

## Asarco Mission Emissions Summary

### (1) Criteria Pollutants

Pollutant Name	Total Emissions	Total Emissions	Total Emissions
	Fugitive + Non-fugitive	Fugitive	Non-Fugitive
	(tpy)	(tpy)	(tpy)
CO	283.63	275.50	8.13
NO <sub>x</sub>	80.81	69.90	10.90
SO <sub>x</sub>	8.98	8.22	0.76
VOC	7.47	2.08	5.39
PM	7,390.39	7,205.18	185.21
PM <sub>10</sub>	2,658.38	2,491.56	166.82

### (2) HAPs

Total facility-wide HAP Emissions =	5.18	tpy
HAPs included in VOC Emissions =	4.46	tpy
HAPs included in PM Emissions =	0.31	tpy
HAPs Not Part of Other Pollutants =	0.41	tpy

POTENTIAL TO EMIT  
 CRITERIA AIR POLLUTANTS  
 ASARCO MISSION COMPLEX

Number	Emissions Source/Activity	Emissions (Uncontrolled)														Emissions (Controlled)						Control Device	Emissions Summary		
		PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>		PM	PM <sub>10</sub>	PM <sub>2.5</sub>
		(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)		(ton/yr)	(ton/yr)	(ton/yr)
<b>Facility-wide</b>		<b>136.26</b>	<b>76.75</b>	<b>20.18</b>	<b>137.22</b>	<b>34.93</b>	<b>3.36</b>	<b>3.32</b>	<b>763.72</b>	<b>471.24</b>	<b>103.51</b>	<b>283.63</b>	<b>80.81</b>	<b>8.98</b>	<b>7.47</b>	<b>1,620.37</b>	<b>552.43</b>	<b>119.08</b>	<b>6,626.66</b>	<b>2,187.14</b>	<b>455.78</b>		<b>7,390.39</b>	<b>2,658.38</b>	<b>559.29</b>

<b>Mining Subtotal</b>		<b>72.26</b>	<b>46.12</b>	<b>14.36</b>	<b>62.90</b>	<b>15.96</b>	<b>1.88</b>	<b>0.00</b>	<b>487.83</b>	<b>341.45</b>	<b>82.41</b>	<b>275.50</b>	<b>69.90</b>	<b>8.22</b>	<b>0.00</b>	<b>1,238.24</b>	<b>353.32</b>	<b>36.85</b>	<b>5,423.49</b>	<b>1,547.54</b>	<b>161.41</b>		<b>5,911.32</b>	<b>1,888.99</b>	<b>243.82</b>
OFMA-1	Drilling	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.69	1.69	1.69	7.39	7.39	7.39	Shields/water	7.39	7.39	7.39
OFMA-2	Blasting	9.64	5.01	0.29	62.90	15.96	1.88	n/a	42.20	21.95	1.27	275.50	69.90	8.22	n/a	n/a	n/a	n/a	n/a	n/a	n/a	None	42.20	21.95	1.27
VFMA-1	Haulage	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	976.75	277.75	27.78	4,278.15	1,216.55	121.66	Road watering	4,278.15	1,216.55	121.66
VFMA-2	Dozing	14.17	10.63	1.49	n/a	n/a	n/a	n/a	248.04	186.03	26.04	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	None	248.04	186.03	26.04
VFMA-3	Grading	25.53	15.32	0.79	n/a	n/a	n/a	n/a	111.80	67.08	3.47	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	None	111.80	67.08	3.47
VFMA-4	Rubber Tire Rigs	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	124.78	35.48	3.55	546.54	155.42	15.54	Road watering	546.54	155.42	15.54
VFMA-5	Land Clearing	11.19	11.19	11.19	n/a	n/a	n/a	n/a	49.00	49.00	49.00	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	None	49.00	49.00	49.00
VFMA-6	Misc. Vehicles	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	135.02	38.40	3.84	591.40	168.17	16.82	Road watering	591.40	168.17	16.82
HFMA-1	Unloading	8.40	3.97	0.60	n/a	n/a	n/a	n/a	36.79	17.40	2.63	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	None	36.79	17.40	2.63

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CRITERIA AIR POLLUTANTS  
ASARCO MISSION COMPLEX

Number	Emissions Source/Activity	Emissions (Uncontrolled)														Emissions (Controlled)						Control Device	Emissions Summary		
		PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>		PM	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Mission Circuit Subtotal</b>		3.49	1.40	0.39	0.00	0.00	0.00	0.24	15.30	6.13	1.73	0.00	0.00	0.00	1.04	167.35	98.56	49.24	732.97	431.69	215.67		748.27	437.82	217.40
SSOPM-1	Primary Crusher	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.55	1.55	1.55	6.81	6.81	6.81	Scrubber	6.81	6.81	6.81
SSOPM-2a	Transfer to Secondary (North)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	2.06	2.06	2.06	9.02	9.02	9.02	Scrubber	9.02	9.02	9.02
SSOPM-2b	Transfer to Secondary (South)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	2.06	2.06	2.06	9.02	9.02	9.02	Scrubber	9.02	9.02	9.02
SSOPM-3	(307-108A); Sec. & Tertiary Crushing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.87	1.87	1.87	8.20	8.20	8.20	Scrubber	8.20	8.20	8.20
SSOPM-3	(307-108B); Sec. & Tertiary Crushing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.87	1.87	1.87	8.20	8.20	8.20	Scrubber	8.20	8.20	8.20
SSOPM-4	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.72	0.72	0.72	3.15	3.15	3.15	Scrubber	3.15	3.15	3.15
SSOPM-5	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.72	0.72	0.72	3.15	3.15	3.15	Scrubber	3.15	3.15	3.15
SSOPM-6	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.72	0.72	0.72	3.15	3.15	3.15	Scrubber	3.15	3.15	3.15
SSOPM-7	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.72	0.72	0.72	3.15	3.15	3.15	Scrubber	3.15	3.15	3.15
SSOPM-8	Transfer Ore to Tripper Car	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.40	1.40	1.40	6.15	6.15	6.15	Baghouse	6.15	6.15	6.15
SSOPM-9	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.52	0.52	0.52	2.26	2.26	2.26	Baghouse	2.26	2.26	2.26
SSOPM-10	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.52	0.52	0.52	2.26	2.26	2.26	Baghouse	2.26	2.26	2.26
SSOPM-11	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.52	0.52	0.52	2.26	2.26	2.26	Baghouse	2.26	2.26	2.26
SSOPM-12	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.52	0.52	0.52	2.26	2.26	2.26	Baghouse	2.26	2.26	2.26
SSOPM-13	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.52	0.52	0.52	2.26	2.26	2.26	Baghouse	2.26	2.26	2.26
SSOPM-14	Transfer to Rod Mill	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.50	1.50	1.50	6.57	6.57	6.57	Scrubber	6.57	6.57	6.57
SSOPM-15	Transfer to Rod Mill	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.50	1.50	1.50	6.57	6.57	6.57	Scrubber	6.57	6.57	6.57
SSOPM-16	Transfer to Rod Mill	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.50	1.50	1.50	6.57	6.57	6.57	Scrubber	6.57	6.57	6.57
SSOPN-6	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.18	1.18	1.18	5.18	5.18	5.18	Dry Dust Collector	5.18	5.18	5.18
SSOPM-7	Transfer to Ball Mills	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	3.16	3.16	3.16	13.86	13.86	13.86	Wet Scrubber	13.86	13.86	13.86
SSOPM-17	Lime Conveyance	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.14	0.14	0.14	0.63	0.63	0.63	Dry Dust Collector	0.63	0.63	0.63
SSOPM-18	Lime Transfer feeder to Conveyor	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.14	0.14	0.14	0.63	0.63	0.63	Dry Dust Collector	0.63	0.63	0.63
HFOPM-5	Mission Mill Lime Feeder Conveyor	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	4.36	4.36	4.36	19.10	19.10	19.10	Enclosure	19.10	19.10	19.10
HFOPM-1	Dump Pocket	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	68.70	34.35	9.72	300.91	150.45	42.58	Water spray	300.91	150.45	42.58
HFOPM-2	Transfer to Coarse Ore Storage	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	68.70	34.35	9.72	300.91	150.45	42.58	Water spray	300.91	150.45	42.58
HFOPM-3	Transfer of Concentrate	0.87	0.35	0.10	n/a	n/a	n/a	n/a	3.80	1.52	0.43	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Wet Material	3.80	1.52	0.43
HFOPM-4	Transfer of Concentrate	2.60	1.04	0.29	n/a	n/a	n/a	n/a	11.40	4.56	1.29	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Wet Material	11.40	4.56	1.29
HFOPN-3	Transfer to Cleanup Conveyor	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.17	0.09	0.02	0.75	0.37	0.11	Enclosure	0.75	0.37	0.11
WFOPM-1	Coarse ore storage	0.02	0.01	0.00	n/a	n/a	n/a	n/a	0.07	0.04	0.01	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Wet Material	0.07	0.04	0.01
WFOPM-2	Concentrate Storage Pile	0.01	0.00	0.00	n/a	n/a	n/a	n/a	0.02	0.01	0.00	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Wet Material	0.02	0.01	0.00
N/A	PAX Usage	n/a	n/a	n/a	n/a	n/a	n/a	0.24	n/a	n/a	n/a	n/a	n/a	n/a	1.04	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a

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CRITERIA AIR POLLUTANTS  
ASARCO MISSION COMPLEX

Number	Emissions Source/Activity	Emissions (Uncontrolled)														Emissions (Controlled)						Control Device	Emissions Summary		
		PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>		PM	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>South Circuit Subtotal</b>		0.03	0.02	0.00	0.00	0.00	0.00	0.24	0.14	0.07	0.01	0.00	0.00	0.00	1.04	195.03	98.23	30.67	383.66	197.73	68.52		383.81	197.80	68.53
SSOPS-1	Primary Crushing	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.54	0.54	0.54	2.37	2.37	2.37	Dry Dust Collector	2.37	2.37	2.37
SSOPS-2	Transfer to Stacker	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.38	0.38	0.38	1.68	1.68	1.68	Wet Scrubber	1.68	1.68	1.68
SSOPS-3	(30-150A); Trans. to SAG	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.32	0.32	0.32	1.41	1.41	1.41	Dry Dust Collector	1.41	1.41	1.41
SSOPS-3	(30-150B); Trans. to SAG	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.32	0.32	0.32	1.41	1.41	1.41	Dry Dust Collector	1.41	1.41	1.41
SSOPS-4	Omni Cone Crusher and Bypass	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.11	1.11	1.11	4.88	4.88	4.88	Wet Scrubber	4.88	4.88	4.88
SSOPS-4A	Transf. from Intermediate stockpile	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.27	1.27	1.27	5.56	5.56	5.56	Wet Scrubber	5.56	5.56	5.56
SSOPS-6	Lime Loading	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.05	0.05	0.05	0.23	0.23	0.23	Dry Dust Collector	0.23	0.23	0.23
HFOPS-1	Transfer of Ore - Dump Pocket	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	59.40	29.70	8.41	112.50	56.25	15.92	Water sprays/encl.	112.50	56.25	15.92
HFOPS-2	Transfer Point of Crushed Ore	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	118.80	59.40	16.81	225.00	112.50	31.84	Water sprays	225.00	112.50	31.84
WFOPS-1	Coarse Ore Storage	0.02	0.01	0.00	n/a	n/a	n/a	n/a	0.10	0.05	0.01	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	None	0.10	0.05	0.01
PFOPS-8	Omnicone Circuit	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	3.00	1.20	0.34	13.14	5.26	1.49	Wet process/encl.	13.14	5.26	1.49
HFOPS-3	Transfer to Inter. Ore Stockpile	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	3.00	1.20	0.34	13.14	5.26	1.49	Wet process/encl.	13.14	5.26	1.49
WFOPS-2	Intermediate stockpile	0.01	0.00	0.00	n/a	n/a	n/a	n/a	0.02	0.01	0.00	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	None	0.02	0.01	0.00
HFOPS-4	Conveyer to Concentrate Stacking	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.95	0.78	0.22	0.68	0.27	0.08	Wet process/encl.	0.68	0.27	0.08
HFOPS-5	Concentrate Loading	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	4.88	1.95	0.55	1.69	0.68	0.19	Wet process/encl.	1.69	0.68	0.19
WFOPS-3	Concentrate Storage Pile	0.01	0.00	0.00	n/a	n/a	n/a	n/a	0.02	0.01	0.00	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Wet process/encl.	0.02	0.01	0.00
N/A	PAX Usage	n/a	n/a	n/a	n/a	n/a	n/a	0.24	n/a	n/a	n/a	n/a	n/a	n/a	1.04	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a
<b>By-Products Subtotal</b>		0.04	0.04	0.04	0.48	0.57	0.00	0.03	0.19	0.19	0.19	2.10	2.50	0.02	0.14	1.31	1.31	1.31	5.74	5.74	5.74		5.93	5.93	5.93
SSMP-1	Dryer	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.31	1.31	1.31	5.74	5.74	5.74	Wet Scrubber	5.74	5.74	5.74
CFMP-1	Roasters	0.02	0.02	0.02	0.24	0.29	0.00	0.02	0.10	0.10	0.10	1.05	1.25	0.01	0.07	n/a	n/a	n/a	n/a	n/a	n/a	None	0.10	0.10	0.10
CFMP-2	Roasters	0.02	0.02	0.02	0.24	0.29	0.00	0.02	0.10	0.10	0.10	1.05	1.25	0.01	0.07	n/a	n/a	n/a	n/a	n/a	n/a	None	0.10	0.10	0.10
<b>Petroleum Storage Tanks Subtotal</b>		0.00	0.00	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.00	0.00	0.00	0.00	4.34	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00
n/a	Gasoline tank (20,000 gallon)	n/a	n/a	n/a	n/a	n/a	n/a	0.76	n/a	n/a	n/a	n/a	n/a	n/a	3.31	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a
n/a	Gasoline Dispensing	n/a	n/a	n/a	n/a	n/a	n/a	0.15	n/a	n/a	n/a	n/a	n/a	n/a	0.66	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a
n/a	Diesel tank (250,000 gallon)	n/a	n/a	n/a	n/a	n/a	n/a	0.07	n/a	n/a	n/a	n/a	n/a	n/a	0.30	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a
n/a	Diesel tank (20,000 gallon)	n/a	n/a	n/a	n/a	n/a	n/a	0.01	n/a	n/a	n/a	n/a	n/a	n/a	0.02	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a
n/a	Diesel tank (20,000 gallon)	n/a	n/a	n/a	n/a	n/a	n/a	0.01	n/a	n/a	n/a	n/a	n/a	n/a	0.02	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a
n/a	Diesel tank (20,000 gallon)	n/a	n/a	n/a	n/a	n/a	n/a	0.01	n/a	n/a	n/a	n/a	n/a	n/a	0.02	n/a	n/a	n/a	n/a	n/a	n/a	None	n/a	n/a	n/a

