$ 1.3% moisture;
= 0.0015 lb PM/Ton for bulk solid material with < 1.3% moisture;
= 0.00007 lb PM/Ton for bulk solid material with $\geq$ 1.3% moisture;

The above emission factors are reduced by 50% due to enclosures.

N_e = Number of enclosed bulk solid material transfers (drop points);

S = Amount of bulk solid material screened, (tons);

F_s = 0.0022 lb PM/ton;
= 0.00074 lb PM_{10}/ton;

A_p = Area of Screening Active Storage Pile (Acres);

F_p = 2,201 lb PM/acre - month;
= 1,041 lb PM_{10}/acre - month;

T_v = Number of Vehicle Trips Associated with Screening;

D_v = Trip Distance Associated with Screening (mile/trip);

F_v = 3.7 lb PM/VMT;
= 1.0 lb PM_{10}/VMT;

H_d = Hours of operation of each engine > 600 hp, (hours);

Z_d = Size of each engine > 600 hp operated (hp);

F_d = 0.0007 lb/(hp-hour) for diesel engines > 600 hp;

R = Diesel, gasoline or kerosene usage in heaters and engines $\leq$ 600 hp (gallons); and

F_f = 0.002 lb PM or PM_{10}/gallon for diesel and kerosene;
= 0.0013 lb PM or PM_{10}/gallon for gasoline.

ii. The above limitations contain revisions to previously issued Permit 07100090. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit.

b. Emissions and operation of the two diesel-powered generators, and miscellaneous diesel-powered engines at the source shall not exceed the following limits:

Pollutant	Emissions (Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	4.29	42.9
Nitrogen Oxides (NO_x)	9.20	92.0
Sulfur Dioxide (SO_2)	1.71	17.1
Volatile Organic Material (VOM)	1.84	18.4

These emission limits are based on standard emission factors (Tables 1.3-1 and 1.3-3, AP-42, Fifth Edition, Volume I, Supplement E, September 1999, corrected May 2010 (for the heaters), Tables 3.3-1 AP-42, Fifth Edition, Volume I, Supplement B, October 1996 (for the small gasoline and diesel-powered engines $\leq$ 600 hp), and Table 3.4-1, AP 42, Fifth Edition, Volume I, Supplement B, October 1996 (for the diesel-powered generators > 600 hp) Emissions from the generators shall be calculated as follows:

$$E = [(H_i \times Z_i \times F) + (R \times F)]/2,000$$

Where:

E = Total emissions of pollutant, (tons);

H_i = Hours of operation of each generator > 600 hp (hours);

Z_i = Size of each generator > 600 hp (hp);

R = Diesel, gasoline or kerosene usage in heaters and engines $\leq$ 600 hp (gallons); and

F = Emission Factor as follows:

	Emission Factors				
	Gasoline Engines	Heaters		Diesel Engines	
Pollutant	$\leq$ 250 Hp (lbs/gal)	Kerosene (lbs/gal)	Diesel (lbs/gal)	$\leq$ 600 hp (lbs/gal)	Engines > 600 hp (lbs/Hp-Hr)
Carbon Monoxide (CO)	0.13	0.005	0.005	0.13	0.0055
Nitrogen Oxides (NO_x)	0.21	0.02	0.02	0.60	0.024
Sulfur Dioxide (SO_2)	0.011	0.137 x S*	0.139 x S*	0.040	0.00809 x S*
Volatile Organic Material (VOM)	0.39	0.00033	0.00033	0.049	0.000642

S^{*} = Wt. % sulfur in fuel

c. 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 month total).

11a. Pursuant to 40 CFR 60.8(a), 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 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.

12. Pursuant to 40 CFR 60.11(e)(2), except as provided in 40 CFR 60.11(e)(3), the owner or operator of an affected facility to which an opacity standard in 40 CFR Part 60 applies shall conduct opacity observations in accordance with 40 CFR 60.11(b), shall record the

opacity of emissions, and shall report to the Illinois EPA or USEPA the opacity results along with the results of the initial performance test required under 40 CFR 60.8. The inability of an owner or operator to secure a visible emissions observer shall not be considered a reason for not conducting the opacity observations concurrent with the initial performance test.

13a. Pursuant to 40 CFR 60.255(a), an owner or operator of each affected facility that commenced construction, reconstruction, or modification on or before April 28, 2008, must conduct all performance tests required by 40 CFR 60.8 to demonstrate compliance with the applicable emission standards using the methods identified in 40 CFR 60.257.

b. Pursuant to 40 CFR 60.257(a), the owner or operator must determine compliance with the applicable opacity standards as specified in 40 CFR 60.257(a)(1) through (3).

i. Method 9 of Appendix A-4 of this part and the procedures in 40 CFR 60.11 must be used to determine opacity, with the exceptions specified in 40 CFR 60.257(a)(1)(i) and (ii).

A. The duration of the Method 9 of Appendix A-4 of 40 CFR Part 60 performance test shall be 1 hour (ten 6-minute averages).

B. If, during the initial 30 minutes of the observation of a Method 9 of Appendix A-4 of 40 CFR Part 60 performance test, all of the 6- minute average opacity readings are less than or equal to half the applicable opacity limit, then the observation period may be reduced from 1 hour to 30 minutes.

ii. To determine opacity for fugitive coal dust emissions sources, the additional requirements specified in 40 CFR 60.257(a)(2)(i) through (iii) must be used.

A. The minimum distance between the observer and the emission source shall be 5.0 meters (16 feet), and the sun shall be oriented in the 140-degree sector of the back.

B. The observer shall select a position that minimizes interference from other fugitive coal dust emissions sources and make observations such that the line of vision is approximately perpendicular to the plume and wind direction.

C. The observer shall make opacity observations at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. Water vapor is not considered a visible emission.

iii. A visible emissions observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions specified in 40 CFR 60.257(a)(3)(i) through (iii) are met.

A. No more than three emissions points may be read concurrently.

B. All three emissions points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.

C. If an opacity reading for any one of the three emissions points is within 5 percent opacity from the applicable standard (excluding readings of zero opacity), then the observer must stop taking readings for the other two points and continue reading just that single point.

14a. 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 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 15 shall be performed upon a written request from the Illinois EPA by a qualified individual or independent testing service.

15. 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.

16a. 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 performance evaluations; 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.

17a. 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 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 each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical;

E. 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

F. 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)(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)(4), 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.

18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. If the Permittee is relying on Conditions 9(a)(i) and 9(c) to demonstrate compliance with Condition 9(a), the Permittee shall maintain records for the master metering device on the equipment used for wet suppression, including:

A. Dates and hours of usage;

B. Total amount of water applied each month;

C. Malfunctions (type, dates, and measures to correct);

D. Records of each inspection conducted in accordance with Condition 9(c)(ii);

E. Dates of rainfall during the preceding 24 hours; and

F. Daily observations of bulk solid material conditions (wet or dry) and/or other controls as may be present (e.g., coverage by snow or ice);

ii. Records of the moisture content of bulk solid materials as provided by the suppliers of bulk solid materials, unless such records are superseded by moisture analysis from samples collected at this source;

iii. Records of moisture analysis from samples collected at this source including date, time, individual or laboratory performing test, and location of sample (e.g., prior to screening, stockpiles, etc.);

iv. Name and total amount of each bulk solid material (e.g., coal, petroleum coke, etc.) transferred in unenclosed areas, (tons/month and tons/year);

v. Name and total amount of each bulk solid material (e.g., coal, petroleum coke, etc.) material transferred in enclosed areas, (tons/month and tons/year);

vi. Name and total amount of each bulk solid material (e.g., coal, petroleum coke, etc.) screened, (tons/month and tons/year);

vii. Area of Screening Active Storage Pile (Acres);

viii. Number of Vehicle Trips Associated with Screening, Trip Distance Associated with Screening (mile/trip), and total vehicle miles travelled (VMT/month and VMT/year);

ix. Operating hours of the 760 hp Diesel-Powered Generator and the 750 hp Diesel-Powered Generator, (hours/month and hours/year);

x. Fuel use for all other engines, generators and heaters, except those generators identified in Condition 18(a)(v). The fuel use may be taken from purchase invoices or other similar records, (gallons/month and gallons/year); and

xi. Monthly and annual emissions of CO, NO_x, PM, PM_{10}, SO_2, and VOM from this source with supporting calculations (tons/month and tons/year).

b. All records and logs required by Condition 18(a) 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.

19. Pursuant to 40 CFR 60.258(b), for the purpose of reports required under 40 CFR 60.7(c), any owner operator subject to the provisions of 40 CFR 60 Subpart Y also shall report semiannually periods of excess emissions as follow:

All 6-minute average opacities that exceed the applicable standard.

20a. 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. 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.

c. 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 212.324(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.

21a. 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

If you have any questions on this permit, please call Robert Bernoteit at 217/785-1705.

Edwin C. Bakowski

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

Date Signed: 4/5/2012

ECB:RWB:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A- Emission Summary

This attachment provides a summary of the maximum emissions from the source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from the source. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for NO_x and PM_{10}) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Fugitive PM_{10} emissions from storage piles and vehicle traffic at the source are not considered for purposes of applicability of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that control measures are more effective than required in this permit.

	E M I S S I O N S (Tons/Year)					
Emission Unit	CO	NO_x	PM	PM_{10}	SO_2	VOM
Material Handling Activities and Screening Activities			225.0	92.0		
Diesel-Powered Generators and Miscellaneous Engines and Heaters[1]	42.9	92.0	-----	-----	17.1	18.4
Totals	42.9	92.0	225.0	92.0	17.1	18.4

[1] PM and PM_{10} emissions including with Material Handling Activities and Screening Activities.

Exhibit 3

HODGE DWYER & DRIVER

KATHERINE D. HODGE
E-mail: khodge@hddattorneys.com

December 20, 2012

VIA HAND DELIVERY

Edwin C. Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, Illinois 62794-9276

Re: CAAPP Application for KCBX Terminals Company
Facility I.D. No. 031600AHI (3259 East 100th Street, Chicago, IL 60617)

Dear Mr. Bakowski:

This letter is written on behalf of KCBX Terminals Company ("KCBX") for the purpose of submitting a Clean Air Act Permit Program ("CAAPP") application for its facility located at 3259 East 100th Street, Chicago, IL 60617 (Facility I.D. No. 031600AHI) ("KCBX Facility"). The KCBX Facility is currently operated pursuant to a Federally Enforceable State Operating Permit ("FESOP"), which was issued to KCBX by the Illinois Environmental Protection Agency ("Illinois EPA") on April 5, 2012.

On December 20, 2012, KM Railways, LLC ("KMR") acquired the nearby DTE Chicago Fuels Terminal, LLC ("DTE") bulk solid materials transloading facility located at 10730 South Burley Avenue, Chicago, IL 60617 (Facility I.D. No. 031600GSF) ("Burley Facility"), including the real property and all buildings, fixtures and equipment located thereon. The Burley Facility was operated by DTE pursuant to a Joint Construction and Operating Permit (Application No. 07050082, issued on May 21, 2009), which we understand was recently revised and reissued on December 18, 2012, as well as a pending application for a FESOP (deemed complete by Illinois EPA on May 21, 2009). KMR is the new owner of the Burley Facility, but KCBX will be the operator. On December 20, 2012, all permit responsibility, coverage, and liability was transferred to KCBX, the new operator of the Burley Facility, pursuant to an

October 4, 2012 Request for Ownership Change for a CAAPP Permit[1] submitted by KCBX (and DTE).

Together, the KCBX Facility and the Burley Facility could be considered a single source based on the definition of "source" in Section 39.5(l) of the Illinois Environmental Protection Act ("Act"), which is based upon the following criteria: 1) whether the facilities share the same two digit SIC code; 2) whether the facilities are located on one or more contiguous or adjacent properties; and 3) whether the facilities are under common control. Further, without federally enforceable limits on emissions, the combined facilities could result in a new CAAPP source. KCBX will rely on the pending FESOP application for protection with regard to the Burley Facility and, although KCBX does not intend to operate KCBX Facility, the Burley Facility or the facilities combined, pursuant to a CAAPP permit, KCBX is submitting this CAAPP application to Illinois EPA as a protective measure.

KCBX intends to operate the facilities as a single source, pursuant to either a single FESOP or separate FESOPs. KCBX is, therefore, requesting a FESOP(s) constraining the emissions and production or operation of this new source such that potential emissions would not exceed major source applicability levels and, thereby, exclude the new source from requiring a CAAPP permit.

This application for a new CAAPP source is submitted timely, i.e., within 12 months after commencing operation. As you know, Section 39.5(5)(x) of the Act provides as follows:

> The owner or operator of a new CAAPP source shall submit its complete CAAPP application consistent with this subsection within 12 months after commencing operation of such source. The owner or operator of an existing source that has been excluded from the provisions of this Section under subsection 1.1 or paragraph (c) of subsection 3 of this Section and that becomes subject to the CAAPP solely due to a change in operation at the source shall submit its complete CAAPP application consistent with this subsection at least 180 days before commencing operation in accordance with the change in operation.

415 ILCS 5/39.5(5)(x). (Emphasis added.)

When KCBX begins operation of the combined facilities, the combined facilities may be, for the first time, considered a single source and, thus, could be considered a "new CAAPP source" until such time as a FESOP(s) with new federally enforceable limitations on potential emissions would exclude the source from requiring a CAAPP permit.

As stated above, the KCBX Facility is currently operated pursuant to a FESOP (issued by Illinois EPA on April 5, 2012). The enclosed CAAPP Application Forms include incorporations

[1] The Request for Ownership Change covered the pending FESOP application, as well as the Joint Construction and Operating Permit and the pending Construction Permit applications.

by reference to the FESOP (and related Construction Permits), as well as the supporting applications.

If you have any questions regarding the enclosed, please do not hesitate to contact Terry Steinert at (316) 828-7847.

Sincerely,

Katherine D. Hodge

KDH:MTR:kjg
enclosure
pc: Jeff Culver, Esq. (via electronic mail; w/attachments)

KCBX:004/Corr/Illinois EPA cover 2012-10-CAAPP Application

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: _____

APPLICATION FOR CAAPP PERMIT
(CHECK ONLY ONE)

☒ INITIAL APPLICATION

☐ RENEWAL APPLICATION

FOR AGENCY USE ONLY
ID NO.:
PERMIT NO.:
DATE:

SECTION ONE — SOURCE INFORMATION

1) SOURCE NAME: KCBX Terminals Company
2) SOURCE ID NO.: 031600AHI
3) DATE FORM PREPARED: 12 / 5 / 2012

SECTION TWO — INSTRUCTIONS IN BRIEF

1) COMPLETE THE FOLLOWING FORM WHEN APPLYING FOR AN INITIAL OR RENEWAL CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT.
2) A REQUEST TO MODIFY A CAAPP PERMIT SHOULD BE COMPLETED USING FORM 271-CAAPP "APPLICATION FOR MODIFICATION TO A CAAPP PERMIT".
3) THIS FORM PROVIDES APPLICATION AND SOURCE CONTACT INFORMATION TO THE AGENCY AS WELL AS ACTS AS A WORKSHEET FOR QUICKLY ASSESSING WHETHER THE CAAPP APPLICATION IS ADMINISTRATIVELY AND TECHNICALLY COMPLETE.
4) FESOP REQUESTS SHOULD COMPLETE THIS FORM, MARKING SECTION FOUR APPROPRIATELY.
5) REFER TO CAAPP 200 INSTRUCTIONS FOR FURTHER GUIDANCE ON COMPLETING THIS FORM.

SECTION THREE — SOURCE AND CONTACT INFORMATION

SOURCE INFORMATION

1) SOURCE NAME: KCBX Terminals Company
2) DATE FORM COMPLETED: 12/5/2012
3) SOURCE STREET ADDRESS: 3259 East 100th Street
4) CITY: Chicago
5) ZIP: 60617
6) IS THE SOURCE LOCATED WITHIN CITY LIMITS? ☒ YES ☐ NO
7) TOWNSHIP NAME:
8) COUNTY: Cook
9) TYPICAL NO. OF EMPLOYEES AT THE SOURCE: 41
10) ILLINOIS AIR POLLUTION SOURCE ID NO. (IF KNOWN): 031600AHI
11) FEDERAL EMPLOYER IDENTIFICATION NO. (FEIN): 48-1082551
12) TYPE OF SOURCE AND PRODUCTS PRODUCED: Handling of coal and pet coke

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

APPLICATION PAGE _____

13) PRIMARY STANDARD INDUSTRIAL CLASSIFICATION (SIC) CATEGORY:		14) PRIMARY SIC NO.:
Marine Cargo Handling		4491
15a) LATITUDE (DD:MM:SS): 41:42:46.165 N	b) LONGITUDE (DD:MM:SS): 87:32:36.823 W	
16a) UTM ZONE:	b) UTM VERTICAL (KM):	c) UTM HORIZONTAL (KM):
17a) COORDINATE METHOD:	b) REFERENCE LOCATION:	c) COORDINATE ACCURACY:
18) SOURCE ENVIRONMENTAL CONTACT PERSON: Terry Steinert	19a) CONTACT PERSON'S TELEPHONE NO.: 316-828-7847	
19b) CONTACT PERSON'S E-MAIL ADDRESS: STEINE3T@KOCHIND.COM		

OWNER INFORMATION

20) NAME: KCBX Terminals Company		
21) ADDRESS: 3259 East 100th Street		
22) CITY: Chicago	23) STATE: Illinois	24) ZIP: 60617
25) OWNER'S AGENT (IF APPLICABLE):		

OPERATOR INFORMATION

26) NAME: KCBX Terminals Company		
27) ADDRESS: 3259 East 100th Street		
28) CITY: Chicago	29) STATE: Illinois	30) ZIP: 60617

BILLING INFORMATION

31) NAME: KCBX Terminals Company		
32) ADDRESS: 3259 East 100th Street		
33) CITY: Chicago	34) STATE: Illinois	35) ZIP: 60617

36) CONTACT PERSON:	37) CONTACT PERSON'S TELEPHONE NO.:
Brandon Walker	773-978-8518
38) CONTACT PERSON'S E-MAIL ADDRESS:	
Brandon.Walker@kochind.com	

APPLICANT INFORMATION

39) WHO IS THE PERMIT APPLICANT? (CHECK ONE):	[X] OWNER [ ] OPERATOR	40) ALL CORRESPONDENCE TO: (CHECK ONE)	[X] OWNER [ ] OPERATOR [ ] SOURCE

41) ATTENTION NAME AND/OR TITLE FOR WRITTEN CORRESPONDENCE:	
Jim Simmons, Terminal Manager	
42) TECHNICAL CONTACT PERSON FOR APPLICATION:	43) CONTACT PERSON'S TELEPHONE NO.:
Terry Steinert	316-828-7847
44) CONTACT PERSON'S E-MAIL ADDRESS:	
STEINE3T@KOCHIND.COM	

SECTION FOUR PERMIT STATUS

WHY IS THE APPLICANT APPLYING FOR A CAAPP PERMIT?

1	THE POTENTIAL TO EMIT ONE OR MORE CRITERIA AIR POLLUTANT FOR THE SOURCE IS 100 TONS/YEAR OR GREATER? THE POTENTIAL TO EMIT HAZARDOUS AIR POLLUTANTS FOR THE SOURCE IS MORE THAN 10 TONS OF A SINGLE HAZARDOUS AIR POLLUTANT OR 25 TONS OF COMBINED HAZARDOUS AIR POLLUTANTS? CHECK ALL THAT APPLY.		
	[ ] CARBON MONOXIDE (CO)	[X] NITROGEN OXIDES (NOx)	
	[ ] PARTICULATE 10 MICROMETERS (PM10)	[X] PARTICULATE MATTER (PART)	
	[ ] PARTICULATE 2.5 MICROMETERS (PM2.5)	[ ] SULFUR DIOXIDE (SO2)	
	[ ] VOLATILE ORGANIC MATERIAL (VOM)	[ ] SINGLE HAZARDOUS AIR POLLUTANT	
	[ ] COMBINED HAZARDOUS AIR POLLUTANT	[X] OTHER (SPECIFY): Request for FESOP	

		YES	NO
2	THE SOURCE IS AN AFFECTED SOURCE FOR ACID RAIN DEPOSITION.	[ ]	[X]
3	THE POTENTIAL TO EMIT AN INDIVIDUAL HAZARDOUS AIR POLLUTANT IS 10 TONS/YEAR OR MORE OF ANY SINGLE HAZARDOUS AIR POLLUTANT.	[ ]	[X]
4	THE POTENTIAL TO EMIT ALL SOURCE WIDE HAZARDOUS AIR POLLUTANTS IS 25 TONS/YEAR OR MORE OF COMBINED HAZARDOUS AIR POLLUTANTS.	[ ]	[X]
5	THE POTENTIAL TO EMIT A HAZARDOUS AIR POLLUTANT IS MORE THAN AN APPLICABLE LOWER THRESHOLD.	[ ]	[X]
6	THE SOURCE IS AN AFFECTED SOURCE FOR OZONE DEPLETING SUBSTANCES REGULATED UNDER TITLE 6 OF THE CLEAN AIR ACT.	[X]	[ ]
7	THE SOURCE CONTAINS EQUIPMENT OR OPERATIONS SUBJECT TO CERTAIN USEPA EMISSION STANDARDS (NSPS AND NESHAP) FOR WHICH USEPA REQUIRES A CAAPP PERMIT.	[ ]	[X]
8	ARE ACTUAL EMISSIONS OF THE SOURCE BELOW THE APPLICABILITY LEVELS FOR A CAAPP PERMIT?	[X]	[ ]
9	DOES THE APPLICATION CONTAIN PROPOSED PERMIT LIMITATIONS THAT WILL CONSTRAIN THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS OF THE SOURCE WILL FALL BELOW THE LEVELS FOR WHICH A CAAPP PERMIT IS REQUIRED?	[X]	[ ]
10	DOES THE APPLICANT HEREBY REQUEST A FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CONSTRAINING THE EMISSIONS AND PRODUCTION OR OPERATION OF THE SOURCE SUCH THAT POTENTIAL EMISSIONS WOULD FALL BELOW APPLICABILITY LEVELS AND THEREBY EXCLUDE THE SOURCE FROM REQUIRING A CAAPP PERMIT?	[X]	[ ]

SECTION FIVE	SUMMARY OF APPLICATION CONTENT CHECKLIST				
COMPLETE THE FOLLOWING TABLE, ANSWERING YES, NO, OR N/A AS APPROPRIATE. ANSWERING "NO" TO ANY OF THE BELOW, EXCEPT ITEM 33 OR 34, MAY RESULT IN THE ILLINOIS EPA REQUESTING ADDITIONAL INFORMATION, OR POSSIBLY DEEMING THE APPLICATION TO BE INCOMPLETE. IF THE APPLICANT CHOOSES TO INCORPORATE BY REFERENCE DATA PREVIOUSLY SUBMITTED, SELECT THAT COLUMN APPROPRIATLY AND INCLUDE A COMPLETED "INCORPORATION BY REFERENCE" FORM 287-CAAPP.		INFORMATION PROVIDED			INCORPORATE BY REFERENCE
		YES	NO	N/A	
1)	DOES THE APPLICATION INCLUDE A TABLE OF CONTENTS?	☐	☐	☐	☒
2)	DOES THE APPLICATION INCLUDE A COMPLETE PROCESS DESCRIPTION FOR THE SOURCE?	☐	☐	☐	☒
3)	DOES THE APPLICATION INCLUDE A PLOT PLAN AND/OR MAP DEPICTING THE AREA WITHIN ONE-QUARTER MILE OF THE SOURCE?	☐	☐	☐	☒
4)	DOES THE APPLICATION INCLUDE A PROCESS FLOW DIAGRAM(S) SHOWING ALL EMISSION UNITS AND CONTROL EQUIPMENT, AND THEIR RELATIONSHIP?	☐	☐	☐	☒
5)	DOES THE APPLICATION INCLUDE THE APPROPRIATE, COMPLETED FORMS FOR ALL INDIVIDUAL EMSSION UNITS AND AIR POLLUTION CONTROL EQUIPMENT, LISTING ALL APPLICABLE REQUIREMENTS AND PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS?	☐	☐	☐	☒
6)	DOES THE APPLICATION INCLUDE CALCULATIONS TO THE EXTENT THEY ARE RELATED TO AIR EMISSIONS (E.G., FOR POLLUTANT EMISSION RATES, FUELS, RAW MATERIALS USAGE, OR CONTROL EQUIPMENT EFFICIENCY)?	☐	☐	☐	☒
7)	DOES THE APPLICATION INCLUDE A COMPLETED "LISTING OF SIGNIFICANT ACTIVITIES" FORM 299-CAAPP?	☐	☐	☐	☒
8)	DOES THE APPLICATION INCLUDE A COMPLETED "INCORPORATION BY REFERENCE" FORM 287-CAAPP.	☐	☐	☐	☒
9)	DOES THE APPLICATION INCLUDE A COMPLETED "HAZARDOUS AIR POLLUTANT EMISSION SUMMARY" FORM 215-CAAPP?	☐	☐	☐	☒
10)	DOES THE APPLICATION INCLUDE A COMPLETED "FEE DETERMINATION FOR CAAPP PERMIT" FORM 292-CAAPP? (NOTE: ANNUAL FEES WILL BE BASED UPON INFORMATION CONTAINED IN THIS FORM.)	☐	☐	☐	☒
11)	DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT" FORM 293-CAAPP?	☐	☐	☒	☐
12)	DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE-ADDENDUM FOR NONCOMPLYING EMISSION UNITS" FORM 294-CAAPP FOR ONE OR MORE NONCOMPLIANT EMISSION UNITS FOR WHICH ISSUANCE OF A CAAPP PERMIT IS REQUESTED?	☐	☐	☒	☐
13)	DOES THE APPLICATION INCLUDE A COMPLETED "COMPLIANCE CERTIFICATION" FORM 296-CAAPP?	☐	☐	☐	☒
14)	DOES THE APPLICATION INCLUDE A COMPLETED "LISTING OF INSIGNIFICANT ACTIVITIES" FORM 297-CAAPP?	☐	☐	☐	☒
15)	DOES THE APPLICATION INCLUDE A COMPLETED "FUGITIVE EMISSION" FORM 391-CAAPP?	☐	☐	☐	☒
16)	DOES THE APPLICATION INCLUDE A COMPLIANCE ASSURANCE MONITORING PLAN (FORM 464-CAAPP) PURSUANT TO 40 CFR PART 64?	☐	☐	☒	☐
17)	HAS THE APPLICANT REGISTERED A RISK MANAGEMENT PROGRAM FOR ACCIDENTAL RELEASES PURSUANT TO SECTION 112(R) OF THE CLEAN AIR ACT AS AMENDED IN 1990 OR INTENDS TO COMPLY WITH THIS REQUIREMENT IN ACCORDANCE WITH ITS COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE?	☐	☐	☒	☐
18)	HAS THE APPLICANT SUBMITTED A FUGITIVE PARTICULATE MATTER OPERATING PROGRAM PURSUANT TO 35 IAC 212.309?	☐	☐	☐	☒
19)	HAS THE APPLICANT SUBMITTED A PM10 CONTINGENCY MEASURE PLAN PURSUANT TO 35 IAC 212.700?	☐	☐	☐	☒
20)	HAS THE APPLICANT SUBMITTED AN EPISODE ACTION PLAN PURSUANT TO 35 IAC 244.141 FOR THE FACILITIES FOR WHICH ACTION PLANS ARE REQUIRED (SEE 35 IAC 244.142)?	☐	☐	☐	☒
21a)	HAS THE APPLICANT SUBMIT A REQUEST FOR A PERMIT SHIELD FOR THE ENTIRE SOURCE?	☐	☐	☒	☐
21b)	IF NO, DOES THE APPLICATION CONTAIN A REQUEST FOR A PERMIT SHIELD FOR SPECIFIC ITEMS ONLY, IN ACCORDANCE WITH THE INSTRUCTIONS FOR A CAAPP PERMIT?	☐	☐	☒	☐
22)	IF THIS IS A RENEWAL APPLICATION, WAS THE APPLICATION SUBMITTED IN A TIMELY MANNER, I.E., NOT LATER THAN 9 MONTHS BEFORE THE EXPIRATION DATE OF THE EXISTING CAAPP PERMIT PURSUANT TO SECTION 39.5(5)(N) OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT AND 35 IAC 270.301(D).	☐	☐	☒	☐

SECTION FIVE SUMMARY OF APPLICATION CONTENT CHECKLIST - CONTINUED

COMPLETE THE FOLLOWING TABLE, ANSWERING YES, NO, OR N/A AS APPROPRIATE. ANSWERING "NO" TO ANY OF THE BELOW, EXCEPT ITEM 34 OR 35, MAY RESULT IN THE ILLINOIS EPA REQUESTING ADDITIONAL INFORMATION, OR POSSIBLY DEEMING THE APPLICATION TO BE INCOMPLETE.

