STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings involving the **NATIONAL STEEL CORPORATION, GREAT LAKES DIVISION,** a corporation organized under the laws of the State of Delaware and doing business at 1 Quality Drive in the City of Ecorse, County of Wayne, State of Michigan.	SIP No. 27-1993 Revised: 9/9/94

STIPULATION FOR ENTRY OF FINAL ORDER
BY
CONSENT

This proceeding results from provisions of the Federal Clean Air Act ("CAA"), 42 U.S.C. Section 7401 et seq., as amended by the Clean Air Act Amendments of 1990, P.L. No. 101-549, 104 Stat. 2399 (Nov. 15, 1990), that designate a portion of Wayne County as non-attainment for PM-10 (particulate matter less than 10 micrometers) and require a State Implementation Plan ("SIP"), based on legally enforceable control measures, that provides for a demonstration of attainment and maintenance of the primary National Ambient Air Quality Standard ("NAAQS") for PM-10 in Wayne County. Further, pursuant to Section 15 of the Michigan Air Pollution Act, 1965 PA 348, as amended ("Act 348"), companies in the standard industrial classifications listed in 15(1), and which are located in areas listed in Table 36 of R 336.1371 of the Michigan administrative code, are required to develop and implement an approved fugitive dust control operating program and to have the program embodied in a legally enforceable order or as part of an approved permit to install or operate.

The National Steel Corporation, Great Lakes Division ("Company"), owns and operates a steel manufacturing facility, which includes the Zug Island facility in the City of River Rouge, and the Main Plant, 80" Mill, and Michigan Steel facilities in the City of Ecorse ("Plant"), County of Wayne, State of Michigan. The Michigan Department of Natural Resources ("MDNR") alleges that the Plant is a significant source of fugitive dust and particulate emissions which contribute

to the non-attainment problem. Further, the requirements for the control of fugitive dust, set forth in Section 15 of Act 348, apply to the Plant.

The Company and the MDNR stipulate as follows:

1. The Air Pollution Act, 1965 PA 348, as amended, ("Act 348"), MCL 336.11 et seq; MSA 14.58(1) et seq is an act to control air pollution in this state.

2. The Director of the MDNR ("Director") is authorized pursuant to Section 5 of Act 348 to administer and enforce all provisions of Act 348.

3. The Director has delegated authority to the Air Quality Division ("AQD Chief") to enter into the Consent Order.

4. The resolution of this matter by a Consent Order pursuant to Section 16c of Act 348 is proper and acceptable.

5. This Consent Order becomes effective on the date of execution ("effective date of this Consent Order") by the AQD Chief.

6. The emissions of fugitive dust from the Plant are subject to the opacity limitations and prohibitions contained in Sections 15 and 15a of Act 348. The particulate matter and fugitive dust emissions from the Plant must not cause or contribute to a violation of the PM-10 NAAQS. Further, the CAA and Act 348 require the application of all reasonably available control measures ("RACM") for the control of PM-10 emissions.

7. This Consent Order is designed to ensure attainment and maintenance of the PM-10 NAAQS, compliance with Sections 15 and 15a of Act 348, and compliance with the RACM requirements of the CAA and Act 348.

COMPLIANCE PROGRAM AND EMISSION LIMITATIONS

8. On and after the effective date of this Consent Order, the Company shall fully comply with the provisions and requirements of the fugitive dust control operating program and Recordkeeping for Fugitive Dust Sources Addendum, and the particulate emission control program, which are attached as Exhibits A and B, respectively, incorporated by reference, and made an enforceable part of this Consent Order.

RECORDKEEPING AND REPORTING

9. On and after the effective date of this Consent Order, the Company shall keep records as specified in Exhibit A and Exhibit B.

10. On and after the effective date of this Consent Order, the records required pursuant to this Consent Order shall be kept on file at the Company for a period of at least two (2) years, and shall be made available to MDNR upon written or verbal request.

11. Beginning with the calendar quarter starting after the effective date of this Consent Order, and quarterly thereafter, the Company shall submit to MDNR a report identifying each day in which any emission limit, operational requirement, or recordkeeping requirement, as specified in Exhibits A or B, was not met. This report shall, for each instance, explain the reason that the emission limit, operational requirement, or recordkeeping requirement was not met, the duration of the event, the remedial action taken, and a description of the steps which were taken to prevent a recurrence. These reports shall be submitted within 30 days following the end of the calendar quarter in which the data were collected.