POTENTIAL TO EMIT  
 CRITERIA AIR POLLUTANTS  
 ASARCO MISSION COMPLEX

Number	Emissions Source/Activity	Emissions (Uncontrolled)														Emissions (Controlled)						Control Device	Emissions Summary		
		PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>				
<b>Emergency Engines Subtotal</b>		1.14	1.14	1.14	73.84	18.40	1.48	1.82	0.57	0.57	0.57	6.03	8.40	0.74	0.91	0.00	0.00	0.00	0.00	0.00	0.00		0.57	0.57	0.57
n/a	North Mill Admin Generator	0.00	0.00	0.00	0.62	0.42	0.15	0.19	0.00	0.00	0.00	0.31	0.21	0.08	0.09	n/a	n/a	n/a	n/a	n/a	n/a	None	0.00	0.00	0.00
n/a	North Mill Thickener Generator	0.06	0.06	0.06	0.69	0.65	0.17	0.21	0.03	0.03	0.03	0.35	0.33	0.09	0.11	n/a	n/a	n/a	n/a	n/a	n/a	None	0.03	0.03	0.03
n/a	Dispatch Location Generator	0.00	0.00	0.00	0.62	0.42	0.15	0.19	0.00	0.00	0.00	0.31	0.21	0.08	0.09	n/a	n/a	n/a	n/a	n/a	n/a	None	0.00	0.00	0.00
n/a	South Mill Generator	1.07	1.07	1.07	3.26	15.13	1.00	1.23	0.54	0.54	0.54	1.63	7.57	0.50	0.61	n/a	n/a	n/a	n/a	n/a	n/a	None	0.54	0.54	0.54
n/a	South Mill Tank Hill Generator	0.00	0.00	0.00	68.65	1.77	0.00	0.01	0.00	0.00	0.00	3.43	0.09	0.00	0.00	n/a	n/a	n/a	n/a	n/a	n/a	None	0.00	0.00	0.00
<b>Wind Erosion Subtotal</b>		59.29	28.04	4.25	0.00	0.00	0.00	0.00	259.69	122.83	18.60	0.00	0.00	0.00	0.00	18.45	1.01	1.01	80.80	4.44	4.44		340.49	127.27	23.04
WFDA-1	Wind Erosion - Tailings Dams	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	18.45	1.01	1.01	80.80	4.44	4.44	Chemical app.	80.80	4.44	4.44
WFDA-2	Wind Erosion--Overburden	59.29	28.04	4.25	n/a	n/a	n/a	n/a	259.69	122.83	18.60	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Chemical app.	259.69	122.83	18.60



POTENTIAL TO EMIT  
HAZARDOUS AIR POLLUTANT SUMMARY  
ASARCO MISSION COMPLEX

Emission Point	Emissions Source/Activity	Dichlorobenzene	Hexane	Ethylbenzene	Xylene - p	Xylene-m	Xylene-o	MTBE	Carbon Disulfide	MDI	1,1,2,2-Tetrachloroethane	1,1,2-Trichloroethane	1,3-Dichloropropene	Total (tons/yr)
<b>TOTAL</b>		0.00	0.24	0.12	0.00	0.00	0.00	0.60	2.08	0.00	0.00	0.00	0.00	5.18

Mining Activities: Sub-total (Fugitive & Non-Fugitive)		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
OFMA-1	Drilling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OFMA-2	Blasting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
CFMA-1	Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CFMA-2	Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
CFMA-3	Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
VFMA-1	Haulage	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VFMA-2	Dozing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VFMA-3	Grading	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VFMA-4	Rubber Tire Rigs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VFMA-5	Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VFMA-6	Misc. Vehicles	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFMA-1	Unloading	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Mission Circuit: Sub-total(Fugitive & Non-Fugitive)		0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.04	0.00	0.00	0.00	0.00	1.43
SSOPM-1	Primary Crusher	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-2a	Transfer to Secondary (North)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-2b	Transfer to Secondary (South)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-3	(307-108A); Sec. & Tertiary Crushing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-3	(307-108B); Sec. & Tertiary Crushing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-4	Secondary and Tertiary Crushing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-5	Secondary and Tertiary Crushing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-6	Secondary and Tertiary Crushing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-7	Secondary and Tertiary Crushing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-8	Transfer Ore to Tripper Car	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-9	Transfer to Fine Ore Bin	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-10	Transfer to Fine Ore Bin	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-11	Transfer to Fine Ore Bin	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-12	Transfer to Fine Ore Bin	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-13	Transfer to Fine Ore Bin	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-14	Transfer to Rod Mill	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-15	Transfer to Rod Mill	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-16	Transfer to Rod Mill	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPN-6	Transfer to Fine Ore Bin	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPN-7	Transfer to Ball Mills	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-17	Lime Conveyance	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-18	Lime Transfer feeder to Conveyor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPM-5	Mission Mill Lime Feeder Conveyor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPM-1	Dump Pocket	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.16
HFOPM-2	Transfer to Coarse Ore Storage	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.16
HFOPM-3	Transfer of Concentrate	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPM-4	Transfer of Concentrate	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
HFOPN-3	Transfer to Cleanup Conveyor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WFOPM-1	Coarse ore storage	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WFOPM-2	Concentrate Storage Pile	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N/A	PAX Usage	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.04	0.00	0.00	0.00	0.00	1.04





POTENTIAL TO EMIT  
HAZARDOUS AIR POLLUTANT SUMMARY  
ASARCO MISSION COMPLEX

Emission Point	Emissions Source/Activity	Dichlorobenzene	Hexane	Ethylbenzene	Xylene - p	Xylene-m	Xylene-o	MTBE	Carbon Disulfide	MDI	1,1,2,2-Tetrachloroethane	1,1,2-Trichloroethane	1,3-Dichloropropene	Total (tons/yr)
<b>South Circuit: Sub Total (Fugitive &amp; Non-Fugitive)</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1.04</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1.25</b>
SSOPS-1	Primary Crushing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-2	Transfer to Stacker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-3	(30-150A); Trans. to SAG	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-3	(30-150B); Trans. to SAG	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-4	Omni Cone Crusher and Bypass	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-4A	Intermediate stockpile	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-6	Lime Loading	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PFOPS-0	Transfer of Ore - Dump Pocket	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06
HFOPS-2	Transfer Point of Crushed Ore	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12
WFOPS-1	Coarse Ore Storage	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PFOPS-8	Omnicone Circuit	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
HFOPS-3	Transfer to Inter. Ore Stockpile	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
WFOPS-2	Intermediate stockpile	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPS-4	Conveyer to Concentrate Stacking	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPS-5	Concentrate Loading	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WFOPS-3	Concentrate Storage Pile	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N/A	Xanthate Use	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.04	0.00	0.00	0.00	0.00	1.04
<b>Wind Erosion: Sub Total (Fugitive &amp; Non-Fugitive)</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.04</b>
WFDA-1	Tailings Dams	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
WFDA-2	Overburden Areas	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Moly Plant: Sub Total (Fugitive &amp; Non-Fugitive)</b>		<b>0.00</b>	<b>0.05</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.05</b>
SSMP-1	Dryer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CFMP-1	Roasters	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
CFMP-2	Roasters	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
<b>Tanks: Sub Total (Fugitive &amp; Non-Fugitive)</b>		<b>0.00</b>	<b>0.20</b>	<b>0.12</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.60</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2.38</b>
N/A	Gasoline Storage Tank (UST)	0.00	0.17	0.10	0.00	0.00	0.00	0.50	0.00	0.00	0.00	0.00	0.00	1.99
N/A	Gasoline Dispensing	0.00	0.03	0.02	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.40
N/A	Diesel Storage	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Engines: Sub Total (Fugitive &amp; Non-Fugitive)</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
N/A	North Mill Emergency Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N/A	North Mill Thickener Emergency Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N/A	Dispatch Location Emergency Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N/A	South Mill Emergency Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N/A	South Mill Emergency Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**POTENTIAL TO EMIT  
GREENHOUSE GAS EMISSIONS  
ASARCO MISSION COMPLEX**

Number	Emissions Source/Activity	CO2	CH4	N2O	CO2e
		(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
<b>Facility-wide</b>		<b>9,636.27</b>	<b>0.17</b>	<b>0.08</b>	<b>9,663.20</b>

<b>Mining Subtotal</b>		<b>6,215.50</b>	<b>0.10</b>	<b>0.02</b>	<b>6,223.74</b>
OFMA-1	Drilling	n/a	n/a	n/a	n/a
OFMA-2	Blasting	n/a	n/a	n/a	n/a
CFMA-1	Generator	67.50	0.00	0.00	67.59
CFMA-2	Generator	2,320.00	0.04	0.01	2,323.47
CFMA-3	Generator	3,828.00	0.06	0.01	3,832.68
VFMA-1	Haulage	n/a	n/a	n/a	n/a
VFMA-2	Dozing	n/a	n/a	n/a	n/a
VFMA-3	Grading	n/a	n/a	n/a	n/a
VFMA-4	Rubber Tire Rigs	n/a	n/a	n/a	n/a
VFMA-5	Land Clearing	n/a	n/a	n/a	n/a
VFMA-6	Misc. Vehicles	n/a	n/a	n/a	n/a
HFMA-1	Unloading	n/a	n/a	n/a	n/a

<b>Mission Circuit Subtotal</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
SSOPM-1	Primary Crusher	n/a	n/a	n/a	n/a
SSOPM-2a	Transfer to Secondary (North)	n/a	n/a	n/a	n/a
SSOPM-2b	Transfer to Secondary (South)	n/a	n/a	n/a	n/a
SSOPM-3	(307-108A); Sec. & Tertiary Crushing	n/a	n/a	n/a	n/a
SSOPM-3	(307-108B); Sec. & Tertiary Crushing	n/a	n/a	n/a	n/a
SSOPM-4	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a
SSOPM-5	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a
SSOPM-6	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a
SSOPM-7	Secondary and Tertiary Crushing	n/a	n/a	n/a	n/a
SSOPM-8	Transfer Ore to Tripper Car	n/a	n/a	n/a	n/a
SSOPM-9	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a
SSOPM-10	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a
SSOPM-11	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a
SSOPM-12	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a
SSOPM-13	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a
SSOPM-14	Transfer to Rod Mill	n/a	n/a	n/a	n/a
SSOPM-15	Transfer to Rod Mill	n/a	n/a	n/a	n/a
SSOPM-16	Transfer to Rod Mill	n/a	n/a	n/a	n/a
SSOPN-6	Transfer to Fine Ore Bin	n/a	n/a	n/a	n/a
SSOPN-7	Transfer to Ball Mills	n/a	n/a	n/a	n/a
SSOPM-17	Lime Conveyance	n/a	n/a	n/a	n/a
SSOPM-18	Lime Transfer feeder to Conveyor	n/a	n/a	n/a	n/a
HFOPM-5	Mission Mill Lime Feeder Conveyor	n/a	n/a	n/a	n/a
HFOPM-1	Dump Pocket	n/a	n/a	n/a	n/a
HFOPM-2	Transfer to Coarse Ore Storage	n/a	n/a	n/a	n/a
HFOPM-3	Transfer of Concentrate	n/a	n/a	n/a	n/a
HFOPM-4	Transfer of Concentrate	n/a	n/a	n/a	n/a
WFOPM-1	Coarse ore storage	n/a	n/a	n/a	n/a
WFOPM-2	Concentrate Storage Pile	n/a	n/a	n/a	n/a
N/A	PAX Usage	n/a	n/a	n/a	n/a

<b>South Circuit Subtotal</b>		0.00	0.00	0.00	0.00
SSOPS-1	Primary Crushing	n/a	n/a	n/a	n/a
SSOPS-2	Transfer to Stacker	n/a	n/a	n/a	n/a
SSOPS-3	(30-150A); Trans. to SAG	n/a	n/a	n/a	n/a
SSOPS-3	(30-150B); Trans. to SAG	n/a	n/a	n/a	n/a
SSOPS-4	Omni Cone Crusher and Bypass	n/a	n/a	n/a	n/a
SSOPS-4A	Transf. from Intermediate stockpile	n/a	n/a	n/a	n/a
SSOPS-6	Lime Loading	n/a	n/a	n/a	n/a
PFOPS-0	Transfer of Ore - Dump Pocket	n/a	n/a	n/a	n/a
HFOPS-2	Transfer Point of Crushed Ore	n/a	n/a	n/a	n/a
WFOPS-1	Coarse Ore Storage	n/a	n/a	n/a	n/a
PFOPS-8	Omnicone Circuit	n/a	n/a	n/a	n/a
HFOPS-3	Transfer to Inter. Ore Stockpile	n/a	n/a	n/a	n/a
WFOPS-2	Intermediate stockpile	n/a	n/a	n/a	n/a
HFOPS-4	Conveyer to Concentrate Stacking	n/a	n/a	n/a	n/a
HFOPS-5	Concentrate Loading	n/a	n/a	n/a	n/a
WFOPS-3	Concentrate Storage Pile	n/a	n/a	n/a	n/a
N/A	PAX Usage	n/a	n/a	n/a	n/a

