

Permit No. V-4005
March 31, 2023

IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

150 S. Ninth Street
El Centro, CA 92243
(442) 265 1800

MAJOR FACILITY TITLE V PERMIT REVIEW

Issued in Accordance with the Provisions of 40 CFR Part 70
and Rule 900 of the Imperial County Air Pollution Control District

Facility Name:	Mesquite Mines
Parent Company Name:	Western Mesquite Mines, Inc.
Title V Permit Number:	V-4005
SIC Code:	1041 (Gold Ores)
U.S. EPA Plant ID:	To be determined (TBD)
Source Type:	Gold Mining Facility – Carbon Processes with Mercury Retorts at a gold mine ore processing and production facility.
Facility Location:	6502 E. Highway 78 Brawley, CA 92227
Mailing Address:	6502 E. Highway 78 Brawley, CA 92227
Responsible Official:	Bill Martinich
Plant Site Contact:	Ron Leiken, (928) 341-4653
Permit Reviewer:	Jesus Ramirez

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I. Introduction

Pursuant to Rule 900, of the Imperial County Air Pollution Control District (District) Rules and Regulations, the District intends to issue a Renewal Title V Operating Permit to Western Mesquite Mines, Inc. (WMMI) for the Mesquite Mine facility. The gold mine facility, known as Mesquite Mine, is a traditional open pit, heap leach gold mining operation located approximately 35 miles east of Brawley, CA. This facility operates under Title V Operating Permit Number V-4005. The Operating Permit includes conditions to ensure that all Federal, State and District requirements are fully satisfied.

Mesquite Mine is currently permitted with an annual production limit of 65 million (65 MM) tons per year of waste rock/ore. The application indicates that the gold mine facility operates carbon processes with mercury retorts.

The equipment under review in this Title V Permit Application currently operate under District Permit No. 4005A-7. However, the permittee has submitted an application to amend the District Permit to remove the Gold Induction Furnace (GIF) carbon adsorption scrubber. Public notice of this amendment will be published along with the Title V Operating Permit. The amended Permit to Operate #4005A-8 will become federally enforceable. WMMI has a potential to emit (PTE) for each criteria pollutant that is less than the threshold for a Title V major source. With that said, Mesquite Mine's process plant and refinery meets the definition of a gold mine ore processing and production facility which is subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), promulgated under Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart EEEEEEE (7E). Gold mine ore processing and production facilities were added to the list of source categories regulated under Section 112(c)(6) of the Clean Air Act because of the mercury emissions produced at these area sources, which is classified as a Hazardous Air Pollutant (HAP).

Per 40 CFR 63.11640(d), the owner/operator of a source subject to Subpart 7E must obtain a Title V Permit under 40 CFR 70 or 40 CFR 71. However, pursuant to 40 CFR 70.3(c)(2), this Title V Permit will regulate only the applicable emissions units which cause the source to be subject to the Part 70 program. The affected sources of Mesquite Mine's process plant and refinery are the collection of carbon processes with mercury retorts, which include an electrowinning cells system, mercury retort, electric drying oven, gold furnace, carbon regeneration kiln, and a carbon acid wash tank.

II. Process Description

Mesquite Mine resumed full-scale gold mining and processing operations in 2007. WMMI extracts gold from ore on the leach pads at Mesquite Mine by using a diluted cyanide solution within an irrigation system. This solution, referred to as the pregnant solution, is then collected and pumped to the adsorption plant, where gold is removed from the solution via a carbon in column (CIC) circuit. The activated carbon used in the

CIC circuit has the ability to remove dissolved gold from the gold leaching solution. Carbon loaded with gold from the leaching process is transported to the refinery where it is first acid washed to remove scale that has built up on the carbon. After acid washing, the carbon is stripped with a caustic solution to remove the gold from the carbon. During the strip cycle, the gold-bearing solution is processed in the electrowinning (EW) cells. The EW cells have a design solution flow rate of 180 gallons per minute. The EW cells remove the gold from the solution by plating it onto cathodes consisting of stainless-steel plates with steel wool. When the strip cycle is completed, the gold sludge is washed off the cathodes and then retorted to remove mercury prior to melting. The EW cells' exhaust passes through carbon adsorption column CA1, where any remaining mercury is adsorbed onto iodine- or sulfur-impregnated activated carbon before being emitted through a stack into the atmosphere. The adsorption column has a flow rate of 314 cubic feet per minute (CFM), and outlet temperature of 150 °F, a pressure drop of approximately 0.75 inches of water, and contains 600 pounds of iodine- or sulfur-impregnated activated carbon.