GENERAL PROVISIONS

12. Upon entry, this Consent Order, along with other supporting documentation required by the United States Environmental Protection Agency ("U.S.EPA"), shall be submitted to the U.S.EPA for approval as a revision to the Michigan SIP in accordance with Part D, Section 171 et seq., of the Federal Clean Air Act, as amended by Section 105 of the Clean Air Act Amendments of 1990. This Consent Order shall become effective immediately upon entry, except that this Consent Order shall have no effect on the federally-approved SIP unless and until the submitted SIP revision request is formally approved by the U.S.EPA.

13. Upon entry of this Consent Order, the Company may change it's processes, modify the fugitive dust control program contained in Exhibit A, or modify the particulate emission control program contained in Exhibit B ("Control

Programs"), in accordance with the following:

A. Process Change

(1) The Company may change it's operations or processes which are sources of particulate and fugitive dust provided all of the following conditions are met:

(a) The provisions of the Control Programs continue to apply to the subject operation or process;

(b) The change does not result in an increase in the level of fugitive dust or particulate emissions;

(c) The change is approved.

(2) The Company shall submit to MDNR a written description of the proposed change and how it meets the requirements of 13(A)(1).

(3) The MDNR shall approve or disapprove the proposed change, in writing, within 45 days from receiving a proposed change which meets the requirements of 13(A)(1).

(4) Should the MDNR disapprove the proposed change, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

B. Control Program Revision

(1) The Company may revise the Control Programs provided both of the following conditions are met:

(a) The Company demonstrates*, in writing, that the proposed revision does not result in an increase in the level of fugitive dust or particulate emissions and submits the demonstration to the MDNR for approval.

(b) The revision is approved.

(2) The MDNR shall approve or disapprove the proposed revision, in writing, within 45 days from receiving a proposed revision using an applicable U.S.EPA approved method to demonstrate the

proposed revision meets the requirements of 13(B)(1).

(3) Should the MDNR disapprove the proposed revision, the disapproval must describe the specific reasons for the decision and must be forwarded to the Company.

C. U.S.EPA Notification

Upon approval of a change pursuant to subsection A above, or a substitution of a control measure pursuant to subsection B above, MDNR shall notify U.S.EPA, in writing, of the revised provisions which are enforceable for the facility.

D. Minor Modification

Upon adoption by the MDNR, and upon approval by U.S.EPA, of operating permit rules to implement the Permit Modification provisions recited at 40 CFR 70.7 (e), the Company may modify a fugitive dust or particulate emission source referred to in this Consent Order according to the terms and conditions contained in the operating permit rules.

E. Minor Modification Approval

Upon MDNR approval of a minor modification pursuant to subsection D above, the MDNR shall submit the approved minor modification to U.S.EPA as a proposed revision to the Michigan SIP.

F. Other Applicable Requirements

Any process change, control program revision, or minor modification made pursuant to this Paragraph does not affect the company's obligation to obtain a permit to install or operate required by Federal law or regulation, or contained in Part 2 of the Air Pollution Control ("APC") Rules and any other applicable requirement contained in the APC Rules or Act 348.

* - Demonstrations made pursuant to 13(B)(1)(a) involving chemical dust suppressant applications on unpaved roads shall be made using only petroleum resins, asphalt emulsions, or acrylic cements unless otherwise explicitly provided for by the applicable U.S.EPA approved SIP or U.S.EPA approved method.

14. This abatement program is not a variance subject to the 12 month limitation specified in Section 22 of the Air Pollution Act, being MCLA 336.32.

15. The provisions of this Consent Order shall be binding on the parties to this action, their officers, servants, employees, and attorneys, and on those persons in active concert or participation with them who receive actual notice of this Consent Order. In the event National Steel Corporation sells or transfers any property or facilities covered by this Consent Order, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within 30 calendar days, the National Steel Corporation shall also notify MDNR Staff, in writing of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser or transferee. The purchaser must provide written agreement, to the Company, to assume the compliance responsibilities of the Consent Order and provide a copy of the agreement to the MDNR Staff.

16. Pursuant to the requirements of Section 5h of Act 348, the public was notified of a 30-day public comment period on this Consent Order which began on March 1, 1993 and a public hearing on this Consent Order which was held on March 30, 1993.