<b>By-Products Subtotal</b>		3,003.43	0.06	0.06	3,021.28
SSMP-1	Dryer	n/a	n/a	n/a	n/a
CFMP-1	Roasters	1,501.71	0.03	0.03	1,510.64
CFMP-2	Roasters	1,501.71	0.03	0.03	1,510.64

<b>Petroleum Storage Tanks Subtotal</b>		0.00	0.00	0.00	0.00
n/a	Gasoline tank (20,000 gallon)	n/a	n/a	n/a	n/a
n/a	Gasoline Dispensing	n/a	n/a	n/a	n/a
n/a	Diesel tank (250,000 gallon)	n/a	n/a	n/a	n/a
n/a	Diesel tank (20,000 gallon)	n/a	n/a	n/a	n/a
n/a	Diesel tank (20,000 gallon)	n/a	n/a	n/a	n/a
n/a	Diesel tank (20,000 gallon)	n/a	n/a	n/a	n/a

<b>Emergency Engines Subtotal</b>		417.35	0.02	0.00	418.18
n/a	North Mill Admin Generator	43.16	0.00	0.00	43.22
n/a	North Mill Thickener Generator	48.56	0.00	0.00	48.62
n/a	Dispatch Location Generator	43.16	0.00	0.00	43.22
n/a	South Mill Generator	281.33	0.00	0.00	281.68
n/a	South Mill Tank Hill Generator	1.13	0.01	0.00	1.45

<b>Wind Erosion Subtotal</b>		0.00	0.00	0.00	0.00
WFDA-1	Wind Erosion - Tailings Dams	n/a	n/a	n/a	n/a
WFDA-2	Wind Erosion--Overburden	n/a	n/a	n/a	n/a

**OFMA-1 Drilling**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Number of holes} \left( \frac{\text{holes}}{\text{year}} \right) \times \text{Emission Factor} \left( \frac{\text{lb}}{\text{hole}} \right) \times \text{Control Efficiency} (\%) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hour}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Number of holes} \left( \frac{\text{holes}}{\text{year}} \right) \times \text{Emission Factor} \left( \frac{\text{lb}}{\text{hole}} \right) \times \text{Control Efficiency} (\%) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

Holes Drilled = 22,750 holes/yr  
 Emission Factor (TSP) = 1.30 (lb/hole) (Reference: AP-42, Table 11.9-4, Drilling)  
 Emission Factor (PM<sub>10</sub>) = 1.30 (lb/hole) (Note: Assumed PM = PM<sub>10</sub> = PM<sub>2.5</sub> to provide a conservative estimate of potential emissions)  
 Emission Factor (PM<sub>2.5</sub>) = 1.30 (lb/hole) (Note: Assumed PM = PM<sub>10</sub> = PM<sub>2.5</sub> to provide a conservative estimate of potential emissions)  
 Control Efficiency (Note #1) = 50%  
 Annual Operating Hours = 8,760 hours

Emissions (Controlled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
1.69	1.69	1.69	7.39	7.39	7.39

Ore Assay										
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5

HAP Emissions										
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**OFMA-2 Blasting**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{blast}} \right) \times \text{Number of Blasts} \left( \frac{\text{blasts}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hour}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{blast}} \right) \times \text{Number of Blasts} \left( \frac{\text{blasts}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

$$\text{Emission Factor} \left( \frac{\text{lb}}{\text{blast}} \right) = 0.000014 \times \text{Area Blasted}^{1.5}$$

$$\text{Area Blasted} \left( \frac{\text{ft}^2}{\text{blast}} \right) = \text{Total Area Blasted} \left( \frac{\text{ft}^2}{\text{year}} \right) \times \frac{1}{\text{Blasts per Year}} \left( \frac{\text{year}}{\text{blasts}} \right)$$

Holes Drilled	22,750	holes/yr
Blast Pattern (max)	1,050	ft <sup>2</sup> (Based on a blast area of 30 feet x 35 feet for each hole)
Blasts	375	blasts/yr
Total Area Blasted	23,887,500	ft <sup>2</sup> /yr
Area	63,700	ft <sup>2</sup> /blast
Annual Operating Hours	8,760	hours

Emission Factor (TSP) = 0.000014 (A)<sup>1.5</sup> (lb/blast) (Reference: AP-42, Table 11.9-1, Blasting Coal or Overburden)  
 Where: A = Area Blasted in ft<sup>2</sup>

Emission Factor (TSP) =	225.08	lb/blast	
Emission Factor (PM <sub>10</sub> ) =	117.04	lb/blast	(Reference: Calculated as 0.52 * PM per in AP - 42, Table 11.9-1, Blasting Scaling Factors)
Emission Factor (PM <sub>2.5</sub> ) =	6.75	lb/blast	(Reference: Calculated as 0.03 * PM per in AP - 42, Table 11.9-1, Blasting Scaling Factors)

Emissions (Uncontrolled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>10</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
9.64	5.01	0.29	42.20	21.95	1.27

Ore Assay										
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5

HAP Emissions										
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00

**OFMA-2 Blasting (Continued)**

$$\text{Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{ton}} \right) \times \text{Ammonium Nitrate} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hour}} \right)$$

$$\text{Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{ton}} \right) \times \text{Ammonium Nitrate} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{year}} \right)$$

Ammonium Nitrate Usage = 8,224 tons/yr  
 Annual Operating Hours 8,760 hours

Emission Factor (CO) = 67 lb/ton (Reference: AP-42 Table 13.3-1, ANFO)  
 Emission Factor (NO<sub>x</sub>) = 17 lb/ton (Reference: AP-42 Table 13.3-1, ANFO)  
 Emission Factor (SO<sub>2</sub>) = 2 lb/ton (Reference: AP-42 Table 13.3-1, ANFO)

Emissions (Uncontrolled)					
CO	NO <sub>x</sub>	SO <sub>2</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
62.90	15.96	1.88	275.50	69.90	8.22

**CFMA-1, CFMA -2, and CFMA-3 Generators**

$$\text{Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{hp} - \text{hr}} \right) \times \text{Engine Rated Capacity}(\text{hp})$$

$$\text{Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{hp} - \text{hr}} \right) \times \text{Engine Rated Capacity}(\text{hp}) \times \text{Annual Operating Hours} \left( \frac{\text{hours}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

Engine ID	Capacity	Operating Hours	Fuel Use	Fuel Use
	(hp)	(hours)	(gal/hr)	(gal/yr)
		(Note #2)		
CFMA-1	500	250	10	2,500
CFMA-2	1,000	4,000	25	100,000
CFMA-3	2,200	3,000	45	135,000

Emission Factors for CFMA-1

Criteria Pollutants

(Reference: AP-42, Table 3.3-1, Diesel Fuel)

Emission Factor (NOx) =	0.031	lb/hp-hr	
Emission Factor (CO) =	6.68E-03	lb/hp-hr	
Emission Factor (SOx) =	2.05E-03	lb/hp-hr	
Emission Factor (PM/PM <sub>10</sub> /PM <sub>2.5</sub> ) =	2.20E-03	lb/hp-hr	
Emission Factor (VOC) =	6.88E-03	lb/hp-hr	
Emission Factor (CO2) =	1.08	lb/hp-hr	
Emission Factor (CH4) =	6.60E-03	lb/MMBtu	(Reference: 40 CFR Part 98, Subpart C, Table C-2)
Emission Factor (N2O) =	1.32E-03	lb/MMBtu	(Reference: 40 CFR Part 98, Subpart C, Table C-2)

HAPs

(Reference: AP-42, Table 3.3-2)

Emission Factor (Benzene) =	9.33E-04	lb/MMBtu
Emission Factor (Toluene) =	4.09E-04	lb/MMBtu
Emission Factor (Xylenes) =	2.85E-04	lb/MMBtu
Emission Factor (Butadiene) =	3.91E-05	lb/MMBtu
Emission Factor (Formaldehyde) =	1.18E-03	lb/MMBtu
Emission Factor (Acetaldehyde) =	7.67E-04	lb/MMBtu
Emission Factor (Acrolein) =	9.25E-05	lb/MMBtu
Emission Factor (Naphthalene) =	8.48E-05	lb/MMBtu
Emission Factor (Acenaphthylene) =	5.06E-06	lb/MMBtu
Emission Factor (Acenaphthene) =	1.42E-06	lb/MMBtu
Emission Factor (Fluorene) =	2.92E-05	lb/MMBtu
Emission Factor (Phenanthrene) =	2.94E-05	lb/MMBtu
Emission Factor (Anthracene) =	1.87E-06	lb/MMBtu
Emission Factor (Fluoranthene) =	7.61E-06	lb/MMBtu
Emission Factor (Pyrene) =	4.78E-06	lb/MMBtu
Emission Factor (Benz(a)anthracene) =	1.68E-06	lb/MMBtu
Emission Factor (Chrysene) =	3.53E-07	lb/MMBtu
Emission Factor (Benzo(b)fluoranthene) =	9.91E-08	lb/MMBtu
Emission Factor (Benzo(k)fluoranthene) =	1.55E-07	lb/MMBtu
Emission Factor (Benzo(a)pyrene) =	1.88E-07	lb/MMBtu
Emission Factor (Indeno(1,2,3-cd)pyrene) =	3.75E-07	lb/MMBtu
Emission Factor (Dibenz(a,h)anthracene) =	5.83E-07	lb/MMBtu
Emission Factor (Benzo(g,h,l)perylene) =	4.89E-07	lb/MMBtu

Emission Factors for CFMA-2 and CFMA-3

Criteria Pollutants

(Reference: AP-42, Table 3.4-1, Diesel Fuel)

Emission Factor (NOx) =	0.0240	lb/hp-hr	
Emission Factor (CO) =	5.5E-03	lb/hp-hr	
Emission Factor (SOx) =	8.09E-03	lb/hp-hr	
Emission Factor (PM/PM <sub>10</sub> /PM <sub>2.5</sub> ) =	0.0007	lb/hp-hr	
Emission Factor (VOC) =	7.05E-04	lb/hp-hr	
Emission Factor (CO <sub>2</sub> ) =	1.16	lb/hp-hr	
Emission Factor (CH <sub>4</sub> ) =	6.60E-03	lb/MMBtu	(Reference: 40 CFR Part 98, Subpart C, Table C-2)
Emission Factor (N <sub>2</sub> O) =	1.32E-03	lb/MMBtu	(Reference: 40 CFR Part 98, Subpart C, Table C-2)



HAPs

(Reference: AP-42, Table 3.4-3)

Emission Factor (Benzene) =	7.76E-04	lb/MMBtu
Emission Factor (Toluene) =	2.81E-04	lb/MMBtu
Emission Factor (Xylenes) =	1.93E-04	lb/MMBtu
Emission Factor (Formaldehyde) =	7.89E-05	lb/MMBtu
Emission Factor (Acetaldehyde) =	2.52E-05	lb/MMBtu
Emission Factor (Acrolein) =	7.88E-06	lb/MMBtu
Emission Factor (Naphthalene) =	1.30E-04	lb/MMBtu
Emission Factor (Acenaphthylene) =	9.23E-06	lb/MMBtu
Emission Factor (Acenaphthene) =	4.68E-06	lb/MMBtu
Emission Factor (Fluorene) =	1.28E-05	lb/MMBtu
Emission Factor (Phenanthrene) =	4.08E-04	lb/MMBtu
Emission Factor (Anthracene) =	1.23E-06	lb/MMBtu
Emission Factor (Fluoranthene) =	4.03E-06	lb/MMBtu
Emission Factor (Pyrene) =	3.71E-06	lb/MMBtu
Emission Factor (Benz(a)anthracene) =	6.22E-07	lb/MMBtu
Emission Factor (Chrysene) =	1.53E-06	lb/MMBtu
Emission Factor (Benzo(b)fluoranthene) =	1.11E-06	lb/MMBtu
Emission Factor (Benzo(k)fluoranthene) =	2.18E-07	lb/MMBtu
Emission Factor (Benzo(a)pyrene) =	2.57E-07	lb/MMBtu
Emission Factor (Indeno(1,2,3-cd)pyrene) =	4.14E-07	lb/MMBtu
Emission Factor (Dibenz(a,h)anthracene) =	3.46E-07	lb/MMBtu
Emission Factor (Benzo(g,h,l)perylene) =	5.56E-07	lb/MMBtu

**CFMA-1, CFMA -2, and CFMA-3 Generators (Continued)**

Diesel Heating Value = 124,238 Btu/gal

Emission Unit	Emissions (Uncontrolled)									
	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	VOC
	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(ton/year)	(ton/year)	(ton/year)	(ton/year)	(ton/year)
CFMA-1	15.50	3.34	1.03	1.10	3.44	1.94	0.42	0.13	0.14	0.43
CFMA-2	24.00	5.50	8.09	0.70	0.71	48.00	11.00	16.18	1.40	1.41
CFMA-3	52.80	12.10	17.80	1.54	1.55	79.20	18.15	26.70	2.31	2.33
Subtotal	92.30	20.94	26.91	3.34	5.70	129.14	29.57	43.01	3.85	4.17

Emission Unit	Emissions (Uncontrolled)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	(ton/year)	(ton/year)	(ton/year)	(ton/year)
CFMA-1	67.50	0.00	0.00	67.59
CFMA-2	2,320.00	0.04	0.01	2323.47
CFMA-3	3,828.00	0.06	0.01	3832.68
Subtotal	6215.50	0.10	0.02	6223.74