The gold sludge is manually recovered from the EW cells by pressure washing the cathodes and allowing the sludge to fall to the bottom of the EW cell. This material is pumped through a filter press to collect and dewater the gold bearing sludge. The sludge is then placed into a canvas bag and transferred to the retort. Gold sludge that is not retorted may be dried in the electric drying oven, packaged, and sent off-site for further refining.

The gold sludge is then loaded into the retort, where it is heated under vacuum to drive off the mercury. The retort is a refurbished Summit Valley Equipment & Engineering retort with a material capacity of 7.5 cubic feet. The retort exhaust passes through a shell and tube condenser to cool the exhaust and condense the vapor mercury into a liquid, which is collected by the mercury trap. The exhaust passes through carbon adsorption columns CA2 and CA4 where any remaining mercury vapor is adsorbed onto the iodine- or sulfur-impregnated activated carbon before being vented through a stack into the atmosphere. Adsorption column CA2 has a flow rate of 24 CFM, and outlet temperature of 103 °F, and contains 50 pounds of iodine- or sulfur-impregnated activated carbon. Adsorption column CA4 has a flow rate of 24 CFM, and outlet temperature of 103 °F, and contains 151 pounds of iodine- or sulfur-impregnated activated carbon.

After retorting, the gold concentrate is transferred to the electric induction melting furnace. Only retorted concentrate may be melted in the furnace. The furnace is an Inductotherm Corp. gold electric induction furnace with a design capacity of 0.0533 tons of wet gold concentrate per hour. The gold furnace exhaust is routed through a baghouse system with an abatement efficiency of 95 percent to abate particulate emissions. Following the baghouse, the exhaust passes through carbon adsorption column CA5 where mercury is adsorbed onto iodine- or sulfur-impregnated activated carbon before being emitted through a stack into the atmosphere. The carbon adsorption column has a flow rate of 3,702 CFM, an outlet temperature of 120 °F, and

seven beds containing 1,786 pounds of iodine- or sulfur-impregnated activated carbon each. The melted gold is poured into a cascade mold.

Stripped carbon, discussed at the beginning of this section, must be periodically regenerated in the carbon regeneration kiln. The carbon regeneration kiln is a refurbished Rabbit Creek Mining Inc. unit, 36 inches diameter and 17feet 9 inches long, with a design processing rate of 450 pounds of carbon per hour. The carbon kiln drum is heated from the outside by propane-fired burners with a combined heat rating of 2.2 million Btu per hour. The burner exhaust is vented through a stack separated from the kiln drum stack.

Exhaust from the kiln drum passes through carbon adsorption units CA3 and CA6, where mercury is adsorbed onto iodine- or sulfur-impregnated activated carbon before being vented through a stack into the atmosphere. Carbon adsorption unit CA3 has a flow rate of 206 CFM, an outlet temperature of 250 °F, a pressure drop of 0.44 inches of water, and contains approximately 2,400 pounds of iodine- or sulfur-impregnated activated carbon. Carbon adsorption unit CA6 has a flow rate of 206 CFM, an outlet temperature of 250 °F, and six trays containing 400 pounds of iodine- or sulfur-impregnated activated carbon each.

The Superior Aztec Boiler at Mesquite’s processing plant is used for heating the water which is used for treating the loaded carbon in the carbon desorption vessel. The unit is a Superior Aztec Boiler model number 5-5-1276, propane fired, which is equipped with a Cleaver Brooks Profire Model NTH105GX-15S-4 low-NOx burner. The rating of the Superior Boiler is 10.5 MMbtu/hr.

III. Current Emissions Status

The total annual emissions from the various emissions sources of Mesquite Mine’s process plant and refinery of each criteria pollutant are below the thresholds for a major source, per District Rule 900 and 40 CFR Part 72. However, per the requirements of 40 CFR Part 63 Subpart 7E, the process plant and refinery of Mesquite Mine is categorized as a gold mine ore processing and production facility which is subject to Title V requirements.