17. Section 16e of 1965 PA 348 may serve as a source of authority but not a limitation under which this Consent Order may be enforced. Further, the

Michigan Environmental Protection Act ("MEPA"), 1970 PA 127, MCLA 691.1201 et seq; MSA 14.528(201) et seq; and all other applicable laws may be used to enforce this Consent Order.

I, the undersigned, who is signing this Stipulation and Order for the Company, certify that I am fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

Approved as to Form and Content:

David L. Peterson x

NATIONAL STEEL CORPORATION
GREAT LAKES DIVISION
DAVID L. PETERSON
By: VICE PRESIDENT & GENERAL MANAGER

Dated: Sept 30, 1994 x

The above signatory subscribed and sworn to before me this 30 day of Sept., 1994.

Bette Ann Dale
Notary Public

BETTE ANN DALE
Notary Public, Oakland County, MI
My Commission Expires July 1, 1995

Approved as to Content:

Dennis M. Drake, Acting Chief
AIR QUALITY DIVISION
DEPARTMENT OF NATURAL RESOURCES

Dated: 10/12/94

Approved as to Form:

A. Michael Leffler
Assistant Attorney General, In Charge
NATURAL RESOURCES DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: 10/11/94

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Natural Resources pursuant to the provisions of the Air Pollution Control Act;

IT IS ORDERED that this Consent Order is approved and shall be entered in the record of the MDNR as a Final Order.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

By:

Dennis M. Drake, Acting Chief
Air Quality Division

Dated: 10/12/94

EXHIBIT A
FUGITIVE DUST CONTROL PLAN
GREAT LAKES DIVISION
NATIONAL STEEL CORPORATION

1. Facility Name and Address:

National Steel Corporation
Great Lakes Division
Main Plant, 80" Mill, Michigan Steel
1 Quality Drive
Ecorse, Michigan 48229

2. Name and Address of Responsible Person:

Manager of Environmental Control
National Steel Corporation
Great Lakes Division
1 Quality Drive
Ecorse, Michigan 48229

3. Summary of Source Descriptions and Control Measures:

A. Paved Roads

1) Paved roads are water flushed. Roadway Nos. 526 and 527, which serve the BOP area, and Nos. 528, 529 and 518, which are used by the Levy Company to haul BOP slags, etc., will be vacuum swept in addition to being water flushed.

2) Cleaning Equipment Description:

a) Water Flushing - A water truck (approximately 3000 gallon capacity) with a three-way water piping system for high pressure discharge. A hydraulic pump, powered by the vehicle engine via a power take-off drive, assures constant water discharge pressure independent of vehicle speed.

b) Vacuum Sweeping - An industrial road sweeper wets, sweeps and vacuums in one traverse. An on-board water tank supplies the wetting water for the front spray bar, and directly behind the flush bars are two rotary brooms which sweep the road surface washings toward the center of the road sweeper. A vacuum spout draws the swept washings into the debris tank mounted on the truck.

3) Frequency and Application Rate:

a) Frequency of water flushing is once a day, five days a week.

b) The frequency of vacuum sweeping of the roads listed in Paragraph 3.A.1. above is once a week. This sweeping is in addition to the water flushing program specified in Paragraph 3.A.3.a. above.

c) Application rate for water flushing is 5 gal/100 sq. ft.

B. Unpaved Roads

1) All unpaved roads will be treated with a asphalt emulsion, petroleum resin, or an acrylic cement.

2) Petrotac is used as the chemical dust suppressant. The dilution

ratio is 7 parts water/1 part suppressant.

3) Application Intensity - The application rate will be 0.83 gal. solution/sq. yd.

4) The unpaved roads listed in Table 13 will be treated once every month, unless weather conditions preclude treatment. All unpaved roads not listed in Table 13 will be treated once per quarter, unless weather conditions preclude treatment.

C. Paved and Unpaved Parking Lots

1) Of the unpaved total, 0.0163 square miles, 47.4% or 0.0077 square miles occur at Michigan Steel, an unused facility. No control is proposed for these unused parking lots. Vegetative cover has already begun to stabilize these lots. If activity is ever resumed, appropriate control will be employed.

2) Paved lot accesses are water flushed once a day, five (5) days per week.

3) An asphalt emulsion, petroleum resin, or acrylic cement will be applied to unpaved parking lots and unpaved parking lot accesses. The unpaved lots listed in Table 13, and any associated unpaved accesses, will be treated once every month, unless weather conditions preclude treatment. All unpaved lots not listed in Table 13, and any associated accesses, will be treated once per quarter, unless weather conditions preclude treatment.