**CFMA-1, CFMA -2, and CFMA-3 Generators (Continued)**

Pollutant	Emissions (Uncontrolled)		
	CFMA-1	CFMA-2	CFMA-3
	(ton/yr)	(ton/yr)	(ton/yr)
Benzene	0.00	4.82E-03	6.51E-03
Toluene	0.00	1.75E-03	2.36E-03
Xylenes	0.00	1.20E-03	1.62E-03
1,3-Butadiene	0.00	n/a	n/a
Formaldehyde	0.00	4.90E-04	6.62E-04
Acetaldehyde	0.00	1.57E-04	2.11E-04
Acrolein	0.00	4.89E-05	6.61E-05
Naphthalene	0.00	8.08E-04	1.09E-03
Acenaphthylene	0.00	5.73E-05	7.74E-05
Acenaphthene	0.00	2.91E-05	3.92E-05
Fluorene	0.00	7.95E-05	1.07E-04
Phenanthrene	0.00	2.53E-03	3.42E-03
Anthracene	0.00	7.64E-06	1.03E-05
Fluoranthene	0.00	2.50E-05	3.38E-05
Pyrene	0.00	2.30E-05	3.11E-05
Benz(a)anthracene	0.00	3.86E-06	5.22E-06
Chrysene	0.00	9.50E-06	1.28E-05
Benzo(b)fluoranthene	0.00	6.90E-06	9.31E-06
Benzo(k)fluoranthene	0.00	1.35E-06	1.83E-06
Benzo(a)pyrene	0.00	1.60E-06	2.16E-06
Indeno(1,2,3-cd)pyrene	0.00	2.57E-06	3.47E-06
Dibenz(a,h)anthracene	0.00	2.15E-06	2.90E-06
Benzo(g,h,l)perylene	0.00	3.45E-06	4.66E-06
Subtotal	0.00	0.01	0.02

**VFMA-1 Haulage**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{vehicle miles travelled}} \right) \times \text{Vehicle Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \left( \frac{1}{8,760} \right) \left( \frac{\text{year}}{\text{hours}} \right) \times (1 - \text{Control Efficiency} (\%))$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{vehicle miles travelled}} \right) \times \text{Vehicle Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \left( \frac{1}{2,000} \right) \left( \frac{\text{ton}}{\text{pound}} \right) \times (1 - \text{Control Efficiency} (\%))$$

PM and PM<sub>10</sub> Emission Factor (lb/VMT) =  $k(s/12)^a(W/3)^b \times [365-P]/365$  (Reference: AP-42, Section 13.2.2 Unpaved Roads)

Where

	TSP	PM10	PM2.5
k =	4.9	1.5	0.15
a =	0.7	0.9	0.9
b =	0.45	0.45	0.45

s, surface material silt content (%) = 8.3 % (Reference: AP-42, Table 13.2.2-1, Stone Quarrying and Processing)  
 P, days in year with at least 0.01 in. of precipitation = 0 days/yr (See Note #3)  
 Average Mean Vehicle Weight (W) = 400 ton (See Note #4)  
 Vehicle Miles Travelled (VMT) = 1,000,000 mile/yr  
 Road Watering Control Efficiency = 75% (See Note #5)

Emission Factor (PM) = 34.23 lb/VMT  
 Emission Factor (PM<sub>10</sub>) = 9.73 lb/VMT  
 Emission Factor (PM<sub>2.5</sub>) = 0.97 lb/VMT

Emissions (Controlled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
976.75	277.75	27.78	4,278.15	1,216.55	121.66

**VFMA-2 Dozing**

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{hr}} \right) \times \text{Annual Operating Hours} \left( \frac{\text{hours}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pounds}} \right)$$

Emission Factor (TSP) = 5.7(s)<sup>1.2</sup>/(M)<sup>1.3</sup> (Ref: AP-42, Table 11.9-1, Bulldozing Overburden)

s, Silt Content of Road = 8.3 % (Reference: AP-42, Table 13.2.2-1, Stone Quarrying and Processing)

M, Moisture Content = 3.5 %

Hours of Dozing = 35,000 hr/yr

Emission Factor (PM) = 14.17 lb/hr

Emission Factor (PM<sub>10</sub>) = 10.63 lb/hr (Reference: PM<sub>10</sub> is 0.75 \* PM, AP-42, Table 11.9-1, Overburden)

Emission Factor (PM<sub>2.5</sub>) = 1.49 lb/hr (Reference: PM<sub>2.5</sub> is 0.105 \* PM, AP-42, Table 11.9-1, Overburden)

Emissions (Uncontrolled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
14.17	10.63	1.49	248.04	186.03	26.04

**VFMA-3 Grading**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{mile}} \right) \times \text{Annual Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{mile}} \right) \times \text{Annual Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

Emission Factor in lb/VMT (TSP) = 0.040\*(S<sup>2.5</sup>) (Reference: AP-42, Table 11.9-1, Grading)

S, Mean Vehicle Speed 5 mph  
 Blading Hours 20,000 hours/yr  
 Annual Miles Travelled (VMT) 100,000 miles/yr  
 Annual Operating Hours = 8,760 hours/yr

Emission Factor (PM) = 2.24 lb/mile  
 Emission Factor (PM<sub>10</sub>) = 1.34 lb/mile (Reference: PM<sub>10</sub> is 0.6 \* PM, AP-42, Table 11.9-1, Grading )  
 Emission Factor (PM<sub>2.5</sub>) = 0.07 lb/mile (Reference: PM<sub>2.5</sub> is 0.031 \* PM, AP-42, Table 11.9-1, Grading )

Emissions (Uncontrolled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>10</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
25.5	15.3	0.8	111.8	67.1	3.5

**VFMA-4 Rubber Tire Rigs**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{hour}} \right) \times \text{Annual Hours Operated} \left( \frac{\text{hours}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{miles travelled}} \right) \times \text{Annual Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{hour}} \right) \times \text{Annual Hours Operated} \left( \frac{\text{hours}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{miles travelled}} \right) \times \text{Annual Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

PM and PM<sub>10</sub> Emission Factor (lb/VMT) =  $k(s/12)^a(W/3)^b \times [365-P]/365$  (Reference: AP-42, Section 13.2.2 Unpaved Roads)

Where

	<u>TSP</u>	<u>PM10</u>	<u>PM2.5</u>
k =	4.9	1.5	0.15
a =	0.7	0.9	0.9
b =	0.45	0.45	0.45

s, surface material silt content (%) = 8.3 % (Reference: AP-42, Table 13.2.2-1, Stone Quarrying and Processing)  
 P, days in year with at least 0.01 in. of precipitation = 0 days/year (See Note #3)  
 Average Mean Vehicle Weight (W) = 60 (See Note #6)  
 Vehicle Miles Travelled (VMT) = 300,000 mile/yr (Dozers, excavators, backhoes, water trucks, etc.)  
 Road Watering Control Efficiency = 75% (See Note #5)

Emission Factor (PM) = 14.57 lb/VMT  
 Emission Factor (PM<sub>10</sub>) = 4.14 lb/VMT  
 Emission Factor (PM<sub>2.5</sub>) = 0.41 lb/VMT

Emissions (Controlled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>10</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
124.8	35.5	3.5	546.5	155.4	15.5

**VFMA-5 Land Clearing**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{ton}} \right) \times \text{Top Soil Removed} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{ton}} \right) \times \text{Top Soil Removed} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

Topsoil Removed by Scraper = 1,000,000 tons/yr  
 Topsoil Unloaded by Scraper = 1,000,000 tons/yr

Emission Factor, Scraper (PM) = 0.058 lb/ton (Reference: AP-42, Table 11.9-4, Topsoil Removal by Scraper)  
 Emission Factor, Scraper (PM<sub>10</sub>) = 0.058 lb/ton (Reference: No PM<sub>10</sub> emission factor available. PM<sub>10</sub> is conservatively assumed to be equal to PM)  
 Emission Factor, Scraper (PM<sub>2.5</sub>) = 0.058 lb/ton (Reference: No PM<sub>2.5</sub> emission factor available. PM<sub>2.5</sub> is conservatively assumed to be equal to PM)

Emission Factor, Unloading (TSP) = 0.04 lb/ton (Reference: AP-42, Table 11.9-4, Scraper Unloading)  
 Emission Factor, Unloading (PM<sub>10</sub>) = 0.04 lb/ton (Reference: No PM<sub>10</sub> emission factor available. PM<sub>10</sub> is conservatively assumed to be equal to PM)  
 Emission Factor, Unloading (PM<sub>2.5</sub>) = 0.04 lb/ton (Reference: No PM<sub>2.5</sub> emission factor available. PM<sub>2.5</sub> is conservatively assumed to be equal to PM)

Emissions (Uncontrolled)						
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
<i>Topsoil Removal</i>	6.62	6.62	6.62	29.00	29.00	29.00
<i>Topsoil Unloading</i>	4.57	4.57	4.57	20.00	20.00	20.00
Subtotal	11.19	11.19	11.19	49.00	49.00	49.00



**VFMA-6 Miscellaneous Vehicle Traffic**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{miles travelled}} \right) \times \text{Annual Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{miles travelled}} \right) \times \text{Annual Miles Travelled} \left( \frac{\text{miles}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

PM and PM<sub>10</sub> Emission Factor (lb/VMT) =  $k(s/12)^a(W/3)^b \times [365-P]/365$  (Reference: AP-42, Section 13.2.2 Unpaved Roads)

Where

	<u>TSP</u>	<u>PM10</u>	<u>PM2.5</u>
k =	4.9	1.5	0.15
a =	0.7	0.9	0.9
b =	0.45	0.45	0.45

s, surface material silt content (%) = 8.3 % (Reference: AP-42, Table 13.2.2-1, Stone Quarrying and Processing)  
 P, days in year with at least 0.01 in. of precipitation = 0 days/year (See Note #3)  
 Average Mean Vehicle Weight (W) = 2 tons  
 Vehicle Miles Travelled (VMT) = 1,500,000 miles/yr  
 Control Efficiency (Road Watering) = 75% (See Note #5)

Emission Factor (PM) = 3.15 lb/VMT  
 Emission Factor (PM<sub>10</sub>) = 0.90 lb/VMT  
 Emission Factor (PM<sub>2.5</sub>) = 0.09 lb/VMT

Emissions (Controlled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
135.0	38.4	3.8	591.4	168.2	16.8

**HFMA-1 Unloading Overburden**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{ton}} \right) \times \text{Overburden Removed} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{lb}}{\text{ton}} \right) \times \text{Overburden Removed} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

Emission Factor for Unloading =  $k \cdot (0.0032) \cdot (U/5)^{1.3} \cdot (M/2)^{1.4}$  (Reference: AP-42, Section 13.2.4.3)

Where:

k, Particle size Multiplier for TSP = 0.74

k, Particle size Multiplier for PM<sub>10</sub> = 0.35

k, Particle size Multiplier for PM<sub>2.5</sub> = 0.053

U = Mean Wind Speed 10 miles/hr (see Note #7)

M = Moisture Content (%) 2.6 %

Overburden Unloaded 24,804,200 tons/yr

Emission Factor (TSP) = 0.00297 lb/ton

Emission Factor (PM<sub>10</sub>) = 0.00140 lb/ton

Emission Factor (PM<sub>2.5</sub>) = 0.00021 lb/ton

Emissions (Uncontrolled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
8.40	3.97	0.60	36.79	17.40	2.63

## Footnotes

Note #1 - Dust shields and water suppression are used at the facility to control dust emissions from drilling activities. Per NIOSH, "Handbook for Dust Control in Mining," the use of water suppression during drilling activities has demonstrated control efficiencies from 9.1% to 96.3%. The use of 50% provides a conservative control efficiency for the drilling activity.

Note #2 - Operating hours for CFMA-1, 2, and 3 represent the annual operating time spent by these portable engines as a replacement to existing stationary engines.

Note #3 - The mine receives, on average 50 - 60 days of precipitation above 0.01". However, for developing a PTE for the site, 0 days of precipitation above 0.01" is assumed to provide a conservative estimate of the annual emissions from the haul road.

Note #4 - The mine operates haul trucks with average mean vehicles ranging from 300 ton - 400 ton. For the purposes of this PTE, the a conservative estimate of 400 ton is used for the mean vehicle weight.

Note #5 - The control efficiency was estimated using calculations found in the "Watering and Control Efficiency" technical paper published in the Technology Transfer Network (TTN) based upon the control efficiency/moisture ratio established in AP-42 Figure 13.2.2-2 This 75% control efficiency is consistent with the watered road control efficiency accepted by Maricopa County.

Note #6 - The mine operates rubber tire rigs (dozers, excavators, water trucks, etc.) with average mean vehicles ranging from 40 ton - 60 ton. For the purposes of this PTE, the a conservative estimate of 60 ton is used for the mean vehicle weight.

Note #7 - The annual average wind speed for the site ranges from about 6 mph to 7 mph. This PTE estimate uses 10 mph as a the average annual wind speed to provide a conservative estimate of the emissions.