IF THE APPLICANT CHOOSES TO INCORPORATE BY REFERENCE DATA PREVIOUSLY SUBMITTED, SELECT THAT COLUMN APPROPRIATLY AND INCLUDE A COMPLETED "INCORPORATION BY REFERENCE" FORM 287-CAAPP.

		INFORMATION PROVIDED			INCORPORATE BY REFERENCE
		YES	NO	N/A	
23)	DOES THE APPLICATION INCLUDE AN EARLY REDUCTION DEMONSTRATION FOR HAZARDOUS AIR POLLUTANTS (HAP) PURSUANT TO SECTION 112(I)(5) OF THE CLEAN AIR ACT AS AMENDED IN 1990?	☐	☐	☒	☐
24)	DOES THE APPLICATION REQUEST TO UTILIZE THE OPERATIONAL FLEXIBILITY PROVISIONS AND INCLUDE THE INFORMATION REQUIRED FOR SUCH USE?	☐	☐	☐	☒
25)	DOES THE APPLICATION ADDRESS OTHER MODES OF OPERATION FOR WHICH A PERMIT IS BEING SOUGHT?	☐	☐	☐	☒
26)	DOES THE APPLICATION INCLUDE ALL REASONABLY ANTICIPATED OPERATING SCENARIOS FOR WHICH A PERMIT IS BEING SOUGHT?	☐	☐	☐	☒
27a)	DOES THE APPLICATION CONTAIN TRADE SECRET INFORMATION?	☐	☒	☐	☐
27b)	IF YES, HAS SUCH INFORMATION BEEN MARKED AND CLAIMED, AND TWO SEPARATE COPIES OF THE APPLICATION SUITABLE FOR PUBLIC INSPECTION BEEN SUBMITTED IN ACCORDANCE WITH APPLICABLE REGULATIONS?	☐	☐	☒	☐
28a)	DOES THE APPLICANT HEREBY REQUEST OPERATION DURING A MALFUNCTION, CONSISTENT WITH 35 IAC 201.149?	☐	☐	☐	☒
28b)	DOES THE APPLICANT HEREBY REQUEST OPERATION DURING A BREAKDOWN, CONSISTENT WITH 35 IAC 201.149?	☐	☐	☐	☒
28c)	DOES THE APPLICANT HEREBY REQUEST OPERATION DURING A STARTUP, CONSISTENT WITH 35 IAC 201.149?	☐	☐	☐	☒
28d)	IF YES TO ANY OF 28a-c, DOES THE APPLICATION INCLUDE INFORMATION SPECIFIED IN 35 IAC 201.261 (CONTENTS OF REQUEST FOR PERMISSION TO OPERATE DURING A MALFUNCTION, BREAKDOWN OR STARTUP)?	☐	☐	☐	☒
29)	DOES THE APPLICATION INCLUDE A PROPOSED DETERMINATION OF MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) FOR HAZARDOUS AIR POLLUTANTS PURSUANT TO SECTION 112(G) OR (J) OF THE CLEAN AIR ACT AS AMENDED IN 1990?	☐	☐	☒	☐
30)	DOES THE APPLICATION ADDRESS APPLICABLE RULES AND STANDARDS OF 40 CFR 60 NEW SOURCE PERFORMANCE STANDARD (NSPS)?	☐	☐	☐	☒
32)	DOES THE APPLICATION ADDRESS APPLICABLE RULES AND STANDARDS OF 40 CFR 61 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS (NESHAP)?	☐	☐	☐	☒
33)	DOES THE APPLICATION ADDRESS APPLICABLE RULES AND STANDARDS OF 40 CFR 63 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR SOURCE CATEGORIES?	☐	☐	☐	☒
34)	HAS THE APPLICANT RETAINED A COPY OF THIS APPLICATION AT THE SOURCE? (NOTE: IF TRADE SECRET INFORMATION IS NOT BEING SUBMITTED, THEN ONLY THE ORIGINAL APPLICATION NEED BE INITIALLY SUBMITTED, HOWEVER, THE ILLINOIS EPA MAY REQUEST UP TO 4 COPIES OF THE FINAL APPLICATION PRIOR TO PUBLIC NOTICE.)	☒	☐	☐	☐
35)	DOES THE APPLICATION INCLUDE AN ELECTRONIC FILE OF THE APPLICATION (E.G., CD, DVD, ETC.)?	☐	☒	☐	☐

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.

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.

AUTHORIZED SIGNATURE:

BY: _____ AUTHORIZED SIGNATURE JR JAL

President, KCBX Terminals Company
TITLE OF SIGNATORY

David Severson
TYPED OR PRINTED NAME OF SIGNATORY

12 / 18 / 12
DATE

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: _____

CAAPP APPLICATION INCORPORATION BY REFERENCE

FOR AGENCY USE ONLY
ID NO.:
PERMIT NO.:
DATE:

SECTION ONE SOURCE INFORMATION

1) SOURCE NAME: KCBX Terminals Company

2) SOURCE ID NO.: 031600AHI

3) DATE FORM PREPARED: 12 / 5 / 2012

SECTION TWO INSTRUCTIONS IN BRIEF

1) COMPLETE THIS FORM IF THE APPLICANT REQUESTS TO UTLIZE INFORMATION PROVIDED IN A PRIOR CAAPP APPLICATION. INCORPORATION BY REFERENCE MAY BE IN FULL OR IN PART OF THE APPLICATION. THE MATERIAL INCORPORATED MUST REMAIN CORRECT, CURRENT, AND COMPLETE.

2) COMPLETE SECTION THREE IF THE APPLICANT REQUESTS TO INCORPORATE AN ENTIRE APPLICATION. COMPLETE SECTION FOUR IF THE APPLICANT REQUESTS TO INCORPORATE ONLY PORTIONS OF AN APPLICATION. IN EITHER CASE, IDENTIFY AND DESCRIBE THE ITEM TO BE INCORPORATED (E.G., STEAM PLANT, NOX CONTROL SYSTEM, TANKS 32-38, ETC.) AND THE PAGE NUMBERS IN THIS APPLICATION WHERE THE INCORPORATED PAGES WILL BE PLACED, AND FOR PARTIAL INCORPORATIONS THE PAGE NUMBERS FROM THE APPLICATION TO INCORPORATE FROM.

3) UTILIZE A PLACEHOLDER IN THE APPLICATION NOTING THE INCORPORATION BY REFERENCE.

4) BE SURE THE PORTIONS OF THE 200-CAAPP WHICH ADDRESS INCORPORATIONS BY REFERENCE CORRECTLY REFLECT THE INFORMATION CONTAINED ON THIS FORM.

5) THE ILLINOIS EPA ENCOURAGES APPROPRIATE USE OF INCORPORATION BY REFERENCE, WHICH GENERALLY INCLUDES THOUGHTFULLY INCORPORATING LARGE GROUPS OF INFORMATION (E.G., STEAM PLANT) TO FACILITATE THE PERMITTING PROCESS FOR THE PERMITTEE AND THE ILLINOIS EPA.

6) REFER TO 287-CAAPP INSTRUCTIONS FOR FURTHER GUIDANCE ON COMPLETING THIS FORM.

SECTION THREE INCORPORATE ALL MATERIAL FROM A PRIOR APPLICATION

IS THE APPLICANT REQUESTING TO INCORPORATE AN ENTIRE APPLICATION(S)? [X] YES [ ] NO

IF YES, COMPLETE THE FOLLOWING:

	DESCRIPTION OF MATERIAL TO BE INCORPORATED	APPLICATION	PAGE NOs IN THIS APPLICATION
1	FESOP Application (KCBX) (FESOP issued 4/5/12)	NO.: 95050167 DATE: 7/14/11	
2	Construction Permit Application (KCBX) (Permit issued 5/25/10)	NO.: 07100090 DATE:	
3	Two Electric Conveyor Permit Application (and updates 6/5/08 and 2/16/10)	NO.: 00710090 DATE: 10/14/07	
4	DTE Joint Construction and Operating Permit Application (and update/supplement dated May 1, 2009)	NO.: 07050082 DATE: 2/3/09	

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER 39.5 OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, 415 ILCS 5/39.5. FURTHER DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION, MOREOVER AS ALSO PROVIDED IN THAT SECTION, FAILURE TO PROVIDE THIS INFORMATION MAY PREVENT THIS APPLICATION FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED.

FOR APPLICANT'S USE

APPLICATION PAGE _____

5	DTE Application to Construct Additional Equipment	NO.: 07050082 DATE: 9/20/12	
6		NO.: DATE:	
7		NO.: DATE:	
8		NO.: DATE:	

SECTION FOUR INCORPORATE A PRIOR PARTIAL APPLICATION

IS THE APPLICANT REQUESTING TO INCORPORATE A PARTIAL APPLICATION(S)? ☐ YES ☐ NO

IF YES, COMPLETE THE FOLLOWING:

	DESCRIPTION OF ITEM TO BE INCORPORATED	APPLICATION	PAGE NOs TO INCORPORATE	PAGE NOs IN THIS APPLICATION
1		NO.: DATE:		
2		NO.: DATE:		
3		NO.: DATE:		
4		NO.: DATE:		
5		NO.: DATE:		
6		NO.: DATE:		
7		NO.: DATE:		
8		NO.: DATE:		

SECTION FIVE SIGNATURE BLOCK

I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION, INCLUDING THOSE MATERIALS INCORPORATED BY REFERENCE, ARE TRUE, ACCURATE AND COMPLETE.

AUTHORIZED SIGNATURE
BY:

JK JAL

AUTHORIZED SIGNATURE

President, KCBX Terminals Company
TITLE OF SIGNATORY

David Severson
TYPED OR PRINTED NAME OF SIGNATORY

12 / 18 / 13
DATE

APPLICATION PAGE _____

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: _____

FEE DETERMINATION FOR CAAPP SOURCE

FOR IEPA USE ONLY
ID NO.:
PERMIT NO.:
DATE:

SECTION ONE — SOURCE INFORMATION

1) SOURCE NAME: KCBX Terminals Company

2) SOURCE ID NO.: 031600AHI

3) DATE FORM PREPARED: 12 / 5 / 2012

SECTION TWO — INSTRUCTIONS IN BRIEF

1) COMPLETE THIS FORM TO DETERMINE THE PERMIT FEE ESTABLISHED BY THE CAAPP PERMIT.

2) THE EMISSION LEVELS STATED IN SECTION FOUR, WHICH ARE ONLY USED FOR THE PURPOSE OF PERMIT FEE DETERMINATION, WILL BECOME PERMIT SPECIAL CONDITIONS IN THE CAAPP PERMIT.

3) THE ILLINOIS EPA DOES NOT REQUIRE PAYMENT WITH THIS APPLICATION. WHEN YOU ARE BILLED MAKE CHECK OR MONEY ORDER PAYABLE TO THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY. SEND TO THE ADDRESS AT THE TOP OF THIS FORM. DO NOT SEND CASH. ON THE CHECK MEMO LINE, PLEASE LIST "CAAPP OPERATING PERMIT FEE: ID NO. XXXXXXXXX", REPLACE THE Xs WITH YOUR SOURCE ID NUMBER.

SECTION THREE — FEE RATIONALE

WHAT IS THE PERMIT STATUS AT THE TIME OF THIS REQUEST? CHECK ONLY ONE BELOW.

1) ☒ INITIAL CAAPP PERMIT ☐ RENEWAL CAAPP PERMIT ☐ FESOP INITIAL/RENEWAL
☐ SIGNIFICANT MODIFICATION ☐ MINOR MODIFICATION ☐ ADMINISTRATIVE AMENDMENT

2) COMPLETE THE BELOW TABLE FOR A NON-INITIAL CAAPP PERMIT. IF THERE IS AN INCREASE/DECREASE IN EMISSIONS, ENTER THE NUMBER(S) FOR THE EMISSIONS CHANGE RATIONALE AS APPROPRIATE.

POLLUTANT	INCREASE	DECREASE	NO CHANGE	EMISSIONS CHANGE RATIONALE(S)		
NITROGEN OXIDES (NO_X)	☐	☐	☐			
PARTICULATE MATTER (PART)	☐	☐	☐			
SULFUR DIOXIDE (SO_2)	☐	☐	☐			
VOLATILE ORGANIC MATERIAL (VOM)	☐	☐	☐			
OTHER (SPECIFY)	☐	☐	☐			
OTHER (SPECIFY)	☐	☐	☐			

CHANGE RATIONALE:
1 BUSINESS DECISION (E.G., OPERATING NEEDS, BANKRUPTCY, ETC.).
2 REMOVAL OR ADDITION OF PROCESSES AT THE SOURCE.
3 INCLUSION OR REMOVAL OF A CONTROL DEVICE.
4 CHEMICAL REFORMULATION (E.G., REFORMULATING A COATING FROM HIGH VOM TO A LOW VOM).
5 FUEL SWITCHING (E.G., COAL TO NATURAL GAS, ETC.).
6 METHODOLOGY CHANGE (E.G., SWITCHING A PETROLEUM SOLVENT TO AQUEOUS SOLUTION).
7 CHANGES IN METHOD USED FOR CALCULATIONS (E.G., EMISSION FACTOR CHANGE).
8 OTHER (DESCRIBE): _____
9 OTHER (DESCRIBE): _____

THIS AGENCY IS AUTHORIZED TO REQUIRE THIS INFORMATION UNDER 39.5 OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, 415 ILCS 5/39.5. FURTHER DISCLOSURE OF THIS INFORMATION IS REQUIRED UNDER THAT SECTION, MOREOVER AS ALSO PROVIDED IN THAT SECTION, FAILURE TO PROVIDE THIS INFORMATION MAY PREVENT THIS APPLICATION FROM BEING PROCESSED AND COULD RESULT IN THE APPLICATION BEING DENIED.

FOR APPLICANT'S USE

APPLICATION PAGE _____

SECTION FOUR	FEE DATA				
1) WILL THE SOURCE PAY THE CURRENT MAXIMUM FEE OF $250,000.00 PER YEAR? ☐ YES IF YES, THE REMAINDER OF THIS FORM DOES NOT NEED TO BE COMPLETED. ☒ NO					
2) EMISSION UNIT [A]	NITROGEN OXIDES (NO_X) (TONS/YR)	PARTICULATE MATTER$_{10}$ (PART) (TONS/YR)	SULFUR DIOXIDE (SO_2) (TONS/YR)	VOLATILE ORGANIC MATERIAL (VOM) (TONS/YR)	OTHER [B] SPECIFY _____ (TONS/YR)
All	92	92	18	20	
3) SUBTOTAL	92	92	18	20	
4) FUGITIVE					
5) TOTAL	92	92	18	20	
6) GRAND TOTAL ACROSS POLLUTANTS (TONS/YR):					222
7) CALCULATED PERMIT FEE: IF GRAND TOTAL IN ITEM 6 ABOVE IS > 100 TONS/YR THEN MULTIPLY GRAND TOTAL BY $18.00 AND ENTER, OTHERWISE ENTER $1,800.00:					
8) MINIMUM PERMIT FEE IS $1,800.00 PER YEAR. MAXIMUM PERMIT FEE IS $250,000.00 PER YEAR. IF THE CALCULATED PERMIT FEE IN ITEM 7 ABOVE IS BETWEEN THESE TWO FEE AMOUNTS THEN ENTER HERE, OTHERWISE ENTER THE MINIMUM OR MAXIMUM PERMIT FEE, WHICHEVER IS APPLICABLE. THIS IS THE ACTUAL ANNUAL PERMIT FEE:					$4773

A EMISSION UNIT - PROVIDE THE NAME AND FLOW DIAGRAM DESIGNATION OF THE EMISSION UNIT AS IT APPEARS ON THE DATA AND INFORMATION FORM.
B OTHER - ANY HAZARDOUS AIR POLLUTANT (HAP) NOT INCLUDED ELSEWHERE, E.G., CHLORINE, HCl, ETC.

APPLICATION PAGE _____

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:

DELEGATION OF AUTHORITY FOR RESPONSIBLE OFFICIAL TO A REPRESENTATIVE

FOR AGENCY USE ONLY
ID NUMBER:
PERMIT #:
DATE:

THIS FORM SHALL BE USED BY A RESPONSIBLE OFFICIAL TO DELEGATE AUTHORITY TO A REPRESENTATIVE OF SUCH PERSON FOR SIGNATURE ON APPLICATIONS OR CERTIFICATION OF REPORTS TO BE SUBMITTED PURSUANT TO THE CLEAN AIR ACT.

THIS FORM SHALL ONLY BE USED FOR A CORPORATION AT WHICH A PRESIDENT, SECRETARY, TREASURER, OR VICE-PRESIDENT OF THE CORPORATION IN CHARGE OF BUSINESS FUNCTION, OR ANY OTHER PERSON WHO PERFORMS SIMILAR POLICY OR DECISION MAKING FUNCTIONS FOR THE CORPORATION TO TRANSFER THE AUTHORITY AS A RESPONSIBLE OFFICIAL TO A REPRESENTATIVE OF SUCH PERSON. THE REPRESENTATIVE OF SUCH PERSON MUST BE RESPONSIBLE FOR THE OVERALL OPERATION OF ONE OR MORE MANUFACTURING, PRODUCTION, OR OPERATING FACILITIES APPLYING FOR OR SUBJECT TO A PERMIT.

NOTE: THIS TRANSFER OF DELEGATION OF AUTHORITY IS APPLICABLE ONLY IF THE FACILITY EMPLOYS MORE THAN 250 PERSONS OR HAS A GROSS ANNUAL SALES OR EXPENDITURES EXCEEDING $25 MILLION (IN SECOND QUARTER 1980 DOLLARS).

SOURCE INFORMATION

1) SOURCE NAME: KCBX Terminals Company

2) DATE FORM PREPARED: 12/5/12

3) SOURCE ID NO. (IF KNOWN): 031600AHI

TRANSFER OF AUTHORITY

4) I, THE UNDERSIGNED, BEING A PRESIDENT, SECRETARY, TREASURER, OR VICE-PRESIDENT OF THE CORPORATION IN CHARGE OF BUSINESS FUNCTION, OR OTHER PERSON WHO PERFORMS SIMILAR POLICY OR DECISION MAKING FUNCTIONS FOR THE CORPORATION, HEREBY TRANSFER THE AUTHORITY AS A RESPONSIBLE OFFICIAL TO Jim Simmons, THEY BEING A REPRESENTATIVE AND RESPONSIBLE FOR THE OVERALL OPERATION OF ONE OR MORE MANUFACTURING, PRODUCTION, OR OPERATING FACILITIES APPLYING FOR OR SUBJECT TO A PERMIT.

AUTHORIZED SIGNATURE — President, KCBX Terminals Company (TITLE OF SIGNATORY)

David Severson (TYPED OR PRINTED NAME OF SIGNATORY) — 12 / 18 / 12 (DATE)

Jim Simmons (DELEGATED REPRESENTATIVE) — Terminal Manager (TITLE OF DESIGNATED REPRESENTATIVE)

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

APPLICATION PAGE _____

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Exhibit 4

HODGE DWYER & DRIVER

ATTORNEYS AT LAW

KATHERINE D. HODGE
E-mail: khodge@hddattorneys.com

January 18, 2013

VIA HAND DELIVERY

Edwin C. Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, Illinois 62794-9276

Re: Supplement to and Clarification of
CAAPP Application for KCBX Terminals Company
Facility I.D. No. 031600AHI (3259 East 100th Street, Chicago, IL 60617)

Dear Mr. Bakowski:

On December 20, 2012, KCBX Terminals Company ("KCBX") submitted a Clean Air Act Permit Program ("CAAPP") application for its facility located at 3259 East 100th Street, Chicago, IL 60617 (Facility I.D. No. 031600AHI) ("KCBX Facility"). The KCBX Facility is currently operated pursuant to a Federally Enforceable State Operating Permit ("FESOP"), which was issued to KCBX by the Illinois Environmental Protection Agency ("Illinois EPA") on April 5, 2012.

This supplement clarifies that the December 20, 2012 submittal was intended as a protective application for a CAAPP permit for KCBX operations at the above-referenced address and a nearby site, should the combined operations of the KCBX Facility and the newly acquired KCBX South Facility located at 10730 South Burley Avenue, Chicago (Facility I.D. No 031600GSF) be considered a "new CAAPP source." As described in the cover letter to the December 20, 2012 application, efforts are underway to evaluate the possibility of preserving FESOP status for both facilities, either combined or under separate permits. However, should FESOP status not be possible, circumstances may require a CAAPP permit be obtained. The aforementioned CAAPP application would thus facilitate such a contingency.

It is our understanding that the December 20, 2012 submittal in concert with this supplement is considered a CAAPP application and is subject to a sixty day completeness review by Illinois EPA. If you have any questions regarding the enclosed, please do not hesitate to contact Terry Steinert at (316) 828-7847.

Sincerely,

Katherine D. Hodge

pc: Jeff Culver, Esq. (via electronic mail)
Robb H. Layman, Esq. (via hand delivery)

Exhibit 5

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST. P.O. BOX 19506. SPRINGFIELD. ILLINOIS 62794-9506 · (217) 782-2113

PAT QUINN, GOVERNOR

217/785-1705

CONSTRUCTION PERMIT -- NSPS and NESHAP SOURCE -- REVISED

PERMITTEE

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

NSPS/NESHAP

FESOP

Application No.: 07050082
Applicant's Designation:
Subject: Conveyor Addition
Date Issued: April 18, 2013
Location: 10730 South Burley Avenue, Chicago, 60617

I.D. No.: 031600GSF
Date Received: March 11, 2013

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

Two (2) Rail Unloaders (RU-1 and RU-2);
Truck Unloading (TU-1);
Twelve (12) Fixed Conveyors (FC-1, FC-2, FC-3, FC-4, FC-5, FC-6, FC-7, FC-8, FC-9, FC-10, FC-11, and FC-12);
Ten (10) Portable Conveyors (PC-3, PC-4, PC-5, PC-6, PC-7, PC-8, PC-9, PC-10, PC-11, and PC-12);
One (1) Portable Hopper (PH-1);
One (1) Portable Feeder (PF-1);
One (1) Rental Portable Crusher/Screen (PCS-1);
Four (4) Stacking Conveyors (SC-1, SC-2, SC-3, and SC-4);
Two (2) 779 bhp Diesel-Powered Generators (DG-1 and DG-2);
Six (6) 118 HP Diesel-Powered Generators (DG-3, DG-4, DG-5, DG-6, DG-7, and DG-8)
One (1) 400 HP Diesel-Powered Generator (DG-9);
One (1) 375 HP Diesel-Powered Generator (DG-10); and
Bulk Material Storage Piles

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

1a. This Permit is issued based on the modification of the materials transloading system (to increase the permitted throughput) and the construction of the diesel generators and portable conveyors 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_x) and Particulate Matter less than 10 microns (PM_{10}) from the above-listed equipment below the levels that would trigger the applicability of these rules.

b. The Permittee may operate the equipment listed above under this construction permit until the Illinois EPA takes final action on the Permittee's application for a Federally Enforceable State Operating Permit (FESOP) provided that the Permittee timely complies with all the terms of this construction permit. In accordance with the existing operating component of this permit, the Permittee may continue to operate the equipment listed in prior versions of this permit, including the Joint Construction and Operating Permit, issued February 13, 2008, and the revised version issued May 21, 2009, until final action is taken on the aforementioned FESOP application.

2a. Diesel-Powered Generators DG-1 through DG-10 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. Pursuant to 40 CFR 60.4200(a), the provisions of 40 CFR 60 Subpart IIII are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in 40 CFR 60.4200(a)(1) through (4). For the purposes of 40 CFR 60 Subpart IIII, the date that construction commences is the date the engine is ordered by the owner or operator.

i. Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines,

ii. Owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005.

iii. The provisions of 40 CFR 60.4208 are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005

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.

3a. Diesel-Powered Generators DG-1 through DG-10 are subject to the National Emission Standards for Hazardous Air pollutants (NESHAP) Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subparts A and ZZZZ. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Pursuant to 40 CFR 63.6590(a), an affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

b. Pursuant to 40 CFR 63.6590(c)(1), new or reconstructed stationary RICE located at an area source must meet the requirements of 40 CFR 63.6590(c)by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

4a. 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-hour)

Rated Power (kW)	Tier	Model Year[1]	NO_x	HC	NMHC + NO_x	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	
130 ≤ kW < 225	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2003	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
225 ≤ kW < 450	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2002	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
kW>560	Tier 1	2000	9.2	1.3	--	11.4	0.54
	Tier 2	2006	--	--	6.4	3.5	0.20

[1] 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_x standards, NMHC + NO_x 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-hour)

Rated Power (kW)	Tier	Model Year[1]	NO_x FEL	NMHC + NO_x FEL	PM FEL
75 ≤ kW < 130	Tier 1	1997	14.6	--	1.2
	Tier 2	2003	--	11.5	
	Tier 3	2007	--	6.6	
130≤kW<225	Tier 1	1996	14.6	--	--
	Tier 2	2003	--	10.5	0.54
	Tier 3	2006	--	6.6	
225≤kW<450	Tier 1	1996	14.6	--	--
	Tier 2	2001	--	10.5	0.54
	Tier 3	2006	--	6.4	
kW>560	Tier 1	2000	14.6	--	--
	Tier 2	2006	--	10.5	0.54

[1] 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:

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.