4) The dilution ratio and application rate are the same as for unpaved roads. The application rate for water flushing is five (5) gal./100 sq. ft.

D. Transportation of Bulk Materials

1) Each material unloaded and transported which is a result of collection by pollution control equipment is completely contained by one or more of the following methods:

a. Enclosed truck
b. Screw conveying
c. Elephant trunk

2) Raw materials with silt content > 1% received and transported are contained by one or more of the following methods:

a. Enclosed truck
b. Enclosed hoppers
c. Pneumatic truck

3) Observations of transportation of bulk materials are made five (5) times a week and recorded in the journal log book.

(Note: There are at this time no storage piles at the Main Plant, 80" Mill, or the Michigan Steel facility.)

4. Conditions Under Which Cleaning or Water Suppression may be Suspended:

A) When daytime temperatures are below 32 degrees F and/or freezing on roadway surfaces poses a hazard.

B) When precipitation in any form during the previous 24-hour period has exceeded 0.1 inches or current precipitation obviates the need for control.

C) Control measures are also suspended during the non-control season from November through February.

D) If an extended period of sub-freezing weather occurs under conditions where there is no snow or ice cover and if roadway surface loadings become excessive, a vacuum sweeper will be called in. Therefore, the implementation of this action will be discretionary by the Manager, Environmental Control.

5. Recordkeeping, Reporting, and Special Considerations

A) Roads and lots are inspected on a daily basis, 5 days a week, during the control season, and once a week during the non-control season.

B) A journal log book is kept and retained for a period of at least two (2) years after the final entry. Records include:

1) Date
2) Time
3) Weather conditions
4) Observations of roadway and lot conditions
5) Control activities
   a. Recently completed activities
   b. Actions requiring implementation

C) Vehicle speeds are restricted to 15 mph at all times and are monitored by GLS Security.

(Note: See attached DNR Required Recordkeeping for Fugitive Dust Sources Addendum for additional information.)

FUGITIVE DUST CONTROL PLAN
GREAT LAKES DIVISION
NATIONAL STEEL CORPORATION

1. Facility Name and Address:

National Steel Corporation
Great Lakes Division
Zug Island Facility
Zug Island Road
River Rouge, Michigan 48218

2. Name and Address of Responsible Person:

Manager of Environmental Control
National Steel Corporation
Great Lakes Division
Zug Island Facility
Zug Island Road
River Rouge, Michigan 48218

3. Summary of Source Descriptions and Control Measures:

A. Paved Roads

1) Paved roads are vacuum swept twice a day, five (5) days a week.

2) Cleaning Equipment Description:

Vacuum Sweeping - An industrial road sweeper wets, sweeps and vacuums in one traverse. An on-board water tank supplies the wetting water for the front spray bar, and directly behind the flush bars are two rotary brooms which sweep the road surface washings toward the center of the road sweeper. A vacuum spout draws the swept washings into the debris tank mounted on the truck.

3) Roadway sweeper collected is deposited in one of <u>two</u> areas. Material collected from roadways in the coal fields is deposited near the working face of an active pile and is returned to the coal feed stream. Material collected in the breeze processing area can be treated similarly. Other roadway dusts are taken to the refuse transfer station, near D-4 furnace as shown in the plan. On a five (5) day a week basis debris is hauled from the transfer area to licensed landfills.

B. Unpaved Roads

1) All unpaved roads will be treated with a asphalt emulsion, petroleum resin, or acrylic cement.

2) Petrotac is used as the chemical dust suppressant. The dilution ratio is 7 parts water/1 part suppressant and the application intensity is 0.83 gal./sq. yd.

3) Application Intensity - One (1) gallon of suppressant solution per 100 square feet of surface.

4) The unpaved roads listed in Table 13 will be treated once every month, unless weather conditions preclude treatment. All unpaved roads not listed in Table 13 will be treated once per quarter, unless weather conditions preclude treatment.

C. Paved and Unpaved Parking Lots

1) Paved lot accesses are vacuum swept once a week.