**Calculation Methodology**

A. Scrubbers and Baghouses

$$1. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Annual Throughput } \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

$$2. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{hour}} \right) \times 8,760 \left( \frac{\text{hours}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

B. Transfer Points

$$3. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Annual Throughput } \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right) \times (1 - \text{Control Efficiency})(\%)$$

$$4. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Daily Throughput } \left( \frac{\text{ton}}{\text{day}} \right) \times \frac{1}{24} \left( \frac{\text{day}}{\text{hour}} \right) \times 8,760 \left( \frac{\text{hour}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right) \times (1 - \text{Control Efficiency})(\%)$$

C. CS2 Emissions from Xanthate Usage

$$5. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Annual PAX Usage } \left( \frac{\text{pound}}{\text{year}} \right) \times \text{Decomposition Rate of PAX}(\%) \times \text{Molar Mass Ratio of CS2 to Pax } \left( \frac{\text{g/gmol}}{\text{g/gmol}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

Operational Information

Mission Circuit Ore Throughput =	2,290	ton/hr
Mission Circuit Ore Throughput =	20,060,400	ton/yr
Annual Lime Throughput =	28,470	ton/yr
Copper Concentrate Produced =	760,000	ton/yr
Annual Operating Hours =	8,760	hr/yr

Emission Unit	Emission Rate (gr/dscf)	Exhaust Flow (scfm)	Emission Rate					
			PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
			(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
SSOPM-1 (Note #1)	0.004	41,503	1.55	1.55	1.55	6.81	6.81	6.81
SSOPM-2 (305-07a) (Note #2)	0.022	11,000	2.06	2.06	2.06	9.02	9.02	9.02
SSOPM-2 (305-07b) (Note #2)	0.022	11,000	2.06	2.06	2.06	9.02	9.02	9.02
SSOPM-3 (307-108A) (Note #3)	0.022	10,000	1.87	1.87	1.87	8.20	8.20	8.20
SSOPM-3 (307-108B) (Note #3)	0.022	10,000	1.87	1.87	1.87	8.20	8.20	8.20
SSOPM-4 (Note #4)	0.002	42,000	0.72	0.72	0.72	3.15	3.15	3.15
SSOPM-5 (Note #4)	0.002	42,000	0.72	0.72	0.72	3.15	3.15	3.15
SSOPM-6 (Note #4)	0.002	42,000	0.72	0.72	0.72	3.15	3.15	3.15
SSOPM-7 (Note #4)	0.002	42,000	0.72	0.72	0.72	3.15	3.15	3.15
SSOPM-8 (Note #5)	0.022	7,500	1.40	1.40	1.40	6.15	6.15	6.15
SSOPM-9 (Note #5)	0.022	2,750	0.52	0.52	0.52	2.26	2.26	2.26
SSOPM-10 (Note #5)	0.022	2,750	0.52	0.52	0.52	2.26	2.26	2.26
SSOPM-11 (Note #5)	0.022	2,750	0.52	0.52	0.52	2.26	2.26	2.26
SSOPM-12 (Note #5)	0.022	2,750	0.52	0.52	0.52	2.26	2.26	2.26
SSOPM-13 (Note #5)	0.022	2,750	0.52	0.52	0.52	2.26	2.26	2.26
SSOPM-14	0.01	17,500	1.50	1.50	1.50	6.57	6.57	6.57
SSOPM-15	0.01	17,500	1.50	1.50	1.50	6.57	6.57	6.57
SSOPM-16	0.01	17,500	1.50	1.50	1.50	6.57	6.57	6.57
SSOPN-6	0.02	6,312	1.18	1.18	1.18	5.18	5.18	5.18
SSOPN-7	0.02	16,899	3.16	3.16	3.16	13.86	13.86	13.86
Subtotal			25.13	25.13	25.13	110.06	110.06	110.06

Ore Assay										
Sb (mg/kg)	As (mg/kg)	Be (mg/kg)	Cd (mg/kg)	Cr (mg/kg)	Co (mg/kg)	Pb (mg/kg)	Mn (mg/kg)	Hg (mg/kg)	Ni (mg/kg)	Se (mg/kg)
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5

Emission Unit	HAP Emissions										
	Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
SSOPM-1 (Note #1)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-2 (305-07a) (Note #2)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-2 (305-07b) (Note #2)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-3 (307-108A) (Note #3)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-3 (307-108B) (Note #3)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-4 (Note #4)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-5 (Note #4)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-6 (Note #4)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-7 (Note #4)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-8 (Note #5)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-9 (Note #5)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-10 (Note #5)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-11 (Note #5)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-12 (Note #5)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-13 (Note #5)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPM-16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPN-6	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPN-7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00
Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00

Source - SSOPM-17

Description - Lime Transfer

Lime Throughput	28,470	tons/yr	
Emission Factor (TSP) =	2.2	lb/ton	(Reference: AP-42, Table 11.17-4, Product Transfer and Conveying)
Emission Factor (PM <sub>10</sub> ) =	2.2	lb/ton	(Reference: PM10 is assumed to be equal to PM as AP-42, Table 11.17-4, has no data available)
Emission Factor (PM <sub>2.5</sub> ) =	2.2	lb/ton	(Reference: No data available. Assumed PM <sub>2.5</sub> = PM <sub>10</sub> )
Number of Transfer Points SSOPM-17	2		
Control Efficiency (Baghouse 328-E6) =	99%		

Source - SSOPM-18

Description - Lime Transfer from 328-E44 to 328-E11, and 328-E11 to 328-E14

Lime Throughput	28,470	tons/yr	
Emission Factor (TSP) =	2.2	lb/ton	(Reference: AP-42, Table 11.17-4, Product Transfer and Conveying)
Emission Factor (PM <sub>10</sub> ) =	2.2	lb/ton	(Reference: PM10 is assumed to be equal to PM as AP-42, Table 11.17-4, has no data available)
Emission Factor (PM <sub>2.5</sub> ) =	2.2	lb/ton	(Reference: No data available. Assumed PM <sub>2.5</sub> = PM <sub>10</sub> )
Number of Transfer Points SSOPM-18	2		
Control Efficiency (Baghouse 328-E6) =	99%		

Source - HFOPM-5

Description - Mission Mill Lime Feeder Conveyor

Lime Throughput	28,470	tons/yr	
Emission Factor (TSP) =	2.2	lb/ton	(Reference: AP-42, Table 11.17-4, Product Transfer and Conveying)
Emission Factor (PM <sub>10</sub> ) =	2.2	lb/ton	(Reference: PM10 is assumed to be equal to PM as AP-42, Table 11.17-4, has no data available)
Emission Factor (PM <sub>10</sub> ) =	2.2	lb/ton	(Reference: PM2.5 is assumed to be equal to PM as AP-42, Table 11.17-4, has no data available)
Number of Transfer Point =	2		(Controlled by Enclosure)
Number of Transfer Point =	1		(Controlled by Baghouse)
Controlled with enclosure =	70%		
Control Efficiency (Baghouse 328-E6) =	99%		

Source - HFOPM-1

Description - Dump Pocket

Annual Ore Throughput	20,060,400	ton/yr	
Emission Factor (TSP) =	0.12	lb/ton	(Reference: AP-42, Table 11.24-2, Low Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.06	lb/ton	(Reference: AP-42, Table 11.24-2, Low Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.02	lb/ton	(Reference: PM <sub>2.5</sub> is assumed to be 28.6% of PM <sub>10</sub> )
Controlled with water sprays/dust suppressant =	75%		

Source - HFOPM-2

Description - Transfer Point of Crushed Ore to the Coarse Ore Stockpile

Ore Throughput	20,060,400	ton/yr	
Emission Factor (TSP) =	0.12	lb/ton	(Reference: AP-42, Table 11.24-2, Low Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.06	lb/ton	(Reference: AP-42, Table 11.24-2, Low Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.02	lb/ton	(Reference: PM <sub>2.5</sub> is assumed to be 28.6% of PM <sub>10</sub> )
Controlled with water sprays/dust suppressant =	75%		

Source - HFOPM-3

Description - Transfer Point of Concentrate Product Into Rail Cars at Concentrate Loading Area East

Conc. Prod. Throughput	760,000	ton/yr	
Emission Factor (TSP) =	0.01	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.004	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.001	lb/ton	(Reference: PM <sub>2.5</sub> is assumed to be 28.6% of PM <sub>10</sub> )
Number of Transfer Points =	1		

Source - HFOPM-4

Description - Transfer Point of Conc. Prod at Concentrate Loading Area North. Transfer points included are:

- (1) Transfer of concentrate from conveyer belt into haul truck
- (2) Transfer of concentrate from the haul truck to concrete pad
- (3) Loading of concentrate from concrete pad into semi truck for offsite transfer

Ore Throughput	760,000	ton/yr	
Emission Factor (TSP) =	0.01	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.004	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.001	lb/ton	(Reference: PM <sub>2.5</sub> is assumed to be 28.6% of PM <sub>10</sub> )
Number of Transfer Points =	3		

Source - HFOPN-3

Description - Transfer of Ore to Cleanup Conveyer 311-96a

Ore Throughput	41,600	ton/yr	
Emission Factor (TSP) =	0.12	lb/ton	(Reference: AP-42, Table 11.24-2, Low Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.06	lb/ton	(Reference: AP-42, Table 11.24-2, Low Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.017	lb/ton	(Reference: PM <sub>2.5</sub> is assumed to be 28.6% of PM <sub>10</sub> )
Controlled with Enclosure =	70%		

Source - WFOPM-1

Description - Coarse ore storage

Emission Factor (TSP) =	$1.7 * (s/1.5) * (f/15)$	(WRAP, Section 9.3)
	<i>Where</i>	
s, silt content of material (weight %) =	4.3	(Reference: AP-42, Table 13.2.4-1, Pellet Ore)
f, % of time the wind speed > 12 mph =	100	(See Note #6)

Emission Factor (TSP) =	32.49	lb/year/acre
Emission Factor (PM <sub>10</sub> ) =	16.24	lb/year/acre
Emission Factor (PM <sub>2.5</sub> ) =	2.44	lb/year/acre
Stockpile Height =	50	ft (Reference: Google Earth <sup>®</sup> )
Stockpile Radius =	175	ft (Reference: Google Earth <sup>®</sup> )
Stockpile Surface Area =	196,298	ft <sup>2</sup>
Stockpile Surface Area =	5	acres



Source - WFOPM-2

Description - Concentrate Storage Pile (Wind Erosion)

Emission Factor (TSP) =  $1.7 * (s/1.5) * (f/15)$  (WRAP, Section 9.3)  
*Where*  
 s, silt content of material (weight %) = 4.3 (Reference: AP-42, Table 13.2.4-1, Pellet Ore)  
 f, % of time the wind speed > 12 mph = 100 (See Note #6)

Emission Factor (TSP) = 32.49 lb/year/acre  
 Emission Factor (PM<sub>10</sub>) = 16.24 lb/year/acre  
 Emission Factor (PM<sub>2.5</sub>) = 2.44 lb/year/acre  
 Stockpile Height = 25 ft (Reference: Google Earth<sup>®</sup>)  
 Stockpile Radius = 100 ft (Reference: Google Earth<sup>®</sup>)  
 Stockpile Surface Area = 63,807 ft<sup>2</sup>  
 Stockpile Surface Area = 1 acres

Emission Unit	Emissions (Uncontrolled)						Emissions (Controlled)					
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
SSOPM-17	n/a	n/a	n/a	n/a	n/a	n/a	0.14	0.14	0.14	0.63	0.63	0.63
SSOPM-18	n/a	n/a	n/a	n/a	n/a	n/a	0.14	0.14	0.14	0.63	0.63	0.63
HFOPM-5	n/a	n/a	n/a	n/a	n/a	n/a	4.36	4.36	4.36	19.10	19.10	19.10
HFOPM-1	n/a	n/a	n/a	n/a	n/a	n/a	68.70	34.35	9.72	300.91	150.45	42.58
HFOPM-2	n/a	n/a	n/a	n/a	n/a	n/a	68.70	34.35	9.72	300.91	150.45	42.58
HFOPM-3	0.87	0.35	0.10	3.80	1.52	0.43	n/a	n/a	n/a	n/a	n/a	n/a
HFOPM-4	2.60	1.04	0.29	11.40	4.56	1.29	n/a	n/a	n/a	n/a	n/a	n/a
HFOPN-3	n/a	n/a	n/a	n/a	n/a	n/a	0.17	0.09	0.02	0.75	0.37	0.11
WFOPM-1	0.02	0.01	0.00	0.07	0.04	0.01	n/a	n/a	n/a	n/a	n/a	n/a
WFOPM-2	0.01	0.00	0.00	0.02	0.01	0.00	n/a	n/a	n/a	n/a	n/a	n/a
Subtotal	3.49	1.40	0.39	15.30	6.13	1.73	142.22	73.43	24.11	622.92	321.64	105.62

Ore Assay											
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se	
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5	

Emission Unit	HAP Emissions										
	Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
HFOPM-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.00	0.00	0.00
HFOPM-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.00	0.00	0.00
HFOPM-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPM-4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00
HFOPN-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WFOPM-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WFOPM-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.31	0.00	0.00	0.00

Source - Mission Concentrator

Quantity of PAX Used in the Mission Circuit = 700,000 lb  
Quantity of PAX Used in the Mission Circuit = 350 ton

Decomposition rate of PAX = 1.58% (See Note #7)  
Mole ratio of CS2 to PAX (Decomposition Coefficient) = 0.50

Note: It is assumed that 3 moles of CS2 are formed for every six moles of PAX that decompose:  
 $6\text{ROCS}_2 + 3\text{H}_2\text{O} \rightarrow 6\text{ROH} + \text{CO}_3(2-) + 3\text{CS}_2 + 2\text{CS}_3(2-)$

Molecular weight of PAX = 202.4 gram/gram-mol  
Molecular weight of CS2 = 76.14 gram/gram-mol

Quantity of CS2 Formed = 2,080.31 lb  
Quantity of CS2 Formed = 0.24 lb/hr (Annual Average)  
Quantity of CS2 Formed = 1.04 ton

Footnotes:

Note #1 - SSOPM-1 is limited to an emission rate of 0.01 grams/dscm (Condition Part B, Section 1, I.B.1). This emission rate is converted to grains/dscf, as follows, to support the emissions calculations.

Permitted emission rate =	0.01 grams/dscm
1 gram =	15.43 grains
1 cubic meter =	35.31 cubic feet
Permitted emission rate =	0.0043699 grains/dscf

Note #2 - SSOPM-2 is limited to an emission rate of 0.05 grams/dscm (Condition Part B, Section 1, I.B.2). This emission rate is converted to grains/dscf, as follows, to support the emissions calculations.

Permitted emission rate =	0.05 grams/dscm
1 gram =	15.43 grains
1 cubic meter =	35.31 cubic feet
Permitted emission rate =	0.022 grains/dscf

Note #3 - SSOPM-3 is limited to an emission rate of 0.05 grams/dscm (Condition Part B, Section 2, I.B.1). This emission rate is converted to grains/dscf, as follows, to support the emissions calculations.