Table 1: Annual Process Plant & Refinery Emissions (tons/yr)

Source	PM10/PM2.5	VOC	CO	NOx	SO ₂	Hg
Superior Aztec Boiler	0.056	0.064	0.600	0.436	0.143	0.00
Carbon Kiln – Combustion	0.074	0.084	0.790	1.367	0.188	0.00
Carbon Kiln – Drum	1.716	0.00	0.00	0.00	0.00	1.76E-3
36% HCl Storage Tank	0.00	0.00	0.00	0.00	0.00	0.00
Mercury Retort	0.0219	0.00	0.00	0.00	0.00	2.05E-5

Gold Furnace	0.0469	0.00	0.00	0.00	0.00	4.25E-5
Electrowinning Cells	0.00	0.00	0.00	0.00	0.00	4.44E-3
Drying Oven	0.00	0.00	0.00	0.00	0.00	4.60E-7
Total:	1.91	0.15	1.39	1.80	0.33	6.26E-3

IV. Applicable Requirements

According to the information submitted by the permittee in its Title V Operating Permit application and the analysis of District Staff, the following are the Federal, State, and District requirements that apply to the affected sources:

Applicable Requirement	Affected Source	Adoption Date
Rule 101, Definitions	Facility Wide	09/11/18
Rule 201, Permits Required	Facility Wide	10/10/06
Rule 206, Processing of Applications	Facility Wide	10/22/13
Rule 207, Standards for Permit to Construct	Facility Wide	09/11/18
Rule 208, Permit to Operate	Facility Wide	09/14/99
Rule 400.2, Boilers, Process Heaters and Steam Generators	Hot Water Boiler	02/23/10
Rule 401, Opacity of Emissions	Facility Wide	11/19/85
Rule 403, Quantity of Emissions	Facility Wide	05/18/04
Rule 405, Sulfur Compounds Emission Standards, Limitations, and Prohibitions	Facility Wide	05/18/04
Rule 407, Nuisances	Facility Wide	09/14/99
Regulation VIII – Fugitive Dust Rules	Facility Wide	10/16/12
Rule 900-Operating Permits	Facility Wide	12/20/11
NSR Permit 4005A-8	Facility Wide	N/A
40 CFR Part 63, Subpart EEEEEEE	Facility Wide	02/17/11
40 CFR Part 60, Subpart Dc	Hot Water Boiler	06/13/07

V. Statement of Basis

The proposed Renewal Title V Operating Permit includes conditions to ensure that all Federal requirements will be fully satisfied. Additionally, the Title V Permit was designed to have proper and adequate monitoring, recordkeeping and reporting requirements to demonstrate continuous compliance with the permit conditions.

The following provides additional clarification on the various sections of the Title V Permit, as well as certain requirements listed within the permit conditions.

A. Equipment/Source List

This initial section of the Title V Permit lists all permitted sources, which may either emit or control air contaminants, with each one being considered significant source. Permitted sources are those that require an Authority to Construct (ATC) and Permit to Operate (PTO), pursuant to District Rule 201. Each emissions source has the potential to emit more than two pounds per day (uncontrolled) of any affected pollutant or the potential to emit toxic air contaminants (TACs). All control (abatement) devices that control permitted sources are listed as well in this section. A control device may also be a source of secondary emissions. If the primary function of a device is to control, reduce, or eliminate the issuance of air emissions, it is considered a control device.

B. General Conditions

The first section of the Title V Permit Conditions contains administrative requirements and conditions which apply to all permitted facilities/sources. This permit does not include Title IV or accidental release provisions. The general conditions derive from the standard requirements in District Rules 207 and 900, as well as Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart EEEEEEE (7E).

1. Original Authority to Construct (ATC) and Permit to Operate (PTO) No. 4005 was issued to Western Mesquite Mines, Inc. (WMMI) in 2010 for miscellaneous emissions sources and control equipment located at the facility's process plant and refinery. Subsequent revisions to Permit 4005 between 2011 and 2015 resulted in the remaining process plant and refinery equipment, which were previously permitted under other District Permits held by WMMI, being included in the permit. The revision of Permit 4005, conducted in 2016, finalized the inclusion of the collection of sources classified as carbon processes without mercury retorts, including two new associated emissions control devices (adsorption units). The Permit to Operate number was change to 4005A-5.

