



FUGITIVE DUST PROGRAM

Grede LLC | 801 S. Carpenter Ave Kingsford, MI 49802 | 12/12/19

## Purpose

To prevent the creation and to minimize the impacts of fugitive dust for all material handling activities on the Grede LLC site.

The Environmental Management Representative for Grede LLC IRO is responsible for implementation and execution of this plan.

## POTENTIAL SOURCES AND BEST MANAGEMENT PRACTICES

Best management practices need to be utilized for all material handling practices, and road maintenance. Opacity limits must be maintained below 5% at all times. This will be evaluated per method 9D at semi-annual opacity monitoring event.

Source	Control	Frequency/Notes
Blacktop Surfaces where travel, loading and unloading of sand, coke and other materials takes place	Wet Sweeping	Roads will be swept once per day or as required if visible emissions dictate. Sweeping will not be utilized if temperatures are below 32 degrees F, or if roads are snow covered/wet
Blacktop Surfaces where travel, loading and unloading of sand, coke and other materials takes place	Speed Limits	Speed Limits of 5 MPH will be enforced on all plant roads at all times.
Blacktop Surfaces where travel, loading and unloading of sand, coke and other materials takes place	Traffic Patterns	Traffic will enter through the South Entry gate and Exit through the same gate to mitigate areas where material may be tracked.
Dust from Plant Parking Lots	Wet Sweeping	Parking lots will be swept 2 times per year in May and in October, and at any other times were visible emissions dictate.
Scrap Steel Piles	Coverage	All scrap steel piles will be kept under covered charge yard area. Any metallic charge materials stored outside of the charge area will be tarped
Scrap Steel Piles	Cleaning of Spilled materials	All spilled materials or material tracked outside of the covered area will be cleaned daily
Scrap Steel Piles	Maximum Pile Height Control	Scrap steel piles will be maintained below the height of the main plant roofline at all times
Scrap Steel Piles - Dust from Handling	Proper Drop Height	Crane Operators will be trained to drop charge material as low as possible to minimize fugitive dust

Coke Piles	Maximum Storage	Piles will be maintained below a total for all piles of coke material below 131 CY. If for some reason stockpiles are ordered for due to supply issues the storage piles will be tarped
Coke Piles	3 Sided Bunkers	Concrete bunkers will be maintained with 3 sides keeping coke material below the height of the bunker wall
Coke Piles	Cleaning of Spilled materials	All spilled or tracked material outside the bunkers will be cleaned daily
Limestone Piles	Maximum Storage	Piles will be maintained below a total for all piles of limestone material below 131 CY. If for some reason stockpiles are ordered for due to supply issues the storage piles will be tarped
Limestone Piles	3 Sided Bunkers	Concrete bunkers will be maintained with 3 sides keeping limestone material below the height of the bunker wall
Limestone Piles	Cleaning of Spilled materials	All spilled or tracked material outside the bunkers will be cleaned daily
Incoming/Outbound Trucks	Tarps	All incoming or outbound trucks will utilize tarps while moving
Baghouse fines	Bags, or covered roll-offs	Baghouse fines will be held in bags or covered rolloffs for transport to landfill
Waste Sand	Minimize Spillage	Overfull hoppers or loader buckets will not be transported around the plant, hoppers will be leveled below the rim before transporting
Waste Sand	Covered Bunker	Covered bunker will be utilized for all sand waste material and will be emptied prior to filling
Waste Sand	Cleaning of Spilled materials	All spilled or tracked material outside the bunkers will be cleaned daily
Gate and Riser Conveyor	Water Sprays	Water Sprays will be utilized on the gate and riser conveyor when temperatures are above 32 degrees F

## INSPECTIONS

Daily Inspections will be done, and any deficiencies noted. Inspections will be stored with Environmental Maintenance and any deviation outside permit limits will be recorded on semi-annual deviation report.