Permitted emission rate =	0.05 grams/dscm
1 gram =	15.43 grains
1 cubic meter =	35.31 cubic feet
Permitted emission rate =	0.022 grains/dscf

Note #4 - The emission rate used for SSOPM-4 through SSOPM-7 is 0.002 grain/dscf. Although Condition Part B, Section 2, I.B.1 of the permit limits the emission rate to 0.05 grams/dscm, Asarco submitted an application to PDEQ limiting the exhaust particulate emission rate of SSOPM4 through 7 to 0.002 grains/dscf. Note that Asarco is required to operate only three of the four control devices at all times. For the purposes of this PTE, emissions from all four control devices are included and is therefore considered conservative.

Note #5 - SSOPM-3 is limited to an emission rate of 0.05 grams/dscm (Condition Part B, Section 3, I.B.1.a). This emission rate is converted to grains/dscf, as follows, to support the emissions calculations.

Permitted emission rate =	0.05 grams/dscm
1 gram =	15.43 grains
1 cubic meter =	35.31 cubic feet
Permitted emission rate =	0.022 grains/dscf

Note #6 - The annual average wind speed for the site ranges from about 6 mph to 7 mph. For the purposes of developing an emission factor for the PTE average wind greater than 12 mph are assumed for a 100 percent of the time to provide a conservative estimate.

Note #7 -

- (1) CS<sub>2</sub> emissions are estimated using the emissions calculation methods provided in "Stationary and Mobile Source Emission Calculations for the NorthMet Project – Combined Report (RS57) PolyMet Mining Inc, November 2008.
- (2) CS<sub>2</sub> emissions are estimated by considering the annual usage of PAX powder (lb/year) and the decomposition rate for PAX when in solution
- (3) Decomposition of PAX in solution and hence formation of CS<sub>2</sub> is dependent on a number of factors , including temperature and pH. A higher pH results in a reduced decomposition rate of the PAX while the rate of decomposition increases with increasing temperature. Mission Mine's floatation systems at both the North and South Mills are operated at a relative high pH (10 - 11) and ambient temperatures (around 25 C). It is known that in acidic solution xanthate decomposes to carbon disulfide and fresh xanthate solutions are neutral. Under these conditions the formation of CS<sub>2</sub> is greatly reduced . Therefore, CS<sub>2</sub> emissions estimated above are conservative.
- (4) The emissions reporting assumes that the decomposition product CS<sub>2</sub> is emitted to the atmosphere adding to the conservativeness of the estimate.
- (5) We continue to investigate available literature to further refine and update, as necessary, the CS<sub>2</sub> emissions estimation for the conditions at the Mission and South Mills.

**Calculation Methodology**

**A. Scrubbers and Baghouses**

$$1. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Annual Throughput } \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

$$2. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{hour}} \right) \times 8,760 \left( \frac{\text{hours}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

**B. Transfer Points**

$$3. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Annual Throughput } \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right) \times (1 - \text{Control Efficiency})(\%)$$

$$4. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor } \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Daily Throughput } \left( \frac{\text{ton}}{\text{day}} \right) \times \frac{1}{24} \left( \frac{\text{day}}{\text{hour}} \right) \times 8,760 \left( \frac{\text{hour}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right) \times (1 - \text{Control Efficiency})(\%)$$

**C. CS2 Emissions from Xanthate Usage**

$$5. \text{ Annual Emission } \left( \frac{\text{ton}}{\text{year}} \right) = \text{Annual PAX Usage } \left( \frac{\text{pound}}{\text{year}} \right) \times \text{Decomposition Rate of PAX}(\%) \times \text{Molar Mass Ratio of CS}_2 \text{ to Pax } \left( \frac{\text{g/gmol}}{\text{g/gmol}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

**Operational Information**

South Mill Circuit Permitted Ore Throughput =	12,500,000	ton/yr
South Mill Circuit Permitted Ore Throughput =	3,300	ton/hr
Omnicone Circuit Throughput =	8,760,000	ton/yr
Omnicone Circuit Throughput =	1,000	ton/hr
Concentrate Throughput =	450,000	ton/yr
Concentrate Throughput =	650	ton/hr
Lime Throughput =	20,000	ton/yr
Lime Throughput =	100	ton/hr
Annual Operating Hours =	8,760	hours

Emission Unit	Emission Rate (gr/dscf)	Exhaust Flow (scfm)	Emissions (Controlled)					
			PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
			(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
SSOPS-1	0.003	21,000	0.54	0.54	0.54	2.37	2.37	2.37
SSOPS-2	0.01	4,471	0.38	0.38	0.38	1.68	1.68	1.68
SSOPS-3 (30-150A)	0.003	12,500	0.32	0.32	0.32	1.41	1.41	1.41
SSOPS-3 (30-150B)	0.003	12,500	0.32	0.32	0.32	1.41	1.41	1.41
SSOPS-4	0.01	13,000	1.11	1.11	1.11	4.88	4.88	4.88
SSOPS-4a	0.01	14,800	1.27	1.27	1.27	5.56	5.56	5.56
SSOPS-6	0.003	2,000	0.05	0.05	0.05	0.23	0.23	0.23
Subtotal			4.00	4.00	4.00	17.52	17.52	17.52

Ore Assay											
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se	
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5	

Emission Unit	HAP Emissions										
	Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
SSOPS-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-3 (30-150A)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-3 (30-150B)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSOPS-4a	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00

Source - HFOPS-1

Description - Transfer Point of Crushed Ore - Dump Pocket

Ore Throughput	12,500,000	ton/year	
Ore Throughput	3,300	ton/hr	
Emission Factor (TSP) =	0.12	lb/ton	(Reference: AP-42, Table 11.24-2, Low-moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.06	lb/ton	(Reference: AP-42, Table 11.24-2, Low-moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.017	lb/ton	(PM <sub>2.5</sub> = 0.283*PM <sub>10</sub> - Reference: South Mill Expansion Permit Application)
Controlled with enclosure =	25%	percent	(Reference: South Mill Expansion Permit Application)
Controlled with water sprays =	80%	percent	(Reference: South Mill Expansion Permit Application)
Overall control achieved =	85%	percent	(Reference: South Mill Expansion Permit Application)

Source - HFOPS-2

Description - Transfer Point of Crushed Ore to the Stockpile

AP-42, Table 11.24-2: Material Handling and Transfer

Ore Throughput	12,500,000	ton/year	
Ore Throughput	3,300	ton/hr	
Emission Factor (TSP) =	0.12	lb/ton	(Reference: AP-42, Table 11.24-2, Low-moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.06	lb/ton	(Reference: AP-42, Table 11.24-2, Low-moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.017	lb/ton	(PM <sub>2.5</sub> = 0.283*PM <sub>10</sub> - Reference: South Mill Expansion Permit Application)
Controlled with water sprays =	70%	percent	

Source - WFOPS-1

Description - Coarse ore storage

Emission Factor (TSP) =	$1.7 * (s/1.5) * (f/15)$	(WRAP, Section 9.3)
	<i>Where</i>	
s, silt content of material (weight %) =	4.3	(Reference: AP-42, Table 13.2.4-1, Pellet Ore)
f, % of time the wind speed > 12 mph =	100	(See Note #1)

Emission Factor (TSP) =	32.49	lb/year/acre
Emission Factor (PM <sub>10</sub> ) =	16.24	lb/year/acre
Emission Factor (PM <sub>2.5</sub> ) =	2.44	lb/year/acre
Stockpile Height =	60	ft (Reference: Google Earth <sup>®</sup> )
Stockpile Radius =	200	ft (Reference: Google Earth <sup>®</sup> )
Stockpile Surface Area =	256,894	ft <sup>2</sup>
Stockpile Surface Area =	6	acres

Source PFOPS-6 and 7

Description - SAG Reclaim Circuit; Belt 20-244/245 to 20-266/268

Note: Emissions from this emission point are controlled by SSOPS-3 (30-150A and 30-150B) and are therefore not calculated separately.

Source PFOPS-8

Description - Omnicone Circuit; Belt 20-238/241 to 20-250

Annual Ore Throughput =	8,760,000	ton/yr	
Hourly Ore Throughput =	1,000	ton/hr	
Emission Factor (TSP) =	0.01	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.004	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.001	lb/ton	(PM <sub>2.5</sub> = 0.283*PM <sub>10</sub> - Reference: South Mill Expansion Permit Application)
Controlled (wet process and enclosure) =	70%	percent	

Source - PSOPS-11

Description - Transfer from Omnicone crushers

Note: Emissions from this emission point are controlled by SSOPS-4 and are therefore not calculated separately.

Source - PSOPS-12

Description - Transfer from Omnicone crushers (bypass)

Note: Emissions from this emission point are controlled by SSOPS-4 and are therefore not calculated separately.

Source - PSOPS-13

Description - Transfer from Omnicone crushers (Return)

Note: Emissions from this emission point are controlled by SSOPS-3 (30-150A and 30-150B) and are therefore not calculated separately.

Source - HFOPS-3

Description - Transfer of oversize ore to intermediate ore stockpile from Belt 20-250

Ore Throughput =	8,760,000	ton/yr	
Ore Throughput =	1,000	ton/hr	
Emission Factor (TSP) =	0.01	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.004	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.001	lb/ton	(PM <sub>2.5</sub> = 0.283*PM <sub>10</sub> - Reference: South Mill Expansion Permit Application)
Control achieved (Wet process and enclosure) =	70%	percent	



Source - WFOPS-2

Description - Intermediate Ore Storage Pile (Wind Erosion)

Emission Factor (TSP) =	1.7 * (s/1.5) * (f/15)	(WRAP, Section 9.3)
	<i>Where</i>	
s, silt content of material (weight %) =	4.3	(Reference: AP-42, Table 13.2.4-1, Pellet Ore)
f, % of time the wind speed > 12 mph =	100	(See Note #1)

Emission Factor (TSP) =	32.49	lb/year/acre
Emission Factor (PM <sub>10</sub> ) =	16.24	lb/year/acre
Emission Factor (PM <sub>2.5</sub> ) =	2.44	lb/year/acre
Stockpile Height =	20	ft
Stockpile Radius =	100	ft
Stockpile Surface Area =	63,462	ft <sup>2</sup>
Stockpile Surface Area =	1	acres

Source - HFOPS-4

Description - Conveyor to Concentrate Stacking

Concentrate Throughput =	450,000	ton/yr	
Concentrate Throughput =	650	ton/hr	
Emission Factor (TSP) =	0.01	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.004	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.001	lb/ton	(PM <sub>2.5</sub> = 0.283*PM <sub>10</sub> - Reference: South Mill Expansion Permit Application)
Control achieved (Wet process and enclosure) =	70%	percent	

Source - HFOPS-5

Description - Concentrate Loading

AP-42, Table 11.24-2: Material Handling and Transfer

Concentrate Throughput =	450,000	ton/yr	
Concentrate Throughput =	650	ton/hr	
Emission Factor (TSP) =	0.01	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.004	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.001	lb/ton	(PM <sub>2.5</sub> = 0.283*PM <sub>10</sub> - Reference: South Mill Expansion Permit Application)
Control achieved (Wet process and enclosure) =	25%	percent	

Source - WFOPS-3

Description - Concentrate Storage Pile (Wind Erosion)

Emission Factor (TSP) =  $1.7 * (s/1.5) * (f/15)$  (WRAP, Section 9.3)  
*Where*  
s, silt content of material (weight %) = 4.3 (Reference: AP-42, Table 13.2.4-1, Pellet Ore)  
f, % of time the wind speed > 12 mph = 100 (See Note #1)

Emission Factor (TSP) = 32.49 lb/year/acre  
Emission Factor (PM<sub>10</sub>) = 16.24 lb/year/acre  
Emission Factor (PM<sub>2.5</sub>) = 2.44 lb/year/acre  
Stockpile Height = 25 ft  
Stockpile Radius = 100 ft  
Stockpile Surface Area = 63,807 ft<sup>2</sup>  
Stockpile Surface Area = 1 acres

Source - PFOPS-16

Description - Lime loading to Lime Bin (Pneumatic)

Note: Emissions from this emission point are controlled by SSOPS-6 and are therefore not calculated separately.

Source - PFOPS-17

Description - Lime Bin to Feeder

Note: Emissions from this emission point are controlled by SSOPS-6 and are therefore not calculated separately.

Source - PFOPS-18

Description - Belt Conveyer from the Lime Silo to the Ball Mill

Note: PFOPS-18 is the belt conveyer itself and is not an emission point.

Source - PFOPS-19

Description - Lime Ball Mill

Note: PFOPS-18 is the belt conveyer itself and is not an emission point.

