

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

July 9, 2019

PERMIT TO INSTALL
29-19

ISSUED TO
Delray Connecting Railroad Company

LOCATED AT
1 Zug Island Road
River Rouge, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
A7809

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: April 10, 2019	
DATE PERMIT TO INSTALL APPROVED: July 9, 2019	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

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

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a. A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b. A visible emission limit specified by an applicable federal new source performance standard.
 - c. A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU-PORTSCRN-S2	Portable screener – Powerscreen Warrior 2400, 800 tons per hour capacity.	TBD	FG-SCRN&HAND-S2
EU-FIXSCRN-S2	Fixed screener – Terex Cedarapids CFS620H, 40 tons per hour capacity.	TBD	FG-SCRN&HAND-S2
EU-HANDLING-S2	Material handling operations, material storage, and roadway and parking lot emissions.	TBD	FG-SCRN&HAND-S2

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-SCRN&HAND-S2	Material handling operations including 800 ton per hour portable screener and 40 ton per hour fixed screener, material storage, and roadway and parking lot emissions.	EU-PORTSCRN-S2, EU-FIXSCRN-S2, EU-HANDLING-S2

**FG-SCRN&HAND-S2
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Material handling operations including 800 ton per hour portable screener and 40 ton per hour fixed screener, material storage, and roadway and parking lot emissions.

Emission Unit: EU-PORTSCRN-S2, EU-FIXSCRN-S2, EU-HANDLING-S2

POLLUTION CONTROL EQUIPMENT

Covered conveyors, partial enclosure on each screener, fugitive dust measures

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Fugitive Dust	5% opacity	3-minute average ^{a,b}	Fugitive dust from any road, lot, storage pile, or material handling activity at a storage pile	SC VI.2, SC VI.3	Act 451 324.5524(2), Act 451 324.5525(j)
2. Fugitive Dust	20% opacity	3-minute average ^a	Fugitive dust from any other source	SC VI.2, SC VI.3	Act 451 324.5524(2), Act 451 324.5525(j)

^a In accordance with Test Method 9D and Act 451 324.5525(j)

^b This condition does not apply to storage pile material handling activities when wind speeds are in excess of 25 miles per hour (40.2 kilometers per hour).

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Pellet Ore	1,500,000 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PORTSCRN-S2	SC VI.4	R 336.1205(1)(a), 40 CFR 52.21(c) & (d)
2. Slag ^a	50,000 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PORTSCRN-S2	SC VI.4	R 336.1205(1)(a), R 336.1225, 40 CFR 52.21(c) & (d)
3. All Materials ^b	2,550,000 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PORTSCRN-S2	SC VI.4	R 336.1205(1)(a), 40 CFR 52.21(c) & (d)
4. Coke	150,000 tpy	12-month rolling time period as determined at the end of each calendar month	EU-FIXSCRN-S2	SC VI.4	R 336.1205(1)(a), 40 CFR 52.21(c) & (d)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
5. BOP Slag	7,800 tons per month ¹	Calendar Month	EU-PORTSCRN-S2	SC VI.4	R 336.1225
6. BOP Slag	107 tons per hour ¹	Hourly	EU-PORTSCRN-S2	SC VI.5	R 336.1225
7. BOP Slag	207 tons per 8-hour rolling time period ¹	Rolling 8-hour period	EU-PORTSCRN-S2	SC VI.5	R 336.1225
8. Pellet Ore	2,645 tons per 8-hour rolling time period ¹	Rolling 8-hour period	EU-PORTSCRN-S2	SC VI.6	R 336.1225

^a Slag includes BOP Slag and Blast Furnace Slag.

^b All Materials includes coke, pellet ore, lump ore, coal, slag, coke breeze, and blended ore.