5a. 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 meter (1000 foot) 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 212.316(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.

e. 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.

f. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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).

g. 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.

h. 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.

6a. 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, except as further provided by 35 Ill. Adm. Code Part 214, 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).

7. 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.

8a. 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).

9a. Pursuant to 40 CFR 60.11(b), compliance with opacity standards in 40 CFR Part 60 shall be determined by conducting observations in accordance with Method 9 in Appendix A of 40 CFR Part 60, any alternative method that is approved by the Illinois EPA or USEPA, or as provided in 40 CFR 60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

b. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

c. 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.

10a. 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 and 60.4205 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.

b. 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).

c. 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.

d. 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.

e. 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 emission-related specifications, except as permitted in 40 CFR 60.4211(g).

f. Pursuant to 40 CFR 60.4211(e)(1), if you are an owner or operator of a modified or reconstructed stationary CI internal combustion engine and must comply with the emission standards specified in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), you must demonstrate compliance according to one of the methods specified in 40 CFR 60.4211(e)(1) or (2). Purchasing,

or otherwise owning or operating, an engine certified to the emission standards in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), as applicable.

11a. 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.

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_{10} 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_{10} 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_{10} 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_{10} 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.

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 ug/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 ug/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 generators shall only be operated with distillate fuel oil as the fuel. The use of any other fuel in the generators 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 generators 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 generators.

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 as measured by the amount of materials shipped from the facility.

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).

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** (Ton/Mo)	(Ton/Yr)	PM Emissions (lb/Ton)	(T/Mo)	(T/Yr)	PM_{10} Emissions (lb/Ton)	(T/Mo)	(T/Yr)
Coal & Coke*	1,100,000	11,000,000	0.00064	12.21	102.08	0.0003	4.79	47.85
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	102.38			47.96

* 50 % control for wet suppression
** Throughput is measured by the amount of material shipped from the site.

ii. 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).

iii. 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 11.25 million tons per year and the permitted emissions of PM_{10} are being increases from 12.5 tons per year to 49.24 tons per year.

d. Emissions and operation of the two 581 kW (779 HP) Diesel-Powered Generator (DG-1 and DG-2) combined shall not exceed the following:

i. The diesel-powered generator runtime shall not exceed 770 hours/month and 7,700 hours/year year from the two generators combined.

ii. Emissions from the two diesel-powered generators combined shall not exceed:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00575	1.72	17.25
Nitrogen Oxides (NO_x) *	0.00999	3.00	29.96
Particulate Matter(PM)	0.00033	0.10	0.99
Particulate Matter-10(PM_{10})	0.00033	0.10	0.99
Sulfur Dioxide (SO_2) **	0.00040	0.12	1.20
Volatile Organic Material (VOM)	0.00053	0.16	1.59

These limits are based on the emission factors for units with power rating greater than 600 HP, and the emission factors for CO, NO_x, 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.

* The NOx emission factor is based on 95% of the NMHC + NOx standard as described in Table B-22 of "The Carl Moyer Program Guidelines", California Air Resources Board, November 2005.

** SO_2 emissions calculated using 40 CFR 60.4207(a), maximum sulfur content of 0.05% per gallon of fuel and the standard emission factor for SO_2 (Table 3.4-1, AP-42 Fifth Edition, Volume I, Supplement B, October 1999.

e. Emissions and operation of the six 88 kW (118 HP) Diesel-Powered Generators (DG-3, DG-4, DG-5, DG-6, DG-7, and DG-8) combined will not exceed the following:

i. The diesel-powered generators runtime shall not exceed 1,800 hours/month and 18,000 hours/year from the six generators combined.

ii. Emissions from the six diesel-powered generators combined shall not exceed:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00815	0.87	8.66
Nitrogen Oxides (NO_x)	0.015	1.59	15.93
Particulate Matter(PM)	0.0005	0.05	0.53
Particulate Matter-10(PM_{10})	0.0005	0.05	0.53
Sulfur Dioxide (SO_2)	**	0.03	0.32
Volatile Organic Material (VOM)	0.00033	0.04	0.35

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_x, 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_2 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.

18,000 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.32 tpy

f. Emissions and operation of the 280 kW (375 HP) Diesel-Powered Generator (DG-10) shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00573	0.38	3.76
Nitrogen Oxides (NO_x)	0.015	0.98	9.84
Particulate Matter(PM)	0.0003	0.02	0.20
Particulate Matter-10(PM_{10})	0.0003	0.02	0.20
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 hours/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.06 tpy

g. Emissions and operation of the 298 kW (400 HP) Diesel-Powered Generator (DG-9) shall 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:

	Emission Factor	Emissions

Pollutant	(lb/HP-Hour)	(Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00573	0.40	4.01
Nitrogen Oxides (NO_x)	0.015	1.05	10.50
Particulate Matter(PM)	0.0003	0.02	0.21
Particulate Matter-10(PM_{10})	0.0003	0.02	0.21
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 hour/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.06 tpy

h. 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.

16. This permit is issued based on Diesel-Powered Generators Sets DG-1 through DG-10 each having a displacement of less than 30 liters per cylinder and have been certified by the manufacturer, as required by 40 CFR 60.4211(c), to meet the standards of 40 CFR 60.4204(b) or 60.4205(b). As a result, this permit is issued based on the Diesel-Powered Generators Sets DG-1 through DG-10 not being subject to the testing requirements of 40 CFR 60.8.

17a. 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 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 18 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

18. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification from 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.

19a. Pursuant to 40 CFR 60.4209(a), if you are an owner or operator, you must meet the monitoring requirements of 40 CFR 60.4209. In addition, you must also meet the monitoring requirements specified in 40 CFR 60.4211. If you are an owner or operator of an emergency stationary CI internal combustion engine, you must install a non-resettable hour meter prior to startup of the engine.

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.

20a. 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 performance evaluations; 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.

21. 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.

22a. 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 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.

23a. 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 generators runtime (hours/month and hours/year);

vi. Delivery ticket from the fuel supplier showing delivery of ultra low sulfur diesel fuel and sulfur content in weight percent for fuel shipments received;

vii. An inspection, maintenance and repair log of the generators listing each activity performed with date; and

viii. Monthly and annual emissions of NO_x, CO, SO_2, PM, PM_{10} and VOM from the source with supporting calculations (tons/month and tons/year).

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.

24a. 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.

25a. 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.

26a. 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 shall be noted that this permit was revised to add four portable conveyors to the list of emission units, to increase the emissions limits in Condition 14(c), to correct emission units and revise the emissions limits in Condition 14(c), and to add two 779 bhp diesel-fired generators (DG-1 and DG-2) to the list of emission sources and Condition 14(d).

If you have any questions on this, please call Mike Dragovich at 217/785-1705.

ECB

COPY
Original Signed by
Edwin C. Bakowski, P.E.

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

Date Signed: 4/18/2013

ECB:MJD:jws

cc: Region 1

Exhibit 6

IBD 2/20/08 → B Bernoteit

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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

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.

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

TABLE OF CONTENTS

LIST OF APPENDICES

LIST OF FIGURES

LIST OF TABLES

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_{10}).

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.

118

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_X	0.015	1.77	1.86	18.59
CO	0.0187	2.21	2.32	23.21
SO_2	0.00205	0.24	0.25	2.52
PM	0.0009	0.1	0.11	1.05
PM_{10}	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)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO_X	0.015	6	1.05	10.50
CO	0.0187	7.48	1.31	13.09
SO_2	0.00205	0.82	0.14	1.44
PM	0.0009	0.35	0.06	0.61
PM_{10}	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)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO_X	0.015	5.63	0.99	9.85
CO	0.0187	7.01	1.23	12.27
SO_2	0.00205	0.77	0.13	1.35
PM	0.0009	0.33	0.06	0.58
PM_{10}	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)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO_X	0.015	0.6	0.11	1.05
CO	0.0187	0.75	0.13	1.31
SO_2	0.00205	0.08	0.01	0.14
PM	0.0009	0.04	0.01	0.07
PM_{10}	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)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO_X	0.015	4.5	2.36	23.63
CO	0.0187	5.61	2.95	29.45
SO_2	0.00205	0.62	0.33	3.26
PM	0.0009	0.26	0.14	1.37
PM_{10}	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)

Pollutant	Emission Factor	Emissions		
	lb/bhp-hr	lb/hr	ton/month	ton/yr
NO_X	0.015	0.3	0.01	0.08
CO	0.0187	0.37	0.01	0.09
SO_2	0.00205	0.04	0.001	0.01
PM	0.0009	0.02	0.001	0.01
PM_{10}	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

Construction Permit Application for a Proposed Project 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 - $14,000.00

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)?
   ☐ No ☒ Yes If Yes, provide BOA ID Number: 031600GSF
3. Does this application request a revision to an existing construction permit issued by the BOA?
   ☐ No ☒ 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:	4. County:	5. Zip code:*
Chicago	Cook	60617

ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.

6. Is the source located within city limits? ☐ Yes ☐ 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?	2. All correspondence to: (check one)
☒ Owner ☐ Operator	☐ Source ☒ Owner ☐ 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 idifferent 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) ☒ Applicant's contact ☐ 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: ☐ Source ☒ 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: ☒ Source ☐ Other (provide below):	
5. Contact person for Annual Emission Report: Kim Bradford	6. Contact person's telephone number: 734-302-8206

Review Of Contents of the Application	
NOTE: ANSWERING "NO" TO THESE ITEMS MAY RESULT IN THE APPLICATION BEING DEEMED INCOMPLETE	
1. Does the application include a narrative description of the proposed project?	☒ Yes ☐ No
2. Does the application clearly identify the emission units and air pollution control equipment that are part of the project?	☒ Yes ☐ 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?	☒ Yes ☐ 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?	☒ Yes ☐ No ☐ 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)?	☒ Yes ☐ No
6. Does the application include relevant supporting data and information for the proposed project as provided on CAAPP forms?	☒ Yes ☐ 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)?	☒ Yes ☐ No
8. Does the application address whether the project would be a major project for Prevention of Significant Deterioration, 40 CFR 52.21?	☐ Yes ☐ No ☒ N/A
9. Does the application address whether the project would be a major project for "Nonattainment New Source Review," 35 IAC Part 203?	☐ Yes ☐ No ☒ 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?	☐ Yes ☐ No ☒ N/A* * Source not major ☒ Project not major ☒
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)	☒ Yes ☐ No ☐ 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)?	☒ Yes ☐ No ☐ 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?	☐ Yes ☐ No ☒ 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.	☐ Yes ☐ No ☒ 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)	☒ Yes ☐ 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?	☒ Yes ☐ 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 Grantham — AUTHORIZED SIGNATURE

Vice President — TITLE OF SIGNATORY

John Grantham — 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

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY	
ID NUMBER: 031600GSF	
PERMIT #: 07050082	
COMPLETE [X] INCOMPLETE [ ]	DATE COMPLETE: 2/3/09
CHECK #: 47623 0	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	+	$ 10,000	=	$*15,000 - 1,000 = 14,000
SECTION 1 SUBTOTAL		SECTION 2, 3 OR 4 SUBTOTAL		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.

FOR PURPOSES OF THIS FORM:

- ***MAJOR SOURCE*** IS A SOURCE THAT IS REQUIRED TO OBTAIN A CAAPP PERMIT.
- ***SYNTHETIC MINOR SOURCE*** IS A SOURCE THAT HAS TAKEN LIMITS ON POTENTIAL TO EMIT IN A PERMIT TO AVOID CAAPP PERMIT REQUIREMENTS (E.G., FESOP).
- ***NON-MAJOR SOURCE*** IS A SOURCE THAT IS NOT A MAJOR OR SYNTHETIC MINOR SOURCE.

[ ] 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.	
[X] EXISTING NON-MAJOR SOURCE THAT WILL BECOME SYNTHETIC MINOR OR MAJOR SOURCE. ENTER $5,000 AND PROCEED TO SECTION 4.	
[ ] EXISTING MAJOR OR SYNTHETIC MINOR SOURCE THAT WILL BECOME NON-MAJOR SOURCE. ENTER $4,000 AND PROCEED TO SECTION 3.	$ 5,000 SECTION 1 SUBTOTAL
[ ] NEW MAJOR OR SYNTHETIC MINOR SOURCE. ENTER $5,000 AND PROCEED TO SECTION 4.	
[ ] NEW NON-MAJOR SOURCE. ENTER $500 AND PROCEED TO SECTION 3.	
[ ] AGENCY ERROR. 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.	

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SECTION 2: SPECIAL CASE FILING FEE

8) FILING FEE. 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.

- [ ] ADDITION OR REPLACEMENT OF CONTROL DEVICES ON PERMITTED UNITS
- [ ] PILOT PROJECTS/TRIAL BURNS BY A PERMITTED UNIT
- [ ] APPLICATIONS ONLY INVOLVING INSIGNIFICANT ACTIVITIES UNDER 35 IAC 201.210 (MAJOR SOURCES ONLY)
- [ ] LAND REMEDIATION PROJECTS
- [ ] REVISIONS RELATED TO METHODOLOGY OR TIMING FOR EMISSION TESTING
- [ ] 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: John Grantz — SIGNATURE

Vice President — TITLE OF SIGNATORY

John Grantham — TYPED OR PRINTED NAME OF SIGNATORY

2 / 03 / 09 — DATE

APPLICATION PAGE 10

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187 FEE

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: _____

PROCESS EMISSION UNIT DATA AND INFORMATION	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: 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

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

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

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

☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER _____ ☐ COAL ☐ 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? ☐ YES ☐ NO

IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:

See Narrative, Section 1.0.

APPLICABLE RULES

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):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)

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		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]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.

[1]CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
[2]PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3]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.)
[4]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)
[5]RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

N/A

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

☐ [1]ACTUAL EMISSION RATE
☐ [1]UNCONTROLLED EMISSION RATE

NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE: [5]RATE OR STANDARD	ALLOWABLE BY RULE: APPLICABLE RULE
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]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.).
[4]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).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION		
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
P.O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

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

STATIONARY INTERNAL COMBUSTION ENGINE OR TURBINE DATA AND INFORMATION	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.

APPLICATION PAGE 21

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? ☐ YES ☒ NO

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: ☐ PIPELINE (FIRM CONTRACT) ☐ BY-PRODUCT, SPECIFY ORIGIN:

☐ PIPELINE (INTERRUPTIBLE SUPPLY CONTRACT) ☐ 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): ☐ NO. 1 ☒ NO. 2 ☐ NO. 4 ☐ NO. 5 ☐ NO. 6

☐ OTHER, SPECIFY (INCLUDE GENERATOR OR SUPPLIER): _____

b) TYPICAL HEAT CONTENT: 137,000 ☐ BTU/LB - OR - ☒ BTU/GAL

c) IS OIL USED ONLY AS A RESERVE FUEL? ☐ YES ☒ NO

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: ☐ HORIZONTAL ☐ TANGENTIAL ☐ OTHER, SPECIFY:

OTHER FUEL FIRING

30a) OTHER FUEL FIRING

	TYPE	SUPPLIER
a)		
b)		

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):

COMBUSTION CONTROL INFORMATION

31a) IS THERE ANY TYPE OF INTERNAL CONTROL USED TO REDUCE EMISSIONS ? (A 260-CAAPP FORM MUST BE COMPLETED FOR EXTERNAL CONTROLS) ☐ YES ☐ NO

IF NO, GO TO ITEM 33.

b) TOTAL % REDUCTION IN EMISSIONS:

☐ NO_x _____ %
☐ CO _____ %
☐ VOM _____ %
☐ PM_{10} _____ %
☐ PM _____ %
☐ SO_2 _____ %

c) CHECK THE FOLLOWING THAT APPLY:

☐ WATER INJECTION WATER TO FUEL RATIO: _____
☐ FLUE GAS RECIRCULATION % RECIRCULATED _____
☐ OXYGEN TRIM AIR TO FUEL RATIO: _____
☐ REDUCED RESIDENCE TIME (SPECIFY SEC): _____
☐ REDUCED TEMPERATURE (SPECIFY DEGREES F): _____
☐ FUEL INJECTION RETARD (SPECIFY DEGREES): _____
☐ (NON)SELECTIVE CATALYTIC REDUCTION (260-CAAPP)
☐ 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.

APPLICABLE RULES

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_2):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)

33) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)

34) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)

35) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)

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)

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		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]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.

[1]CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
[2]PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3]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.)
[4]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)
[5]RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

See Table 3A.

(46) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

HAP INFORMATION		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE				ALLOWABLE BY RULE	
NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	[5]RATE OR STANDARD	APPLICABLE RULE
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 270-4.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIOE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]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.).
[4]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).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

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)		

THE FOLLOWING INFORMATION NEED ONLY BE SUPPLIED IF READILY AVAILABLE.

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,

COMPLIANCE PLAN/ SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT

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?

☐ YES ☐ NO

IF NO, EXPLAIN:

N/A

6) WILL THE SOURCE MEET, ON A TIMELY BASIS, APPLICABLE REQUIREMENTS WHICH BECOME EFFECTIVE DURING THE PERMIT TERM?

☒ YES ☐ 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

APPLICATION PAGE 32

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	

EMISSION UNITS COMPLIANCE INFORMATION (cntd)

DESIGNATION ID NUMBER	EMISSION UNIT

8) EMISSION UNITS SUBJECT TO FUTURE COMPLIANCE DATES

THE FOLLOWING EMISSION UNITS, WHICH ARE CURRENTLY IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS, WILL ACHIEVE ON A TIMELY BASIS, AND MAINTAIN COMPLIANCE WITH, FUTURE COMPLIANCE DATES AS THEY BECOME APPLICABLE DURING THE PERMIT TERM. IF ADDITIONAL SPACE IS NEEDED, ATTACH AND LABEL AS EXHIBIT 293-2:

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

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:

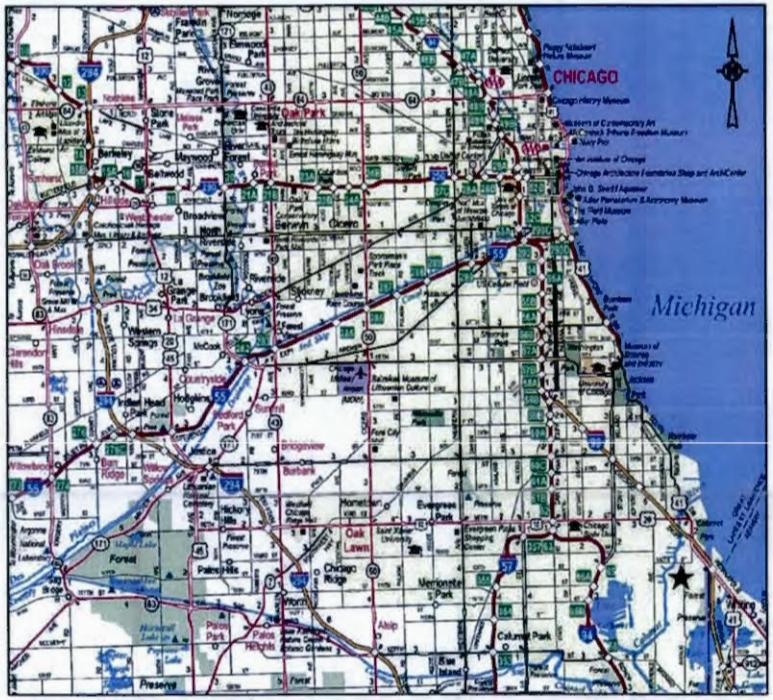
DESIGNATION ID NUMBER	EMISSION UNIT	FUTURE COMPLIANCE DATE (MONTH/DAY/YEAR)
N/A		

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

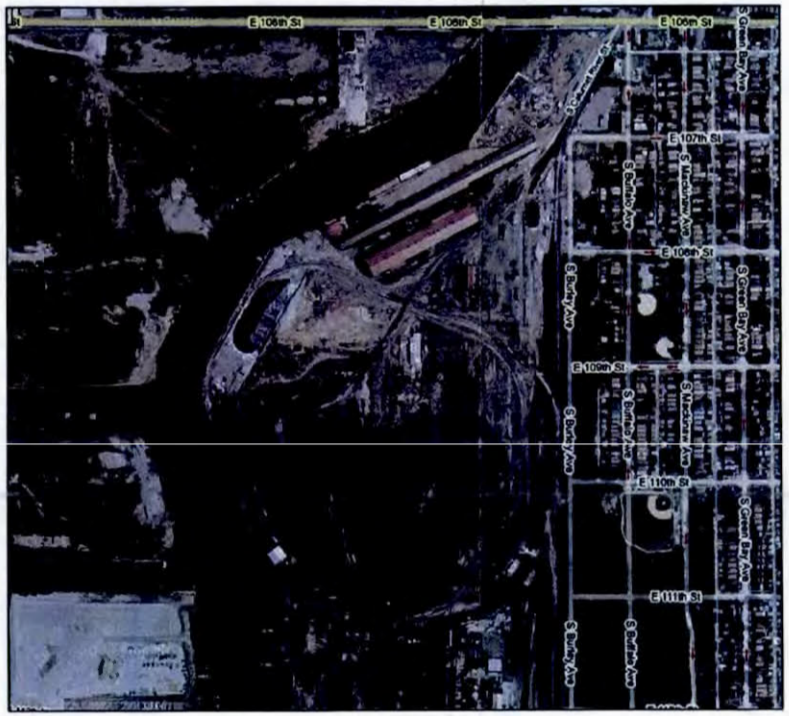
10) EMISSION UNITS NOT IN COMPLIANCE - COMPLIANCE WILL NOT BE ACHIEVED PRIOR TO PERMIT ISSUANCE
THE FOLLOWING EMISSION UNITS WILL NOT BE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUANCE. A FORM 294-CAAPP, "COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE - ADDENDUM FOR NON COMPLYING 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