In 2018, the permittee requested to modify Permit to Operate # 4005A-5 to allow the installation of a retort to the facility's process refinery. The retort system reduced mercury content in the gold concentrate prior to furnace melting in order to reduce mercury air emissions. The Permit to Operate #4005A-5 was

amended following the District's NSR procedures. The Permit to Operate number was change to 4005A-6.

In 2020, the permittee requested to modify Permit to Operate # 4005A-6 to allow the installation of three new carbon adsorption scrubbers at existing retort, gold furnace, and carbon kiln. WMMI also requested to remove the hour per day limit on the gold furnace and be permitted at its design capacity with no hours per day limit. The Permit to Operate #4005A-6 was amended following the District's NSR procedures. An Authority to Construct was issued and number was change to 4005A-7

The permittee is requesting to modify Authority to Construct (ATC) # 4005A-7 to remove the Gold Induction Furnace (GIF) carbon adsorption scrubber from the list of permitted equipment. This equipment was originally proposed under ATC # 4005A-7 but was never installed. The ATC #4005A-7 will be amended following the District's NSR procedures (a complete review of this application is attached). Public notice of this amendment will be published along with the Title V Operating Permit. The amended Permit to Operate #4005A-8 will become federally enforceable; therefore, the Permit to Operate conditions will be incorporated into the Title V Operating Permit.

Mesquite Mine's process plant and refinery meet the definition of gold mine ore processing and production, and as a result trigger the Title V requirements of NESHAP, promulgated under 40 CFR Part 63, Subpart 7E.

2. As previously stated, 40 CFR 63.11640(d) requires the owner/operator of a source subject to Subpart 7E to obtain a Title V Permit under 40 CFR 70 or 40 CFR 71. Also, per 40 CFR 70.3(c)(2), the Title V Permit for WMMI will regulate only the applicable emissions units which cause the source to be subject to the Part 70 program. In this case, the applicable emissions units are the carbon processes with mercury retorts that operate at Mesquite Mine's process plant and refinery.

C. Emissions Limits and Specifications

1. Carbon Processes With Mercury Retorts

Sections II.A and III.A of the Permit Conditions for the proposed Title V Permit sets forth the emission limits and operation requirements for each affected source that is categorized as carbon processes with mercury retorts. These emissions units include the process plant and refinery's carbon acid wash tank, gold furnace, mercury retort, electric drying oven, gold furnace, carbon regeneration kiln, and electrowinning cells system, as well as the two separate carbon adsorption systems for the carbon kiln and electrowinning system. The subsection includes operating conditions from District NSR Permit 4005A-8,

which cites District Rule 207 and 900, as well as the mercury (Hg) emission limit for the affected sources, set in 40 CFR Part 63, Subpart 7E. Mesquite Mine's affected sources are all classified as existing sources, since the permittee commenced construction or reconstruction of all the affected sources on or before April 28, 2010. As existing sources that are defined as carbon processes with mercury retorts, the Hg emissions limit for the affected sources is 2.2 pounds of Hg per ton of concentrate processed.

2. HCl Trans-loading and Boiler

Sections II.B, III.B, and III.C of the Permit Conditions set forth the operating conditions for the remaining emissions sources of Mesquite Mine's process plant and refinery regulated under District NSR Permit 4005A-8. These emissions sources include hydrochloric acid (HCl) trans-loading and one hot water boiler (Superior Aztec). The HCl trans-loading activities have operational limits which were established by the District in Permit 4005A-8, per the standards and requirements of District Rule 207. The Superior Aztec boiler has its operational and emissions limits set by District Rule 207 and District Rule 400.2 – Boilers, Process Heaters and Steam Generators, as well as 40 CFR Part 60 Subpart Dc. Rule 400.2 limits emissions of oxides of nitrogen (NOx) for boilers and is applicable to Mesquite Mine's boiler. The rule contains specific operational, testing, monitoring, recordkeeping, and reporting requirements that the permittee must adhere to in order to demonstrate and maintain compliance with the NOx emissions limit of 70 ppmv at 3% O₂.

D. Testing Requirements

1. Section IV of the proposed Permit Conditions lists the specific testing requirements that the permittee must adhere to in order to demonstrate compliance with 40 CFR Part 63, Subpart 7E. WMMI conducted an initial mercury compliance emission by February 17, 2015 as allowed by EPA. Thereafter, WMMI is been required to annually source test all carbon processes with mercury retorts.

