

Drury, Andrew (EGLE)

From: Carlson, Nicholas (EGLE)
Sent: Friday, April 2, 2021 10:59 AM
To: Eric Marko
Cc: Drury, Andrew (EGLE); Smith, Cindy (EGLE); Theodore Pagano, PE, PG; Jeff Kummer; MMello@nthconsultants.com; Rhiana Dornbos; Owens, Caryn (EGLE); Nixon, Shane (EGLE)
Subject: Additional Information Request for Michigan Potash Operating, LLC

Hello,

The preliminary screening for the Permit to Install application for Michigan Potash Operating, LLC has been completed. In order to complete our review, we will need some additional information. Some of the information may have been in the application and may have been missed in the preliminary screening, so if that is the case, please let me know.

- The space heaters need to be included in the modeling. Please provide the appropriate information so that the space heaters may be included in the modeling (emissions, number of space heaters, size, etc.). In addition, since the heaters cannot be exempt due to the project emissions, they will need to be included in the permit conditions as emission units.
- Please provide the SDS for the additives.- say what the additives are and where in the application they are located so they know what we're talking about. We also need emission estimates for the additives so we can evaluate Rule 225 compliance for any TACs in the additives.
- The PM10 and PM2.5 emission factors for the baghouse and scrubber emissions were not listed but the emission rates were calculated using a different value than what was used for PM. Please provide the source or rationale for the emission factor used for PM10 and PM2.5 emissions.
- In addition, it appears that the non-combustion emissions from the drying and compaction processes were not evaluated for Rule 225 compliance. It is possible the salt and potash may be considered nuisance particulate and may have been addressed through the PM2.5 modeling, but we need to confirm that with the AQD Toxics Unit.
- Please provide the Excel spreadsheets as discussed previously as well.

Please let me know if you have any questions. We can have a call, Teams meeting, etc. to discuss these questions if you would like.

Thank you,

Nicholas Carlson, Environmental Engineer
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