SCALE
0 2 4 MILES



SITE MAP

SCALE
0 500 1000 FEET

ISSUE DATE
11-25-2008

Source: DTE Chicago Fuels Terminal

figure 1

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

052450 (01), Jan 2009, F1

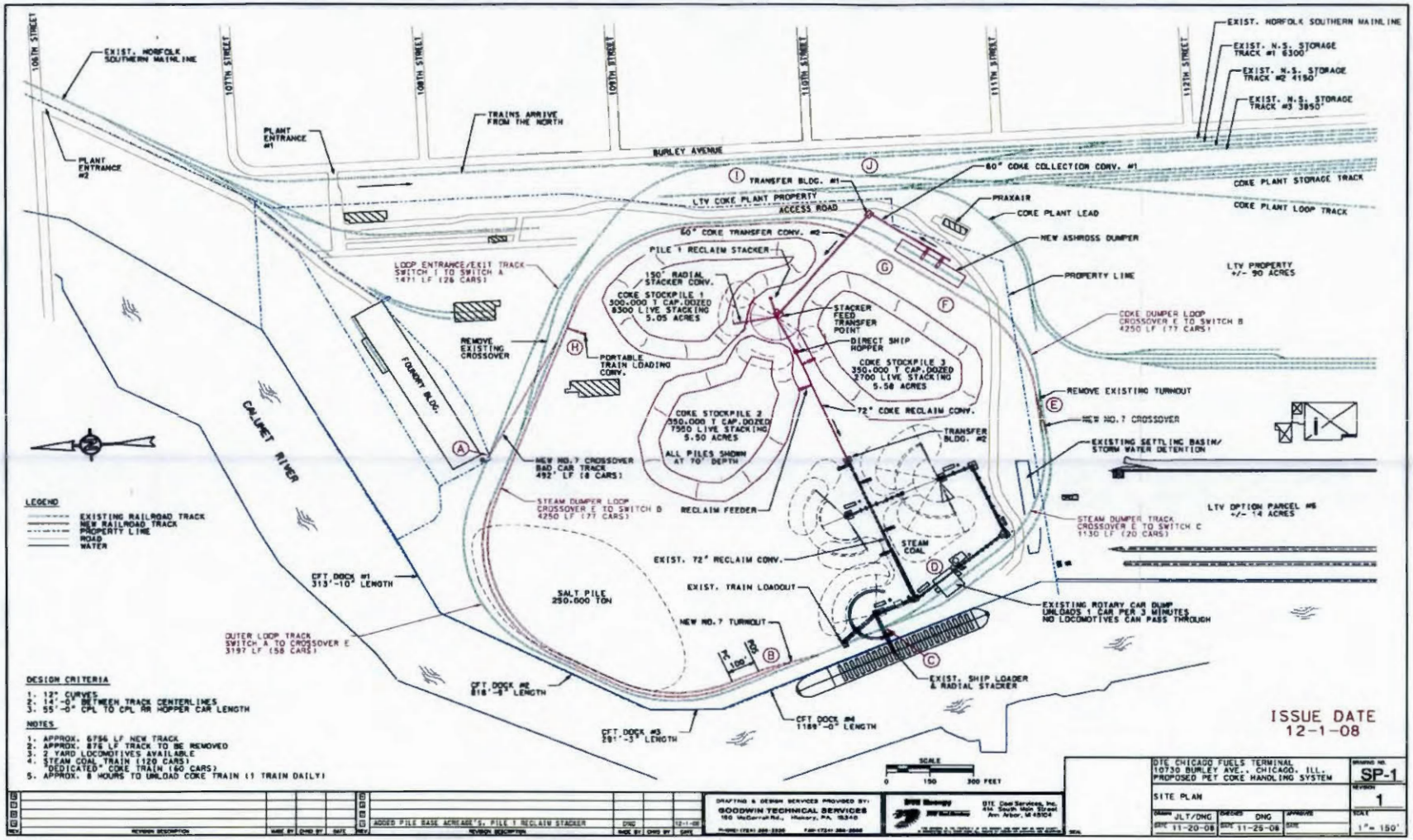


figure 2

Source: DTE Chicago Fuels Terminal

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

052450 (03), Jan 2009, F2

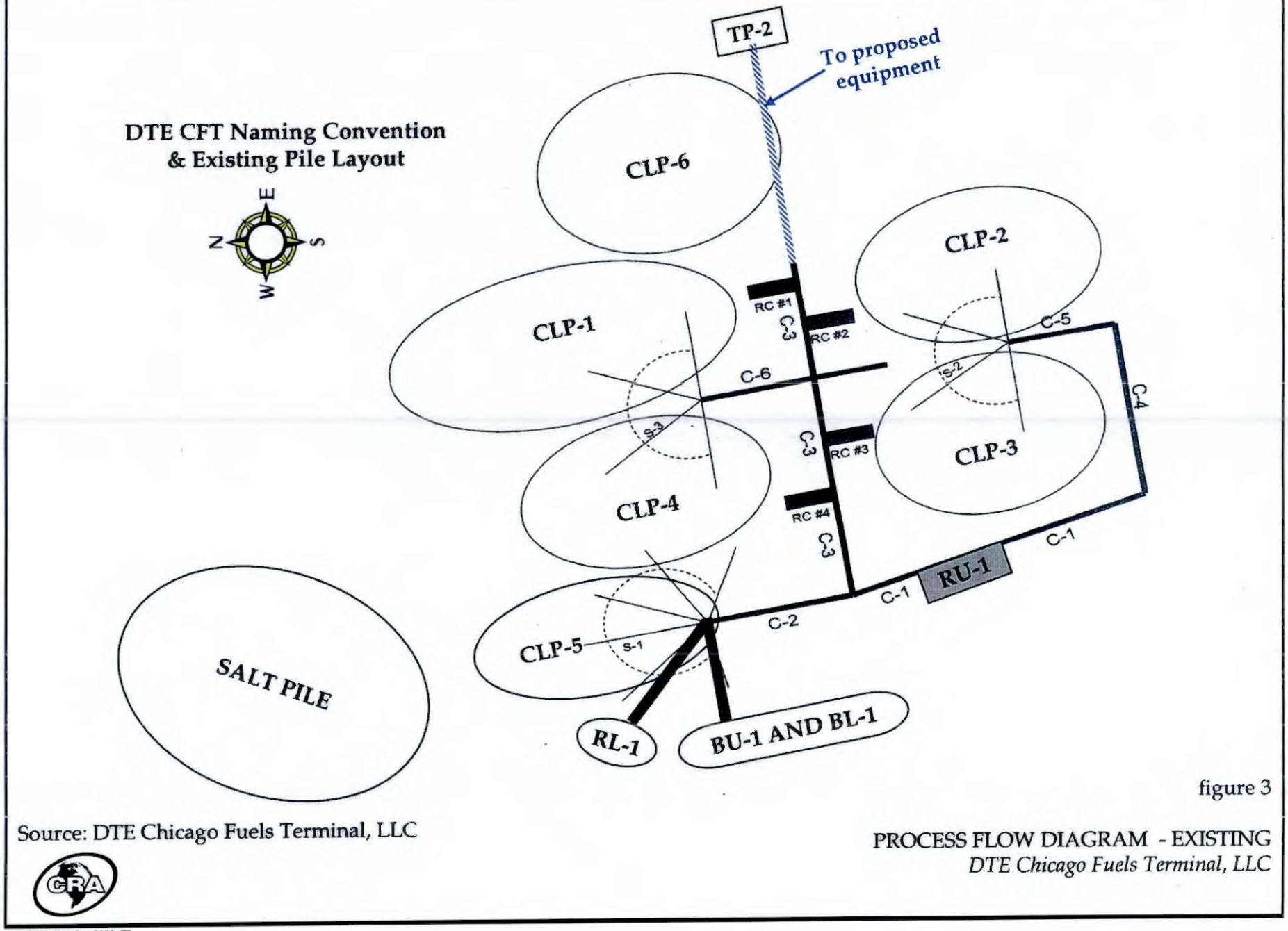


figure 3

Source: DTE Chicago Fuels Terminal, LLC

PROCESS FLOW DIAGRAM - EXISTING
DTE Chicago Fuels Terminal, LLC

052450 (01), Jan 2009, F3

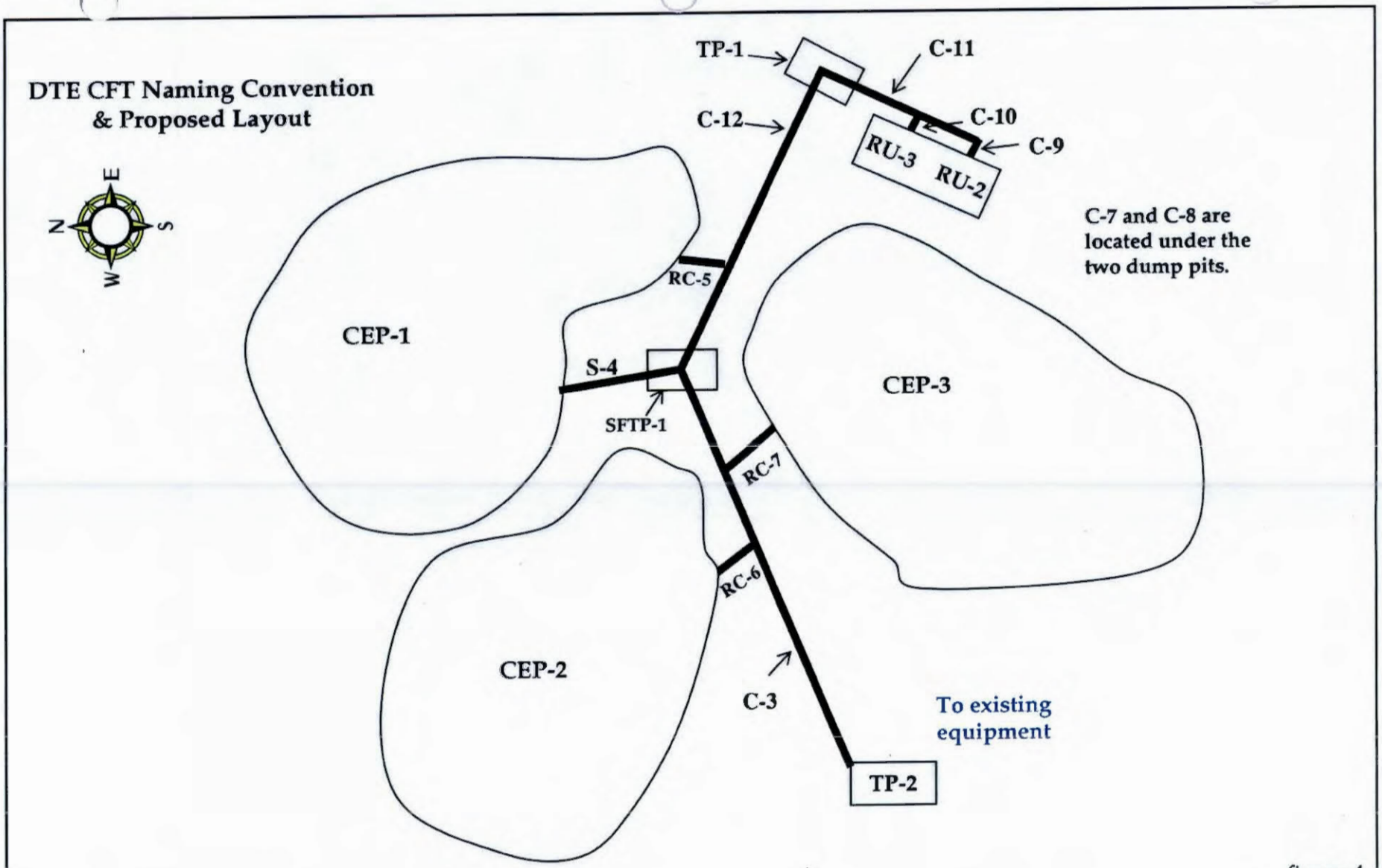


figure 4

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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Unloading Emissions													
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
								Emissions From Unloading : Total>>		53.0	9.7	25.1	4.6
Conveyor Transfer Point Emissions													
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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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
									Emissions From Transfer Points Total>>	*344.0*	*62.8*	*162.7*	*29.7*
Portable Equipment Emissions													
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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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
								Emissions From Portable Conveyor Transfer Points Total>>		*186.2*	*17.0*	*87.2*	*8.0*
Stacker Emissions													
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
									Stacker Emissions: Total>>	*155.5*	*28.4*	*73.6*	*13.4*

TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Londont Emissions Emissions													
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
									Loadout Emissions: Total>>	*57.3*	*10.5*	*27.1*	*4.9*
									Facility Total>>	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 conservartive 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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Storage Pile Emissions													
CLP-1[7]	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[7]	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[7]	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[7]	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[7]	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[7]	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[7]	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
									Storage Pile Emissions: Total>>	*1253.8*	*228.8*	*626.9*	*114.4*
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer[4]	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[4]	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[4]	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[4]	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[5] 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[5] 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[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
RC-6 Loaded by Dozer[4]	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[4]	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
									Reclaim Belt Loading Emissions: Total>>	*605.0*	*110.4*	*176.7*	*32.2*

TABLE 2

FUGITIVE POTENTIAL TO EMIT CALCULATIONS

Roadway Emissions													
Inbound Coal Truck Traffic[5]	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[5]	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[5]	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
									Roadway Emissions: Total>>		2488.6	454.2	*0.0*	*0.0*
									Facility Total>>		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) : 16.3%
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[6] with rain > 0.01 inch = 117 days
Mean wind speed[3] = 16.4 mph
Percent of time[4] 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^a	CO^a	$SO_2{}^a$	PM^a	$PM_{10}{}^d$	VOM^b
			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)[c]			159.27	198.55	21.77	9.34	9.34	26.23

Maximum Emissions Assumptions:

[a] Calculated using NSPS emission factors for stationary combustion sources

[b] Calculated using low sulfur diesel fuel (20 ppm) and emision factor from AP-42 Section 3.3, Gasoline and Diesel Industrial Engines, Table 3.3-1.

[c] Hours of operation 8,760 hr/yr
500 hr/yr (For emergency diesel water pump only.)

[d] It is assumed that PM_{10} emissions are equal to PM.

TABLE 3A

POTENTIAL TO EMIT HAP CALCULATIONS
DIESEL GENERATORS

CAS No.	*Pollutant*	*Diesel Engines*		
		Emission Factor[a] *(lb/hp-hr)*	*Emission Rate*[b] *(lb/hr)*	*Emission Rate*[c] *(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**

[a] AP-42, Fifth Edition, Volume I, Section 3.3, Gasoline and Industrial Engines (October 1996)

[b] Diesel Fuel-Fired Engines maximum heat input 2443 Horsepower

[c] 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 lb/hp-hr / 4.41 lb/MMBtu = 0.007

TABLE 4

PTE EMISSIONS SUMMARY

Emission Point	*Emissions (tpy)*					
	NOx	*CO*	*SO_2*	*PM*	*PM_{10}*	*VOM*
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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Unloading Emissions													
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
								Emissions From Unloading : Total>>		*25.7*	*1.7*	*12.2*	*0.8*
Conveyor Transfer Point Emissions													
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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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 SFTP-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
SFTP-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
									Emissions From Transfer Points Total>>	*172.0*	*33.7*	*81.3*	*15.9*
Portable Conveyor Emissions													
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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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
								Emissions From Portable Conveyor Transfer Points Total>>		*93.1*	*8.5*	*43.6*	*4.0*
Stacker Emissions													
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
								Stacker Emissions: Total>>		*77.8*	*14.0*	*36.8*	*6.6*

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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	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
									Loadout Emissions: Total>>	*28.6*	*2.3*	*13.5*	*1.1*
									Facility Total>>	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.

<u>Assumptions:</u>

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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Storage Pile Emissions													
CLP-1[7]	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[7]	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[7]	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[7]	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[7]	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[7]	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[7]	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
									Storage Pile Emissions: Total>>	*1253.8*	*228.8*	*626.9*	*114.4*
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer[4]	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[4]	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[4]	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[4]	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[5] 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[5] 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[4]	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[4]	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[4]	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
									Reclaim Belt Loading Emissions: Total>>	*302.5*	*46.9*	*88.3*	*13.1*

Roadway Emissions													
Inbound Coal Truck Traffic[5]	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[5]	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[5]	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[6] with rain > 0.01 inch = 117 days
Mean wind speed[3] = 16.4 mph
Percent of time[7] 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

Unit	Prime Power (hp)	Maximum Material Handling Rate (tons/hr)	Emission Factor (lb/hp-hr) NOx[a] 0.015	CO[a] 0.01870	SO_2[a] 0.00205	PM[a] 0.0009	PM_{10}[d] 0.0009	VOM[b] 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)[c]			63.68	79.39	8.70	3.74	3.74	10.49

Maximum Emissions Assumptions:

[a] Calculated using NSPS emission factors for stationary combustion sources

[b] Calculated using low sulfur diesel fuel (20 ppm) and emision factor from AP-42 Section 3.3, Gasoline and Diesel Industrial Engines, Table 3.3-1.

[c] Hours of operation 3,500 hr/yr
500 hr/yr (For emergency diesel water pump only.)

[d] It is assumed that PM_{10} emissions are equal to PM.

TABLE 8

MAXIMUM EMISSIONS SUMMARY

Emission Point	Emissions (tpy)					
	NOx	CO	SO_2	PM	PM_{10}	VOM
Process				60.14	28.40	
Fugitive				393.17	157.33	
Generator	63.68	79.39	8.70	3.74	3.74	10.49
Total	**63.68**	**79.39**	**8.70**	**457.05**	**189.46**	**10.49**

TABLE 8A

FESOP REQUESTED LIMITATION AND FEE ALLOWABLE EMISSIONS SUMMARY

Emission Point	Emissions (tpy)					
	NOx	CO	SO_2	PM	PM_{10}	VOM
Process				60.14	28.40	
Generator	63.68	79.39	8.70	3.74	3.74	10.49
Total	**63.68**	**79.39**	**8.70**	**63.87**	**32.14**	**10.49**

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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Unloading Emissions													
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
								Emissions From Unloading : Total>>		*26.5*	*2.1*	*12.5*	*1.0*
Conveyor Transfer Point Emissions													
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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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 SFTP-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
SFTP-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
									Emissions From Transfer Points Total>>	*175.0*	*6.7*	*82.8*	*3.2*
Portable Conveyor Emissions													
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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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
PFH-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
PF-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
									Emissions From Portable Conveyor Transfer Points Total>>	*93.1*	*6.0*	*43.6*	*2.8*
Stacker Emissions													
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
									Stacker Emissions: Total>>	*77.8*	*2.5*	*36.8*	*1.2*

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	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
									Loadout Emissions: Total>>	*28.6*	*0.4*	*13.5*	*0.2*
									Facility Total>>	401.0	17.8	189.2	8.4

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 conservartive 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[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Storage Pile Emissions													
CLP-1[7]	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[7]	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[7]	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[7]	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[7]	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[7]	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[7]	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
								Storage Pile Emissions: Total>>		*1253.8*	*228.8*	*626.9*	*114.4*
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer[4]	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[4]	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[4]	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[4]	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[5] 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[5] 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[4]	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[4]	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[4]	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
								Reclaim Belt Loading Emissions: Total>>		*302.5*	*33.5*	*88.3*	*8.7*

TABLE 10

TYPICAL FUGITIVE EMISSIONS CALCULATIONS

Roadway Emissions													
Inbound Coal Truck Traffic[5]	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[5]	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[5]	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
									Roadway Emissions: Total>>	*208.5*	*27.1*	*53.8*	*7.0*
									Facility Total>>	1764.8	289.5	769.0	130.2

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[6] with rain > 0.01 inch = 117 days
Mean wind speed[3] = 16.4 mph
Percent of time[7] 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^a	CO^a	$SO_2{}^a$	PM^a	$PM_{10}{}^d$	VOM^b
			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)[c]			27.30	34.03	3.73	1.60	1.60	4.49

Maximum Emissions Assumptions:

[a] Calculated using NSPS emission factors for stationary combustion sources

[b] Calculated using low sulfur diesel fuel (20 ppm) and emision factor from AP-42 Section 3.3, Gasoline and Diesel industrial Engines, Table 3.3-1.

[c] Hours of operation 1,500 hr/yr
250 hr/yr (For emergency diesel water pump only.)

[d] It is assumed that PM_{10} emissions are equal to PM.

TABLE 12

TYPICAL EMISSIONS SUMMARY

Emission Point	*Emissions (tpy)*					
	NOx	*CO*	*SO_2*	*PM*	*PM_{10}*	*VOM*
Process				17.79	8.39	
Generator	27.30	34.03	3.73	1.60	1.60	4.49
Total	**27.30**	**34.03**	**3.73**	**19.40**	**9.99**	**4.49**

TABLE 13

LISTING OF EMISSION UNITS

Process Equipment	*Unit Designation*	*DTE Designation*	*Submittal*
Unloading Operations			
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
Conveyor Operations			
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
Transfer Hopper Operations			
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	RPS-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

Process Equipment	*Unit Designation*	*DTE Designation*	*Submittal*
Stacker Operations			
Stacker 1	S-1		Existing
Stacker 2	S-2		Existing
Stacker 3	S-3		Existing
Stacker 4	S-4	150' Radial Stacker Conveyor	Proposed
Loadout Operations			
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
Storage Pile Operations			
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
Diesel Generators			
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_{10}, etc.) to be emitted, including emission factors to be used to estimate emissions;

Justify the PM and PM_{10} 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_{10}), volatile organic materials (VOM), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur dioxide (SO_2), 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_{10}, 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_{10} 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 7

HODGE DWYER & DRIVER
ATTORNEYS AT LAW

KATHERINE D. HODGE
E-mail: khodge@hddattorneys.com

October 4, 2012

VIA HAND DELIVERY

Edwin C. Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 67294-9276

Re: Request for Ownership Change for a CAAPP Permit
Facility I.D No. 031600GSF

Dear Mr. Bakowski:

On September 19, 2012, representatives from KCBX Terminals Company ("KCBX") (Facility I.D. 031600AHI) met with the Illinois Environmental Protection Agency ("Illinois EPA") to discuss issues related to the transfer of a joint construction and operating permit (No. 07050082 issued May 21, 2009), pending construction permit application (submitted on September 20, 2012), and pending FESOP applications (dated February 2, 2009 and May 1, 2009, respectively)[1] from DTE Chicago Fuels Terminal, LLC ("DTE") (Facility I.D. 031600GSF) to KCBX. As discussed during the meeting, KCBX was directed by Illinois EPA to submit a 272-CAAPP form to transfer the pending FESOP application, as well as the joint construction and operating permit and pending construction permit applications, from DTE to KCBX. Accordingly, please find enclosed a 272-CAAPP form, including a change of ownership agreement for the above-referenced facility.

[1] On May 12, 2009, Illinois EPA issued a CAAPP Application Completeness Determination to DTE and referenced Application/Permit No. 09050011. No. 09050011 is the number listed on the enclosed CAAPP form, although Illinois EPA has yet to act on the pending application.

As referenced in the enclosed, the transfer of ownership of DTE to KCBX is expected to occur on November 1, 2012. Thus, KCBX requests that a revised joint construction and operating permit be issued on November 1, 2012 reflecting the change in ownership. If you have any questions regarding the enclosed, please do not hesitate to contact Terry Steinert at (316) 828-7847.

Sincerely,

Katherine D. Hodge

KDH:MTR:kjg

KCBX:004/Corr/Bakowski Ltr-Transfer of Permit and Applications

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: _____

REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT

FOR AGENCY USE ONLY
ID NUMBER:
PERMIT #:
DATE:

NOTE: THIS FORM SHALL ONLY BE USED TO REQUEST AN AMENDMENT OF A CAAPP PERMIT TO REFLECT A CHANGE IN OWNERSHIP OR OPERATIONAL CONTROL OF A SOURCE. PROVIDE ONLY THE NEW INFORMATION FOR THE SOURCE, OWNER, OPERATOR, AND/OR BILLING IN THE SPACES PROVIDED BELOW, AS IT APPLIES.

GENERAL INFORMATION

1a) ID NUMBER: 031600GSF	b) CAAPP PERMIT NUMBER: 09050011
2) EXISTING SOURCE NAME ON CAAPP PERMIT: DTE Chicago Fuels Terminal, LLC	
3) DATE FORM PREPARED: September 20, 2012	

NEW SOURCE INFORMATION

4) SOURCE NAME: KCBX Terminals Company	
5) FEDERAL EMPLOYER IDENTIFICATION NUMBER (FEIN): 48-1082551	
6) SOURCE ENVIRONMENTAL CONTACT PERSON: Brandon Walker	
7) CONTACT PERSON'S TELEPHONE NUMBER: (773) 978-8518	

NEW OWNER INFORMATION

8) OWNER NAME: KCBX Terminals Company		
9) ADDRESS: 3259 East 100th Street		
10) CITY: Chicago	11) STATE: Illinois	12) ZIP: 60617
13) OWNER'S AGENT (IF APPLICABLE):		

NEW OPERATOR INFORMATION

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
_____

APPLICATION PAGE _____

14) OPERATOR NAME: KCBX Terminals Company		
15) ADDRESS: 3259 East 100th Street		
16) CITY: Chicago	17) STATE: Illinois	18) ZIP: 60617

NEW BILLING INFORMATION		
19) NAME: KCBX Terminals Company		
20) ADDRESS: 3259 East 100th Street		
21) CITY: Chicago	22) STATE: Illinois	23) ZIP: 60617
24) CONTACT PERSON: Brandon Walker		
25) CONTACT PERSON'S TELEPHONE NUMBER: (773) 978-8518		

NEW APPLICANT INFORMATION

26) WHO IS THE NEW PERMITTEE? (CHECK ONE): ☒ OWNER ☐ OPERATOR

27) ALL CORRESPONDENCE SENT TO: ☒ OWNER ☐ OPERATOR ☐ SOURCE

28) ATTENTION NAME AND/OR TITLE FOR WRITTEN CORRESPONDENCE: Jim Simmons, Terminal Manager

29) TECHNICAL CONTACT FOR APPLICATION SUBMITTAL: Brandon Walker

30) TECHNICAL CONTACT PERSON'S TELEPHONE NUMBER: (773) 978-8518

31a) FOR A CHANGE OF OWNERSHIP, ATTACH A COPY OF THE SIGNED, WRITTEN AGREEMENT CONTAINING A SPECIFIC DATE FOR TRANSFER OF PERMIT RESPONSIBILITY, COVERAGE, AND LIABILITY BETWEEN THE CURRENT AND NEW PERMITTEE. ATTACH AND LABEL AS EXHIBIT 272-1.

b) PROVIDE THE SPECIFIC DATE FOR TRANSFER (MONTH/DAY/YEAR): 11 / 01 / 2012

SIGNATURE BLOCK

NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED INCOMPLETE.

32) 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.

AUTHORIZED SIGNATURE:

BY: _____ President

AUTHORIZED SIGNATURE — TITLE OF SIGNATORY

David H. Severson — 9 / 28 / 2012

TYPED OR PRINTED NAME OF SIGNATORY — DATE

Note: The Illinois EPA may DENY the transfer of a permit(s) if any air pollution site fee owed by the applicant has not been paid within 60 days of the due date.

Exhibit 272-1
Change of Ownership Agreement for the
DTE Chicago Fuels Terminal, LLC
Facility I.D. No.: 031600GSF

On March 9th,2012, DTE Chicago Fuels Terminal, LLC's affiliate ("DTE") entered an intent agreement to transfer the materials transloading facility ("Facility"), located at 10730 South Burley Avenue, Chicago, Illinois, to KCBX Terminals Company ("KCBX"), including the real property and all buildings, fixtures and equipment located thereon. This transfer of ownership of the Facility is expected to occur on November 1st, 2012, although the date is subject to change.

The Facility is covered by a Joint Construction and Operating Permit (Application No.: 07050082), issued by the Illinois Environmental Protection Agency ("Illinois EPA") on May 21, 2009, as well as a pending application for a Federally Enforceable State Operating Permit, deemed complete by the Illinois EPA on May 12, 2009, and an application to revise the Joint Construction and Operating Permit, submitted on September 17, 2012.

Upon transfer of ownership of the Facility, it will be owned by KCBX. Thus, DTE and KCBX hereby request that the Joint Construction and Operating Permit and the pending applications referenced above be transferred to KCBX to reflect the change in ownership. Upon transfer of ownership of the Facility, all permit responsibility, coverage, and liability will be transferred from DTE to KCBX. Brandon Walker will be the new contact person at the Facility and may be reached at 773.978.8518.

IN WITNESS WHEREOF, each of the parties has caused this Agreement to be executed by its responsible official in its name and on its behalf.

DTE Chicago Fuels Terminal, LLC

Signature: _____

Name: Stephen C. Braverman

Title: Vice President

Date: Sept. 28, 2012

KCBX Terminals Company

Signature: _____ JK

Name: DAVID H. SEVERSON

Title: PRESIDENT

Date: SEPTEMBER 28th, 2012

Exhibit 8

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

CONSTRUCTION PERMIT -- NSPS and NESHAP SOURCE -- REVISED

PERMITTEE

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

Application No.: 07050082 I.D. No.: 031600GSF
Applicant's Designation: Date Received: September 20, 2012
Subject: Conveyor Addition
Date Issued: December 18, 2012
Location: 10730 South Burley Avenue, Chicago, 60617

Permit is here by granted to the above-designated Permittee to CONSTRUCT 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);
Twelve (12) Portable Conveyors (PC-1, PC-2, PC-3, PC-4, PC-5, PC-6, PC-7, PC-8, PC-9, PC-10, PC-11, and PC-12);
Direct Ship Hopper 1 (DSH-1);
Portable Feed Hopper (PFH-1);
Portable Feeder (PF-1);
Rental Portable Screen (RPS-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 (DG-7);
One (1) 375 HP Diesel-Powered Generator (DG-8);
One (1) 40 HP Diesel-Powered Generator (DG-9);
Three (3) 300 HP Diesel Generators (DG-10, DG-11, and DG-12); and
One (1) 20 HP Diesel-Powered Water Pump (DWP-1)

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

1a. This Permit is issued based on the modification of the materials transloading system (to increase the permitted throughput) and the construction of the diesel generators and portable conveyors 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_x) and Particulate Matter less than 10 microns (PM_{10}) from the above-listed equipment below the levels that would trigger the applicability of these rules.

b. The Permittee may operate the equipment listed above under this construction permit until the Illinois EPA takes final action on the Permit tee's application for a Federally Enforceable State Operating Permit (FESOP) provided that the Permittee timely complies with all the terms of this construction permit.

2a. Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 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. Pursuant to 40 CFR 60.4200(a), the provisions of 40 CFR 60 Subpart IIII are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in 40 CFR 60.4200(a)(1) through (4). For the purposes of 40 CFR 60 Subpart IIII, the date that construction commences is the date the engine is ordered by the owner or operator.

i. Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines,

ii. Owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005.

iii. The provisions of 40 CFR 60.4208 are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005

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.

