U.S. Steel Keetac Tailings Storage Facility Project - EAW
Record of Decision - Attachment 1.oo

United States Steel Corporation Keetac

40 CFR 63 Subpart RRRRR
National Emission Standards for Hazardous Air Pollutants for Taconite Iron Ore Processing

Draft Fugitive Dust Emissions Control Plan

Applicable to the following:

- Stockpiles
- Material Transfer Points
- Plant Roadways
- Tailings Basins
- Pellet Loading Areas
- Yard Areas

Revision No. 13
Effective Date: October 2, 2023

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1.0 Introduction

National Emissions Standards for Hazardous Air Pollutants for Taconite Iron Ore Processing Facilities were promulgated under 40 CFR 63 Subpart RRRRR on October 30, 2003. The following USS-Keetac facility, hereinafter called Keetac, emission sources are subject to the standards specified under 40 CFR 63 Subpart RRRRR:

- Ore Crushing and Handling Operations
- Grate Kiln Indurating Furnace
- Finished Pellet Handling Operations
- Fugitive Dust Emissions.

2.0 Purpose

The purpose of this document is to comply with 40 CFR 63 Subparts A and RRRRR to develop and implement a Fugitive Dust Emissions Control Plan. 40 CFR 63.9591 requires that a written Fugitive Dust Emissions Control Plan be developed and implemented for the affected source as specified in §63.9583. The requirement for Keetac is incorporated by reference in the operating permit that is issued by the designated permitting authority under 40CFR Part 70.

3.0 History of Revisions Submitted to Permitting Authorities

Revision 2 November 15, 2002
Revision 3 October 30, 2006 – Revised to include MACT requirements for yard areas.
Revision 4 December 31, 2007 – Revised to update operating procedures

4.0 Scope

The scope of the Fugitive Emission Control Plan is to identify the fugitive sources, and detail the Keetac control measures and practices used to minimize and control fugitive emissions. This includes identification of all fugitive emission sources, operating controls and practices to control fugitive emissions, and corrective action requirements.

5.0 Fugitive Emissions Sources

5.1 Blasting

Blasting is conducted for both **crude ore (FUGI4)** and **waste rock (FUGI11)** and is not a significant emission source for larger time scales. Keetac blasts crude ore an average of once per week during daylight hours. Waste rock is blasted five to ten times per year. Blasting techniques usually do not differ between the two rock types. Keetac uses appropriate and relevant Best Mining Practices to satisfy the requirements of the Mineland Reclamation Rules (Minn. R. 6130.3800 and .3900). These include but are not limited to:

- Engineered blast hole pattern to minimize the amount of blasting agent used and maximize fragmentation
- Blast hole stemming to direct energy horizontally
- Blast hole delays to provide planned consecutive detonation rather than simultaneous detonation. This reduces shock and, along with stemming, moves the rock outward instead of upward into the air.
- Meteorological conditions are monitored before each blast. Keetac will not blast when temperature inversion and wind conditions would create air shock (overpressure) beyond state and federal limits.

5.2 Haul Roads

Haul road sources subject to the plan include **crude ore hauling (FUGI21**) and **waste materials hauling (FUGI8)**. There are no differences in control practices for the hauling sources. Controlling haul road fugitive dust is important from a safety as well as environmental standpoint. Keetac will use several routine operating practices to ensure that dust is appropriately controlled. The operating practices Keetac will use include, but are not limited to:

- Daily visible emission checks will be made on all active haul roads. If visible emissions are observed during the visible emission check or are reported by an equipment operator or employee, then Keetac will investigate the condition and dispatch water trucks or undertake other appropriate corrective action to address the visible emissions. The observation of visible emissions does not, in and of itself, demonstrate noncompliance with any applicable requirement but is a signal to trigger investigation and, if necessary, reasonable and appropriate corrective action.
- After the unpaved roads have thawed, they will be watered during the day and afternoon shifts, as required by weather, traffic, and road conditions. Water trucks will be dispatched and unpaved roads will be watered if excessive dusting is encountered. Some weather conditions during the summer months, such as low humidity and high winds, require a higher watering frequency. The water application rate is adjusted, depending on weather conditions.
- Keetac maintains adequate watering capabilities to control dust during typical conditions, including backup in the event of breakdown.
- MPCA NPDES permit-approved chemical dust suppressants will be used for backup to watering when technically and economically feasible.
- Keetac will scarify and grade the road surface and, as required, add crushed and screened rock to control fugitive dust, both in freezing and nonfreezing conditions.
- Keetac evaluates new technologies and dust suppressants for their technical and economic feasibility as they present themselves.