2) An asphalt emulsion, petroleum resin, or an acrylic cement will be applied to unpaved parking lots and unpaved parking lot accesses. The unpaved lots listed in Table 13, and any associated unpaved accesses, will be treated once every month, unless weather conditions preclude treatment. All unpaved lots not listed in Table 13, and any associated unpaved accesses, will be treated once per quarter, unless weather conditions preclude treatment.

3) The dilution ratio is 7 parts water/1 part suppressant. The application intensity is 0.83 gal. solution /sq. yd.

4) Dust suppressant application is suspended during the non-control season from November through February. (Note: Not applicable to vacuum sweeping which is continuous.)

5) Roads are inspected on a daily basis, five (5) days a week during the control season and once a week during the non-control season.

6) The road sweeper operator traces his route on a plant map showing which roads were swept on his shift. The Environmental Control Inspector on duty at Zug Island reviews the maps and may make recommendations for priorities. In addition to those roads specified by Environmental Control, the sweeper operator at his discretion may resweep any road he determines to be dusty. This flexibility has been built in to permit the Environmental Control Inspector to focus on roads on a priority basis based on the locations in the plant where transportation activities are occurring. Sweeper route maps are maintained for a period of at least two (2) years.

7) Spills are observed by the Environmental Control Inspector or are reported by others to him. The Environmental Control Inspector arranges with General Labor to have appropriate equipment and personnel dispatched to clean up the spill. Spills are removed by the end of the next weekday workday.

8) Vehicle speeds are restricted to 15 mph at all times and monitored by GLS Security.

D. Unloading or Loading of Open Storage Piles

1) Self unloading boats have an adjustable stacker type unloading conveyor. These booms will be made to track or follow pile tops closely.

2) Conveyor stacker booms are operated such that the drop height is less than five (5) feet.

3) Clam shell crane buckets are lowered to within five (5) feet of the pile before material discharge is permitted.

4) All scheduled coal vessels are equipped with water sprays at the discharge end of the unloading boom which consists of serrated head water sprays to spray the entire width of the unloading boom transfer belt.

5) Pile reclaim is by front end loader to large dump trucks. The loader bucket is lowered to within 12" of the truck top before the bucket is tilted.

6) There are two principal coal dump stations. One has two enclosed sides, the other has three enclosed sides.

7) During periods of high winds (two instantaneous readings greater than 35 mph within one hour, as measured by a calibrated anemometer on site) unloading of coal boats, transport of coal to field storage and reclamation of coal therefrom, will be discontinued. Operations may resume within 15 minutes after wind speeds have lowered below this level.

8) Water sprays are located at discharge end of stacker booms (see Attachment 5). Depending on the amount of moisture added during coal loading, up to ten gallons per ton may be applied.

9) The above plan elements will be suspended when precipitation in any form during the previous 24-hour period has exceeded 0.1 inches or current precipitation obviates the need for control on the material being loaded or unloaded.

10) Inspections of loading and unloading operations are made by the Environmental Control Inspector 5 days a week during the control season of March through October and once a week during the balance of the year.

E. Storage Piles

1) A chemical dust suppressant is applied to temporary roadways used or created by equipment reclaiming coal from field storage.

2) When coal is reclaimed from storage, the open exposed face is treated with a chemical dust suppressant, except for the actual working face. The working face will not exceed an area greater than 120 linear or horizontal feet.

3) If a bulk material spills, the loader operator pushes the material back into the main pile. Also, suppressant is used in the active area of loading/unloading to minimize the potential for fugitive dust generation. Should a material spill on a road surface, the spilled material is readily removed by the industrial vacuum sweeper.

4) Areas listed in E. 1),2), and 3) above will be treated with a chemical dust suppressant once a month during the control season.

5) Petrotac is used as the chemical dust suppressant (See Attachment 1).

6) A 1 to 20 dilution ratio will be used. The application intensity will be 0.2 gal./square yard.

7) Suppressant application will be suspended during the non-control season from November through February.

8) Weekly visual inspections are made of the sprayed storage piles by the Environmental Control Inspector. The inspector's observations include the barrier thickness on the storage pile surface and an overall visual inspection of the suppressant surface quality. If the surface quality of the suppressant exhibits the potential to allow for a visible emission (i.e. emissions producing a 10% opacity), additional suppressant compound will be applied.

9) Daily inspections, five days per week, of the raw material storage and transportation areas, including the working face area, will be made by Environmental Control personnel during the months of March through October. Inspections for the months of November through February will be made on a weekly basis. A log of inspections and records will be retained on file for at least two (2) years from the date of inspection.