3a. Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 are subject to the National Emission Standards for Hazardous Air pollutants (NESHAP) Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subparts A and ZZZZ. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Pursuant to 40 CFR 63.6590(a), an affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

b. Pursuant to 40 CFR 63.6590(c)(1), a new or reconstructed stationary residential, commercial, or institutional emergency stationary RICE located at an area source must meet the requirements of 40 CFR Part 63 by meeting the requirements of 40 CFR 60 Subpart IIII, for compression ignition engines or 40 CFR 60 Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR Part 63.

4a. 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-hour)

Rated Power (kW)	Tier	Model Year[1]	NO_x	HC	NMHC + NO_x	CO	PM
8 ≤ kW < 19	Tier 1	2000	--	--	9.5	6.6	0.80
	Tier 2	2005	--	--	7.5	6.6	0.80
19 ≤ kW < 37	Tier 1	1998	9.2	--	9.5	6.6	0.80
	Tier 2	2004	--	--	7.5	5.0	0.60
75 ≤ kW < 130	Tier 1	1997	9.2	--	--	--	--
	Tier 2	2003			6.6	5.0	0.30
	Tier 3	2007		--	4.0	5.0	
130 ≤ kW < 225	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2003	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
225 ≤ kW < 450	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2002	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
kW>560	Tier 1	2000	9.2	1.3	--	11.4	0.54
	Tier 2	2006	--	--	6.4	3.5	0.20

[1] 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_x standards, NMHC + NO_x 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-hour)

Rated Power (kW)	Tier	Model Year[1]	NO_x FEL	NMHC + NO_x FEL	PM FEL
8≤kW<19	Tier 1	2000	--	16.0	1.2
	Tier 2	2005	--	9.5	0.80
19≤kW<37	Tier 1	1999	14.6	16.0	1.2
	Tier 2	2004	--	9.5	0.80
75 ≤ kW < 130	Tier 1	1997	14.6	--	1.2
	Tier 2	2003	--	11.5	
	Tier 3	2007	--	6.6	
130≤kW<225	Tier 1	1996	14.6	--	--
	Tier 2	2003	--	10.5	0.54
	Tier 3	2006	--	6.6	
225≤kW<450	Tier 1	1996	14.6	--	--
	Tier 2	2001	--	10.5	0.54
	Tier 3	2006	--	6.4	
kW>560	Tier 1	2000	14.6	--	--
	Tier 2	2006	--	10.5	0.54

[1] 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:

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.

5a. 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 meter (1000 foot) 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 212.316(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.

e. 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.

f. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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).

g. 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.

h. 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.

6a. 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, except as further provided by 35 Ill. Adm. Code Part 214, 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).

7. 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.

8a. 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).

9a. Pursuant to 40 CFR 60.11(b), compliance with opacity standards in 40 CFR Part 60 shall be determined by conducting observations in accordance with Method 9 in Appendix A of 40 CFR Part 60, any alternative method that is approved by the Illinois EPA or USEPA, or as provided in 40 CFR 60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

b. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup,

shutdown, malfunction, and as otherwise provided in the applicable standard.

c. 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.

10a. 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 and 60.4205 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.

b. 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).

c. 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.

d. 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.

e. 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 emission-related specifications, except as permitted in 40 CFR 60.4211(g).

f. Pursuant to 40 CFR 60.4211(e)(1), if you are an owner or operator of a modified or reconstructed stationary CI internal combustion engine and must comply with the emission standards specified in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), you must demonstrate compliance according to one of the methods specified in 40 CFR 60.4211(e)(1) or (2). Purchasing, or otherwise owning or operating, an engine certified to the emission standards in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), as applicable.

11a. 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.

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_{10} 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_{10} 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_{10} 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_{10} 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.

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 ug/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 ug/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 (Ton/Mo)	(Ton/Yr)	PM Emissions (lb/Ton)	(T/Mo)	(T/Yr)	PM_{10} Emissions (lb/Ton)	(T/Mo)	(T/Yr)
Coal & Coke*	1,100,000	11,000,000	0.00064	12.21	102.08	0.0003	4.79	47.85
Salt	25,000	250,000	0.00064	0.27	2.87	0.0003	0.13	1.28
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	105.25			49.24

* 50 % control for wet suppression

ii. 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).

iii. 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 11.25 million tons per year and the permitted

emissions of PM_{10} are being increases from 12.5 tons per year to 49.24 tons per year.

d. Emissions and operation of the 15 kW (20 HP) Diesel-Powered Water Pump (DWP-1) shall not exceed the following:

i. The diesel-powered water pump runtime shall not exceed 150 hours/month and 500 hours/year.

ii. Emissions from the diesel-powered water pump shall not exceed:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.01079	0.02	0.05
Nitrogen Oxides (NO_x)	0.015	0.03	0.08
Particulate Matter(PM)	0.0013	0.01	0.01
Particulate Matter-10(PM_{10})	0.0013	0.01	0.01
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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

e. Emissions and operation of the 30 kW (40 HP) Diesel-Powered Generator (DG-9) shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00903	0.06	0.63
Nitrogen Oxides (NO_x)	0.015	0.11	1.05
Particulate Matter(PM)	0.001	0.01	0.07

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Particulate Matter-10 (PM_{10})	0.001	0.01	0.07
Sulfur Dioxide (SO_2)	**	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 600 HP, and the emission factors for CO, NO_x, 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_2 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 hours/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.06 tpy

f. Emissions and operation of the six 88 kW (118 HP) Diesel-Powered Generators (DG-1, DG-2, DG-3, DG-4, DG-5, and DG-6) 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00815	1.01	10.10
Nitrogen Oxides (NO_x)	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_2)	**	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 600 HP, and the emission factors for CO, NO_x, 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_2 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 three 224 kW (300 HP) Diesel-Powered Generators (DG-10, DG-11, and DG-12) combined shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00573	0.90	9.02
Nitrogen Oxides (NO_x)	0.015	2.36	23.63
Particulate Matter(PM)	0.0003	0.05	0.47
Particulate Matter-10(PM_{10})	0.0003	0.05	0.47
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 (DG-8) shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00573	0.38	3.76
Nitrogen Oxides (NO_x)	0.015	0.98	9.84
Particulate Matter(PM)	0.0003	0.02	0.20
Particulate Matter-10(PM_{10})	0.0003	0.02	0.20
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 hours/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.06 tpy

i. Emissions and operation of the 298 kW (400 HP) Diesel-Powered Generator (DG-7) shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00573	0.40	4.01
Nitrogen Oxides (NO_x)	0.015	1.05	10.50
Particulate Matter(PM)	0.0003	0.02	0.21
Particulate Matter-10(PM_{10})	0.0003	0.02	0.21
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 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.

16. This permit is issued based on Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 each having a displacement of less than 30 liters per cylinder and have been certified by the manufacturer, as required by 40 CFR 60.4211(c), to meet the standards of 40 CFR 60.4204(b) or 60.4205(b). As a result, this permit is issued based on the Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 not being subject to the testing requirements of 40 CFR 60.8.

17a. 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 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 18 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

18. 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.

19a. Pursuant to 40 CFR 60.4209(a), if you are an owner or operator, you must meet the monitoring requirements of 40 CFR 60.4209. In addition, you must also meet the monitoring requirements specified in 40 CFR 60.4211. If you are an owner or operator of an emergency stationary CI internal combustion engine, you must install a non-resettable hour meter prior to startup of the engine.

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.

20a. 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 performance evaluations; 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.

21. 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.

22a. 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 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.

23a. 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 and 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 and 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_x, CO, SO_2, PM, PM_{10} and VOM from the source with supporting calculations (tons/month and tons/year).

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.

24a. 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.

25a. 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.

26a. 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 shall be noted that this permit was revised to add four portable conveyors to the list of emission units and to increase the emissions limits in Condition 14(c).

If you have any questions on this, please call Mike Dragovich at 217/785-1705.

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

Date Signed: 12/18/2012

ECB:MJD:psj

cc: Region 1

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

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless susperseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.

2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.

3. There sball be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall bave been submitted to the Agency and a supplemental written permit issued.

4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under thia permit,

   d. to obtain and remove samples of any discharge or emissions of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,

   c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,

   d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.

b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.

7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:

a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or

b. upon finding that any standard or special conditions have been violated, or

c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

'or assistance in preparing a permit
ipplication contact the Permit
ection.

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O. Box 19506
Springfield, Illinois 62794-9506

)r a regional office of the
Field Operations Section.
The regional offices and their
areas of responsibility are
shown on the map. The
addresses and telephone
numbers of the regional
offices are as follows:

Illinois EPA
Region 1
Bureau of air, FOS
9511 West Harrison
Des Plaines, Illinois 60016
847/294-4000

Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614
309/693-5463

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
618/346-5120

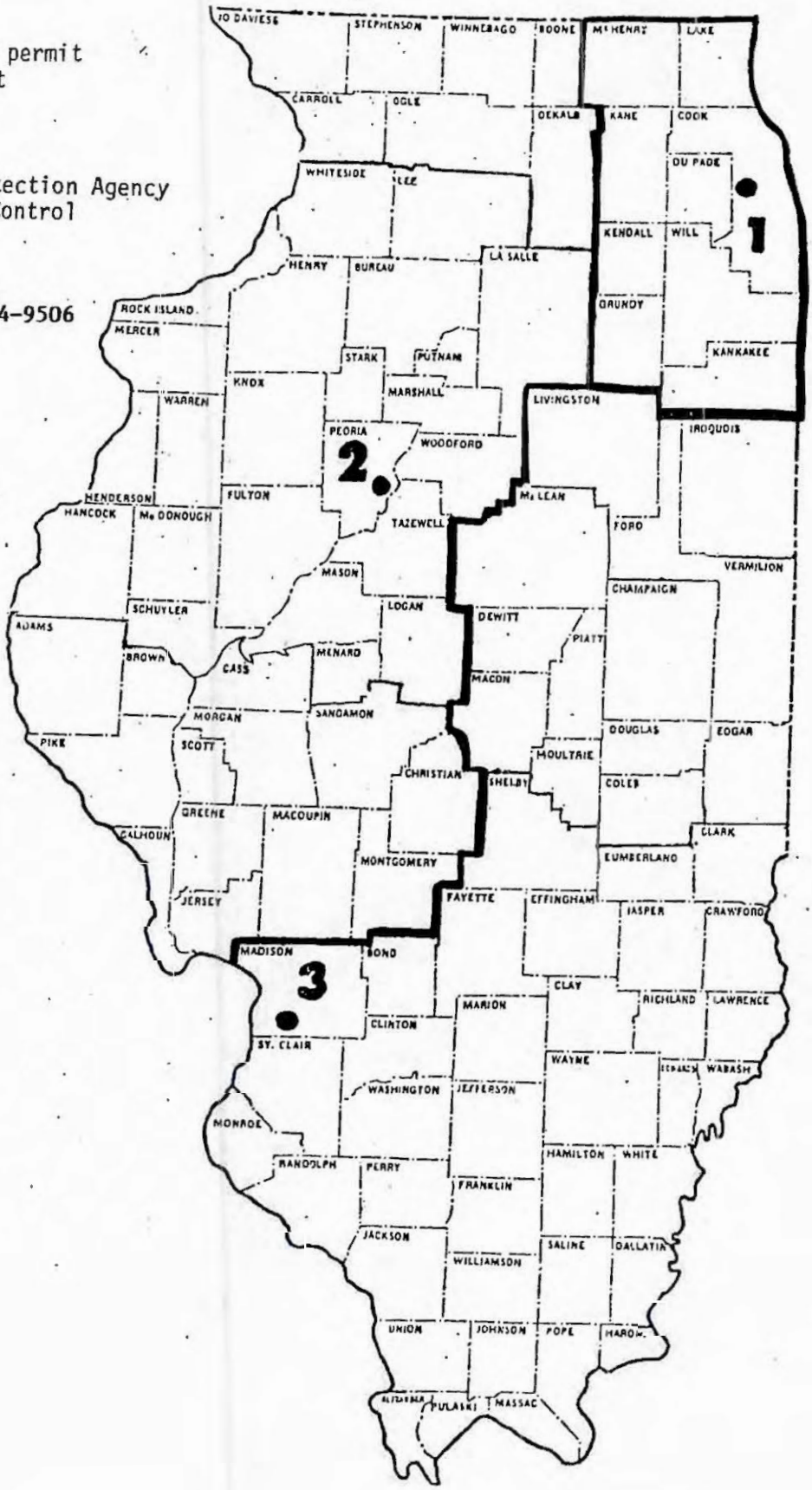


Exhibit 9

HODGE DWYER & DRIVER

MONICA T. RIOS
E-mail: mrios@hddattorneys.com

December 20, 2012

VIA ELECTRONIC MAIL

Lori Pennington
Illinois Environmental Protection Agency
Bureau of Air
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 67294-9276

Re: Transfer of Joint Construction and Operating Permit and pending permit applications from DTE Chicago Fuels Terminal, LLC to KCBX Terminals Company
10730 South Burley Avenue, Chicago, Illinois 60617
Facility I.D. 031600GSF

Dear Ms. Pennington:

Based on our telephone discussion yesterday, on behalf of KCBX Terminals Company ("KCBX"), we are submitting the enclosed Bill of Sale and Bill of Sale and Assignment and Assumption Agreement to demonstrate that the above-referenced facility was sold by DTE Chicago Fuels Terminal, LLC to KM Railways, LLC ("KMR"). As discussed, although KMR is the owner of the site, KCBX is the new operator of the site and is responsible for all permitting, coverage, and liability. Accordingly, KMR and KCBX[1] request that the Joint Construction and Operating Permit (No. 07050082, issued December 18, 2012) and pending FESOP application be transferred to KCBX. If you have any questions regarding this transfer, please do not hesitate to contact me.

Sincerely,

Monica T. Rios

Monica T. Rios

MTR:kjg
enclosure

[1] A Request for Ownership Change was submitted by KCBX (and DTE) on October 4, 2012.

EXECUTION VERSION

BILL OF SALE

THIS BILL OF SALE (this "Agreement") is entered into this 20th day of December, 2012, by and between DTE Chicago Fuels Terminal, LLC, a Michigan limited liability company ("Seller"), and KM Railways, LLC, a Delaware limited liability company ("Purchaser").

WHEREAS, Seller has agreed to sell to Purchaser the KMR Transferred Assets pursuant to that certain Asset Purchase Agreement, dated as of the date hereof, by and among Seller, Purchaser (solely for purposes of Sections 1.1, 1.5(c) and 5.8 thereof), KCBX Terminals Company, a North Dakota corporation, and DTE Coal Services, Inc. (solely for purposes of Sections 1.6(d), 1.8(b) and 4.2 thereof) (the "Purchase Agreement");

WHEREAS, the parties wish to formally document such purchase and sale.

NOW, THEREFORE, in consideration of the mutual benefits to the parties, the receipt and adequacy of which are hereby acknowledged, the parties, intending to be legally bound, agree as follows:

1. General Conveyance. Seller does hereby sell, assign, bargain, transfer, convey, grant, deliver and set over unto Purchaser, its successors, designees and assigns, all right, title and interest of Seller in and to the KMR Transferred Assets as and to the extent provided in the Purchase Agreement.

2. Defined Terms. Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Purchase Agreement.

3. Entire Agreement. This Agreement is subject to the terms and conditions of the Purchase Agreement, including without limitation the representations, warranties and covenants set forth therein and the provisions of Article 5, and to the extent this Agreement is inconsistent with any terms or conditions of the Purchase Agreement, the terms and conditions of the Purchase Agreement shall control. This Agreement shall not be deemed to limit, enlarge or extinguish any obligations of KCBX Terminals Company, DTE Coal Services, Purchaser or Seller under the Purchase Agreement, all of which obligations shall survive the delivery of this Agreement in accordance with the terms of the Purchase Agreement.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK – SIGNATURE PAGE FOLLOWS]

IN WITNESS WHEREOF, each of the parties hereto has duly executed this Agreement as of the date first written above.

SELLER:

DTE CHICAGO FUELS TERMINAL, LLC

By: _____
Name: David Rund
Title: Chief Executive Officer

REVIEWED BY: LEGAL

PURCHASER:

KM RAILWAYS, LLC

REVIEWED BY: ACCOUNTING BGS

By: _____
Name: _____
Title: _____

IN WITNESS WHEREOF, each of the parties hereto has duly executed this Agreement as of the date first written above.

SELLER:

DTE CHICAGO FUELS TERMINAL, LLC

By: _____
Name: _____
Title: _____

PURCHASER:

KM RAILWAYS, LLC

By: _____
Name: Jason W. Russell
Title: Authorized Signatory

EXECUTION VERSION

BILL OF SALE
AND
ASSIGNMENT AND ASSUMPTION AGREEMENT

THIS BILL OF SALE AND ASSIGNMENT AND ASSUMPTION AGREEMENT (this "Agreement") is entered into this 20th day of December, 2012, by and between DTE Chicago Fuels Terminal, LLC, a Michigan limited liability company ("Seller"), and KCBX Terminal Company, a North Dakota corporation ("Purchaser").

WHEREAS, Seller has agreed to sell to Purchaser the Purchaser Transferred Assets (including the Assigned Contracts to which Seller is a party) pursuant to that certain Asset Purchase Agreement, dated as of the date hereof, by and among Seller, Purchaser, KM Railways, LLC, a Delaware limited liability company (solely for purposes of Sections 1.1, 1.5(c) and 5.8 thereof), and DTE Coal Services, Inc. (solely for purposes of Sections 1.6(d), 1.8(b) and 4.2 thereof) (the "Purchase Agreement");

WHEREAS, pursuant to the Purchase Agreement, Purchaser has agreed to assume certain obligations of Seller; and

WHEREAS, the parties wish to formally document such assignment and assumption.

NOW, THEREFORE, in consideration of the mutual benefits to the parties, the receipt and adequacy of which are hereby acknowledged, the parties, intending to be legally bound, agree as follows:

1. General Conveyance. Seller does hereby sell, assign, bargain, transfer, convey, grant, deliver and set over unto Purchaser, its successors, designees and assigns, all right, title and interest of Seller in and to the Purchaser Transferred Assets as and to the extent provided in the Purchase Agreement.

2. Assignment of Contracts. Without limiting the effect of Section 1 hereof, Seller does hereby sell, assign, bargain, transfer, convey, grant, deliver and set over unto Purchaser, its successors, designees and assigns, all right, title and interest of Seller in and to the Assigned Contracts set forth on Exhibit A attached hereto as and to the extent provided in the Purchase Agreement.

3. Assumption of Assumed Liabilities. Purchaser hereby assumes only the following Liabilities of Seller, in each case, as and to the extent provided in the Purchase Agreement:

    a. all obligations of Seller under the Assigned Contracts listed on Exhibit A attached hereto that are required to be performed after the Closing; and

    b. those Liabilities specifically identified on Exhibit B attached hereto.

Nothing herein shall be construed as an assumption by Purchaser of any Retained Liabilities.

4. Defined Terms. Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Purchase Agreement.

5. Entire Agreement. This Agreement is subject to the terms and conditions of the Purchase Agreement, including without limitation the representations, warranties and covenants set forth therein and the provisions of Article 5, and to the extent this Agreement is inconsistent with any terms or conditions of the Purchase Agreement, the terms and conditions of the Purchase Agreement shall control. This Agreement shall not be deemed to limit, enlarge or extinguish any obligations of KMR, DTE Coal Services, Purchaser or Seller under the Purchase Agreement, all of which obligations shall survive the delivery of this Agreement in accordance with the terms of the Purchase Agreement.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK – SIGNATURE PAGE FOLLOWS]

IN WITNESS WHEREOF, each of the parties hereto has duly executed this Agreement as of the date first written above.

SELLER:

DTE CHICAGO FUELS TERMINAL, LLC

By: _____
Name: David Rund
Title: Chief Executive Officer

REVIEWED BY: _____ LEGAL

PURCHASER:

KCBX TERMINALS COMPANY

By: _____
Name: _____
Title: _____

REVIEWED BY: ACCOUNTING BGS

IN WITNESS WHEREOF, each of the parties hereto has duly executed this Agreement as of the date first written above.

SELLER:

DTE CHICAGO FUELS TERMINAL, LLC

By: _____
Name: _____
Title: _____

PURCHASER:

KCBX TERMINALS COMPANY

By: _____
Name: David H. Severson
Title: President

MX

Exhibit 10

HODGE DWYER & DRIVER

KATHERINE D. HODGE
E-mail: khodge@hddattorneys.com

December 20, 2012

VIA HAND DELIVERY

Edwin C. Bakowski, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control – MC #11
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 67294-9276

Re: Supplement to Pending FESOP Application
KCBX Terminals Company
10730 South Burley Avenue, Chicago, Illinois 60617
Facility I.D. 031600GSF

Dear Mr. Bakowski:

Please find enclosed a copy of the September 20, 2012 application to revise the Joint Construction and Operating Permit (No. 07050082) to construct additional equipment at the above-referenced site, which was formerly owned and operated by DTE Chicago Fuels Terminal, LLC.[1] KCBX Terminals Company requests that the enclosed application be considered a supplement to the pending FESOP application for this site. If you have any questions regarding this supplement, please do not hesitate to contact me.

Sincerely,

Katherine D. Hodge

KDH:MTR:kjg
enclosures

[1] On December 20, 2012, KM Railways, LLC and KCBX Terminals Company became the owner and operator, respectively, of the site.

September 17, 2012

Reference No. 052450

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: Construction Permit Application
Portable Conveyors and Diesel Generators
Chicago Fuels Terminal, LLC
ID# 031600GSF

Enclosed please find three copies of an Air Pollution Control Permit application to construct additional portable conveyors, stackers, and storage piles diesel generators for the Chicago Fuels Terminal ID# 031600GSF. DTE requests that the emission units included in this application be incorporated into the FESOP application currently under review.

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

We have enclosed the revised Fee Determination for Construction Permit Application (197-FEE) form and a check for $7,000.

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

Yours truly,

Donald Januszek
Environmental Affairs
DTE Chicago Fuels Terminal

DJ/DS/sm/07
Encl.

CONSTRUCTION PERMIT APPLICATION FOR A FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) SOURCE

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

SEPTEMBER 2012
REF. NO. 052450 (2)

Prepared by:
Conestoga-Rovers & Associates

1234 Centre West Drive
Springfield, Illinois 62704

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

web: http:\\www.CRAworld.com

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

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, for its facility located at 10730 South Burley Avenue in Chicago, Illinois (Facility). In this permit, the Agency determined that this Facility has potential to emit (PTE) more than 100 tons per year (ton/yr) of particulate matter of less than ten microns (PM_{10}).

DTE filed a Federally Enforceable State Operating Permit (FESOP) application on February 2, 2009 and this application is still under review by the Agency. The FESOP application was deemed complete by the IEPA per the May 12, 2009 CAAPP Application Completeness Determination Letter. The purpose of this application is to request a modification to Construction Permit #07050082 issued on May 21, 2009 to allow the installation of additional equipment. DTE also requests that the FESOP application be updated to include the limitations contained in this application.

DTE proposes to construct four portable conveyors, fourteen storage piles, one 100-Horsepower (HP) air compressor, and five 15-HP light standards. Emissions from the 14 storage piles are fugitive and are not included in the 197-FEE form. The air compressor and five light standards are exempt from permitting under 35 IAC 201.146(i) are not included in the 197-FEE form.

Emissions from the proposed emission units including existing emission units are contained in Tables 1-12. Table 13 provides a listing of all emission units at the Facility.

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 sources 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 PTE does not include fugitive emissions.

DTE requests a control efficiency of 50% for the control of particulate matter using a water suppression system.

A list of State Rules and an applicability determination for each Rule are as follows:

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 in the 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.

35 IAC Section 212.305 - Conveyor Loading Operations
The inherent moisture content of the coal/pet coke, telescoping chutes, and water suppression 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/pet coke 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/pet coke and water suppression will provide adequate control for particulate matter emissions for all of the emission points at the facility except for the pet coke rail unloading operations which will employ choke loading to reduce particulate matter emissions.

35 IAC Section 212.309 - Operating Program
A Fugitive Dust Plan has been created/updated.

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
A Fugitive Dust Plan has been created/updated to include the operating scenario at the Facility. If the Facility 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

$E = 2.54(2500)^{0.534}$

E = 165.70 pounds per hour

The actual emissions from this transfer point are 0.79 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.

The diesel fuel-fired engines are subject to 40 Code of Federal Regulations (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 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.

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

Transfer and Conveying, and Loadout – Requested Permit Limitations

Material Handled	*Throughput*		*Emission Factor (lb/ton)*		*Number of Transfer Points*	*PM Emissions*		*PM10 Emissions*	
	ton/ month	*ton/yr*	*PM*	*PM_{10}*		*ton/ month*	*ton/yr*	*ton/ month*	*ton/yr*
Coal & Pet Coke	1,100,000	11,000,000	0.00064	0.0003	58	10.3	102.5	4.9	48.5
Salt	25,000	250,000	0.00064	0.0003	34	0.14	1.4	0.06	0.6
Incidental Soil Crushing	29,400	294,000	0.0033	0.00101	N/A	0.03	0.25	0.01	0.08
Incidental Soil Screening	29,400	294,000	0.00067	0.00034	N/A	0.01	0.05	0.01	0.03

The emission factors are based on material unloading, all possible transfer points located at the facility, and loadout. The emission factors are derived from AP-42 Section 13.2.4.3. There is also a 50% control efficiency taken into account in the emission calculations based on the use of water suppression.