9. The permittee shall not screen materials in EU-PORTSCRN-S2 other than coke, pellet ore, lump ore, coal, BOP slag, blast furnace slag, coke breeze, and blended ore. **(R 336.1205(1)(a), R 336.1225, 40 CFR 52.21(c) & (d))**
10. The permittee shall not screen materials in EU-FIXSCRN-S2 other than coke. **(R 336.1205(1)(a), R 336.1225, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-PORTSCRN-S2 or EU-FIXSCRN-S2 unless the stacking conveyors have the covers installed, fastened on them securely, and maintained in good working order. **(R 336.1371)**
2. The permittee shall not process any asbestos or asbestos containing waste materials, as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations, in FG-SCRN&HAND-S2. **(40 CFR Part 61 Subpart M)**
3. The permittee shall not operate FG-SCRN&HAND-S2 unless the approved fugitive dust control plan (Plan), in Appendix B, has been implemented and is maintained. Alternate formats or revisions to the approved Plan must be approved by the AQD District Supervisor. **(R 336.1371)**
4. The paved roads must be flushed with water twice per week, paved lots must be flushed with water monthly, and paved open areas must be flushed with water four times per year. **(R 336.1371)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate either screener (EU-PORTSCRN-S2 or EU-FIXSCRN-S2) unless the associated partial enclosure is installed, maintained, and operated in a satisfactory manner. **(R 336.1205(1)(a), R 336.1225, R 336.1910, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required records and calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1201(3))**
2. The permittee shall perform a non-certified visible emission observation of the material screening, handling, and storage operations at least once a week. The observation shall take place while screening and material handling activities are taking place. The permittee shall initiate appropriate corrective action upon observation of visible emissions and shall keep a written record of each required observation and the corrective action taken. **(Act 451 324.5524(2), Act 451 324.5525(j))**
3. The permittee shall perform a Method 9 certified visible emission observation of the coke screening, handling, and storage operations at least once per month. The observation shall take place while screening and material handling activities are taking place. The permittee shall initiate corrective action upon observation of visible emissions exceeding the applicable visible emission limits of this permit and shall keep a written record of each required observation and the corrective action taken. **(Act 451 324.5524(2), Act 451 324.5525(j))**
4. The permittee shall monitor and record, in a satisfactory manner, the following records on a monthly and 12-month rolling time period basis.
 - a. The weight (in tons) of each material (including coke, pellet ore, lump ore, coal, slag, coke breeze, and blended ore) screened in EU-PORTSCRN-S2;
 - b. The weight (in tons) of each material (including coke, pellet ore, lump ore, coal, slag, coke breeze, and blended ore) screened in EU-FIXSCRN-S2;

The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a), R 336.1225, 40 CFR 52.21(c) & (d))**

5. The permittee shall monitor and record, in a satisfactory manner, the weight (in tons) of BOP Slag screened in EU-PORTSCRN-S2 for the following time periods.
 - a. on an hourly basis, for each hour that BOP Slag is screened; and
 - b. on an 8-hour rolling time period basis, for each 8-hour time period in which BOP slag is screened.

The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ **(R 336.1225)**

6. The permittee shall monitor and record, in a satisfactory manner, the weight (in tons) of Pellet Ore screened in EU-PORTSCRN-S2 on an 8-hour rolling time period basis, for each 8-hour time period in which Pellet Ore is being screened.¹ **(R 336.1225)**
7. The permittee shall keep records, in a manner acceptable to the AQD District Supervisor, of the treatment information specified in Appendix A for the fugitive dust sources. **(SIP Consent Order No. 8-1993, Exhibit A, Paragraph D (Note) and ADDENDUM)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-PORTSCRN-S2 or EU-FIXSCRN-S2. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the following source descriptions and control measures: **(SIP Consent Order No. 8-1993, Exhibit A, Paragraph 3)**
 - a. Control Methods:
 - i. Paved Roads - Paved roads are vacuum swept twice weekly.
 - ii. Unpaved Roads - Unpaved road C-D will be treated with asphalt emulsion, petroleum resin, or acrylic cement, once every two months. Unpaved road E-F will be treated once every three months.
 - iii. Paved Parking Lots – Paved lots will be vacuum swept once each week.
 - iv. Unpaved Parking Lots - Unpaved lots will be treated with asphalt emulsion, petroleum resin, or acrylic cement, once every two months.
 - b. Cleaning Equipment Description:
 - i. Vacuum Sweeper – Ford, CT 8000, Tandem Axle Truck with Vac All, Industrial Wet Vac Unit.
Sweeper description:
 1. Two gutter brooms with sprays.
 2. Two four-foot nozzles.
 3. Deflector broom (parallel to frame of truck)
 4. Anterior spray bar, width of truck.
 5. Water injection collar on vacuum nozzle.
 - ii. Dust Suppressant – Tandem axle truck with eight-foot spray bar on back of truck.
 1. Dilution ratio – 7:1 (water: chemical)
 2. Application rate – 0.1 gallons concentrate/sq. yd.
 3. Rate – 0 to 400 GPM at 0 to 100 psi.
 - c. Other Considerations:
 - i. All techniques to be implemented as scheduled during the months of April through November. During the months of November through March, treatment will be weather and need dependent.

