

Exhibit A
Fugitive Dust Control Plan
Morton Salt, Inc.

1. Facility Name and Address:

Morton Salt, Inc.
10335 Flora Street
Detroit, Michigan 48209

2. Name and Address of Responsible Person/s:

Susan Anders
Morton Salt, Inc.
Corporate Environmental Manager (or successor)
123 N. Wacker Drive
Chicago, IL 60606-1743

I Summary of Source Descriptions:

A. Identification of Fugitive Dust Sources

1. Paved Surfaces – The site has a total of 191,116 square feet of paved area. Paved areas which could potentially contribute to fugitive dust emissions include the following:
 - stockpile pad: 97,834 square feet
 - truck traffic area and employee parking lot: 78,266 square feet

II Process Flow Description and Control Measures :

Approximately 170,000 tons of rock salt pre-treated with a liquid anti-caking additive is delivered to the Morton Salt location on the Rouge River from K+S Windsor Salt's mine in Windsor, Ontario, Canada. The product is primarily shipped by vessel and is unloaded onto an asphalt storage pad. On occasion, product may also be delivered via barge or truck. A front-end loader is utilized to load salt from the stockpile into customer trucks.

1. Vessel Unloading: The product is unloaded by self-unloading vessels equipped with a 150 foot adjustable conveyor. Once pile formation starts (typically within 15 minutes) drop height is minimized to less than five feet. If excessive fugitive dust is observed during unloading, the vessel conveyor is equipped with water spray bars that may be utilized; however this typically is not necessary.

2. Stockpile Pad: Approximately 170,000 tons of salt is unloaded onto to the storage pad. The stockpile is built upon an asphalt pad with an aggregate subbase, and is located within a secondary containment structure. A manhole located inside the contained area has been permanently sealed. In January 2009, the facility obtained a Special Discharge Permit with the Detroit Water and Sewerage Department that allows for storm water accumulation in the pad containment area to be pumped to a manhole located outside the bermed area for discharge to the sewer system.

Typically, vessels are brought in at the end of the ice control season and once the stockpile is entirely constructed, the pile is covered. If there are gaps between shipments of vessels, the facility will partially cover what is received, leaving the face open to receive the next shipment. To ship covered product, the tarp is cut off as they progress, exposing the face of the stockpile.

III Other Specific Dust Control Measures

- A. The paved area which experiences truck traffic encompasses 67,653 square feet. This area does, at times, retain dust that is deposited by vehicles entering and leaving the facility. The dust can become airborne on a windy day. The paved areas will be manually or mechanically swept on a bi-monthly schedule. During the ice control season (December 15th through March 15th) inspections will be carried out weekly to determine whether additional sweeping of the paved areas is required to control fugitive dust emissions. A maximum vehicle speed of 5 mph has been posted for this area.
- B. Bulk salt is loaded into trucks from the stockpile. The potential for fugitive dust during this procedure is minimized by limiting the drop height of salt from the front-end loader. The loader operator shall keep the machine's bucket a distance of no more than one foot above the top of the sides of the truck. Morton Salt requires all open-bodied trucks to be tarped prior to transporting.
- C. An inherent characteristic of sodium chloride is it's propensity to absorb moisture from surrounding air whenever the relative humidity exceeds 75%. At this point, the surface of the crystals dissolves slightly and become damp. When the relative humidity then drops below 75%, the salt surface dries out and causes the crystals to bind together in a hard surface crust. A recurring cycle of wetting and drying will induce a very dense crust formation

The monthly climatological data for Detroit indicates that the average relative humidity fluctuates above and below 75%, thereby ensuring crust formation at the surface of all exposed salt crystals.

The moisture absorption and surface caking characteristics of rock salt appears to duplicate the qualities of commercially available chemical dust suppressants. Morton Salt, Inc. contends that the calculated area emissions are probably greater than actual

emissions at our location because of the salt's inherent moisture absorption characteristics.

Any operations not addressed in this plan are adequately contained or controlled and do not require any corrective dust control measures.

IV Required Recordkeeping

- A) Paved Roads/Lots
 - 1) Sweeping invoices
 - 2) Inspections
 - 3) Quarterly Fugitive Dust Reports

- B) Storage Piles/Material Handling
 - 1) Tarping invoices

Revision Log

REVISION NO.	REASON FOR CHANGES	DATE
000	Updated 1994 version to reflect facility changes (removal of various conveyors, silos, truck loading station and bagging operations and updated vessel unloading information).	January 11, 2010
001	Changed company name from Morton International to Morton Salt, Inc.	May 13, 2013
002	Change mine company name from Canadian Salt to K+S Windsor Salt. Removal of warehousing and packaged product shipping. Added more detail regarding vessel unloading. Added recordkeeping section. Updated contact information.	January 23, 2014



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



THOMAS WYANT
DIRECTOR

March 7, 2014

Ms. Susan Anders
Environmental Manager
Morton Salt, Inc.
123 North Wacker Drive
Chicago, IL 60606-1743

Dear Ms. Anders:

Subject: Morton Salt Detroit Facility N1032 - Revised Fugitive Dust Control Plan

This letter is written in response to the revised Fugitive Dust Control Plan submitted on February 25, 2014. A previously revised Fugitive Dust Control Plan, submitted on January 11, 2010 requesting approval for a revised fugitive dust plan at the Morton Salt facility in Detroit as required under Consent Order SIP 26-1993, Revised 9/9/94, was approved on December 2, 2011. Based upon a review by MDEQ, Air Quality Division, of the proposed fugitive dust plan revisions, the new plan has been approved. The original plan was amended to reflect the current operations at the Morton Salt facility. Most of the particulate emitting equipment, which was included in the previous plan, has been dismantled and removed from the facility. The revised plan contains equivalent treatment, monitoring and recordkeeping requirements as the original plan. As such, no increases in the level of fugitive dust or particulate emissions are expected as a result of the revisions.

If you have any questions, please feel free to contact Mr. Jorge Acevedo at 313-456-4679 regarding the revised fugitive dust control plan for the Morton Salt facility.

Sincerely,

Wilhemina McLemore
Detroit District Supervisor
Air Quality Division
313-456-4685

cc: Ms. Sally McKellar, Morton Salt
Ms. Mary Maupin, DEQ
Mr. Tom Hess, DEQ
Mr. Tracey McDonald, DEQ
Mr. Jorge Acevedo, DEQ