The equation is a follows:

$E = k(0.0032) \times ((U/5)^{1.3}) / ((M/2)^{1.4})$
Coal and Coke Handling PM Emission Factor - $0.74(0.0032) \times ((10.3/5)^{1.3}) / (10\%/2)^{1.4}) = 0.00064$
Coal and Coke Handling PM_{10} Emission Factor - $0.35(0.0032) \times ((10.3/5)^{1.3}) / (10\%/2)^{1.4}) = 0.0003$

Coal and Coke Handling PM Emissions were calculated via the following formula:

11,000,000 ton/yr x 0.00064 lb/ton x 50% control efficiency x 58 transfers / 2,000 lb/ton = 102.5 ton/yr
102.5 ton/yr / 10 months = 10.3 ton/month

118 HP Diesel Engine Emissions (Diesel Generators 1-3) - Requested Permit Limitations

	Emission Factor	*Emissions*		
Pollutant	*lb/bhp-hr*	*lb/hr*	*ton/month*	*ton/yr*
NO_X	0.015	1.77	1.12	11.15
CO	0.00815	0.96	0.61	6.06
SO_2	**	0.021	0.013	0.13
PM	0.0005	0.06	0.04	0.37
PM_{10}	0.0005	0.06	0.04	0.37
VOM	0.00033	0.04	0.03	0.25

This Table provides the emissions for DG-(1-3).
Emissions are based on 4,200 hours of operation per year for each unit, or 12,600 hr/yr total (three units). (118 HP x 0.015 lb/bhp-hr x 4,200 hr/yr / 2,000 lb/ton x 3 units = 11.15 ton/yr)
Emission factors are from 40 CFR 89.112 Table 1.
** SO_2 emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.
12,600 hr/yr x 10 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO_2/32 MW of S= 0.13 ton/yr

500 HP Diesel Engine Emissions (Diesel Generators 4-7) - Requested Permit Limitations

	Emission Factor	*Emissions*		
Pollutant	*lb/bhp-hr*	*lb/hr*	*ton/month*	*ton/yr*
NO_X	0.015	7.5	6.30	63.00
CO	0.00573	2.86	2.41	24.05
SO_2	**	0.043	0.036	0.36
PM	0.0003	0.15	0.13	1.26
PM_{10}	0.0003	0.15	0.16	1.26
VOM	0.00033	0.17	0.14	1.39

This Table provides the emissions for DG-(4-7).
Emissions are based on 4,200 hours of operation per year for each unit, or 16,800 hr/yr total
(500 HP x 0.015 lb/bhp-hr x 4,200 hr/yr / 2,000 lb/ton x 4 units = 63.00 ton/yr)
Emission factors are from 40 CFR 89.112 Table 1.
** SO_2 emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 20 gallons of diesel fuel per hour per engine.
16,800 hr/yr x 20 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO_2/32 MW of S = 0.36 ton/yr

100 HP Diesel Engine Emissions (Air Compressor) – Requested Permit Limitations

	Emission Factor	*Emissions*		
Pollutant	*lb/bhp-hr*	*lb/hr*	*ton/month*	*ton/yr*
NO_X	0.015	1.50	0.99	3.15
CO	0.00815	0.82	0.38	1.71
SO_2	**	0.02	0.004	0.04
PM	0.0005	0.05	0.02	0.11
PM_{10}	0.0005	0.05	0.02	0.11
VOM	0.00033	0.03	0.16	0.07

This Table provides the emissions for AC-1.

Emissions are based on 4,200 hours of operation per year.

(100 HP x 0.015 lb/bhp-hr x 4,200 hr/yr / 2,000 lb/ton = 3.15 tons/yr)

Emission factors are from 40 CFR 89.112 Table 1.

** SO_2 emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.15% per gallon of fuel and a fuel consumption rate of 10 gallons of diesel fuel per hour per engine.

4,200 hr/yr x 10 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO_2/32 MW of S = 0.04 ton/yr

15 HP Diesel Engine Emissions (Light Standards 1-5) – Requested Permit Limitations

	Emission Factor	*Emissions*		
Pollutant	*lb/bhp-hr*	*lb/hr*	*ton/month*	*ton/yr*
NO_X	0.015	0.23	0.11	2.36
CO	0.00903	0.12	0.06	1.28
SO_2	**	0.01	0.011	0.11
PM	0.001	0.01	0.007	0.08
PM_{10}	0.001	0.01	0.007	0.08
VOM	0.00033	0.005	0.02	0.05

This Table provides the emissions for LS-1(-5).

Emissions are based on 4,200 hours of operation per year for each unit, or 21,000 hr/yr total

(15 HP x 0.015 lb/bhp-hr x 3,500 hr/yr / 2,000 lb/ton x 5 units = 2.36 tons/yr)

Emission factors are from 40 CFR 89.112 Table 1.

** SO_2 emissions calculated using 40 CFR 60.4207 maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 5 gallons of diesel fuel per hour per engine.

21,000 hr/yr x 5 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO_2/32 MW of S = 0.11 ton/yr

20 HP Diesel Engine Emissions (Emergency Water Pump) – Requested Permit Limitations

	Emission Factor	*Emissions*		
Pollutant	*lb/bhp-hr*	*lb/hr*	*ton/month*	*ton/yr*
NO_X	0.015	0.3	0.01	0.08
CO	0.01079	0.22	0.005	0.05
SO_2	**	0.01	0.0003	0.003
PM	0.0013	0.03	0.0007	0.01
PM_{10}	0.0013	0.03	0.0007	0.01
VOM	0.00033	0.01	0.001	0.01

This Table provides the emissions for DWP-1.
Emissions are based on 500 hours of operation per year.
(20 HP x 0.015 lb/bhp-hr x 500 hr/yr / 2,000 lb/ton = 0.08 ton/yr)
Emission factors are from 40 CFR 89.112 Table 1.
** SO_2 emissions calculated using 40 CFR 60.4207maximum sulfur content of 0.015% per gallon of fuel and a fuel consumption rate of 5 gallons of diesel fuel per hour per engine.
500 hr/yr x 5 gal/hr x 7.1 lb/gal x 0.015% S / 2,000 lb/gal x 64 MW of SO_2/32
MW of S = 0.003 ton/yr

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

Construction Permit Application For a FESOP Source (FORM APC628)

For Illinois EPA use only
BOA ID No.:
Application No.:
Date Received:

This form is to be used to supply information to obtain a construction permit for a proposed project involving a Federally Enforceable State Operating Permit (FESOP) or Synthetic Minor source, including construction of a new FESOP source. Other necessary information must accompany this form as discussed in the "General Instructions For Permit Applications," Form APC-201.

Proposed Project

1. Working Name of Proposed Project:
   Conveyor Addition
2. Is the project occurring at a source that already has a permit from the Bureau of Air (BOA)?
   ☐ No ☒ Yes If Yes, provide BOA ID Number: 0 3 1 6 0 0 G S F
3. Does this application request a revision to an existing construction permit issued by the BOA?
   ☐ No ☒ Yes If Yes, provide Permit Number: 0 7 0 5 0 0 8 2
4. Does this application request that the new/modified emission units be incorporated into an existing FESOP issued by the BOA? **
   ☐ No ☐ Yes If Yes, provide Permit Number: _ _ _ _ _ _ _ _ _ _

Source Information

5. Source name:*
   DTE Chicago Fuels Terminal, LLC
6. Source street address:*
   10730 South Burley Avenue

7. City:	8. County:	9. Zip code:
Chicago	Cook	60617

ONLY COMPLETE THE FOLLOWING FOR A SOURCE WITHOUT AN ID NUMBER.

10. Is the source located within city limits? ☐ Yes ☐ No
    If no, provide Township Name:

11. Description of source and product(s) produced:	12. Primary Classification Code of source: SIC: _ _ _ _ or NAICS: _ _ _ _ _ _
13. Latitude (DD:MM:SS.SSSS):	14. Longitude (DD:MM:SS.SSSS):

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Applicant Information

15. Who is the applicant?	16. All correspondence to: (check one)
☒ Owner ☐ Operator	☒ Owner ☐ Operator ☐ Source
17. Applicant's FEIN: 204570538	18. Attention name and/or title for written correspondence: Donald Januszek

***The FESOP has not been issued yet.*

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*		
19. Name: DTE Chicago Fuels Terminal, LLC		
20. Address: 414 South Main Street		
21. City: Ann Arbor	22. State: Michigan	23. Zip code: 48104

* If this information different than previous information, then complete Form 272-CAAPP for a Request for Ownership Change for CAAPP Permit for an initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Operator Information (If Different from Owner)*		
24. Name DTE Chicago Fuels Terminal, LLC		
25. Address: 10730 South Burley Avenue		
26. City: Chicago	27. State: Illinois	28. Zip code: 60617

* If this information different than previous information, then complete a new Form 200-CAAPP to change the source name in initial FESOP application for the source or Form APC-620 for Air Permit Name and/or Ownership Change if the FESOP has been previously issued.

Technical Contacts for Application	
29. Preferred technical contact: (check one) ☒ Applicant's contact ☐ Consultant	
30. Applicant's technical contact person for application: Donald Januszek	
31. Contact person's telephone number 734-302-5344	32. Contact person's email address: januszekd@dteenergy.com
33. Applicant's consultant for application: Conestoga-Rovers & Associates (Don Sutton)	
34. Consultant's telephone number: 217-717-9009	35. Consultant's email address: dsutton@craworld.com

Review Of Contents of the Application	
36. Is the emission unit covered by this application already constructed? If "yes", provide the date construction was completed: Note: The Illinois EPA is unable to issue a construction permit for a emission unit that has already been constructed.	☐ Yes ☒ No
37. Does the application include a narrative description of the proposed project?	☒ Yes ☐ No
38. Does the application contain a list or summary that clearly identifies the emission units and air pollution control equipment that are part of the project?	☒ Yes ☐ No
39. Does the application include process flow diagram(s) for the project showing new and modified emission units and control equipment and related existing equipment and their relationships?	☒ Yes ☐ No
40. If the project is at a source that has not previously received a permit from the BOA, does the application include a source description, plot plan and site map?	☐ Yes ☐ No ☒ N/A* *Information previously submitted.

Review Of Contents of the Application (continued)	
41. Does the application include relevant information for the proposed project as requested on Illinois EPA, BOA application forms (or otherwise contain all the relevant information)?	☒ Yes ☐ No
42. Does the application identify and address all applicable or potentially applicable emissions standards, including: a. State emission standards (35 IAC Chapter I, Subtitle B); b. Federal New Source Performance Standards (40 CFR Part 60); c. Federal standards for HAPs (40 CFR Parts 61 and 63)?	☒ Yes ☐ No
43. Does the application address whether the proposed project or the source could be a major project for Prevention of Significant Deterioration (PSD), 40 CFR 52.21?	☐ Yes ☐ No ☒ N/A
44. Does the application address for which pollutant(s) the proposed project or the source could be a major project for PSD, 40 CFR 52.21?	☐ Yes ☐ No ☒ N/A
45. Does the application address whether the proposed project or the source could be a major project for "Nonattainment New Source Review," (NA NSR), 35 IAC Part 203?	☐ Yes ☐ No ☒ N/A
46. Does the application address for which pollutant(s) the proposed project or the source could be a major project for NA NSR, 35 IAC Part 203?	☐ Yes ☐ No ☒ N/A
47. Does the application address whether the proposed project or the source could potentially be subject to federal Maximum Achievable Control Technology (MACT) standard under 40 CFR Part 63 for Hazardous Air Pollutants (HAP) and identify the standard that could be applicable?	☐ Yes ☐ No ☒ N/A* * Source not major ☒ Project not major ☒
48. Does the application identify the HAP(s) from the proposed project or the source that would trigger the applicability of a MACT standard under 40 CFR Part 63?	☐ Yes ☐ No ☒ N/A
49. Does the application include a summary of the current and the future potential emissions of the source after the proposed project has been completed for each criteria air pollutant and/or HAP (tons/year)?	☒ Yes ☐ No ☐ N/A* * Applicability of PSD, NA NSR or 40 CFR 63 not applicable to the source's emissions.
50. Does the application include a summary of the requested permitted annual emissions of the proposed project for the new and modified emission units (tons/year)?	☒ Yes ☐ No ☐ N/A* * Project does not involve an increase in emissions from new or modified emission units.
51. Does the application include a summary of the requested permitted production, throughput, fuel, or raw material usage limits that correspond to the annual emissions limits of the proposed project for the new and modified emission units?	☒ Yes ☐ No ☐ N/A* * Project does not involve an increase in emissions from new or modified emission units.
52. Does the application include sample calculations or methodology for the emission estimations and the requested emission limits?	☒ Yes ☐ No
53. Does the application address the relationships with and implications of the proposed project for the source's FESOP?	☐ Yes ☐ No ☒ N/A* *FESOP not yet issued.
54. If the application contains information that is considered a TRADE SECRET, has such information been properly marked and claimed and other requirements to perfect such a claim been satisfied in accordance with 35 IAC Part 130? 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.	☐ Yes ☐ No ☒ N/A* * No information in the application is claimed to be a TRADE SECRET

Review Of Contents of the Application (continued)		
55. If the source is located in a county other than Cook County, are two separate copies of this application being submitted?	☐ Yes	☒ No
56. If the source is located in Cook County, are three separate copies of this application being submitted?	☒ Yes	☐ No
57. Does the application include a completed "FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION," Form 197-FEE, for the emission units and control equipment for which a permit for construction or modification is being sought?	☒ Yes	☐ No
58. Does the application include a check in the proper amount for payment of the Construction permit fee?	☒ Yes	☐ No

Note: Answering "No" to Items 36 through 58 may result in the application being deemed incomplete.

Signature Block

Pursuant to 35 IAC 201.159, all applications and supplements thereto shall be signed by the owner and operator of the source, or their authorized agent, and shall be accompanied by evidence of authority to sign the application. Applications without a signed certification will be deemed incomplete.

59. 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. In addition, the technical contact person identified above is authorized to submit (by hard copy and/or by electronic copy) any supplemental information related to this application that may be requested by the Illinois EPA.

BY: _____ Vice President

AUTHORIZED SIGNATURE — TITLE OF SIGNATORY

Stephen C. Braverman — 9 / 17 / 2012

TYPED OR PRINTED NAME OF SIGNATORY — DATE

Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY

ID Number: _____ Permit #: _____

☐ Complete ☐ Incomplete Date Complete: _____

Check Number: _____ Account Name: _____

This form is to be used 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, Division of Air Pollution Control - Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

Source Information

1. Source Name: DTE Chicago Fuels Terminal, LLC
2. Project Name: Conveyor Addition
3. Source ID #: (if applicable) 031600GF
4. Contact Name: Donald Januszek
5. Contact Phone #: 734-302-5344

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal $0 + Section 2, 3 or 4 Subtotal $7,000 = $7,000 Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- **Major Source** is a source that is required to obtain a CAAPP permit.
- **Synthetic Minor Source** is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g.,FESOP).
- **Non-Major Source** is a source that is not a major or synthetic minor source.

☑ Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.

☐ Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.

☐ New major or synthetic minor source. Proceed to Section 4.

☐ New non-major source. Proceed to Section 3.

☐ AGENCY ERROR. 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. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

$0
Section 1 Subtotal

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.

Section 2: Special Case Filing Fee

8. **Filing Fee.** If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

☐ Addition or replacement of control devices on permitted units.
☐ Pilot projects/trial burns by a permitted unit
☐ Land remediation projects
☐ Revisions related to methodology or timing for emission testing
☐ Minor administrative-type change to a permit

Section 3: Fees for Current or Projected Non-Major Sources

9.	☐	This application consists of a single new emission unit or no more than two modified emission units. ($500 fee)	9. _____
10.	☐	This application consists of more than one new emission unit or more than two modified units. ($1,000 fee)	10. _____
11.	☐	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. ($15,000 fee)	11. _____
12.	☐	A public hearing is held (see instructions). ($10,000 fee)	12. _____
13.		Section 3 subtotal. (lines 9 through 12 - 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 = 3 x $1,000.	18.	$3,000
	19. Line 17 plus line 18, or $10,000, whichever is less.	19.	$7,000
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 area 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 area (NAA) NSR, enter $20,000.	24.	
	25. If this is a major modification subject to NAA NSR, enter $25,000.	25.	
	26. If the 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.	26.	
	27. If a public hearing is held (see instructions), enter $10,000.	27.	
28. Section 4 subtotal (line 16 and lines 19 through 28) to be entered on page1		28.	$7,000

Section 5: Certification

NOTE: Applications without a signed certification will be deemed incomplete.

29. 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: _____ Vice President
Signature — Title of Signatory

Stephen C. Braverman — 9-17-2012
Typed or Printed Name of Signatory — Date

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:

PROCESS EMISSION UNIT DATA AND INFORMATION	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):
March 12, 2012	031600GSF

GENERAL INFORMATION

4) NAME OF EMISSION UNIT:
Four additional portable conveyors

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 figure 1.

9) MANUFACTURER OF EMISSION UNIT (IF KNOWN):
To Be Determined

10) MODEL NUMBER (IF KNOWN):	11) SERIAL NUMBER (IF KNOWN):
To Be Determined	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
052450-02-220-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, athough water suppression is used to control particulate emissions.

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: 12	DAYS/WEEK: 7	WEEKS/YEAR: 50	
b) TYPICAL OPERATING HOURS	HOURS/DAY: 12	DAYS/WEEK: 5.2	WEEKS/YEAR: 50	
20) ANNUAL THROUGHPUT	DEC-FEB(%): 25	MAR-MAY(%): 25	JUN-AUG(%): 25	SEP-NOV(%): 25

MATERIAL USAGE INFORMATION

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

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

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

☐ NATURAL GAS ☐ FUEL OIL: GRADE NUMBER _____ ☐ COAL ☐ 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? ☐ YES ☐ NO

IF NO, IDENTIFY THE EXHAUST POINT FOR COMBUSTION EMISSIONS:

See Narrative, Section 1.0.

APPLICABLE RULES

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):

REGULATED AIR POLLUTANT(S)	EMISSION STANDARD(S)	REQUIREMENT(S)

25) PROVIDE ANY SPECIFIC RECORDKEEPING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	RECORDKEEPING RULE(S)	REQUIREMENT(S)

26) PROVIDE ANY SPECIFIC REPORTING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	REPORTING RULE(S)	REQUIREMENT(S)

27) PROVIDE ANY SPECIFIC MONITORING RULE(S) WHICH ARE APPLICABLE TO THIS EMISSION UNIT:

REGULATED AIR POLLUTANT(S)	MONITORING RULE(S)	REQUIREMENT(S)

28) PROVIDE ANY SPECIFIC TESTING RULES AND/OR PROCEDURES WHICH ARE APPLICABLE TO THIS EMISSION UNIT :

REGULATED AIR POLLUTANT(S)	TESTING RULE(S)	REQUIREMENT(S)

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	Upon request by the Agency

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	Operations Manager	Operations Manager

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
[illegible]	A[illegible]	A[illegible]

See Tables 1-12.

(37)EMISSION INFORMATION

REGULATED AIR POLLUTANT		☐ [1]ACTUAL EMISSION RATE ☐ [1]UNCONTROLLED EMISSION RATE					ALLOWABLE BY RULE EMISSION RATE			[2]PERMITTED EMISSION RATE	
		LBS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[3]OTHER TERMS	[4]DM	[5]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.

[1]CHECK UNCONTROLLED EMISSION RATE BOX IF CONTROL EQUIPMENT IS USED, OTHERWISE CHECK AND PROVIDE THE ACTUAL EMISSION RATE TO ATMOSPHERE, INCLUDING INDOORS. SEE INSTRUCTIONS.
[2]PROVIDE THE EMISSION RATE THAT WILL BE USED AS A PERMIT SPECIAL CONDITION. THIS LIMIT WILL BE USED TO DETERMINE THE PERMIT FEE.
[3]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.)
[4]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)
[5]RATE - ALLOWABLE EMISSION RATE SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

N/A

(38) HAZARDOUS AIR POLLUTANT EMISSION INFORMATION

☐ [1]ACTUAL EMISSION RATE
☐ [1]UNCONTROLLED EMISSION RATE

NAME OF HAP EMITTED	[2]CAS NUMBER		POUNDS PER HOUR (LBS/HR)	TONS PER YEAR (TONS/YR)	[3]OTHER TERMS	[4]DM	ALLOWABLE BY RULE: [5]RATE OR STANDARD	ALLOWABLE BY RULE: APPLICABLE RULE
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
		MAXIMUM:						
		TYPICAL:						
EXAMPLE:		MAXIMUM:	*10.0*	*1.2*		*2*	*98% by wt control device*	*CFR 61*
Benzene	*71432*	TYPICAL:	*8.0*	*0.8*		*2*	*leak-tight trucks*	*61.302(b),(d)*

IMPORTANT: ATTACH CALCULATIONS, TO THE EXTENT THEY ARE AIR EMISSIONS RELATED, ON WHICH EMISSIONS WERE DETERMINED AND LABEL AS EXHIBIT 220-6.

[1]PROVIDE UNCONTROLLED EMISSIONS IF CONTROL EQUIPMENT IS USED. OTHERWISE, PROVIDE ACTUAL EMISSIONS TO THE ATMOSPHERE, INCLUDING INDOORS. CHECK BOX TO SPECIFY.
[2]CAS - CHEMICAL ABSTRACT SERVICE NUMBER.
[3]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.).
[4]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).
[5]RATE - ALLOWABLE EMISSION RATE OR STANDARD SPECIFIED BY MOST STRINGENT APPLICABLE RULE.

EXHAUST POINT INFORMATION

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

39) FLOW DIAGRAM DESIGNATION OF EXHAUST POINT:
See figure 1.

40) DESCRIPTION OF EXHAUST POINT (STACK, VENT, ROOF MONITOR, INDOORS, ETC.). IF THE EXHAUST POINT DISCHARGES INDOORS, DO NOT COMPLETE THE REMAINING ITEMS.
Varies

41) DISTANCE TO NEAREST PLANT BOUNDARY FROM EXHAUST POINT DISCHARGE (FT):
Varies

42) DISCHARGE HEIGHT ABOVE GRADE (FT):
Varies

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. N/A

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

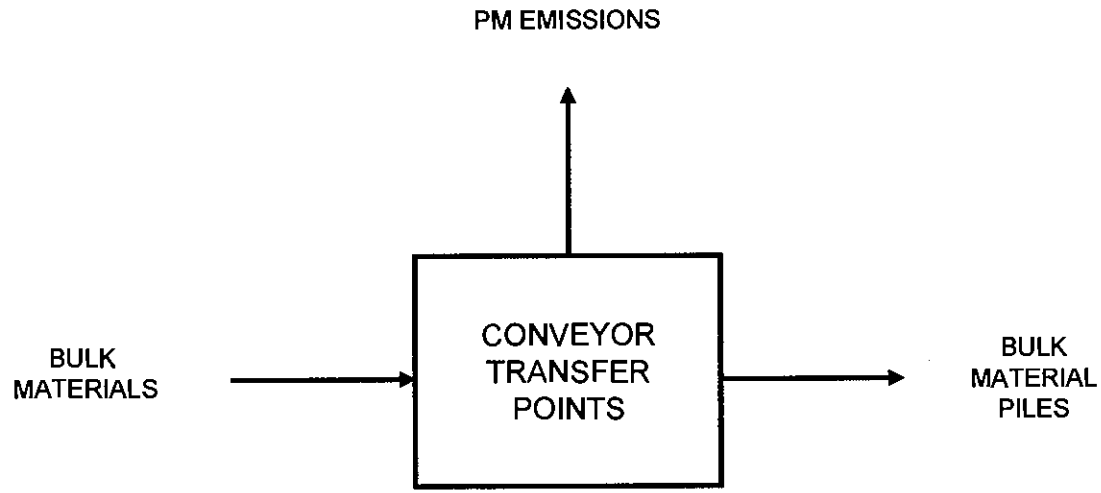
47) DIRECTION OF EXHAUST (VERTICAL, LATERAL, DOWNWARD):
N/A

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):



Note: End loaders transfer stored materials to transport vehicle.

figure 1

CONVEYOR TRANSFER POINTS PROCESS FLOW DIAGRAM
CONSTRUCTION PERMIT APPLICATION
DTE Chicago Fuels Terminal, LLC
Chicago, Illinois

CRA 052450 (02), MAR 03/2012, SPRINGFIELD, Figure 1

TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Unloading Emissions													
BU-1 to C-(1-6) (Coal/Petcoke)	266	2,330,160	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	2.03	0.37	0.96	0.18
RU/TU-1 to C-(1-6) (Coal/Petcoke)	266	2,330,160	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	2.03	0.37	0.96	0.18
RU/TU-1 to C-(1 -6) (Coal/Petcoke)	266	2,330,160	0.740	0.350	0.00064	0.00030	lb/ton	Baghouse	90.0%	0.41	0.07	0.19	0.04
RU-2 to C-7 (Coal/Petcoke)	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
RU-3 to C-8 (Coal/Petcoke)	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
								Emissions From Coal/Petcoke Unloading : Total>>		*35.0*	*6.4*	*16.6*	*3.0*
Coal/Petcoke Conveyor Transfer Point Emissions													
C-1 to C-2	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
C-2 to S-1	4,000	35,040,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	14.45	2.64
C-3 to C-2	4,000	35,040,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	14.45	2.64
C-6 to S-3	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
C-1 to C-4	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
C-4 to C-5	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
C-5 to S-2	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
RC-1 to C-3	3,000	26,280,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	4.18	10.84	1.98
RC-2 to C-3	3,000	26,280,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	4.18	10.84	1.98
RC-3 to C-3	3,000	26,280,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	4.18	10.84	1.98
RC-4 to C-3	3,000	26,280,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	4.18	10.84	1.98
C-7 to C-9	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
C-8 to C-10	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
C-9 to C-11	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
C-10 to C-11	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
C-11 to TP-1	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
TP-1 to C-12	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
C-12 to SFTP-1	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32

TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
SFTP-1 to S-4	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
DSH-1 to C-3	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
RC-5 to C-3	1,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	7.64	1.39	3.61	0.66
RC-6 to C-3	1,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	7.64	1.39	3.61	0.66
RC-7 to C-3	1,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	7.64	1.39	3.61	0.66
									Emissions From Coal/Petcoke Transfer Points: Total>>	*408.7*	*74.6*	*193.3*	*35.3*
Coal/Petcoke Portable Conveyor Emissions													
PC-1 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-2 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-3 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-4 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-5 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-6 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-7 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-8 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-9 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-10 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-11 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PC-12 Drop Point	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PFH-1 to PC-(1-12)	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
PF-1 to PC-(1-12)	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
RPCS-1 to PC-(1-12)	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
									Emissions From Coal/Petcoke Portable Conveyor Transfer Points: Total>>	*286.5*	*52.3*	*135.5*	*24.7*

TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Stacker Emissions													
S-1 to CLP-5	4,000	35,040,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	14.45	2.64
S-1 CLP-4	4,000	35,040,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	14.45	2.64
S-2 to CLP-2	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-2 CLP-3	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-3 to CLP-1	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-3 to CLP-4	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-6	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-7	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-8	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-9	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-10	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-11	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-12	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-13	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-14	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-1 to CLP-15	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	19.10	3.49	9.03	1.65
S-4 to CEP-1	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
S-4 to CEP-2	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
S-4 to CEP-3	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
S-4 to CEP-4	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
S-4 to CEP-5	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
S-4 to CEP-6	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
S-4 to CEP-7	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
S-4 to DSH-1	2,000	17,520,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	2.79	7.23	1.32
									Emissions From Coal/Petcoke Stacker: Total>>	*450.7*	*82.3*	*213.2*	*38.9*
Coal/Petcoke Loadout Emissions Emissions													
Coal Loadout to S-1	4,000	35,040,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	14.45	2.64
Coal/Pet Coke Loadout to TL-2	550	4,818,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	4.20	0.77	1.99	0.36
Petcoke Loadout to S-1	4,000	35,040,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	30.56	5.58	14.45	2.64
									Emissions From Coal/Petcoke Loadout: Total>>	*65.3*	*11.9*	*30.9*	*5.6*
									Coal/Petcoke Emissions: Total>>	*1246.2*	*227.4*	*589.4*	*107.6*
Salt Handling Emissions													
BU-1 to SP-1 (Salt)	3,500	30,660,000	0.740	0.350	0.00064	0.00030	lb/ton	None	0.0%	53.47	9.76	25.29	4.62

TABLE 1

PROCESS UNITS POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
16 Various Transfer Points	2,500	21,900,000	0.740	0.350	0.00064	0.00030	lb/ton	None	0.0%	611.11	111.53	289.04	52.75
									Emissions From Salt Handling: Total>>	*664.6*	*121.3*	*314.3*	*57.4*
Soil Crushing/Screening Emissions													
RPCS-1 (Crushing)	140	1,226,400			0.0033	0.00101	lb/ton	Water Suppression	50.0%	5.54	1.01	1.70	0.31
RPCS-1 (Screening)	140	1,226,400			0.00067	0.00034	lb/ton	Water Suppression	50.0%	1.13	0.21	0.57	0.10
									Emissions From Soil Crushing/Screening: Total>>	*6.7*	*1.2*	*2.3*	*0.4*
									Facility Total>>	**1917.4**	**349.9**	**906.0**	**165.3**

1. The hourly rate is based on 8,760 hours/year of operation.
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.
4. http://www.ncdc.noaa.gov/oa/climate/online/ccd/avgwind.html

Assumptions:

BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) : 10.0%
Operating Schedule = 24 hours/day
Operating Schedule = 365 days/year
Operating Schedule = 8,760 hours/year
Mean wind speed[4] = 10.3 mph

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.