5.3 Stockpiles

Eight stockpiles are listed sources of fugitive emissions (Table 3-1). Four stockpiles are associated with the mine and four are associated with the plant.

The mine stockpiles are:

- Crude ore in pit (FUGI39)
- Crushed waste rock (FUGI32)
- Waste materials dump (FUGI36)

The plant stockpiles are:

- Concentrate storage (FUGI28)
- Pellet storage (FUGI19)
- Offspec material storage (FUGI29)
- Fines storage (FUGI6)

In general, no dust controls are applied to the stockpiles because the stockpiles do not generate avoidable fugitive dust.

- All stockpiles are limited in size, with the exception of the **waste materials dump** (FUGI36) that is subject to the MDNR Mine Permit and MDNR Reclamation Rules.
- **Concentrate storage** (FUGI28), **offspec material storage** (FUGI29), and **fines storage piles** (FUGI6) are production overflow piles limited in size and duration.

- The **crude ore stockpile** (FUGI39) is not a constructed stockpile, but is comprised of broken material generated from a blast that stays in place until loaded.

- The **rock stockpile** (FUGI32) used for construction and maintenance, are of limited area of extent and have limited fine material.

- The **waste material dump** (surface and rock overburden) (FUGI36) is comprised of blasted waste rock and glacial till. The waste dump surface vegetates itself to some degree. Keetac follows the MDNR Mine Permit and MDNR Reclamation Rules (Minn. R. 6130.0100–.6300). Keetac contemporaneously benches, slopes and vegetates surface stockpiles as each segment or lift reaches its final extent. Rock stockpiles are benched and vegetated as each bench and the top surface is completed. Inactive areas that are potential fugitive emission sources will be covered with waste rock.

- **Pellet stockpiles** (good pellets and offspec pellets) (FUGI19 and FUGI29) contain pellets that have been watered at transfer points and on the conveyor belt prior to storage.

- **Stockpiled concentrate** (FUGI28) contains approximately 10 percent moisture and therefore does not generate avoidable fugitive dust.

- **Stockpiled fines** (FUGI6) have a high moisture content. Fines absorb and retain more water than pellets. Natural precipitation maintains the moisture at levels sufficient to control and minimize fugitive dust emissions.

- The **pellet storage pile** (FUGI19) is typically one day's worth of pellet production. Its small size minimizes the potential for dust generation and it contains pellets that have been watered at transfer points and on the conveyor belt prior to storage.

5.4 Materials Loading/Unloading

Several fugitive dust sources result from material loading and unloading from trucks including:

- **Crude ore truck loading (FUGI18)**
- **Crude ore truck unloading (FUGI30 & FUGI33)**
- **Waste materials truck loading (FUGI34)**
- **Waste materials truck unloading (FUGI26)**
- **Concentrate loadout (FUGI3)**
- **Concentrate receiving (FUGI20)**
- Two of these sources (FUGI3 and FUGI20) are intermittent (i.e., they occur occasionally during the year).
- These are not sources with avoidable fugitive emissions, except for FUGI30 and FUGI33, which are controlled as set forth below.

- The drop distance from the shovel to the truck will be adjusted to minimize fugitive dust emissions during **crude ore truck loading** (FUGI18) and **waste materials truck loading** (FUGI34).

- To control the fugitive emissions when **unloading crude ore** from trucks into the two crushers (FUGI30 & FUGI33) dust that may be generated is minimized through the material's large size and natural moisture content that it may have. Water is added as needed based upon visible emission checks during non-freezing months. Keetac continues researching practical and effective control practices to contain fugitive emissions.

- The **waste rock and overburden loading and unloading** (FUGI34 and FUGI26) fugitive emissions are minimal due to natural moisture content. Dust that may be generated is minimized through the material's large size and natural moisture content, and through operational practices such as minimizing drop distances.

- Little or no fugitive dust emissions are generated from **concentrate loading and receiving** (FUGI3 and FUGI20) because of the material's moisture content.

