

SENT BY:

12-29-9 11:54AM DEPT OF ENVIRONMENT



Mostardi Platt
Environmental

1580 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-843-2100
Fax 630-843-9017
www.mostardi-platt.com

DUST MANAGEMENT PLAN
Prepared For
CARMEUSE LIME, INC.
South Chicago Plant
Plant ID. #031600 ADY
Located At
3245 East 103rd Street
Chicago, Illinois
November 21, 2003

© Copyright 2003
All rights reserved in
Mostardi Platt Environmental

MPE PROJECT M033101

NRDC-SETF ATTACHMENT TWO

12-29-83 11:54AM ; DEPT OF ENVIRONMENT

3123330200

SENT BY:

Mustardi Platt Environmental

TABLE OF CONTENTS

- REGULATORY APPLICABILITY 1
- REGULATORY LIMITS 1
- FACILITY INFORMATION 1
- RESPONSIBLE PERSONNEL 2
- FACILITY DUST COLLECTORS 2
- DUST MANAGEMENT PRACTICES 2
 - Building Exteriors 2
 - Building Interiors 2
 - Load-Out Bays 3
 - Load-Out Spouts 3
 - Track Wash Station 3
 - Dust Mitigation for Roads and Parking Areas 3
 - Paved Roads 3
 - Unpaved Roads 4
 - Suspension of Treatments 4
 - Dust Management for Storage Piles 4
 - Fuel Storage Pile 4
 - Limestone Storage Piles 4
 - Off-Specification Material 5
- MAINTENANCE 5
 - Dust Collectors 5
- DOCUMENTATION 6
- PERSONNEL TRAINING 6
- APPENDICES 7

SENT BY:



Mustardi Platt
Environmental

1820 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mustardi-plattenv.com

DUST MANAGEMENT PLAN

Prepared For
CARMEUSE LIME, INC.
South Chicago Plant
Plant I.D. #031600 ADY
Located At
3245 East 103rd Street
Chicago, Illinois
November 21, 2003

REGULATORY APPLICABILITY

The Carmeuse Lime, Inc., South Chicago Plant (Carmeuse) Dust Management Plan (Plan) complies with the Compliance Plan set forth in the letter from the City of Chicago Department of Environment to Carmeuse dated October 31, 2003.

This Plan is also in compliance with requirements specified in the City of Chicago Municipal Code, Chapter 11-4, "Environmental Protection and Control, Article II. Air Pollution Control".

REGULATORY LIMITS

Pursuant to Title 35 of the Illinois Administrative Code, Subtitle B: Air Pollution, Part 212.313, emissions from particulate collection equipment shall not exceed 0.03 gr/dscf.

FACILITY INFORMATION

South Chicago Plant - IEPA Permit I.D. No. 031600ADY

Carmeuse Lime, Inc.
3245 East 103rd Street
(Lake Calumet Township)
Chicago, Illinois 60617

12-29- 9 :11:55AM ; DEPT OF ENVIRONMENT->

3123538289

RESPONSIBLE PERSONNEL

The contact person for the Plan is the Production Superintendent. It is the responsibility of the Production Superintendent or his designee to inspect the facility on a daily basis and to ensure that all plan elements are implemented and carried out. This shall include, but not be limited to: inspections of emission sources and processes, inspection and maintenance of all dust mitigation equipment, and all record-keeping required by the Plan. The Production Superintendent will be assisted by the following facility personnel in meeting the requirements of the Plan:

Derald Bogs, Area Operations Manager
Richard Mikus, Maintenance Manager
Randall Boisvert, Regional Environmental Manager

FACILITY DUST COLLECTORS

A list of the dust collectors at the Carneuse facility, which are covered under this Plan, is contained in Appendix A.

DUST MANAGEMENT PRACTICES

Building Exteriors

1. Spills shall be cleaned up as soon as possible after they occur, however, in no case later than the end of the shift in which the spill occurred.
2. Dust buildup on the building roof and supporting structural members will be removed by a contracted vacuum service on a quarterly basis.
3. Management will inspect the facility on a daily basis to ensure a clean workplace environment. These inspections will be recorded on the Workplace Examination Sheet (WES). The Production Superintendent shall review the WES on a daily basis to ensure that daily inspections are being performed.

Building Interiors

1. Production and maintenance employees will set aside at least 15 minutes of each shift to clean up their designated work area(s).
2. All plant interior locations are cleaned on a monthly basis.
3. Process upsets or equipment failures that release product to the ground will be cleaned up by plant personnel and/or a contracted vacuum cleaning service as rapidly as possible.

SENT BY:

12-29-83 11:55AM DEPT OF ENVIRONMENT

Load-Out Bays

1. Load-out bays shall be cleaned of all spilled materials by no later than the end of each shift.
2. Spills resulting from the overloading of trucks or rail cars shall be cleaned at the earliest possible opportunity and as soon as safe operating conditions permit.
3. Overloaded trucks shall remove excess material at one of two designated locations called the "Transfer Station". The "Transfer Station" will be cleaned each shift.
4. Weighing scales are utilized to ensure proper loading of trucks and railcars.
5. The entrances and exits to load out areas will have either plastic flaps or doors to reduce wind flow through the area during material loading operations.

Load-Out Spouts

Telescoping load-out spouts are utilized at the high volume load-out locations. Air displaced during product load-out is vented through dust collectors prior to being discharged to the atmosphere. The dust collectors shall be in operation prior to the loading of trucks and rail cars.

Truck Wash Station

A truck wash station has been installed and is currently operating near the truck scale. Rumble strips are installed in the front of the truck wash. All loaded lime trucks exiting the facility will drive over the rumble strips and be washed with water prior to exiting.