Facility has a water suppression system to control particulate matter emissions.

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

TABLE 2

FUGITIVE POTENTIAL TO EMIT CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE [1]		PARTICLE SIZE MULTIPLIER [2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Storage Pile Emissions													
CLP-1 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-2 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-3 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-4 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-5 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-6 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-7 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-8 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-9 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-10 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-11 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-12 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-13 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-14 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-15 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-1	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-2	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-3	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-4	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-5	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-6	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-7	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
SP-1 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lb/acre	Water Suppression	75.0%	33.89	6.18	16.94	3.09
									Storage Pile Emissions: Total>>	*3016.0*	*550.4*	*1508.0*	*275.2*

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer/End Loader[4]	3,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	1.39	10.84	0.66
RC-2 Loaded by Dozer/End Loader[4]	3,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	1.39	10.84	0.66
RC-3 Loaded by Dozer/End Loader[4]	3,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	1.39	10.84	0.66
RC-4 Loaded by Dozer/End Loader[4]	3,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	22.92	1.39	10.84	0.66
Front End Loader[5] Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lb/VMT	Water Suppression	75.0%	254.65	46.47	65.69	11.99
Front End Loader[5] Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lb/VMT	Water Suppression	75.0%	254.65	46.47	65.69	11.99
RC-5 Loaded by Dozer[4]	2,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	15.28	1.39	7.23	0.66
RC-6 Loaded by Dozer[4]	1,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	7.64	1.39	3.61	0.66
RC-7 Loaded by Dozer[4]	1,000	8,760,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	7.64	1.39	3.61	0.66
									Reclaim Belt Loading Emissions: Total>>	*631.5*	*102.7*	*189.2*	*28.6*
Truck Loading Emissions													
Salt Loaded by End Loader[4]	550	4,818,000	0.740	0.350	0.00064	0.00030	lb/ton	None	0.0%	8.40	1.53	3.97	0.73
Coal Loaded by End Loader[4]	475	4,161,000	0.740	0.350	0.00064	0.00030	lb/ton	Water Suppression	50.0%	3.63	0.66	1.72	0.31
									Truck Loading Emissions: Total>>	*12.0*	*2.2*	*5.7*	*1.0*
Roadway Emissions													
Inbound Coal Truck Traffic[5]	N/A	N/A	4.900	1.500	6.6	1.7	lb/VMT	Fugitive Dust Management Plan	75.0%	0.00	0.00	0.00	0.00
Outbound Coal Truck Traffic[5]	N/A	N/A	4.900	1.500	6.6	1.7	lb/VMT	Fugitive Dust Management Plan	75.0%	1074.63	196.12	277.23	50.59
Outbound Salt Truck Traffic[5]	N/A	N/A	4.900	1.500	6.6	1.7	lb/VMT	Fugitive Dust Management Plan	75.0%	1244.31	227.09	321.00	58.58
									Roadway Emissions: Total>>	*2318.9*	*423.2*	*598.2*	*109.2*
									Facility Total>>	**5978.5**	**1078.5**	**2301.1**	**414.0**

1. The hourly rate is based on 4,200 hours/year of operation.
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 Section 9.3. (http://www.wrapair.org/forums/dejf/fdh/content/Ch9-Storage_Pile_Wind%20Erosion_Rev06.pdf)
   TSP (lb/year/acrea surface) = 1.7(s/1.5)(365[365-p]/235)(f/15)

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

Assumptions:

COAL BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) : 10.0%
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/day
VMT of Front End Loader/Dozer (Reclaim) = 120.0 miles/day
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[6] with rain > 0.01 inch = 117 days
Mean wind speed[3] = 10.3 mph
Percent of time[7] 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 ton/year
Maximum truck loadout= 4,161,000 ton/year
Number of coal trucks= 297,214 trucks/year
Miles per trip= 0.8 miles
Miles per day= 651.4 miles/day
Miles per year= 237,771 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 ton/year
Maximum truck delivery= 4,161,000 ton/year
Number of coal trucks= 297,214 trucks/year
Miles per trip= 0.8 miles
Miles per day= 651.4 miles/day
Miles per year= 237,771 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 ton/year
Maximum truck loading= 4,818,000 ton/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 Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Diesel Generator 1	DG-1	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 2	DG-2	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 3	DG-3	118	1.77	0.96	0.021	0.06	0.06	0.04
Totals (lb/hr)			5.31	2.89	0.06	0.18	0.18	0.12
Totals (ton/yr) [c]			23.26	12.64	0.28	0.78	0.78	0.51

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.00573	**	0.0003	0.0003	0.00033
			Emissions (lb/hr)					
Diesel Generator 4	DG-4	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 5	DG-5	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 6	DG-6	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 7	DG-7	500	7.50	2.86	0.043	0.15	0.15	0.17
Totals (lb/hr)			30.00	11.45	0.17	0.60	0.60	0.66
Totals (ton/yr) [c]			131.40	50.17	0.75	2.63	2.63	2.89

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Air Compressor	AC-1	100	1.50	0.82	0.02	0.05	0.05	0.03
Totals (lb/hr)			1.50	0.82	0.02	0.05	0.05	0.03
Totals (ton/yr) [c]			6.57	3.57	0.09	0.22	0.22	0.14

TABLE 3

POTENTIAL TO EMIT CALCULATIONS
DIESEL GENERATORS

Unit Description	*Unit ID*	*Prime Power (hp)*	*Emission Factor (lb/hp-hr)*					
			NOx[a]	*CO*[a]	*SO_2*[b]	*PM*[a]	*PM_{10}*[d]	*VOM*[a]
			0.015	*0.00903*	**	*0.001*	*0.001*	*0.00033*
			Emissions (lb/hr)					
Light Standard	LS-1	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-2	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-3	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-4	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-5	15	0.23	0.14	0.01	0.02	0.02	0.005
		Totals (lb/hr)	1.13	0.68	0.05	0.08	0.08	0.02
		Totals (ton/yr)[c]	4.93	2.97	0.23	0.33	0.33	0.11

Unit Description	*Unit ID*	*Prime Power (hp)*	*Emission Factor (lb/hp-hr)*					
			NOx[a]	*CO*[a]	*SO_2*[b]	*PM*[a]	*PM_{10}*[d]	*VOM*[a]
			0.015	*0.01079*	**	*0.0013*	*0.0013*	*0.00033*
			Emissions (lb/hr)					
Diesel Water Pump	DWP-1	20	0.30	0.22	0.01	0.03	0.03	0.01
		Totals (lb/hr)	0.30	0.22	0.01	0.03	0.03	0.01
		Totals (ton/yr)[c]	0.08	0.05	0.003	0.01	0.01	0.002
		Facility Emissions (ton/yr)	**166.23**	**69.39**	**1.36**	**3.96**	**3.96**	**3.66**

PTE Emissions Assumptions:

[a] Calculated using NSPS emission factors for stationary combustion sources (40 CFR Part 89, Section 112). VOM emission factor from Permit #07050082 issued on May 21, 2009.

[b] Calculated using low sulfur diesel fuel and formula used in Permit #07050082 issued on May 21, 2009 with revised diesel fuel consumption data as follows:

500 HP Engine	20 gal/hr
100 & 118 HP Engines	10 gal/hr
15 & 20 HP Engines	5 gal/hr

[c] Hours of operation 8,760 hr/yr
500 hr/yr (For emergency diesel water pump only.)

[d] It is assumed that PM_{10} emissions are equal to PM.

Example Calculation

500 HP Diesel Engine NO_X Emissions

500 horsepower x 0.015 lb NO_X per horsepower hour x 8,760 hr/yr / 2,000 lb/ton = 32.85 ton/yr NO_X.

Conversion of NSPS Emission Factors

NO_X = 9.2 g/kW-hr or 6.9 g/HP-hr

6.9 g/HP-hr /454 g per pound = 0.015 lb/hp-hr

TABLE 3A

POTENTIAL TO EMIT HAP CALCULATIONS
DIESEL GENERATORS

CAS No.	*Pollutant*	*Diesel Engines*		
		Emission Factor[a] (lb/hp-hr)	*Emission Rate[b] (lb/hr)*	*Emission Rate[c] (ton/yr)*
71-43-2	Benzene	6.56E-06	1.67E-02	7.32E-02
108-88-3	Toluene	2.88E-06	7.33E-03	3.21E-02
1330207	Xylene	2.00E-06	5.11E-03	2.24E-02
106-99-0	1,3-Butadiene	2.75E-07	7.01E-04	3.07E-03
50-00-0	Formaldehyde	8.29E-06	2.11E-02	9.26E-02
75070	Acetaldehyde	5.39E-06	1.37E-02	6.02E-02
107028	Acrolein	6.50E-07	1.66E-03	7.26E-03
91-20-3	Naphthalene	5.96E-07	1.52E-03	6.66E-03
		HAP Totals:	**6.79E-02**	**2.97E-01**

[a] AP-42, Fifth Edition, Volume I, Section 3.3, Gasoline and Industrial Engines (October 1996)

[b] Diesel Fuel-Fired Engines maximum heat input 2549 Horsepower

[c] 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 NO_X emission factor (lb/MMBtu). This provides a conversion factor for use with HAP emission calculation.
0.031 lb/hp-hr / 4.41 lb/MMBtu = 0.007

TABLE 4

PTE EMISSIONS SUMMARY

Emission Point	*Emissions (ton/yr)*					
	NOx	*CO*	SO_2	*PM*	PM_{10}	*VOM*
Process				349.93	165.35	
Generator	166.23	69.39	1.36	3.96	3.96	3.66
Total	**166.23**	**69.39**	**1.36**	**353.89**	**169.30**	**3.66**

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Unloading Emissions													
BU-1 to C-(1-6) (Coal/Petcoke)	266	1,117,200	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.02	0.18	0.48	0.08
RU/TU-1 to C-(1-6) (Coal/Petcoke)	266	1,117,200	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.02	0.18	0.48	0.08
RU/TU-1 to C-(1 -6) (Coal/Petcoke)	266	1,117,200	0.740	0.350	0.00064	0.00030	lbs/ton	Baghouse	90.0%	0.20	0.04	0.10	0.02
RU-2 to C-7 (Coal/Petcoke)	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
RU-3 to C-8 (Coal/Petcoke)	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
								Emissions From Coal/Petcoke Unloading : Total>>		*17.5*	*3.1*	*8.3*	*1.4*
Coal/Petcoke Conveyor Transfer Point Emissions													
C-1 to C-2	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-2 to S-1	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
C-3 to C-2	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
C-6 to S-3	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-1 to C-4	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-4 to C-5	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
C-5 to S-2	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
RC-1 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
RC-2 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
RC-3 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
RC-4 to C-3	3,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	1.75	5.42	0.83
C-7 to C-9	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-8 to C-10	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-9 to C-11	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-10 to C-11	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-11 to TP-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
TP-1 to C-12	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
C-12 to SFTP-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	*MAXIMUM MATERIAL HANDLING RATE*[1]		*PARTICLE SIZE MULTIPLIER*[2]		*EMISSION FACTORS*[3]			*CONTROL*		*PM EMISSION RATE*		*PM_{10} EMISSION RATE*	
	ton/hr	*ton/yr*	*PM*	*PM_{10}*	*PM*	*PM_{10}*	*UNITS*	*TYPE*	*EFFIC.*	*lb/day*	*ton/yr*	*lb/day*	*ton/yr*
SFTP-1 to S-4	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
DSH-1 to C-3	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
RC-5 to C-3	1,000	4,200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.67	1.81	0.32
RC-6 to C-3	1,000	4,200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.67	1.81	0.32
RC-7 to C-3	1,000	4,200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.67	1.81	0.32
								Emissions From Coal/Petcoke Transfer Points: Total>>		*204.3*	*32.9*	*96.6*	*15.6*
Coal/Petcoke Portable Conveyor Emissions													
PC-1 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-2 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-3 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-4 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-5 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-6 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-7 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-8 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-9 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-10 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-11 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PC-12 Drop Point	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PFH-1 to PC-(1-12)	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
PF-1 to PC-(1-12)	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
RPCS-1 to PC-(1-12)	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
								Emissions From Coal/Petcoke Portable Conveyor Transfer Points: Total>>		*143.2*	*25.1*	*67.7*	*11.9*

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Stacker Emissions													
S-1 to CLP-5	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
S-1 to CLP-4	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
S-2 to CLP-2	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-2 to CLP-3	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-3 to CLP-1	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-3 to CLP-4	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-6	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-7	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-8	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-9	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-10	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-11	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-12	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-13	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-14	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-1 to CLP-15	2,500	10,500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.67	4.52	0.79
S-4 to CEP-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-2	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-3	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-4	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-5	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-6	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to CEP-7	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
S-4 to DSH-1	2,000	8,400,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	1.34	3.61	0.63
								Emissions From Coal/Petcoke Stacker: Total>>		*225.3*	*37.6*	*106.6*	*17.8*

TABLE 5

MAXIMUM PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Loadout Emissions Emissions													
Coal Loadout to S-1	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
Coal/Pet Coke Loadout to TL-2	550	2,310,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	2.10	0.37	0.99	0.17
Petcoke Loadout to S-1	4,000	11,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	1.75	7.23	0.83
									Emissions From Coal/Petcoke Loadout: Total>>	*32.7*	*3.9*	*15.4*	*1.8*
									Coal/Petcoke Emissions: Total>>	*623.1*	*102.5*	*294.7*	*48.5*
Salt Handling Emissions													
BU-1 to SP-1 (Salt)	3,500	250,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	26.74	0.08	12.65	0.04
16 Various Transfer Points	2,500	250,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	305.56	1.27	144.52	0.60
									Emissions From Salt Handling: Total>>	*332.3*	*1.4*	*157.2*	*0.6*
Soil Crushing/Screening Emissions													
RPCS-1 (Crushing)	140	306,600			0.0033	0.00101	lbs/ton	Water Suppression	50.0%	2.77	0.25	0.85	0.08
RPCS-1 (Screening)	140	306,600			0.00067	0.00034	lbs/ton	Water Suppression	50.0%	0.56	0.05	0.29	0.03
									Emissions From Soil Crushing/Screening: Total>>	*3.3*	*0.3*	*1.1*	*0.1*
									Facility Total>>	**958.7**	**104.1**	**453.0**	**49.2**

1. The hourly rate is based on 4,200 hours/year of operation.
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.
4. http://www.ncdc.noaa.gov/oa/climate/online/ccd/avgwind.html

Assumptions:

BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) : 10.0%
Operating Schedule = 12 hours/day
Operating Schedule = 350 days/year
Operating Schedule = 4,200 hours/year
Mean wind speed[4] = 10.3 mph

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.

Facility has a water suppression system to control particulate matter emissions.

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

TABLE 6

MAXIMUM FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Storage Pile Emissions													
CLP-1[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-2[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-3[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-4[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-5[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-6[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-7[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-8[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-9[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-10[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-11[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-12[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-13[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-14[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CLP-15[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-1	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-2	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-3	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-4	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-5	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
CEP-6	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
CEP-7	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	129.98	23.72	64.99	11.86
SP-1[7]	N/A	N/A	1.000	0.500	4744.2	2372.1	lbs/acre	Water Suppression	75.0%	32.49	5.93	16.25	2.97
									Storage Pile Emissions: Total>>	*2892.0*	*527.8*	*1446.0*	*263.9*
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer/End Loader[4]	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
RC-2 Loaded by Dozer/End Loader[4]	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
RC-3 Loaded by Dozer/End Loader[4]	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
RC-4 Loaded by Dozer/End Loader[4]	3,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.44	5.42	0.21
Front End Loader[5] Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Suppression	75.0%	127.32	22.28	32.85	5.75
Front End Loader[5] Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Suppression	75.0%	127.32	22.28	32.85	5.75
RC-5 Loaded by Dozer[4]	2,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.44	3.61	0.21
RC-6 Loaded by Dozer[4]	1,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.44	1.81	0.21
RC-7 Loaded by Dozer[4]	1,000	2,750,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.44	1.81	0.21
									Reclaim Belt Loading Emissions: Total>>	*315.8*	*47.6*	*94.6*	*12.9*
Truck Loading Emissions													
Salt Loaded by End Loader[4]	550	250,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	4.20	0.08	1.99	0.04
Coal Loaded by End Loader[4]	475	1,995,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.81	0.32	0.86	0.15
									Truck Loading Emissions: Total>>	*6.0*	*0.4*	*2.8*	*0.2*
Roadway Emissions													
Inbound Coal Truck Traffic[5]	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	296.27	51.85	76.43	13.37
Outbound Coal Truck Traffic[5]	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	296.27	51.85	76.43	13.37
Outbound Salt Truck Traffic[5]	N/A	N/A	4.900	1.500	6.6	1.7	lbs/VMT	Fugitive Dust Management Plan	75.0%	67.33	11.78	17.37	3.04
									Roadway Emissions: Total>>	*659.9*	*115.5*	*170.2*	*29.8*
									Facility Total>>	**3873.7**	**691.3**	**1713.7**	**306.8**

1. The hourly rate is based on 4,200 hours/year of operation.
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 Section 9.3. (http://www.wrapair.org/forums/dejf/fdh/content/Ch9-Storage_Pile_Wind%20Erosion_Rev06.pdf)
   TSP (lb/year/acrea surface) = 1.7(s/1.5)(365[365-p]/235)(f/15)

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

Assumptions:

COAL BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) : 10.0%
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 = 350 days/year
Operating Schedule = 4,200 hours/year
Front End Loader/Dozer speed = 5.0 mph
VMT of Front End Loader/Dozer (Storage Piles) = 60.0 miles/day
VMT of Front End Loader/Dozer (Reclaim) = 60.0 miles/day
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 = 350 days
Number of days[6] with rain > 0.01 inch = 117 days
Mean wind speed[3] = 10.3 mph
Percent of time[7] 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= 179.6 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 ton/year
Maximum truck delivery= 1,100,000 ton/year
Number of coal trucks= 78,571 trucks/year
Miles per trip= 0.8 miles
Miles per day= 179.6 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 ton/year
Maximum truck loading= 250,000 ton/year
Number of coal trucks= 17,857 trucks/year
Miles per trip= 0.8 miles
Miles per day= 40.8 miles/day
Miles per year= 14,286 miles/year

TABLE 7

MAXIMUM EMISSION CALCULATIONS
DIESEL GENERATORS

Unit Description	*Unit ID*	*Prime Power (hp)*	*Emission Factor (lb/hp-hr)*					
			NOx [a]	*CO* [a]	*SO_2* [b]	*PM* [a]	*PM_{10}* [d]	*VOM* [a]
			0.015	*0.00815*	**	*0.0005*	*0.0005*	*0.00033*
			Emissions (lb/hr)					
Diesel Generator 1	DG-1	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 2	DG-2	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 3	DG-3	118	1.77	0.96	0.021	0.06	0.06	0.04
Totals (lb/hr)			5.31	2.89	0.06	0.18	0.18	0.12
Totals (ton/yr) [c]			11.15	6.06	0.13	0.37	0.37	0.25

Unit Description	*Unit ID*	*Prime Power (hp)*	*Emission Factor (lb/hp-hr)*					
			NOx [a]	*CO* [a]	*SO_2* [b]	*PM* [a]	*PM_{10}* [d]	*VOM* [a]
			0.015	*0.00573*	**	*0.0003*	*0.0003*	*0.00033*
			Emissions (lb/hr)					
Diesel Generator 4	DG-4	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 5	DG-5	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 6	DG-6	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 7	DG-7	500	7.50	2.86	0.043	0.15	0.15	0.17
Totals (lb/hr)			30.00	11.45	0.17	0.60	0.60	0.66
Totals (ton/yr) [c]			63.00	24.05	0.36	1.26	1.26	1.39

Unit Description	*Unit ID*	*Prime Power (hp)*	*Emission Factor (lb/hp-hr)*					
			NOx [a]	*CO* [a]	*SO_2* [b]	*PM* [a]	*PM_{10}* [d]	*VOM* [a]
			0.015	*0.00815*	**	*0.0005*	*0.0005*	*0.00033*
			Emissions (lb/hr)					
Air Compressor	AC-1	100	1.50	0.82	0.02	0.05	0.05	0.03
Totals (lb/hr)			1.50	0.82	0.02	0.05	0.05	0.03
Totals (ton/yr) [c]			3.15	1.71	0.04	0.11	0.11	0.07

TABLE 7

MAXIMUM EMISSION CALCULATIONS
DIESEL GENERATORS

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.00903	**	0.001	0.001	0.00033
			Emissions (lb/hr)					
Light Standard	LS-1	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-2	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-3	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-4	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-5	15	0.23	0.14	0.01	0.02	0.02	0.005
Totals (lb/hr)			1.13	0.68	0.05	0.08	0.08	0.02
Totals (ton/yr) [c]			2.36	1.42	0.11	0.16	0.16	0.05

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.01079	**	0.0013	0.0013	0.00033
			Emissions (lb/hr)					
Diesel Water Pump	DWP-1	20	0.30	0.22	0.01	0.03	0.03	0.01
Totals (lb/hr)			0.30	0.22	0.01	0.03	0.03	0.01
Totals (ton/yr) [c]			0.08	0.05	0.003	0.01	0.01	0.002
Facility Emissions (ton/yr)			**79.74**	**33.30**	**0.65**	**1.90**	**1.90**	**1.75**

Maximum Emissions Assumptions:

[a] Calculated using NSPS emission factors for stationary combustion sources (40 CFR Part 89, Section 112). VOM emission factor from Permit #07050082 issued on May 21, 2009.

[b] Calculated using low sulfur diesel fuel and formula used in Permit #07050082 issued on May 21, 2009 with revised diesel fuel consumption data as follows:

500 HP Engine	20 gal/hr
100 & 118 HP Engines	10 gal/hr
15 & 20 HP Engines	5 gal/hr

[c] Hours of operation 4,200 hr/yr
500 hr/yr (For emergency diesel water pump only.)

[d] It is assumed that PM_{10} emissions are equal to PM.

Example Calculation

500 HP Diesel Engine NO_x Emissions

500 horsepower x 0.015 lb NO_X per horsepower hour x 4,200 hr/yr / 2,000 lb/ton = 15.75 ton/yr NO_X.

Conversion of NSPS Emission Factors

NO_X = 9.2 g/kW-hr or 6.9 g/HP-hr

6.9 g/HP-hr /454 g per pound = 0.015 lb/hp-hr

TABLE 8

FESOP REQUESTED LIMITATION AND FEE ALLOWABLE EMISSIONS SUMMARY

Emission Point	*Emissions (ton/yr)*					
	NOx	*CO*	*SO_2*	*PM*	*PM_{10}*	*VOM*
Process				104.14	49.22	
Generator	79.74	33.30	0.65	1.90	1.90	1.75
Total	**79.74**	**33.30**	**0.65**	**106.04**	**51.12**	**1.75**

Based on limiting operations to 4,200 hours per year.

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Unloading Emissions													
BU-1 to C-(1-6) (Coal/Petcoke)	266	829,920	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.02	0.13	0.48	0.06
RU/TU-1 to C-(1-6) (Coal/Petcoke)	266	829,920	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.02	0.13	0.48	0.06
RU/TU-1 to C-(1-6) (Coal/Petcoke)	266	829,920	0.740	0.350	0.00064	0.00030	lbs/ton	Baghouse	90.0%	0.20	0.03	0.10	0.01
RU-2 to C-7 (Coal/Petcoke)	2,000	6,240,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.99	3.61	0.47
RU-3 to C-8 (Coal/Petcoke)	2,000	6,240,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.99	3.61	0.47
								Emissions From Coal/Petcoke Unloading : Total>>		*17.5*	*2.3*	*8.3*	*1.1*
Coal/Petcoke Conveyor Transfer Point Emissions													
C-1 to C-2	2,500	7,800,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	1.24	4.52	0.59
C-2 to S-1	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
C-3 to C-2	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
C-6 to S-3	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
C-1 to C-4	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
C-4 to C-5	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
C-5 to S-2	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
RC-1 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
RC-2 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
RC-3 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
RC-4 to C-3	3,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.32	5.42	0.15
C-7 to C-9	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-8 to C-10	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-9 to C-11	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-10 to C-11	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-11 to TP-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
TP-1 to C-12	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
C-12 to SFTP-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
SFTP-1 to S-4	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
DSH-1 to C-3	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
RC-5 to C-3	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
RC-6 to C-3	1,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.32	1.81	0.15
RC-7 to C-3	1,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.32	1.81	0.15
Emissions From Coal/Petcoke Transfer Points: Total>>										*208.2*	*8.2*	*98.5*	*3.9*
Coal/Petcoke Portable Conveyor Emissions													
PC-1 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-2 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-3 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-4 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-5 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-6 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-7 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-8 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-9 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-10 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-11 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PC-12 Drop Point	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PFH-1 to PC-(1-12)	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
PF-1 to PC-(1-12)	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
RPCS-1 to PC-(1-12)	2,500	3,900,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.62	4.52	0.29
Emissions From Coal/Petcoke Portable Conveyor Transfer Points: Total>>										*143.2*	*9.3*	*67.7*	*4.4*

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Stacker Emissions													
S-1 to CLP-5	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
S-1 CLP-4	4,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.32	7.23	0.15
S-2 to CLP-2	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-2 to CLP-3	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-3 to CLP-1	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-3 to CLP-4	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-6	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-7	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-8	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-9	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-10	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-11	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-12	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-13	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-14	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-1 to CLP-15	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	9.55	0.32	4.52	0.15
S-4 to CEP-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-2	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-3	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-4	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-5	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-6	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to CEP-7	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
S-4 to DSH-1	2,000	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.32	3.61	0.15
									Emissions From Coal/Petcoke Stacker: Total>>	225.3	7.6	106.6	3.6

TABLE 9

TYPICAL PROCESS UNITS EMISSION CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE[1]		PARTICLE SIZE MULTIPLIER[2]		EMISSION FACTORS[3]			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Coal/Petcoke Loadout Emissions Emissions													
Coal Loadout to S-1	4,000	1,300,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.21	7.23	0.10
Coal/Pet Coke Loadout to TL-2	550	200,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	2.10	0.03	0.99	0.02
Pet Coke Loadout to S-1	4,000	1,300,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	15.28	0.21	7.23	0.10
									Emissions From Coal/Petcoke Loadout: Total>>	32.7	0.4	15.4	0.2
									Coal/Petcoke Emissions: Total>>	626.9	27.9	296.5	13.2
Salt Handling Emissions													
BU-1 to SP-1 (Salt)	3,500	175,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	26.74	0.06	12.65	0.03
16 Various Transfer Points	2,500	2,000,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	19.10	0.64	9.03	0.30
									Emissions From Salt Handling: Total>>	45.8	0.7	21.7	0.3
Soil Crushing/Screening Emissions													
RPCS-1 (Crushing)	140	218,400			0.0033	0.00101	lbs/ton	Water Suppression	50.0%	2.77	0.18	0.85	0.06
RPCS-1 (Screening)	140	218,400			0.00067	0.00034	lbs/ton	Water Suppression	50.0%	0.56	0.04	0.29	0.02
									Emissions From Soil Crushing/Screening: Total>>	3.3	0.2	1.1	0.1
									Facility Total>>	676.1	28.8	319.3	13.6

1. The hourly rate is based on 3,120 hours/year of operation.
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.
4. http://www.ncdc.noaa.gov/oa/climate/online/ccd/avgwind.html

Assumptions:

BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) : 10.0%
Operating Schedule = 12 hours/day
Operating Schedule = 260 days/year
Operating Schedule = 3,120 hours/year
Mean wind speed[4] = 10.3 mph

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.