Emission Unit	Uncontrolled Emissions						Controlled Emissions					
	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	PM (ton/yr)	PM <sub>10</sub> (ton/yr)	PM <sub>2.5</sub> (ton/yr)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	PM (ton/yr)	PM <sub>10</sub> (ton/yr)	PM <sub>2.5</sub> (ton/yr)
PFOPS-0	n/a	n/a	n/a	n/a	n/a	n/a	59.40	29.70	8.41	112.50	56.25	15.92
HFOPS-2	n/a	n/a	n/a	n/a	n/a	n/a	118.80	59.40	16.81	225.00	112.50	31.84
WFOPS-1	0.02	0.01	0.00	0.10	0.05	0.01	n/a	n/a	n/a	n/a	n/a	n/a
PFOPS-8	n/a	n/a	n/a	n/a	n/a	n/a	3.00	1.20	0.34	13.14	5.26	1.49
HFOPS-3	n/a	n/a	n/a	n/a	n/a	n/a	3.00	1.20	0.34	13.14	5.26	1.49
WFOPS-2	0.01	0.00	0.00	0.02	0.01	0.00	n/a	n/a	n/a	n/a	n/a	n/a
HFOPS-4	n/a	n/a	n/a	n/a	n/a	n/a	1.95	0.78	0.22	0.68	0.27	0.08
HFOPS-5	n/a	n/a	n/a	n/a	n/a	n/a	4.88	1.95	0.55	1.69	0.68	0.19
WFOPS-3	0.01	0.00	0.00	0.02	0.01	0.00	n/a	n/a	n/a	n/a	n/a	n/a
Subtotal	0.03	0.02	0.00	0.14	0.07	0.01	191.03	94.23	26.67	366.14	180.21	51.00

Ore Assay											
Sb (mg/kg)	As (mg/kg)	Be (mg/kg)	Cd (mg/kg)	Cr (mg/kg)	Co (mg/kg)	Pb (mg/kg)	Mn (mg/kg)	Hg (mg/kg)	Ni (mg/kg)	Se (mg/kg)	
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5	

Emission Unit	HAP Emissions										
	Sb (ton/yr)	As (ton/yr)	Be (ton/yr)	Cd (ton/yr)	Cr (ton/yr)	Co (ton/yr)	Pb (ton/yr)	Mn (ton/yr)	Hg (ton/yr)	Ni (ton/yr)	Se (ton/yr)
PFOPS-0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00
HFOPS-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.00
WFOPS-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PFOPS-8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00
HFOPS-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00
WFOPS-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPS-4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HFOPS-5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WFOPS-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.18	0.00	0.00	0.00

**CS2 Emissions From Xanthate Use - South Circuit**

Quantity of PAX Used in the Mission Circuit = 700,000 lb  
Quantity of PAX Used in the Mission Circuit = 350.00 ton

Decomposition rate of PAX = 1.58% (See Note #2)  
Mole ratio of CS2 to PAX (Decomposition Coefficient) = 0.50

Note: It is assumed that 3 moles of CS2 are evaporated for every six moles of PAX that decompose:  
 $6\text{ROCS}_2 + 3\text{H}_2\text{O} \rightarrow 6\text{ROH} + \text{CO}_3(2-) + 3\text{CS}_2 + 2\text{CS}_3(2-)$

Molecular weight of PAX = 202.4 gram/gram-mol  
Molecular weight of CS2 = 76.14 gram/gram-mol

Quantity of CS2 Formed = 2080.31 lbs  
Quantity of CS2 Formed = 0.24 lb/hr (Annual Average)  
Quantity of CS2 Formed = 1.04 ton

Footnote:

Note #1 - The annual average wind speed for the site ranges from about 6 mph to 7 mph. For the purposes of developing an emission factor for the PTE average wind greater than 12 mph are assumed for a 100 percent of the time to provide a conservative estimate.

Note #2 -

- (1) CS<sub>2</sub> emissions are estimated using the emissions calculation methods provided in "Stationary and Mobile Source Emission Calculations for the NorthMet Project – Combined Report (RS57) PolyMet Mining Inc, November 2008.
- (2) CS<sub>2</sub> emissions are estimated by considering the annual usage of PAX powder (lb/year) and the decomposition rate for PAX when in solution
- (3) Decomposition of PAX in solution and hence formation of CS<sub>2</sub> is dependent on a number of factors , including temperature and pH. A higher pH results in a reduced decomposition rate of the PAX while the rate of decomposition increases with increasing temperature. Mission Mine's floatation systems at both the North and South Mills are operated at a relative high pH (10 - 11) and ambient temperatures (around 25 C). It is known that in acidic solution xanthate decomposes to carbon disulfide and fresh xanthate solutions are neutral. Under these conditions the formation of CS<sub>2</sub> is greatly reduced . Therefore, CS<sub>2</sub> emissions estimated above are conservative.
- (4) The emissions reporting assumes that the decomposition product CS<sub>2</sub> is emitted to the atmosphere adding to the conservativeness of the estimate.
- (5) We continue to investigate available literature to further refine and update, as necessary, the CS<sub>2</sub> emissions estimation for the conditions at the Mission and South Mills.

## Molybdenum By-Product Plant

Concentrate Throughput =	2,000	lb/hr
Concentrate Throughput =	8,760	tons/year
Operating hours	8,760	hours

### (1) Filter Press Drop to Dryers

Description - Transfer Point of Moly Concentrate

Ore Throughput	2,000	lb/hr	
Ore Throughput	8,760	ton/year	
Emission Factor (TSP) =	0.01	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.004	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.0017	lb/ton	(Moly Plant Restart Minor Permit Application)
Percent Capture =	90%		

### (2) Dryer Drop to Product Packaging

Description - Transfer Point of Moly Concentrate

Ore Throughput	2,000	lb/hr	
Ore Throughput	8,760	ton/year	
Emission Factor (TSP) =	0.12	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.06	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.017	lb/ton	(Moly Plant Restart Minor Permit Application)
Percent Capture =	90%		

### (3) Product Packaging

Description - Transfer Point of Moly Concentrate

Ore Throughput	2,000	lb/hr	
Ore Throughput	8,760	ton/year	
Emission Factor (TSP) =	0.12	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>10</sub> ) =	0.06	lb/ton	(Reference: AP-42, Table 11.24-2, High Moisture Ore, Material Handling)
Emission Factor (PM <sub>2.5</sub> ) =	0.0170	lb/ton	(Moly Plant Restart Minor Permit Application)
Percent Capture =	90%		

Emission Unit	Emission Rate	Exhaust Flow	Emissions (Controlled)					
			PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
	(gr/dscf)	(scfm)	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
Filter Press Drop to Dryers (see Note #1)	n/a	n/a	0.001	0.0004	0.00017	0.004	0.002	0.002
SSMP-1; Moly Scrubber (see Note #2)	0.022	7,000	1.31	1.31	1.31	5.74	5.74	5.74
Dryer Drop to Product Packaging (see Note #1)	n/a	n/a	0.01	0.006	0.0017	0.05	0.03	0.01
Product Packaging (see Note #1)	n/a	n/a	0.01	0.006	0.0017	0.05	0.03	0.01
Subtotal						5.85	5.80	5.76

Ore Assay											
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se	
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5	

Emission Unit	HAP Emissions										
	Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Filter Press Drop to Dryers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SSMP-1; Moly Scrubber	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dryer Drop to Product Packaging	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Product Packaging	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

CFMP-1 and CFMP-2 Dryers

Dryer	Size	Gas Fire Rate	Operating Hours
	(Btu/hr)	(ft3/hr)	(hours)
CFMP-1	3,000,000	2,857	8,760
CFMP-2	3,000,000	2,857	8,760

Emission Factors for CFMP-1 and CFMP-2 Dryers

Criteria Pollutants

(Reference: AP-42, Table 1.4-1 and 1.4-2)

Emission Factor (SO <sub>2</sub> )	0.6	lb/MMscf
Emission Factor (NO <sub>2</sub> )	100	lb/MMscf
Emission Factor (CO)	84	lb/MMscf
Emission Factor (PM Total)	7.6	lb/MMscf
Emission Factor (VOC)	5.5	lb/MMscf
Emission Factor (CO <sub>2</sub> ) =	120,000	lb/MMscf
Emission Factor (CH <sub>4</sub> ) =	2.3	lb/MMscf
Emission Factor (N <sub>2</sub> O) =	2.2	lb/MMscf

HAPs

(Reference: AP-42, Table 1.4-3)

Emission Factor (2-Methylnaphthalene)	2.40E-05	lb/MMscf	Emission Factor (Arsenic)	2.00E-04	lb/MMscf
Emission Factor (3-Methylchloranthrene)	1.80E-06	lb/MMscf	Emission Factor (Beryllium)	1.25E-05	lb/MMscf
Emission Factor (7,12-Dimethylbenz(a)anthracene)	1.60E-05	lb/MMscf	Emission Factor (Cadmium)	1.10E-03	lb/MMscf
Emission Factor (Acenaphthene)	1.80E-06	lb/MMscf	Emission Factor (Chromium)	1.40E-03	lb/MMscf
Emission Factor (Acenaphthylene)	1.80E-06	lb/MMscf	Emission Factor (Cobalt)	8.40E-05	lb/MMscf
Emission Factor (Anthracene)	2.40E-06	lb/MMscf	Emission Factor (Manganese)	3.80E-04	lb/MMscf
Emission Factor (Benz(a)anthracene)	1.80E-06	lb/MMscf	Emission Factor (Mercury)	2.60E-04	lb/MMscf
Emission Factor (Benzene)	2.10E-03	lb/MMscf	Emission Factor (Nickel)	2.10E-03	lb/MMscf
Emission Factor (Benzo(a)pyrene)	1.20E-06	lb/MMscf	Emission Factor (Selenium)	2.40E-05	lb/MMscf
Emission Factor (Benzo(b)fluoranthene)	1.80E-06	lb/MMscf			
Emission Factor (Benzo(g,h,i)perylene)	1.20E-06	lb/MMscf			
Emission Factor (Benzo(k)fluoranthene)	1.80E-06	lb/MMscf			
Emission Factor (Chrysene)	1.80E-06	lb/MMscf			
Emission Factor (Dibenzo(a,h)anthracene)	1.20E-06	lb/MMscf			
Emission Factor (Dichlorobenzene)	1.20E-03	lb/MMscf			
Emission Factor (Fluoranthene)	3.00E-06	lb/MMscf			
Emission Factor (Fluorene)	2.80E-06	lb/MMscf			
Emission Factor (Formaldehyde)	7.50E-02	lb/MMscf			
Emission Factor (Hexane)	1.80E+00	lb/MMscf			
Emission Factor (Indeno(1,2,3-cd)pyrene)	1.80E-06	lb/MMscf			
Emission Factor (Naphthalene)	6.10E-04	lb/MMscf			
Emission Factor (Phenanathrene)	1.70E-05	lb/MMscf			
Emission Factor (Pyrene)	5.00E-06	lb/MMscf			
Emission Factor (Toluene)	3.40E-03	lb/MMscf			



Emission Unit	Emissions (Uncontrolled)									
	SO <sub>2</sub>	NO <sub>2</sub>	CO	PM	VOC	SO <sub>2</sub>	NO <sub>2</sub>	CO	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	VOC
	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
CFMP-1 Dryer	0.002	0.286	0.240	0.022	0.016	0.008	1.251	1.051	0.095	0.069
CFMP-2 Dryer	0.002	0.286	0.240	0.022	0.016	0.008	1.251	1.051	0.095	0.069
TOTAL	0.00	0.57	0.48	0.04	0.03	0.02	2.50	2.10	0.19	0.14

Emission Unit	Emissions (Uncontrolled)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
CFMP-1 Dryer	1,501.71	0.03	0.03	1,510.64
CFMP-2 Dryer	1,501.71	0.03	0.03	1,510.64
TOTAL	3,003.43	0.06	0.06	3,021.28

HAP	CFMP-1	CFMP-2
	(ton/yr)	(ton/yr)
2-Methylnaphthalene	0.000	0.000
3-Methylchloranthrene	0.000	0.000
7,12-Dimethylbenz(a)anthracene	0.000	0.000
Acenaphthene	0.000	0.000
Acenaphthylene	0.000	0.000
Anthracene	0.000	0.000
Benz(a)anthracene	0.000	0.000
Benzene	0.000	0.000
Benzo(a)pyrene	0.000	0.000
Benzo(b)fluoranthene	0.000	0.000
Benzo(g,h,i)perylene	0.000	0.000
Benzo(k)fluoranthene	0.000	0.000
Chrysene	0.000	0.000
Dibenzo(a,h)anthracene	0.000	0.000
Dichlorobenzene	0.000	0.000
Fluoranthene	0.000	0.000
Fluorene	0.000	0.000
Formaldehyde	0.001	0.001
Hexane	0.023	0.023
Indeno(1,2,3-cd)pyrene	0.000	0.000
Naphthalene	0.000	0.000
Phenanathrene	0.000	0.000
Pyrene	0.000	0.000
Toluene	0.000	0.000
Arsenic	0.000	0.000
Beryllium	0.000	0.000

Cadmium	0.000	0.000
Chromium	0.000	0.000
Cobalt	0.000	0.000
Manganese	0.000	0.000
Mercury	0.000	0.000
Nickel	0.000	0.000
Selenium	0.000	0.000
Total	0.02	0.02

Footnotes:

Note #1 - Particulate emissions from (1) Filter Press Drop to Dryers, (2) Dryer Drop to Product Packaging, and (3) Product Packaging are controlled by scrubber SSMP-1. Emission collection points are not completely enclosed which may not provide for complete capture and are therefore assigned a 90% capture efficiency.

Note #2 - SSMP-1 is limited to an emission rate of 0.05 grams/dscm (Condition Part B, Section 11, II.B.1). This emission rate is converted to grains/dscf, as follows, to support the emissions calculations.