5.5 Tailings Basin

Wind erosion can cause fugitive dust emissions from exposed **tailings basin beaches (FUGI27)**. In 1995, Keetac changed its tailings basin operation from a closed-cell-based design to a submerged interior basin design. The submerged interior basin design provided improved operational control, which decreased exposed beach areas and therefore dust emissions. This design consists of a small beach area at the edge of a large pond of water. Tailings are spigotted from the outside edge of a small portion of the beach area toward the water pond for about a week until it attains a specified height. Medium and coarse tailings are retained on the beach area, while the finest tailings are deposited in the water pond. With the submerged interior basin design, Keetac maximizes the water pool and minimizes beach areas subject to wind erosion. A new beach is created each time the deposition line is relocated. The deposition areas are managed to ensure dam stability. The goal is to maximize the vegetated areas on the beaches that will be inactive for a period of time.

Daily visible emission checks will be made on the tailings basin. If visible emissions are observed during the visible emission check or are reported by an equipment operator or employee, then Keetac will investigate the condition and implement appropriate corrective actions to address the visible emissions. During periods when weather conditions may be conducive to generating fugitive dust (i.e. freezing temperatures, high winds, lack of cover, etc.) additional visible emission checks will be conducted and recorded. The observation of visible emissions does not, in and of itself, demonstrate noncompliance with any applicable requirement but is a signal to trigger investigation and, if necessary, reasonable and appropriate corrective action. The investigation/corrective actions will include evaluating if modifications to the current operation can be made, for example switching tails lines or pumping water and evaluating whether the area can support equipment that could be deployed to mitigate which could include mulching or other application methods. If feasible, a contractor will be contacted to begin activities.

Periodic use of aerial observations will be utilized as an additional tool to evaluate the adequacy of coverage and/or extent of open deposition areas. This may include taking visual observations during blast plane aerial surveillance that is conducted during blasting activities.

The following table outlines activities or conditions could result in the potential for generation of fugitive dust and the mitigation thereof:

Activities/Conditions	Mitigation
Lack of snow cover	Proper planning activities for tails deposition and reclamation activities
Changing tails lines	Proper planning activities for tails deposition and reclamation activities
Seasonal affects	Proper planning activities to account for rate at which tails will de-water or become subject to freeze/dry conditions to allow for reclamation or MPCA approved dust suppressant activities. Evaluating opportunities deposition planning to minimize the opportunity for dust to leave the property. Managing water levels in the interior pond.
High winds	Evaluation of weather conditions to ensure areas are covered to the extent practical prior to high wind events
Unanticipated events such as weather, failed lines, etc.	Case by case review of potential mitigation options such as switching lines, reclamation, water use, etc.

Keetac also uses several routine operational procedures to ensure that wind erosion emissions are minimized. These include:

Freezing Months

- During freezing months (typically late November through early April), freshly deposited tailings freeze and are covered with snowfall. Immediately prior to the freezing months, aerial application of mulch will be utilized or the use of a hovercraft with dust suppressant, on an “As-Needed” basis to minimize any fugitive dusting events.
- If insufficient snowfall is present, freshly deposited tailings will be mulched as soon as practical when they become inactive and are able to support equipment.
- Tailings basin operations will minimize potential areas that may cause fugitive dust. This may include switching discharge lines where tailings are deposited to wet down affected areas.
- Deposition areas will be minimized, as allowed by the operation and dam stability, to reduce the tailings deposition footprint areas, and therefore reduce the potential for fugitive creation.
- Monitoring of weather forecasts for predicted adverse weather conditions.
- The use of MPCA approved chemical binders or dust suppressants will be utilized “as needed”, as weather conditions permit and within allowable volumes.
- Records of dust suppressant usage will be maintained, which includes acreage where dust suppressant was utilized and an evaluation of the performance of the dust suppressant.
- Temporary seeding will be employed to the extent practical on areas that will be inactive for a period of time, or mulching in early spring before the tailings completely thaw to control tailings deposited during freezing months.

Non-Freezing Months:

- Tailings deposited during non-freezing months are seeded and mulched before the surface tailings are completely dry. The mulching/seeding is completed using an aerial application on an “As-Needed” basis if the surface tailings cannot support the use of conventional equipment and freezing conditions are expected to occur before surface tailings are dry.
- The small active tailings basin work area is kept wet by moisture from the fresh tailings deposition, precipitation, and near the water pool by capillary action.
- The small beach areas located along the edge of the dike in the active tailings basin work area will be mulched/seeded either by conventional methods, by hovercraft application or by an aerial application. The equipment will be used to conduct additional dust control measures such as spraying MPCA approved dust suppression, mulching, and seeding on the beach areas. Mulch applied will be crimped into the tailings as much as practical and as conditions allow.
- An outside contractor will be retained to address seeding and mulching a minimum of 6 times per year, to ensure proper attention to new deposition.