Facility has a water suppression system to control particulate matter emissions.

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

TABLE 10

TYPICAL FUGITIVE EMISSIONS CALCULATIONS

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE [1]		PARTICLE SIZE MULTIPLIER [2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	ton/hr	ton/yr	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	ton/yr	lb/day	ton/yr
Storage Pile Emissions													
CLP-1 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-2 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-3 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-4 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-5 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-6 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-7 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-8 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-9 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-10 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-11 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-12 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-13 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-14 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CLP-15 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	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	Water Suppression	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	Water Suppression	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	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-4	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-5	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-6	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
CEP-7	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	135.55	24.74	67.77	12.37
SP-1 [7]	N/A	N/A	1.000	0.500	4947.6	2473.8	lbs/acre	Water Suppression	75.0%	33.89	6.18	16.94	3.09
									Storage Pile Emissions: Total>>	*3016.0*	*550.4*	*1508.0*	*275.2*

DESCRIPTION	MAXIMUM MATERIAL HANDLING RATE [1]		PARTICLE SIZE MULTIPLIER [2]		EMISSION FACTORS			CONTROL		PM EMISSION RATE		PM_{10} EMISSION RATE	
	tons/hr	tons/year	PM	PM_{10}	PM	PM_{10}	UNITS	TYPE	EFFIC.	lb/day	tpy	lb/day	tpy
Reclaim Belt Loading Emissions													
RC-1 Loaded by Dozer/End Loader [4]	3,000	500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.08	5.42	0.04
RC-2 Loaded by Dozer/End Loader [4]	3,000	500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.08	5.42	0.04
RC-3 Loaded by Dozer/End Loader [4]	3,000	500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.08	5.42	0.04
RC-4 Loaded by Dozer/End Loader [4]	3,000	500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	11.46	0.08	5.42	0.04
Front End Loader [5] Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Suppression	75.0%	127.32	16.55	32.85	4.27
Front End Loader [5] Roadway Emissions	N/A	N/A	4.900	1.500	8.5	2.2	lbs/VMT	Water Suppression	75.0%	127.32	16.55	32.85	4.27
RC-5 Loaded by Dozer [4]	2,000	500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	7.64	0.08	3.61	0.04
RC-6 Loaded by Dozer [4]	1,000	500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.08	1.81	0.04
RC-7 Loaded by Dozer [4]	1,000	500,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	3.82	0.08	1.81	0.04
									Reclaim Belt Loading Emissions: Total>>	*315.8*	*33.7*	*94.6*	*8.8*
Truck Loading Emissions													
Salt Loaded by End Loader [4]	550	1,716,000	0.740	0.350	0.00064	0.00030	lbs/ton	None	0.0%	4.20	0.55	1.99	0.26
Coal Loaded by End Loader [4]	475	1,482,000	0.740	0.350	0.00064	0.00030	lbs/ton	Water Suppression	50.0%	1.81	0.24	0.86	0.11
									Truck Loading Emissions: Total>>	*6.0*	*0.8*	*2.8*	*0.4*
Roadway Emissions													
Inbound Coal Truck Traffic [5]	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 [5]	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 [5]	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
									Roadway Emissions: Total>>	*208.5*	*27.1*	*53.8*	*7.0*
									Facility Total>>	**3546.2**	**612.0**	**1659.2**	**291.4**

1. The hourly rate is based on 3,120 hours/year of operation.
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 Section 9.3. (http://www.wrapair.org/forums/dejf/fdh/content/Ch9-Storage_Pile_Wind%20Erosion_Rev06.pdf)
   TSP (lb/year/acrea surface) = 1.7(s/1.5)(365[365-p]/235)(f/15)

Coal and pet coke received at the Facility have an average moisture content of 18.3% and 10.0% respectively. Emissions were calculated based on 100% throughput of pet coke as a worst-case scenario.

Assumptions:

COAL BACKGROUND DATA

Coal/Pet Coke moisture content (weighted average) :	10.0%
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/day
VMT of Front End Loader/Dozer (Reclaim) =	60.0 miles/day
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[6] with rain > 0.01 inch =	117 days
Mean wind speed[3] =	10.3 mph
Percent of time 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 ton/year
Maximum truck loadout=	200,000 ton/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 ton/yr
Maximum truck loading=	175,000 ton/yr
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 Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Diesel Generator 1	DG-1	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 2	DG-2	118	1.77	0.96	0.021	0.06	0.06	0.04
Diesel Generator 3	DG-3	118	1.77	0.96	0.021	0.06	0.06	0.04
Totals (lb/hr)			5.31	2.89	0.06	0.18	0.18	0.12
Totals (ton/yr) [c]			8.28	4.50	0.10	0.28	0.28	0.18

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.00573	**	0.0003	0.0003	0.00033
			Emissions (lb/hr)					
Diesel Generator 4	DG-4	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 5	DG-5	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 6	DG-6	500	7.50	2.86	0.043	0.15	0.15	0.17
Diesel Generator 7	DG-7	500	7.50	2.86	0.043	0.15	0.15	0.17
Totals (lb/hr)			30.00	11.45	0.17	0.60	0.60	0.66
Totals (ton/yr) [c]			46.80	17.87	0.27	0.94	0.94	1.03

Unit Description	Unit ID	Prime Power (hp)	Emission Factor (lb/hp-hr)					
			NOx^a	CO^a	$SO_2{}^b$	PM^a	$PM_{10}{}^d$	VOM^a
			0.015	0.00815	**	0.0005	0.0005	0.00033
			Emissions (lb/hr)					
Air Compressor	AC-1	100	1.50	0.82	0.02	0.05	0.05	0.03
Totals (lb/hr)			1.50	0.82	0.02	0.05	0.05	0.03
Totals (ton/yr) [c]			2.34	1.27	0.03	0.08	0.08	0.05

TABLE 11

TYPICAL EMISSION CALCULATIONS
DIESEL GENERATORS

Unit Description	*Unit ID*	*Prime Power (hp)*	*Emission Factor (lb/hp-hr)*					
			NOx [a]	*CO* [a]	*SO_2* [b]	*PM* [a]	*PM_{10}* [d]	*VOM* [a]
			0.015	*0.00903*	**	*0.001*	*0.001*	*0.00033*
			Emissions (lb/hr)					
Light Standard	LS-1	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-2	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-3	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-4	15	0.23	0.14	0.01	0.02	0.02	0.005
Light Standard	LS-5	15	0.23	0.14	0.01	0.02	0.02	0.005
		Totals (lb/hr)	1.13	0.68	0.05	0.08	0.08	0.02
		Totals (ton/yr) [c]	1.76	1.06	0.08	0.12	0.12	0.04

Unit Description	*Unit ID*	*Prime Power (hp)*	*Emission Factor (lb/hp-hr)*					
			NOx [a]	*CO* [a]	*SO_2* [b]	*PM* [a]	*PM_{10}* [d]	*VOM* [a]
			0.015	*0.01079*	**	*0.0013*	*0.0013*	*0.00033*
			Emissions (lb/hr)					
Diesel Water Pump	DWP-1	20	0.30	0.22	0.01	0.03	0.03	0.01
		Totals (lb/hr)	0.30	0.22	0.01	0.03	0.03	0.01
		Totals (ton/yr) [c]	0.04	0.03	0.001	0.003	0.003	0.001
		Facility Emissions (ton/yr)	**59.22**	**24.72**	**0.48**	**1.41**	**1.41**	**1.30**

Maximum Emissions Assumptions:

[a] Calculated using NSPS emission factors for stationary combustion sources (40 CFR Part 89, Section 112). VOM emission factor from Permit #07050082 issued on May 21, 2009.

[b] Calculated using low sulfur diesel fuel and formula used in Permit #07050082 issued on May 21, 2009 with revised diesel fuel consumption data as follows:

500 HP Engine	20 gal/hr
100 & 118 HP Engines	10 gal/hr
15 & 20 HP Engines	5 gal/hr

[c] Hours of operation 3,120 hr/yr
250 hr/yr (For emergency diesel water pump only.)

[d] It is assumed that PM_{10} emissions are equal to PM.

Example Calculation

500 HP Diesel Engine NO_X Emissions

500 horsepower x 0.015 lb NO_X per horsepower hour x 3,120 hr/yr / 2,000 lb/ton = 11.7 ton/yr NO_X.

Conversion of NSPS Emission Factors

NO_X = 9.2 g/kW-hr or 6.9 g/HP-hr

6.9 g/HP-hr / 454 g per pound = 0.015 lb/hp-hr

TABLE 12

TYPICAL EMISSIONS SUMMARY

Emission Point	*Emissions (ton/yr)*					
	NOx	*CO*	*SO_2*	*PM*	*PM_{10}*	*VOM*
Process				28.82	13.60	
Generator	59.22	24.72	0.48	1.41	1.41	1.30
Total	**59.22**	**24.72**	**0.48**	**30.23**	**15.01**	**1.30**

TABLE 13

LISTING OF EMISSION UNITS

Process Equipment	*Unit Designation*	*Submittal*	*Permit #*
Unloading Operations			
Barge Unloader	BU-1	Existing	
Rail/Truck Unloader	RU/TU-1	Existing	
Rail Unloader 2	RU-2	Existing	7050082
Rail Unloader 3	RU-3	Existing	7050082
Conveyor Operations			
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	Existing	7050082
Conveyor 8	C-8	Existing	7050082
Conveyor 9	C-9	Existing	7050082
Conveyor 10	C-10	Existing	7050082
Conveyor 11	C-11	Existing	7050082
Conveyor 12	C-12	Existing	7050082
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	Existing	7050082
Reclaim Conveyor 6	RC-6	Existing	7050082
Reclaim Conveyor 7	RC-7	Existing	7050082
Portable Conveyor 1	PC-1	Existing	7050082
Portable Conveyor 2	PC-2	Existing	7050082
Portable Conveyor 3	PC-3	Existing	7050082
Portable Conveyor 4	PC-4	Existing	7050082
Portable Conveyor 5	PC-5	Existing	7050082
Portable Conveyor 6	PC-6	Existing	7050082
Portable Conveyor 7	PC-7	Existing	7050082
Portable Conveyor 8	PC-8	Existing	7050082
Portable Conveyor 9	PC-9	Proposed	
Portable Conveyor 10	PC-10	Proposed	
Portable Conveyor 11	PC-11	Proposed	
Portable Conveyor 12	PC-12	Proposed	
Transfer Hopper Operations			
Direct Ship Hopper 1	DSH-1	Existing	7050082
Portable Feed Hopper	PFH-1	Existing	7050082
Portable Feeder	PF-1	Existing	7050082
Rental Portable Crusher/Screen	RPCS-1	Existing	7050082
Transfer Point 1	TP-1	Existing	7050082
Stacker Feed Transfer Point	SFTP-1	Existing	7050082

TABLE 13

LISTING OF EMISSION UNITS

Process Equipment	*Unit Designation*	*Submittal*	*Permit #*
Stacker Operations			
Stacker 1/Barge & Rail Loadout	S-1	Existing	
Stacker 2	S-2	Existing	
Stacker 3	S-3	Existing	
Stacker 4	S-4	Existing	7050082
Storage Pile Operations			
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	Proposed	
Coal Pile 7	CLP-7	Proposed	
Coal Pile 8	CLP-8	Proposed	
Coal Pile 9	CLP-9	Proposed	
Coal Pile 10	CLP-10	Proposed	
Coal Pile 11	CLP-11	Proposed	
Coal Pile 12	CLP-12	Proposed	
Coal Pile 13	CLP-13	Proposed	
Coal Pile 14	CLP-14	Proposed	
Coal Pile 15	CLP-15	Proposed	
Salt Pile 1	SP-1	Existing	7050082
Coke Pile 1	CEP-1	Existing	7050082
Coke Pile 2	CEP-2	Existing	7050082
Coke Pile 3	CEP-3	Existing	7050082
Coke Pile 4	CEP-4	Proposed	
Coke Pile 5	CEP-5	Proposed	
Coke Pile 6	CEP-6	Proposed	
Coke Pile 7	CEP-7	Proposed	
Diesel Generators			
Diesel Generator - 118 HP (1)	DG-1	Existing	7050082
Diesel Generator - 118 HP (2)	DG-2	Existing	7050082
Diesel Generator - 118 HP (3)	DG-3	Existing	7050082
Diesel Generator - 500 HP (4)	DG-4	Existing	7050082
Diesel Generator - 500 HP (5)	DG-5	Existing	7050082
Diesel Generator - 500 HP (6)	DG-6	Existing	7050082
Diesel Generator - 500 HP (7)	DG-7	Existing	7050082
Air Compressor - 100 HP	AC-1	Proposed	
Light Standard - 15 HP	LS-1	Proposed	
Light Standard - 15 HP	LS-2	Proposed	
Light Standard - 15 HP	LS-3	Proposed	
Light Standard - 15 HP	LS-4	Proposed	
Light Standard - 15 HP	LS-5	Proposed	
Diesel Water Pump - 20 HP	DWP-1	Existing	7050082

Exhibit 11

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

December 20, 2012

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

I.D. No.: 031600GSF

Dear Mr. Walker:

The Illinois EPA acknowledges your request for an ownership change. The Illinois EPA has appropriately updated its records accordingly.

The TV FESOP permit application revision you requested is currently pending and is under review. Until any revised permit is issued, the facility remains subject to the requirements in the existing permit(s).

If you have any questions concerning this matter, please contact Lori Pennington at 217/785-1720.

Edwin C. Bakowski

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

ECB:LP:jws

Enclosure

cc: Region 1
I.D. File
Permit File
Kathy Hodge, Hodge Dwyer & Driver

Exhibit 12

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-1720

December 20, 2012

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

I.D. No.: 031600GSF

Dear Mr. Walker:

Enclosed is a revised construction permit which reflects a change of ownership. Please note that if you have changed or intend to change this operation it will be necessary to apply for revision of your air pollution permit(s).

If you have any questions or require any assistance concerning these matters, contact Lori Pennington at 217/785-1705.

Very truly yours,

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

Date Signed: 12/20/2012

ECB:LP:07050082:psj

Enclosure

cc: Region 1
I.D. File
Permit File
Kathy Hodge, Hodge Dwyer & Driver

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

CONSTRUCTION PERMIT -- NSPS and NESHAP SOURCE -- REVISED

PERMITTEE

KCBX Terminals Company
Attn: Brandon Walker
3259 East 100th Street
Chicago, Illinois 60617

Application No.: 07050082
Applicant's Designation:
Subject: Conveyor Addition
Date Issued: December 18, 2012
Date Reissued: December 20, 2012
Location: 10730 South Burley Avenue, Chicago, 60617

I.D. No.: 031600GSF
Date Received: September 20, 2012

Permit is here by granted to the above-designated Permittee to CONSTRUCT 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);
Twelve (12) Portable Conveyors (PC-1, PC-2, PC-3, PC-4, PC-5, PC-6, PC-7, PC-8, PC-9, PC-10, PC-11, and PC-12);
Direct Ship Hopper 1 (DSH-1);
Portable Feed Hopper (PFH-1);
Portable Feeder (PF-1);
Rental Portable Screen (RPS-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 (DG-7);
One (1) 375 HP Diesel-Powered Generator (DG-8);
One (1) 40 HP Diesel-Powered Generator (DG-9);
Three (3) 300 HP Diesel Generators (DG-10, DG-11, and DG-12); and
One (1) 20 HP Diesel-Powered Water Pump (DWP-1)

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

1a. This Permit is issued based on the modification of the materials transloading system (to increase the permitted throughput) and the construction of the diesel generators and portable conveyors 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_x) and Particulate Matter less than 10 microns (PM_{10}) from the above-listed equipment below the levels that would trigger the applicability of these rules.

b. The Permittee may operate the equipment listed above under this construction permit until the Illinois EPA takes final action on the Permit tee's application for a Federally Enforceable State Operating Permit (FESOP) provided that the Permittee timely complies with all the terms of this construction permit.

2a. Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 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. Pursuant to 40 CFR 60.4200(a), the provisions of 40 CFR 60 Subpart IIII are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in 40 CFR 60.4200(a)(1) through (4). For the purposes of 40 CFR 60 Subpart IIII, the date that construction commences is the date the engine is ordered by the owner or operator.

i. Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines,

ii. Owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005.

iii. The provisions of 40 CFR 60.4208 are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005

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.

3a. Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 are subject to the National Emission Standards for Hazardous Air pollutants (NESHAP) Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subparts A and ZZZZ. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Pursuant to 40 CFR 63.6590(a), an affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

b. Pursuant to 40 CFR 63.6590(c)(1), a new or reconstructed stationary residential, commercial, or institutional emergency stationary RICE located at an area source must meet the requirements of 40 CFR Part 63 by meeting the requirements of 40 CFR 60 Subpart IIII, for compression ignition engines or 40 CFR 60 Subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under 40 CFR Part 63.

4a. 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-hour)

Rated Power (kW)	Tier	Model Year[1]	NO_x	HC	NMHC + NO_x	CO	PM
8 ≤ kW < 19	Tier 1	2000	--	--	9.5	6.6	0.80
	Tier 2	2005	--	--	7.5	6.6	0.80
19 ≤ kW < 37	Tier 1	1998	9.2	--	9.5	6.6	0.80
	Tier 2	2004	--	--	7.5	5.0	0.60
75 ≤ kW < 130	Tier 1	1997	9.2	--	--	--	--
	Tier 2	2003			6.6	5.0	0.30
	Tier 3	2007		--	4.0	5.0	
130 ≤ kW < 225	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2003	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
225 ≤ kW < 450	Tier 1	1996	9.2	1.3	--	11.4	0.54
	Tier 2	2002	--	--	6.6	3.5	0.20
	Tier 3	2006	--	--	4.0	3.5	
kW>560	Tier 1	2000	9.2	1.3	--	11.4	0.54
	Tier 2	2006	--	--	6.4	3.5	0.20

[1] 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_x standards, NMHC + NO_x 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-hour)

Rated Power (kW)	Tier	Model Year[1]	NO_x FEL	NMHC + NO_x FEL	PM FEL
8≤kW<19	Tier 1	2000	--	16.0	1.2
	Tier 2	2005	--	9.5	0.80
19≤kW<37	Tier 1	1999	14.6	16.0	1.2
	Tier 2	2004	--	9.5	0.80
75 ≤ kW < 130	Tier 1	1997	14.6	--	1.2
	Tier 2	2003	--	11.5	
	Tier 3	2007	--	6.6	
130≤kW<225	Tier 1	1996	14.6	--	--
	Tier 2	2003	--	10.5	0.54
	Tier 3	2006	--	6.6	
225≤kW<450	Tier 1	1996	14.6	--	--
	Tier 2	2001	--	10.5	0.54
	Tier 3	2006	--	6.4	
kW>560	Tier 1	2000	14.6	--	--
	Tier 2	2006	--	10.5	0.54

[1] 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:

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.

5a. 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 meter (1000 foot) 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 212.316(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.

e. 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.

f. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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).

g. 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.

h. 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.

6a. 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, except as further provided by 35 Ill. Adm. Code Part 214, 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).

7. 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.

8a. 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).

9a. Pursuant to 40 CFR 60.11(b), compliance with opacity standards in 40 CFR Part 60 shall be determined by conducting observations in accordance with Method 9 in Appendix A of 40 CFR Part 60, any alternative method that is approved by the Illinois EPA or USEPA, or as provided in 40 CFR 60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

b. Pursuant to 40 CFR 60.11(c), the opacity standards set forth in 40 CFR Part 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

c. 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.

10a. 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 and 60.4205 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.

b. 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).

c. 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.

d. 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.

e. 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 emission-related specifications, except as permitted in 40 CFR 60.4211(g).

f. Pursuant to 40 CFR 60.4211(e)(1), if you are an owner or operator of a modified or reconstructed stationary CI internal combustion engine and must comply with the emission standards specified in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), you must demonstrate compliance according to one of the methods specified in 40 CFR 60.4211(e)(1) or (2). Purchasing, or otherwise owning or operating, an engine certified to the emission standards in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), as applicable.

11a. 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.

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_{10} 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_{10} 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_{10} 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_{10} 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.

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 ug/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 ug/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 (Ton/Mo)	(Ton/Yr)	PM Emissions (lb/Ton)	(T/Mo)	(T/Yr)	PM_{10} Emissions (lb/Ton)	(T/Mo)	(T/Yr)
Coal & Coke*	1,100,000	11,000,000	0.00064	12.21	102.08	0.0003	4.79	47.85
Salt	25,000	250,000	0.00064	0.27	2.87	0.0003	0.13	1.28
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	105.25			49.24

* 50 % control for wet suppression

ii. 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).

iii. 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 Aot, 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 11.25 million tons per year and the permitted

emissions of PM_{10} are being increases from 12.5 tons per year to 49.24 tons per year.

d. Emissions and operation of the 15 kW (20 HP) Diesel-Powered Water Pump (DWP-1) shall not exceed the following:

i. The diesel-powered water pump runtime shall not exceed 150 hours/month and 500 hours/year.

ii. Emissions from the diesel-powered water pump shall not exceed:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.01079	0.02	0.05
Nitrogen Oxides (NO_x)	0.015	0.03	0.08
Particulate Matter(PM)	0.0013	0.01	0.01
Particulate Matter-10(PM_{10})	0.0013	0.01	0.01
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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

e. Emissions and operation of the 30 kW (40 HP) Diesel-Powered Generator (DG-9) shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00903	0.06	0.63
Nitrogen Oxides (NO_x)	0.015	0.11	1.05
Particulate Matter(PM)	0.001	0.01	0.07

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Particulate Matter-10(PM_{10})	0.001	0.01	0.07
Sulfur Dioxide (SO_2)	**	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 600 HP, and the emission factors for CO, NO_x, 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_2 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 hours/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.06 tpy

f. Emissions and operation of the six 88 kW (118 HP) Diesel-Powered Generators (DG-1, DG-2, DG-3, DG-4, DG-5, and DG-6) 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00815	1.01	10.10
Nitrogen Oxides (NO_x)	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_2)	**	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 600 HP, and the emission factors for CO, NO_x, 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_2 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 three 224 kW (300 HP) Diesel-Powered Generators (DG-10, DG-11, and DG-12) combined shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	(Tons/Year)
Carbon Monoxide (CO)	0.00573	0.90	9.02
Nitrogen Oxides (NO_x)	0.015	2.36	23.63
Particulate Matter(PM)	0.0003	0.05	0.47
Particulate Matter-10(PM_{10})	0.0003	0.05	0.47
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 (DG-8) shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00573	0.38	3.76
Nitrogen Oxides (NO_x)	0.015	0.98	9.84
Particulate Matter(PM)	0.0003	0.02	0.20
Particulate Matter-10(PM_{10})	0.0003	0.02	0.20
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 hours/year x 10 gallons/hour x 7.1 lbs/gallon x 0.05% S / 2,000 lbs/gallon = 0.06 tpy

i. Emissions and operation of the 298 kW (400 HP) Diesel-Powered Generator (DG-7) shall 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:

Pollutant	Emission Factor (lb/HP-Hour)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	0.00573	0.40	4.01
Nitrogen Oxides (NO_x)	0.015	1.05	10.50
Particulate Matter(PM)	0.0003	0.02	0.21
Particulate Matter-10(PM_{10})	0.0003	0.02	0.21
Sulfur Dioxide (SO_2)	**	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_x, 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_2 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 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.

16. This permit is issued based on Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 each having a displacement of less than 30 liters per cylinder and have been certified by the manufacturer, as required by 40 CFR 60.4211(c), to meet the standards of 40 CFR 60.4204(b) or 60.4205(b). As a result, this permit is issued based on the Diesel-Powered Generators Sets DG-1 through DG-12 and Diesel-Powered Water Pump DWP-1 not being subject to the testing requirements of 40 CFR 60.8.

17a. 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 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 18 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

18. 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.

19a. Pursuant to 40 CFR 60.4209(a), if you are an owner or operator, you must meet the monitoring requirements of 40 CFR 60.4209. In addition, you must also meet the monitoring requirements specified in 40 CFR 60.4211. If you are an owner or operator of an emergency stationary CI internal combustion engine, you must install a non-resettable hour meter prior to startup of the engine.

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.

20a. 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 performance evaluations; 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.

21. 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.

22a. 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 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.

23a. 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 and 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 and 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_x, CO, SO_2, PM, PM_{10} and VOM from the source with supporting calculations (tons/month and tons/year).

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.

24a. 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.

25a. 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.

26a. 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 shall be noted that this permit was revised to add four portable conveyors to the list of emission units and to increase the emissions limits in Condition 14(c).

If you have any questions on this, please call Mike Dragovich at 217/785-1705.

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

Date Signed: 12/20/2012

ECB:MJD:psj

cc: Region 1