The water wash station will not operate during periods of freezing weather conditions when such operation would present an adverse safety condition to plant personnel or affect the reliability of washing equipment due to ice buildup.

Dust Mitigation for Roads and Parking Areas

Paved Roads

The roads for customer truck loading throughout this facility are paved. Paved roads are treated by combination of two dust suppression techniques: sweeping and watering.

Sweeping and watering are performed at least daily or on an as-needed basis dependent upon climatic conditions. The Elgin White Wing 3-wheel street sweeper is located at the plant on a permanent basis. The water storage capacity of this sweeper is 300 gallons.

Also, a Ford 9000 water truck is utilized at the plant to water asphalt paved areas. The water storage capacity of the truck is 500 gallons. The water truck is equipped with two spray heads on the front and two heads on the rear.

12-29- 3 :11:56AM : DEPT OF ENVIRONMENT-

31233302007

SENT BY:

Unpaved Roads

All unpaved roads and other unpaved area are watered at least daily or on an as-needed basis dependent upon climatic conditions. The Ford 9000 water truck is utilized for these areas. In order to improve the efficiency of dust suppression operation, the facility hires a third party that applies a water/calcium chloride or other type of dust suppressant solution at least two times during the year.

Suspension of Treatments

Water treatments will be suspended during the period December 1 through the end of February and during any other periods of freezing temperatures for paved and unpaved roads. Sweeping of paved roads will be suspended when the roads are snow and/or ice covered and from December 1 through the end of February and during any other periods of freezing temperatures.

The treatments will be suspended for up to 24 hours subsequent to a precipitation event of 0.1 inches or greater. For the purposes of this plan a precipitation event is the total precipitation that occurs in the 24-hour period midnight to midnight. Precipitation data will be obtained from a local weather station.

Water treatments of paved and unpaved roadways will be suspended when malfunctions of the water truck occur such that normal treatments cannot be conducted. Sweeping of paved areas will be suspended when malfunctions of the sweeping equipment occur. Repairs to both the water truck and street sweeper will be made as soon as possible after the occurrence of malfunctions. If necessary, a third party water truck and/or street sweeper will be utilized.

A log will be maintained of the days on which water treatments and road sweeping are suspended due to the weather conditions stated above.

Dust Management for Storage Piles

Fuel Storage Pile

The fuel for the storage pile is pretreated with water prior to shipment as required to minimize fugitive dust generation. The level of fugitive dust emissions from the fuel pile is dependent upon the activity of the pile and climatic conditions. The attached drawing (see Appendix B) shows the location of the fuel storage pile.

Limestone Storage Piles

Limestone is pretreated with water prior to shipment to minimize fugitive dust emissions during material transfer and storage. The two active limestone storage piles are located closest to the unloading point (near the Calumet River) and are nearest to the kilns that utilize this limestone. Thus, loading and unloading emissions are minimized. The surplus limestone is stored in inactive piles located on the east side of the Facility and is shown in the attached drawing (see Appendix B).

SENT BY:

Off-Specification Material

All off-specification material shall be removed from the facility within 14 days after it is generated. Any accumulation of off-specification material shall not exceed a 3-foot height level. Company shall maintain an inventory listing of all off-specification material generated along with disposal receipts demonstrating that the material has been removed from the facility in accordance with the compliance plan.

MAINTENANCE**Dust Collectors**

1. Dust collectors will be inspected by facility personnel on a daily basis to assess the condition of emissions from the dust collector exhaust points. Any unusual visible emission conditions will be noted and brought to the attention of facility maintenance personnel for corrective action.
2. Plant maintenance staff performs a monthly inspection of each dust collector unit. These inspections will include the following items:
 - Overall dust collector operational condition
 - Condition of dust collector bags
 - Ductwork condition (check for leaks, condition of seals)
 - Fan motor/blower performance (condition of bearings, excessive vibration)
 - Fan belt condition
 - Dust chamber inspection
 - Static pressure measurement
 - Bag cleaning system operation and cycle times

A maintenance request will be made in response to any unusual conditions found during these inspections.

3. A ventilation system contractor will inspect and maintain facility dust collectors on a semi-annual basis. These inspections will include the following items:
 - Overall dust collector operational condition
 - Condition of dust collector bags
 - Ductwork condition (check for leaks, condition of seals)
 - Fan motor performance (condition of bearings, excessive vibration)
 - Fan belt condition
 - Dust chamber inspection
 - Static pressure measurement
 - Bag cleaning system operation and cycle times

SENT BY

The contractor will perform any needed maintenance and other corrective actions to maintain dust collector operation and performance.

These inspections will be documented and will be available for inspection upon request.

DOCUMENTATION

1. Documentation of all required Dust Management Plan activities, including records of plant personnel training in the Plan, is maintained in the South Chicago Plant offices and is available for inspection during normal business hours. These Plan records will be retained for 5 years.
2. A PM and PM-10 emission inventory (EI) will be maintained for the facility. The EI will include all on-site point and fugitive emission sources (see Appendix C). A quarterly report will be submitted to the City of Chicago Department of Environment demonstrating the location of sources, calculation methods, level of control applied, and production rates. This report will be submitted to the DOE within thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

PERSONNEL TRAINING

1. All plant personnel will receive training on this Dust Management Plan and the associated duties and responsibilities. Records will be kept of all plant personnel who receive training in the Plan including who performed the training. Signed acknowledgments of training by the employees and the trainer will be kept on site.
2. The Dust Management Plan will also be included in the weekly Tool Box training program.