- Inactive areas of tailings deposition located within the dike will be seeded or mulched where feasible. Dust mitigation techniques will be applied to the areas as they become inactive and able to support the equipment, in order to suppress fugitives until the area can be seeded or mulched.

- Temporary seeding will be used for areas that will not be redeposited on for a minimum of six months to increase vegetated areas and mulch will be used for areas that will be recovered within six months.

- During construction, berms and benches are graded to gentle slopes to reduce wind resistance, which limits the potential for dusting.

- Increasing the overall water level of the tailings pond when conditions allow can minimize surface areas of exposed tailings beach.

- A program has been implemented to permanently seed the completed slopes of the exterior dike, to maximize vegetation and further reduce the potential for fugitive emissions. An allotted amount of biosolids will be retained in the spring to be used for seeding.

- Tree planting has been conducted extensively in the past. Evaluations of additional tree plantings are ongoing which will ultimately provide additional barriers around the basin.

In addition to these operational procedures, Keetac will be utilizing the meteorological station located at the tailings basin as a tool to monitor ambient conditions. The station monitors and records temperature, windchill, relative humidity, barometric pressure, dew point, precipitation, wind speed, and wind direction.

5.6 Transfer Points

Several fugitive dust sources result from the transfer of pellets in the plant area. These sources are:

- **Emergency conveyor loadout Phase II (FUGI37)**

- **Oversize bypass loadout (FUGI7)**

- **Pellet drop loadout bin to railcar (FUGI13)**

- **Portable conveyors and bar screen (FUGI12)**

- **Portable pellet reclaim and screen (pellets sent back to plant for reprocessing) (FUGI41)**

- **Pellet drop onto storage pile (FUGI24)**

- **Conveyor transfer-crude ore storage (dumping of crushed ore from drivehouse conveyors, FUGI5)**

- **Conveyor transfer-fines conveyor (FUGI35)**

- **Pellet drop loadout conveyor to loadout bin (FUGI16)**

- Water is sprayed on the **pellet drop loadout conveyor to the railcar** (FUGI13**), loadout bin** (FUGI16) and the **emergency conveyor loadout** (FUGI37) to control dust during non-freezing conditions. The use of the water sprays for FUGI13 and FUGI16 is utilized during most train loadings, as weather conditions dictate.

- The transfer points for the **pellet drop loadout bin to the portable conveyors and bar screen** (FUGI12), the **portable pellets reclaim and screen** (FUGI41), the **fines conveyor** (FUGI35), and the **oversize bypass loadout** (FUGI7) (handles small amounts of chunk material) do not require control mechanisms. Based on Keetac operating experience, these are all insignificant sources of fugitive dust because the moisture content of the pellets and fines minimizes dust formation.

- Control measures may be implemented to control wind erosion in and around the **crude ore storage barn** (FUGI5). When applicable, these measures may include maintaining piles at the north and south end of the **crude ore storage barn** (FUGI5).

- **Pellet drop onto the storage pile** (FUGI24) is controlled through material moisture, which has been augmented by earlier water sprays.

5.7 Coal Delivery, Receiving, and Storage

These fugitive dust sources result from the delivery, unloading and storage of coal for use as an alternative fuel:

- **Coal Delivery (FUGI31)**
- **Coal Receiving (FUGI15)**
- **Coal Pile (FUGI23)**
- Daily visible emission checks will be made on all three sources in this category. If visible emissions are observed during the visible emission check or are reported by an equipment operator, then Keetac will investigate the condition and dispatch water trucks or undertake other appropriate corrective action to address the visible emissions.
- The observation of visible emissions does not, in and of itself, demonstrate noncompliance with any applicable requirement but is a signal to trigger investigation and, if necessary, reasonable and appropriate corrective action.
- MPCA NPDES permit-approved chemical dust suppressants will be used for backup to watering when technically and economically feasible.
- **Coal Delivery (FUGI31)** utilizes the service roads at the entrance to the facility.
- **Coal Receiving (FUGI15) and Piled Coal (FUGI23)** are not sources with avoidable fugitive dust emissions. The coal contains approximately 25 percent moisture. The coal pile is also enclosed on three sides by an engineered structure.

5.8 Other Sources

Other sources of fugitive dust include **limestone delivery** (FUGI43) **chemical delivery** (FUGI45), **small truck traffic around the facility** (FUGI40), **Concentrate Truck Hauling (FUGI46),** and **Yard Areas**. Dust from semi truck and small truck traffic is controlled when the trucks travel on the main haul roads and tailings basin access road utilizing water as needed. Dust suppressants are occasionally applied to the service roads in and around the plant **and tailings basin** area when truck traffic volume and weather conditions require.