The source test procedures are explicitly laid out in Section IV, identifying the approved test methods, duration and quantity of test runs, instrumentation accuracy requirements, frequency and scheduling of source tests, and emission calculation requirements. Finally, Section IV states that WMMI must operate and maintain all associated air pollution control equipment and monitoring equipment in a proper manner in order to minimize mercury emissions. The testing requirements are taken from 40 CFR §63.11646 and are also mandated by District Rule 900.

E. Monitoring Requirements

1. Section V of the Title V Permit Conditions encompasses the monitoring requirements for the carbon processes with mercury retorts. These provisions are contained in 40 CFR §63.11646 and §63.11647. The monitoring requirements are applicable toward the two carbon adsorption systems that are utilized to minimize mercury emissions at the mine's process plant and refinery. The performance and condition of the electrowinning carbon column and kiln carbon bed must be monitored by WMMI in accordance with 40 CFR §63.11647(f)-(g). By following this set of procedures, WMMI has the ability to ensure that the carbon in each control system is sampled and analyzed properly to measure its mercury adsorption and replaced once the carbon is compromised.

WMMI submitted a proposed monitoring and sampling protocol for the electrowinning carbon column and kiln carbon bed in March 2016 to the Air District. This protocol followed the requirements set forth in 40 CFR §63.11647(f)(2) and was incorporated into the Permit Conditions of District NSR Permit 4005A-8. In the proposed Title V Permit, the permittee has the option of monitoring mercury emissions controlled by the two carbon adsorption systems by using one of the two allowed procedures listed in 40 CFR §63.11647(f). Also, the permittee will be required to monitor the gas stream inlet temperature to each carbon adsorption system once per shift to ensure that the control efficiencies of each system are not reduced.

On May 1, 2017, U.S. EPA approved an alternative monitoring procedure that was requested by WMMI for the facility's two carbon adsorption systems. The approval is only applicable for the specific carbon adsorbent product that WMMI applied for with U.S. EPA. The product is Oxbow Activated Carbon OXPURE 612C-KI, and U.S. EPA approved the manufacturer's design capacity of 3% as the design capacity for a carbon bed (carbon adsorption system) using this product. Section V of the Title V Permit Conditions has been updated to include this alternative monitoring procedure.

F. Recordkeeping Requirements

1. Section VI of the Title V Permit Conditions lists the various records WMMI must maintain to demonstrate compliance with 40 CFR Part 63, Subpart 7E. This section also includes the recordkeeping requirements for the affected sources, HCl trans-loading and Superior Aztec Boiler which are included in the Permit Conditions of District NSR Permit 4005A-8 based on District Rules 207 and 900.

WMMI must record the weight in tons for ore pretreatment processes and concentrate for the carbon processes with mercury retorts on a daily and monthly basis. The operational hours for each process at the mine's process

plant and refinery must be recorded too. The permittee will also need to keep records of all performance tests, measurements, monitoring data, and corrective actions that are required by 40 CFR §63.11646 and §63.11647. With the permittee properly maintaining these records on site, the permittee should also have the ability to fulfill its reporting requirements in the proposed Title V Permit and District NSR Permit 4005A-8.

G. Reporting Requirements

1. Section VII of the proposed Permit Conditions lists the reporting requirements that the permittee must adhere to in order to satisfy the requirements of 40 CFR Part 63, Subpart 7E. More specifically, these reporting requirements come from 40 CFR §63.11648, 40 CFR §63.9-10, and District Rules 207 and 900. The reporting requirements mandated by Rules 207 and 900 are also listed in District NSR Permit 4005A-8. The required reports must be prepared and submitted to the District and U.S. EPA according to the deadlines listed in the Permit Conditions. These reports include an Initial Notification of Compliance Status, deviation reports, malfunction/breakdown reports, final source test results, and equipment usage reports.

H. Federal Enforceability of Authority to Construct Conditions.

1. Authority to Construct Permit # 4005A-8, Condition F.1 requires the Permittee to relinquish PM10 Stationary Emission Reduction Credits before a Permit to Operate is issued. Since WMMI is not a major source of PM10 emissions, the source has the option of satisfying this requirement by relinquishing Agricultural Burning PM10 Emission Reduction Credits. This requirement is not part of any Federal, State or SIP District Regulation, therefore, this condition is not considered federal enforceable and it will be included in the Title V Operating Permit as "District Only" Enforceable.