F. Outdoor Conveying Transfer Points

1) Conveyor belt speeds are limited to 700 fpm.

2) Conveyor areas are inspected and cleaned daily.

3) Clean up along the conveyors is performed routinely and any raw materials that are cleaned up are shoveled directly onto the belt.

4) One or more of the following techniques is employed in every external conveyor installation:

a. Enclosure of transfer points.
b. Usage of belt wipers or scrapers.
c. 210 degree corrugated steel covers.
d. Transfer drop heights limited to 4-5 feet.

5) Disposal of belt cleaner collectates: Most conveyor belt cleaners have collecting chutes that direct the removed materials to the primary receiving hopper. Where this is not possible, the material is discharged to a pile and the pile is combined with the transferred material. In all cases raw materials are recombined for forward flow with the bulk material being conveyed.

6) Conveyor speeds are limited by the physical configuration of the units drive train and the size of the motor employed. With the recent reconfiguration of the plant, all conveyors are capable of handling twice the required amounts of material. No inspections are required to assure proper belt speeds.

7) Conveyor areas are monitored by shift supervision on a frequent basis and a housekeeping inspection is made each week. Any spillage is scheduled for cleanup as soon as it is found, but not later than the weekly inspection.

G. Transportation of Bulk Materials

1) Materials transported in trucks that are in the category of > 1% to < 5% silt are loaded with 6" freeboard or are adequately wetted and stable.

a. Breeze - average moisture - 19%
b. Mill Scale - oily material - 6" freeboard
c. Lump Ore - 6" freeboard

2) Truck bodies are inspected to insure integrity.

3) Vehicles are limited to speeds less than 15 mph.

4) Vehicle exhausts are directed upwards.

5) Materials in the category of > 5% to < 20% silt are wet or transported in covered trucks.

a. B.F. flue dust - Not tarped because of high temperatures
b. Blend - Wet and stable crust
c. Coal Pile 1 - 8% moisture
d. Coal Pile 2 - 8% moisture
e. Slag Chips - Delivered to plant in vendor truck
f. Coal Pile 3 - 8% moisture
g. Coal Pile 4 - 8% moisture

6) When precipitation in any form during the previous 24 hour period has exceeded 0.1 inches or current precipitation obviates the need for control of the material being transported, wet suppression is suspended.

7) During the non-control season from November to March, wet suppression of materials is suspended.

H. Inspection Procedures

1) The Environmental Control Department will select 5 random trucks for inspection. These observations will be made on a monthly basis.

Date _____
Truck Identification _____
Contents _____
Adequate freeboard _____

2) Truck bodies will be inspected by the trucking contractor and the Environmental Control Department with the following frequency:

a. Permanently assigned trucks - semiannually
b. Temporary or contract trucks - upon entry to site and every 6 months thereafter

Inspection reports will be prepared and retained on file for a period of 12 months following the date of inspection. Any permanently assigned truck found defective will be promptly scheduled for repair or replacement. Any temporary contract truck found defective will be promptly repaired or removed from the site.

3) Vehicle Speeds - The maximum posted and permitted speed on Great Lakes Steel property is 15 mph. This speed is monitored and controlled by the mobile division of the Great Lakes Security Department.

4) Vehicle Exhaust - Truck exhausts will be reexamined to confirm their vertical discharge. Contract trucks will be inspected upon arrival at the plant. These inspections and the resulting records will be prepared and retained as in H. 2, above.

I. Recordkeeping and Reporting Requirements

1) A journal log book is kept and retained for a period of at least two (2) years after the final entry. Records include:

a) Date
b) Time
c) Weather conditions
d) Observations of roadway and lot conditions
e) Observations of spills or reports of such
f) Observations of loading and unloading operations
g) Control activities:
1 - Recently completed activities

2 - Actions requiring implementation
h) Dates of arrival of boat or train shipments

2) Records of dust suppressant applications made pursuant to paragraphs E.1 and E.2 above will be maintained by Great Lakes Steel Environmental Control Department and will be retained for a period of at least two (2) years.

J. Special Considerations

1) Most of the raw materials are received in self unloading boats. The booms from these boats are normally kept close to a pile top. However, occasionally wave action causes a boat to rock gently and results in boom rise and fall. To avoid boom damage under these conditions a greater vertical separation is maintained between the boom and pile top, and as a result, drop heights of 20 feet may occur at these times. Under more normal conditions, a drop height of 5 feet or less can be maintained. This height of 5 feet or less is also maintained for stacker booms.