Footnotes:

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

APPENDIX A
Required Records for Fugitive Dust Sources per SIP CO 8-1993

The permittee shall keep the following approved formats and procedures for the recordkeeping requirements referenced in FG-SCRN&HAND-S2, Special Condition VI.7. Alternative formats must be approved by the AQD District Supervisor.

- A. Unpaved Roads / Lots
 1. Date of Treatment
 2. Control Measure Used
 3. Responsible Person's Initial
 4. Name of Product Applied
 5. Amount of Solution / Water Applied
 6. Dilution Ratio
 7. Road Segment / Lot Identification

- B. Paved Roads / Lots
 1. Date of Treatment
 2. Control Measure Used
 3. Responsible Person's Initial
 4. Road Segment / Lot Identification

- C. Storage Piles / Material Handling
 1. Date of Treatment
 2. Control Measure Used
 3. Responsible Person's Initial
 4. Dilution Ratio
 5. Amount of Dust Suppressant / Water Applied
 6. Identification of Pile / Material Handling Operation Treated
 7. Equipment Used

- D. Optional Records
 1. Precipitation
 2. Temperature
 3. Wind Direction and Velocity

APPENDIX B
Fugitive Dust Control Plan per Rule 336.1371

I. Site Roadways / Plant Yard

- A. The dust on the site roadways/plant yard will be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Application will be on a weekly basis or more frequently if needed.
- B. Truck areas in and around the maintenance facility shall be paved.
- C. All roadways / plant yard shall be swept as needed between applications.
- D. A record of all applications and sweeping shall be kept on file and made available upon request to the Division.
- E. Speed of vehicles will be posted and limited to 10 mph.
- F. Any material spillage on roads shall be removed immediately.

II. Process

- A. All transfer points will have minimal drop distances: 1) Not more than 4 feet during dumping of coke onto the stockpile during truck unloading, 2) Elevation of fixed conveyors shall be maintained at maximum height of 35 feet.
- B. The stacking conveyors for screened coke breeze, nut coke, and furnace coke shall be covered securely and well maintained. Transfer points shall be inspected daily to ensure screen discharge end is properly aligned onto receiving conveyors and/or stackers.
- C. The screen and surrounding area shall be inspected and cleaned for material accumulation at the completion of each working production day.
- D. When wind speed is greater than 25 miles per hour, the operation of coke screening, load-in and load-out, and other material handling activities shall be suspended.
- E. Appropriate spare parts, that will allow for immediate repairs to be done, shall be kept on the premises.
- F. A list of appropriate suppliers of parts and equipment vendors shall be maintained in the event a work order has to be contracted outside.
- G. Material accumulation around conveyors and transfer area shall be cleaned at the completion of each working production day.

III. Storage Piles

- A. Stockpiling of all coke material will be performed with wheeled loaders to minimize drop distance and control potential dust problems.
- B. Stockpiles will be watered on a as needed basis in order to meet the opacity limits included within the permit. A record of all watering shall be kept on file and be made available upon request to the AQD.
- C. Maintain a minimum moisture of 5 percent at a depth of 6 inches from the surface of the pile and at a height 4 feet of the ground.
- D. Stockpile heights shall be maintained at less than 60 feet.

IV. Truck Traffic

- A. On-site, vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within six inches of the top of any side board, side panel or tail gate, otherwise, the truck shall be tarped.
- B. Spills around the transport trucks shall be cleaned daily using hand shovels and placing spilled materials into the truck or onto the stockpiles.
- C. Dirt/mud deposited on wheels of trucking and off-highway vehicles shall be removed before leaving the stockpile areas or premises of the Facility to prevent dragout dirt and/or mud.
- D. Off-site, all trucks leaving must be tarped.

V. Training and Administrative Aspects

- A. Responsible personnel on the management level will be assigned to oversee implementation of the Fugitive Dust Program at the Facility.

- B. Responsible personnel will be assigned to implement and monitor the control measures and the record keeping aspects of the Program.
 - C. Employee orientation on company policies on safety, environmental, operational and housekeeping shall be done for new hires.
 - D. Monthly in-house meetings on safety, environmental, operational and housekeeping shall be conducted.
 - E. Representatives shall attend and participate in coordinated meetings with the industries of Zug Island in improving conditions affecting operations and traffic controls on the island.
- VI. AQD Inspection - The provisions and procedures of this plan are subject to adjustment if following an inspection and written notification the AQD finds the fugitive dust requirements and/or the permitted opacity limits are not being met.