VI. Insignificant Activities

The permittee operates several emission units and activities that are not included in the Title V permit due to the fact the air emissions from these units or activities are considered insignificant. These emissions units and activities are still required to comply with all federal requirements, as applicable. The Title V exclusion was granted following the guidance of CAPCOA Model List of Insignificant Activities for Title V Permit Programs, dated June 28, 2000. The emission units exempt, and the basis for their exemption, are listed below.

The following types of activities and emission units will not be included in the Title V Permit:

1. Motor vehicles and mobile (self-propelled) process plant and refinery equipment,

such as service trucks and other personnel vehicles, are excluded from this Title V Operating Permit. Motor vehicles, as defined by the Vehicle Code of the State of California, are exempt based on District Rule 202.E.2.a and the guidelines of the Title V Operating Permit Program Submittal, Attachment C – List of Trivial Activities.

2. Laboratory Vacuum System serving the following equipment: (1) Jaw Crusher, (1) Roll Crusher, and (1) Splitter. This set of equipment is exempt per District Rule 202.B.
3. Donaldson Torit Filter, serving the Laboratory Flux Mix Table. This piece of equipment is exempt per District Rule 202.B.
4. Carbon Desorption Vessels. The vessels utilize a NaOH solution to strip carbon in an enclosed system with no forced exhaust. The equipment is exempt per District Rule 202.A.
5. R/O Water Wash Bay. This piece of equipment washes concentrate with RO water, and is in turn exempt per District Rule 202.A.
6. Filter Press for electrowinning solution and wash water. This piece of equipment has no exhaust and is therefore exempt per District Rule 202.A.
7. Closed-loop cooling system for cooling gold furnace. The system is a closed loop with no exhaust and is therefore exempt per District Rule 202.A.
8. HCl storage tank caustic bubbler. This system is used for safety purposes for ventilation. Since the system claims no abatement efficiency for HCl emissions, it is an exempt unit per District Rule 202.B.

VII. Supplemental Annual Fee

The supplemental annual fee for the facilities is determined according to the provisions found in District Rule 900.G. The supplemental annual fee is calculated based on the following equation:

$$s = [\$58.55 \text{ per ton} \times e] - f$$

Where:

s = supplemental annual fee in dollars

e = fee-based emissions in tons per year

f = sum (in dollars) of annual fee under Regulation III (Permit Fee Regulation) and that portion of AB 2588 Toxic Hot Spots fees that funds direct and indirect costs associated with activities related to the operating permits program as specified in section 502(b)(3)(A) of the CAA

Fee-based Emissions

2021 Actual emission inventory for which fee-based emission schedule applies (taken from the Imperial County Air Pollution Control District's Emissions Inventory):

Particulate Matter 10 Microns or Less (PM10) = 46.21 tons

Regulation III Fees

The following Regulation III Fees are all incorporated into District Permit 4005A-8:

Source	Fee Paid
Superior Aztec Boiler	\$4,092.50
Carbon Kiln	\$2,042.50
HCl Storage Tank (9,000 gal.)	\$358.00
HCl/Water Mix Tank (5,000 gal.)	\$207.00
Electrowinning Carbon Column	\$213.00
Carbon Kiln Carbon Bed	\$213.00
Mercury Retort	\$213.00
Mercury Retort Carbon Column	\$213.00
2 nd Carbon Regeneration Kiln	\$213.00
2 nd Retort Carbon Adsorption Column/Scrubber	\$213.00
Total:	\$7,978.00

Supplemental Fee Calculation

Total Emissions of Fee Pollutants	46.21 tons/yr
Fee-Based Emissions x \$58.55/ton	\$2,705.60
Reg. III Fees	\$7,978.00
Estimated supplemental Title V Program Fee	\$2,705.60 – \$7,978.00 = - \$5,272.40 (\$0.00)

The above analysis demonstrates that the total of the annual fees paid by the permittee under District Regulation III exceeds the emission fee pollutant schedule in District Rule 900.G. As a result, no supplemental fee will be required from WMMI for this Title V Operating Permit.