Yard Areas are constructed with sufficient barriers, natural or otherwise, so as to reduce the impact of wind carrying fugitives around or off Keetac property.

6.0 Operating Practices and Control Measures

The operating practices and control measures that will be implemented and recorded for the significant fugitive dust sources identified in Section 3 are described below.

6.1 Haul Roads (FUGI21 and FUGI8)

Primary Control: Watering and other dust suppressant application, snow during winter; road maintenance including crushed rock surfacing and grading.

Contingent Control: Other dust-suppressant application

Practices: -Daily visible emissions check by shift manager or other designated visible emission observer.
-Truck drivers notify shift manager or other appropriate personnel of dusty conditions.

Records: -Daily Visible Emissions Checklist (Form 4.1)
-Water truck driver time cards
-Dust suppressant applied (contractor's invoice)
-Road maintenance (Shift Foreman's Report)
-Snow plowing (Shift Foreman's Report)
-GPS Dispatch Records

6.2 Crude Ore Unloading (FUGI30 and FUGI33)

Primary Control: Watering during non-freezing conditions, natural moisture content, rock size

Contingent Control: None

Practices: Visible Emissions Check

Records: -Weekly and Annual Dust Collector Inspection Reports
-Daily Visible Emissions Checklist (Form 4.1)
-Water application rates and duration (Crusher Operator's Report)

6.3 Stockpiles (FUGI39, FUGI32, FUGI36, FUGI28, FUGI19, FUGI29 and FUGI6)

Primary Control: Material moisture content, source extent reduction

Contingent Control: Water spray with portable equipment

Practices: Reclamation and rock cover for waste rock piles

Records: Survey results of stockpiles

6.4 Tailings Basin (FUGI27)

Primary Control: Beach area reduction, mulching (conventional and aerial), vegetation, switching of discharge lines

Contingent Control: Dust suppressant application

Practices: -Minimize exposed area
-Grading, seeding and mulching
-Visible Emissions Check

Records: -Seeding (location, application date)
-Daily Visible Emissions Checklist (Form 4.2)
-Spigotting location — yearly map
-Mulching and Dust Suppressant (location, application dates)

6.5 Transfer Points (FUGI37, FUGI13, FUGI12, FUGI41, FUGI24, FUGI5, FUGI35 and FUGI16)

Primary Control: Water sprays at emergency conveyor loadout and pellet drop to loadout bin; crude ore level in crude ore storage barn, material moisture content

Contingent Control: Water spray with portable equipment

Practices: Water sprays
Visual Emissions Check

Records: Daily Visible Emissions Checklist (Form 4.3)
Loading Report for Pellet Shipments (FUGI 13&16)
Written notice of change of activity

6.6 Coal Delivery, Receiving and Storage (FUGI31, FUGI15 and FUGI23)

Primary Control: Watering and other dust suppressant application, road maintenance including crushed rock surfacing and grading.

Contingent Control: Other dust-suppressant application

Practices: Daily visible emissions check by shift manager or other designated visible emission observer.
Plant personnel notify shift manager or other appropriate personnel of dusty conditions.

Records: Daily Visible Emissions Checklist (Form 4.1)
Water truck driver time cards
Dust suppressant applied (contractor's invoice)
Road maintenance (Shift Foreman's Report)
Snow plowing (Shift Foreman's Report) GPS Dispatch Records

6.7 Concentrate Offsite Truck Hauling (non-routine activity) (FUGI 46)

Primary Control: Watering and other dust suppressant application, road maintenance including crushed rock surfacing and grading

Practices: Visible emission checks when activity is occurring during non-freezing months

Records: Tailings Basin Daily Visible Emissions Checklist (Form 4.4)
Water truck usage report (MinVu)
Dust suppressant applied (contractor's invoice)

6.8 Training

An integral part of the implementation of the Fugitive Control Plan is appropriate training for the personnel involved. Training will be provided for all levels of personnel at the facility. Training records will be kept by the Environmental Department. Training will cover the following:

- Employee Responsibilities and Work Practices
- Forms
- Reporting
- Record Keeping
- Corrective Action
- Maintenance
- Work Orders
- Dust Observation and Visibility Training
- Weather Observations
- Location of Information

7.0 Plan Maintenance, Recordkeeping and Reporting

7.1 Plan Revisions

The Fugitive Dust Emission Control Plan may be revised at any time without permitting agency notification.