Permitted emission rate =	0.05 grams/dscm
1 gram =	15.43 grains
1 cubic meter =	35.31 cubic feet
Permitted emission rate =	0.022 grains/dscf

### Gasoline Storage Tank

Tank volume = 20,000 gallons  
 Annual throughput = 120,000 gallons

(referenced from MSDS)	Benzene	Ethyl Benzene	Butyl Ether	Naphthalene	Xylene	Toluene	Hexane
Percent by Weight	4.90%	3.00%	15%	2.00%	15.00%	15.00%	5.00%

VOC Emissions = 6,628.81 pounds/yr  
 VOC Emissions = 0.76 pounds/hr  
 VOC Emissions = 3.31 tons/yr

HAP Emission (Uncontrolled) - Gasoline Storage Tank						
Benzene	Ethyl Benzene	Butyl Ether	Naphthalene	Xylene	Toluene	Hexane
(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
0.162	0.099	0.497	0.066	0.497	0.497	0.166

### Gasoline Dispensing

Annual throughput = 120,000 gallons

(referenced from MSDS)	Benzene	Ethyl Benzene	Butyl Ether	Naphthalene	Xylene	Toluene	Hexane
Percent by Weight	4.90%	3.00%	15%	2.00%	15.00%	15.00%	5.00%

VOC Emission Factor = 11 lb/1,000 gallon (Ref: US, EPA, AP-42, Chapter 5.2, Table 5.2-7)

VOC Emissions = 1,320.00 pounds/yr  
 VOC Emissions = 0.15 pounds/hr  
 VOC Emissions = 0.66 tons/yr

HAP Emission (Uncontrolled) - Gasoline Dispensing						
Benzene	Ethyl Benzene	Butyl Ether	Naphthalene	Xylene	Toluene	Hexane
0.007	0.005	0.023	0.003	0.023	0.023	0.008
<b>0.032</b>	<b>0.020</b>	<b>0.099</b>	<b>0.013</b>	<b>0.099</b>	<b>0.099</b>	<b>0.033</b>

**Diesel Storage Tank**

Location	Name	Contents	Annual Throughput	Height (ft)	Diameter (ft)	Capacity (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (lbs/hr)	VOC Emissions (tons/yr)
Tank Farm	Storage Tank	Diesel	6,979,909	30	38	250,000	595.69	0.07	0.30
Tank Farm	Storage Tank	Diesel	2,326,636	30	10.65	20,000	46.69	0.01	0.02
Tank Farm	Storage Tank	Diesel	2,326,636	30	10.65	20,000	46.69	0.01	0.02
Tank Farm	Storage Tank	Diesel	2,326,636	30	10.65	20,000	46.69	0.01	0.02

(referenced from MSDS)	Naphthalene
Percent by Weight	1.00%

Emission Point	Naphthalene (ton/yr)
Diesel Tanks	0.00

## Engines

(1) North Mill Admin Generator

Annual operating hours = 1,000 hours  
 Rated capacity = 56 kW 75 bhp  
 Rated capacity = 0.19 MMBtu/hr

Pollutant	Emission Factor		Emission Rate		Emission Factor Reference
			(lb/hr)	(ton/year)	
NOx	2.53	g/bhp-hr	0.42	0.21	Exhaust emission data sheet
SOx	2.05E-03	lb/hp-hr	0.15	0.08	AP-42, Ch: 3.3, Table 3.3-1
VOC	0.0025141	lb/hp-hr	0.19	0.09	AP-42, Ch: 3.3, Table 3.3-1
PM	0.0149	g/bhp-hr	0.00	0.00	Exhaust emission data sheet
PM <sub>10</sub>	0.0149	g/bhp-hr	0.00	0.00	Exhaust emission data sheet
PM <sub>2.5</sub>	0.0149	g/bhp-hr	0.00	0.00	Assumed PM <sub>2.5</sub> = PM <sub>10</sub>
CO	3.72	g/bhp-hr	0.62	0.31	Exhaust emission data sheet
CO <sub>2</sub>	1.15	lb/hp-hr	86.33	43.16	AP-42, Ch: 3.3, Table 3.3-1
CH <sub>4</sub>	6.60E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
N <sub>2</sub> O	1.32E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
CO <sub>2e</sub>	n/a	n/a	86.43	43.22	n/a
Benzene	9.33E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Toluene	4.09E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Xylenes	2.85E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
1,3-Butadiene	3.91E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Formaldehyde	1.18E-03	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acetaldehyde	7.67E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acrolein	9.25E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Naphthalene	8.48E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2

(2) North Mill Thickener Generator

Annual operating hours = 1,000 hours  
 Rated capacity = 63 kW 84 bhp  
 Rated capacity = 0.21 MMBtu/hr

Pollutant	Emission Factor		Emission Rate		Emission Factor Reference
			(lb/hr)	(ton/year)	
NOx	4.7	g/kW-hr	0.65	0.33	Title V permit
SOx	1.25E-03	kg/kw-hr	0.17	0.09	AP-42, Ch: 3.3, Table 3.3-1
VOC	0.001528573	kg/kw-hr	0.21	0.11	AP-42, Ch: 3.3, Table 3.3-1
PM	0.4	g/kW-hr	0.06	0.03	Title V permit
PM <sub>10</sub>	0.4	g/kW-hr	0.06	0.03	Title V permit
PM <sub>2.5</sub>	0.4	g/kW-hr	0.06	0.03	Assumed PM <sub>2.5</sub> = PM <sub>10</sub>
CO	5	g/kW-hr	0.69	0.35	Title V permit
CO <sub>2</sub>	1.15	lb/hp-hr	97.12	48.56	AP-42, Ch: 3.3, Table 3.3-1
CH <sub>4</sub>	6.60E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
N <sub>2</sub> O	1.32E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
CO <sub>2e</sub>	n/a	n/a	97.24	48.62	n/a
Benzene	9.33E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Toluene	4.09E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Xylenes	2.85E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
1,3-Butadiene	3.91E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Formaldehyde	1.18E-03	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acetaldehyde	7.67E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acrolein	9.25E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Naphthalene	8.48E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2

(3) Dispatch Location Generator

Annual operating hours = 1,000 hours  
 Rated capacity = 56 kW 75 bhp  
 Rated capacity = 0.19 MMBtu/hr

Pollutant	Emission Factor		Emission Rate		Emission Factor Reference
			(lb/hr)	(ton/year)	
NOx	2.53	g/bhp-hr	0.42	0.21	Exhaust emission data sheet
SOx	1.25E-03	kg/kw-hr	0.15	0.08	AP-42, Ch: 3.3, Table 3.3-1
VOC	0.001528573	kg/kw-hr	0.19	0.09	AP-42, Ch: 3.3, Table 3.3-1
PM	0.0149	g/bhp-hr	0.00	0.00	Exhaust emission data sheet
PM <sub>10</sub>	0.0149	g/bhp-hr	0.00	0.00	Exhaust emission data sheet
PM <sub>2.5</sub>	0.0149	g/bhp-hr	0.00	0.00	Assumed PM <sub>2.5</sub> = PM <sub>10</sub>
CO	3.72	g/bhp-hr	0.62	0.31	Exhaust emission data sheet
CO <sub>2</sub>	1.15	lb/hp-hr	86.33	43.16	AP-42, Ch: 3.3, Table 3.3-1
CH <sub>4</sub>	6.60E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
N <sub>2</sub> O	1.32E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
CO <sub>2e</sub>	n/a	n/a	86.43	43.22	n/a
Benzene	9.33E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Toluene	4.09E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Xylenes	2.85E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
1,3-Butadiene	3.91E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Formaldehyde	1.18E-03	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acetaldehyde	7.67E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acrolein	9.25E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Naphthalene	8.48E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2

(4) South Mill Generator

Annual operating hours = 1000 hours  
 Rated capacity = 365 kW 489 bhp  
 Rated capacity = 1.25 MMBtu/hr

Pollutant	Emission Factor		Emission Rate		Emission Factor Reference
			(lb/hr)	(ton/year)	
NOx	0.018848	kg/kw-hr	15.13	7.57	Title V permit
SOx	1.25E-03	kg/kw-hr	1.00	0.50	AP-42, Ch: 3.3, Table 3.3-1
VOC	0.001528573	kg/kw-hr	1.23	0.61	AP-42, Ch: 3.3, Table 3.3-1
PM	1.34E-03	kg/kw-hr	1.07	0.54	Title V permit
PM <sub>10</sub>	1.34E-03	kg/kw-hr	1.07	0.54	Title V permit
PM <sub>2.5</sub>	1.34E-03	kg/kw-hr	1.07	0.54	Assumed PM <sub>2.5</sub> = PM <sub>10</sub>
CO	4.06E-03	kg/kw-hr	3.26	1.63	Title V permit
CO <sub>2</sub>	1.15	lb/hp-hr	562.67	281.33	AP-42, Ch: 3.3, Table 3.3-1
CH <sub>4</sub>	6.60E-03	lb/MMBtu	0.01	0.00	40 CFR Part 98, Table C-2
N <sub>2</sub> O	1.32E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
CO <sub>2e</sub>	n/a	n/a	563.36	281.68	n/a
Benzene	9.33E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Toluene	4.09E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Xylenes	2.85E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
1,3-Butadiene	3.91E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Formaldehyde	1.18E-03	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acetaldehyde	7.67E-04	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Acrolein	9.25E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2
Naphthalene	8.48E-05	lb/MMBtu	0.00	0.00	AP-42, Ch: 3.3, Table 3.3-2



(5) South Mill Tank Hill Generator

Annual operating hours = 100 hours  
 Rated capacity = 60 kW 80 bhp  
 Rated capacity = 0.20 MMBtu/hr

Pollutant	Emission Factor		Emission Rate		Emission Factor Reference
			(lb/hr)	(ton/year)	
NOx	13.4	gram/kW-hr	1.77	0.09	Title V permit
SOx	5.88E-04	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
VOC	2.96E-02	lb/MMBtu	0.01	0.00	AP-42, Table 3.2-2
PM	9.99E-03	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
PM <sub>10</sub>	9.99E-03	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
PM <sub>2.5</sub>	9.99E-03	lb/MMBtu	0.00	0.00	Assumed PM <sub>2.5</sub> = PM <sub>10</sub>
CO	519.00	gram/kW-hr	68.65	3.43	Title V permit
CO <sub>2</sub>	1.10E+02	lb/MMBtu	22.52	1.13	AP-42, Table 3.2-2
CH <sub>4</sub>	1.25E+00	lb/MMBtu	0.26	0.01	AP-42, Table 3.2-2
N <sub>2</sub> O	1.32E-03	lb/MMBtu	0.00	0.00	40 CFR Part 98, Table C-2
CO <sub>2e</sub>	n/a	n/a	29.00	1.45	n/a
1,1,2,2-Tetrachloroethane	2.53E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
1,1,2-Trichloroethane	1.53E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
1,3-Dichloropropene	1.27E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Benzene	1.58E-03	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Toluene	5.58E-04	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Xylenes	1.95E-04	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Formaldehyde	2.05E-02	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Acetaldehyde	2.79E-03	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Acrolein	2.63E-03	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Naphthalene	9.71E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Carbon Tetrachloride	1.77E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Chlorobenzene	1.29E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Chloroform	1.37E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Ethylbenzene	2.48E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Ethylene Dibromide	2.13E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Methanol	3.06E-03	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Methylene Chloride	4.12E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
PAH	1.41E-04	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Styrene	1.19E-05	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2
Vinyl Chloride	7.18E-06	lb/MMBtu	0.00	0.00	AP-42, Table 3.2-2

**Wind Erosion-Tailings Dams (WFDA-1)**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{pound}}{\text{acre}} \right) \times \text{Acres} \left( \frac{\text{acres}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right) \times (1 - \text{Percent Control (\%)})$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{pound}}{\text{acre}} \right) \times \text{Acres} \left( \frac{\text{acres}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right) \times (1 - \text{Percent Control (\%)})$$

Emission Factor (PM) = 3,513 lbs/acre-yr (Reference: The emission factors are from the Hayden Mine SIP, Appendix E.)  
 Emission Factor (PM<sub>10</sub>) = 193 lbs/acre-yr (Reference: The emission factors are from the Hayden Mine SIP, Appendix E.)  
 Emission Factor (PM<sub>2.5</sub>) = 193 lbs/acre-yr (Reference: Conservatively assumed to be equal to PM<sub>10</sub>)  
 Total Tailing Acres = 4,600 acre

Controlled with chemical application = 99% (See Note #1)

Emissions (Controlled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
18.45	1.01	1.01	80.80	4.44	4.44

Ore Assay										
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
2.5	6.6	0.025	1.7	13	5.2	13	500	0.025	0.9	0.5

HAP Emission										
Sb	As	Be	Cd	Cr	Co	Pb	Mn	Hg	Ni	Se
(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00

**Wind Erosion-Overburden Deposition Areas (WFDA-2)**

$$\text{PM Emissions} \left( \frac{\text{lb}}{\text{hr}} \right) = \text{Emission Factor} \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Overburden Deposited} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{8,760} \left( \frac{\text{year}}{\text{hours}} \right)$$

$$\text{PM Emissions} \left( \frac{\text{ton}}{\text{year}} \right) = \text{Emission Factor} \left( \frac{\text{pound}}{\text{ton}} \right) \times \text{Overburden Deposited} \left( \frac{\text{ton}}{\text{year}} \right) \times \frac{1}{2,000} \left( \frac{\text{ton}}{\text{pound}} \right)$$

Overburden (waste Dumps) 128,615,469 tons/yr

**Emissions Calculations**

$$E = k(0.0032)((U/5)^{1.3}/(M/2)^{1.4})$$

Reference: AP-42, Table 13.2.4.3: Aggregate Handling and Storage Piles

- k = 0.74 TSP
- k = 0.35 PM<sub>10</sub>
- k = 0.053 PM<sub>2.5</sub>
- U = 10 miles/hr (see Note #2)
- M = 2.6 moisture (%) (see Note #3)

- Emission Factor (TSP) = 0.00404 lb/ton (Note #4)
- Emission Factor (PM<sub>10</sub>) = 0.00191 lb/ton
- Emission Factor (PM<sub>2.5</sub>) = 0.00029 lb/ton

Emissions (Uncontrolled)					
PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
59.29	28.04	4.25	259.69	122.83	18.60

## Footnotes

Note #1- AP-42 Chapter 13.2.4 states that the continuous chemical treating of storage piles can have a control efficiency of up to 90%, however based on operations and activity, a higher control factor (fugitive) is applied to this source (tailing) based on the the chemical application and wetting operations at the facility.

Note #2 - The annual average wind speed for the site ranges from about 6 mph to 7 mph. This PTE estimate uses 10 mph as a the average annual wind speed to provide a conservative estimate of the emissions.

Note #3 - Average site ore moisture content

Note #4 - Windblown emissions are considered to be minial as theseare primarily rock dumps. Emissions are therefore considered very conservative.

Rev1 Deleted North Primary Crushing  
Rev2 Added fugitive and points emissions  
Rev3 Changed ID PFOPS-0 to HFOPS-1  
Rev4 Updated Moly plant emissions calculations based on the last permit app