2) All materials hauled from Zug Island are transported in contractor trucks. Although control of fugitive emissions from contractor trucks leaving Zug Island is rightfully the responsibility of each contractor, a requirement for 6" of freeboard will be included in all new truck hauling contracts.

Note: See attached DNR Required Recordkeeping for Fugitive Dust Sources Addendum for further information.)

ADDENDUM

RECORDKEEPING FOR FUGITIVE DUST SOURCES

REQUIRED RECORDS

UNPAVED ROADS/LOTS	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. NAME OF PRODUCT APPLIED 5. AMOUNT OF SOLUTION/WATER APPLIED 6. DILUTION RATIO 7. ROAD SEGMENT/LOT IDENTIFICATION
PAVED ROADS/LOTS	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. ROAD SEGMENT/LOT IDENTIFICATION
STORAGE PILES/MATERIAL HANDLING	1. DATE OF TREATMENT 2. CONTROL MEASURE USED 3. RESPONSIBLE PERSON'S INITIALS 4. DILUTION RATIO (IF APPLICABLE) 5. AMOUNT OF DUST SUPPRESSANT/WATER APPLIED 6. IDENTIFICATION OF PILE/MATERIAL HANDLING OPERATION TREATED 7. EQUIPMENT USED

OPTIONAL RECORDS

WEATHER CONDITIONS	1. PRECIPITATION 2. TEMPERATURE 3. WIND DIRECTION AND VELOCITY

EXHIBIT B
NATIONAL STEEL - GREAT LAKES DIVISION
MAIN PLANT, 80" MILL, MICHIGAN STEEL

PARTICULATE EMISSION CONTROL PROGRAM

1. The type of fuels burned in Boilers No. 17 through No. 19 shall be restricted to either Coke Oven Gas (COG) or Natural Gas (NG).

2. The particulate emission rate from the Basic Oxygen Furnace (BOF) Secondary Collection System No. 1 Baghouse shall not exceed .005 grains per dry standard cubic foot.

3. The particulate emission rate from the Hot Metal Transfer, Slag Skimming, & Iron Desulfurization No. 2 Baghouse stack shall not exceed .007 grains per dry standard cubic foot. The maximum number of heats shall be limited to 16,425 heats per year and 2.482 pounds of particulate per heat on a calendar day basis.

4. The particulate emission rate from the No. 1 Argon Stirring Station Baghouse stack shall not exceed .02 grains per dry standard cubic foot. The No. 1 Argon Stirring Station shall be limited to 13,505 heats per year and .543 pounds of particulate per heat on a calendar day basis.

5. The particulate emission rate from the Vacuum Degasser Baghouse shall not exceed .005 grains per dry standard cubic foot.

6. The particulate emission rate from the Ladle Metallurgy Facility and No. 2 Argon Stirring Station Baghouse shall not exceed .005 grains per dry standard cubic foot. The Ladle Metallurgy Facility shall be limited to 9,855 heats per year and 1.077 pounds of particulate per LMF heat on a calendar day basis. The No. 2 Argon Stirring Station shall be limited to 12,775 heats per year and .108 pounds of particulate per No. 2 Argon Stirring Station heat on a calendar day basis.

7. Verification of the particulate emission rates from the Basic Oxygen Furnace (BOF) Secondary Collection System No. 1 Baghouse, Hot Metal Transfer, Slag Skimming, & Iron Desulfurization No. 2 Baghouse stack, No. 1 Argon Stirring Station Baghouse stack, Vacuum Degasser Baghouse, or Ladle Metallurgy Facility and No. 2 Argon Stirring Station Baghouse, by testing, at owner's expense, in accordance with applicable testing requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification.

NATIONAL STEEL - GREAT LAKES DIVISION
ZUG ISLAND FACILITY

PARTICULATE EMISSION CONTROL PROGRAM

1. The type of fuels burned in No. 1 Boiler House Boilers No. 1 through No. 5 and in No. 2 Boiler House Boilers No. 7 through 11 shall be restricted to either Blast Furnace Gas (BFG), Coke Oven Gas (COG), or Natural Gas (NG).

2. Particulate emissions from the casthouse "A" emission control system shall not exceed .0076 grains per dry standard cubic feet.