7.2 Recordkeeping

7.2.1 All current plans, superceded plans and all information that is necessary to demonstrate that we have complied with each plan requirement will be kept for a period of at least five years. At least three years of records (current year plus two years) will be kept on site. Records older than three years can be stored off-site.

7.2.2 The following records will be maintained at Keetac for the period specified by this permit:

- Time Cards
- Application Records for Road Dust Suppressants
- Water Truck Inspection and Maintenance Logs
- Daily Visible Emissions Checklists
- Work Order Numbers
- Mulching and Dust Suppressant (location, application dates)
- Seeding (location, application dates)
- Spigotting location (yearly map)
- Corrective Action Reports
- Survey Results of Stockpiles
- Weekly and Annual Inspection Reports
- Employee Training Records
- MPCA Fugitive Emission Plan Approval Letter
- Shift Foreman's Report
- Crusher Operator's Report

7.3 Reporting

In the event that excessive fugitive dust that may endanger human health or damage property were to occur, the MPCA Air Compliance Officer will be notified. The notification will include a description of conditions that lead to

the event, details of the perceived extent and location of dust leaving the property, an estimated duration of the event, and any preventative actions taken prior to the event and corrective actions being implemented.

8.0 References

- ISO 14001 Environmental Management System Requirements
- Keetac Environmental Manual
- EWI 02 Blasting Procedure
- EWI 21 Tailings Basin Meteorological Monitoring Plan
- Form 1.011 Environmental Incident Investigation Form
- Form 1.018 Dust Suppression Application
- Form 4.1 Daily Visible Emission Checklist – Mine
- Form 4.2 Daily Visible Emission Checklist – Concentrator
- Form 4.3 Daily Visible Emission Checklist – Pellet Plant
- Form 4.4 Tailings Basin Visible Emissions Checklist

Appendix A

Emission Unit ID #	Emission Unit Name	Source Location	Visible Emissions Check Required?
FUGI4	Crude ore blasting	Mine	No
FUGI39	Crude ore stockpile	Mine	No
FUGI18	Crude Ore Truck Loading	Mine	Yes
FUGI 30 & 33	Crude Ore Truck Unloading	Mine	Yes
FUGI21	Crude Ore Hauling	Mine	Yes
FUGI32	Road material stockpile	Mine	No
FUGI11	Waste rock blasting	Mine	No
FUGI34	Waste Materials Truck Loading	Mine	Yes
FUGI8	Waste Materials Hauling	Mine	Yes
FUGI26	Waste Materials Truck Unloading	Mine	Yes
FUGI36	Waste materials dump	Mine	No
FUGI40	Small Truck Traffic	Facility	Yes
FUGI27	Tailings basin	Tailings Basin	No
FUGI3	Concentrate Loadout	Pellet Plant	No
FUGI20	Concentrate Receiving	Pellet Plant	No
FUGI28	Concentrate Storage	Pellet Plant	No
FUGI37	Emergency Conveyor Loadout Phase II	Pellet Plant	Yes
FUGI7	Oversize Bypass Loadout	Pellet Plant	No
FUGI19	Pellet Storage	Pellet Plant	No
FUGI13	Pellet Drop Loadout Bin to Railcar	Pellet Plant	Yes

FUGI29	Off-Spec. Material Storage Areas	Pellet Plant	No
FUGI6	Fines Storage	Pellet Plant	No
FUGI12	Portable Conveyors and Bar Screen (Chips)	Pellet Plant	Yes
FUGI41	Portable Pellet Reclaim & Screen	Pellet Plant	Yes
FUGI24	Pellet Drop Onto Pile	Pellet Plant	Yes
FUGI5	Conveyor Transfer - Crude Ore Storage	Mine	Yes
FUGI35	Conveyor Transfer - Fines Conveyor (Chip Reclaim Conveyor)	Pellet Plant	Yes
FUGI16	Pellet Drop Loadout Conveyor to Loadout Bin	Pellet Plant	Yes
FUGI31	Coal Delivery	Pellet Plant	Yes
FUGI15	Coal Receiving	Pellet Plant	Yes
FUGI23	Coal Pile	Pellet Plant	Yes
FUGI43	Limestone Delivery	Pellet Plant	No
FUGI45	Chemical Delivery	Pellet Plant	No
FUGI46	Concentrate Hauling	Tailings Basin	Yes