INSTRUCTIONS FOR AIR QUALITY COMPLIANCE PLAN APPLICATION

Rapid City Community Planning & Development Services
Air Quality Division
300 Sixth Street
Rapid City, SD 57701
(605) 394-4120

PLEASE PRINT OR TYPE

Why do I need a Compliance Plan? On-going site activities can generate dust or what is referred to as PM10 (particulate matter 10 microns in size or smaller). Rapid City has a history of poor air quality conditions associated with dust (PM10) and has been in jeopardy of being designated a non-attainment area for PM10. The ramifications of a non-attainment designation would result in possible loss of highway construction funds and would impose more restrictive requirements on area activities than are being imposed by this Compliance Plan. It is in the community’s best interest to control and reduce dust (PM10) levels to the greatest extent possible to avoid a non-attainment designation.

Continuous operations that require a Compliance Plan: A Compliance Plan is needed for any activity which may cause particulate fugitive emissions to be released into the ambient air and which is conducted on an on-going basis in the same locality. Continuous activities include but are not limited to street deicing and traction material activities, loading and unloading of material that may cause fugitive emissions and for a site with ongoing soil fill/borrow operations. Anyone obtaining a compliance plan must follow the Pennington County Ordinance and Rapid City Municipal Code. The purpose of these ordinances is to provide for a program of fugitive emissions control by applying reasonably available control technology.

Deicing and Traction Material Requirements: No person shall place any street deicing and traction materials upon any road, highway, driveway, or parking lot to which the public has general access which does not meet the following requirements: 1) A durability or hardness as defined in Mohs scale of greater than 6 for 70% of the material used; 2) No more than 3% of the total particle material content by weight may be smaller than 200 sieve. For street deicing and traction materials, these criteria apply only to the material prior to the addition of salt or chemicals. The Administrative Rules of South Dakota Chapter 74:36:17 also regulates these types of materials in the Rapid City Air Quality Zone.

Review period: All applications for a compliance plan or amendments to a Compliance Plan shall be submitted to the Air Quality Division at least fifteen working days before the regular Rapid City Area Air Quality Board meeting at which it would be considered. No application shall be submitted to the Air Quality Board that does not have all the information required by the Pennington County Ordinance and Rapid City Municipal Code. Once a complete application for a Compliance Plan has been submitted to the Rapid City Area Air Quality Board, a 90 day review period shall commence.

Fee Requirements: The fee for a Compliance Plan is $150. The fee for a Compliance Plan amendment is $25. The fee is payable to the City of Rapid City and shall be collected by the Air Quality Division at the time an application is filed.

Penalty and fine for non-compliance: The property owner and/or authorized agent are responsible for the submission of the application and fee and for dust control measures. The property owner and/or authorized agent are responsible for ensuring that all other persons operating at the site abide by the conditions of the permit. If a violation of the air quality ordinance occurs, the violator and property owner will receive the Notice of Violation. Violations of the Air Quality Ordinances will result in a daily fine not to exceed $500 per day and/or 30 days in jail.

Life of permit: After approval by the Air Quality Board, a three year operating permit will be issued by the Air Quality Division. Compliance plans shall be updated every three years, or three years from the plan’s last review by the Rapid City Area Air Quality Board, which ever is later.

Blank spaces must be completed for the application to be processed. If not applicable, enter N/A.
APPLICATION FOR AIR QUALITY COMPLIANCE PLAN

Date of Application: 9-24-2020

OFFICE USE ONLY

Permit No.
Issue Date
Expiration Date
Fee

SITE OWNER INFORMATION:
Owner Name: Rapid City, Pierre and Eastern Railroad Genesee and Wyoming
Owner Address: 13901 Sutton Park Drive South entrance A Suite 270
Contact Person: Brent Azzo  Business Phone: 904-900-5249

ACTUAL SOURCE LOCATION AND ADDRESS IF DIFFERENT THAN ABOVE:
Site Name: 2230 Cambell Street - 500 East Main Street between Maple Ave. and East Blvd
Address: 2720 Cambell
Legal Description: Permit 380850 / 002  Business Phone: 605-515-4141
Contact Person: John Sabo

Detailed Description of the Continuous Operation:
see attached plan

SITE INFORMATION AND FUGITIVE DUST CONTROL MEASURES
Reasonably available control technology shall be provided to prevent fugitive emissions from becoming airborne. If the space below is not adequate to describe site activities and control measures, please submit a separate document which includes all required information.

Site map must be attached and is required for permit approval.

Site Information
Size of Site: 38.1 acres
Type of parking and/or storage area:
☐ Paved  ☑ Unpaved  ☑ Both
Type of surface material(s):
☐ Recycled Asphalt  ☑ Gravel  ☑ Soil  ☑ Other
Size of unpaved area: 38.1 acres
Size of paved area: acres
Condition of surface material:
☐ Good  ☑ Fair  ☑ Poor  ☑ Other
Type of traffic:
75% Percent Light Vehicles  5500 Average Vehicle Weight
25% Percent Heavy Vehicles  24000 Average Vehicle Weight
Speed limit
15-25 Miles per hour
Number of vehicle trips
2 Per day
Number of days occupied
7 Per week
Season of most use (select Same if ☐ Spring  ☐ Summer  ☐ Fall  ☐ Winter  ☑ Same consistent throughout the year)

Other Information


G:\Urban\Air Quality\Forms\compliance plan  Page 2 of 6  Revised 10/11
Fugitive Dust Control Methods

Unpaved Areas
- Wetting down with water: Frequency:
- Chemical stabilization: Type & Frequency:
- Vehicular speed limitation: Posted Speed Limit:
- Trackout Control: Type:

Paved Areas
- Sweeping: Type & Frequency:
- Water flushing (when safety is not jeopardized): Frequency:
- Other:

Provide a full description of selected control measures:
see attached plan

Please check appropriate box(es) to identify site activities (No. 1 through No. 4) and fill in all information within the applicable section.

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NO. 1 STREET TRACTION AND DEICING MATERIAL DEPOSITION

<table>
<thead>
<tr>
<th>Number of miles of paved road surface</th>
<th>miles</th>
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<tbody>
<tr>
<td>Type of surface material(s)</td>
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<tr>
<td>Concrete</td>
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<td>Asphalt</td>
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<tr>
<td>Other</td>
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| Condition of surface material         |       |
| Good                                 |       |
| Fair                                 |       |
| Poor                                 |       |
| Other                                |       |

| Site map (including details for road network) |       |
| Yes                        |       |
| No                        |       |

If NO, when will plan be submitted?

<table>
<thead>
<tr>
<th>Type of traffic</th>
<th>Percent Light Vehicles</th>
<th>Typical number of wheels</th>
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<table>
<thead>
<tr>
<th>Street speed limit(s)</th>
<th>Miles per hour</th>
<th>Typical number of wheels</th>
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<table>
<thead>
<tr>
<th>Number of Vehicle Trips</th>
<th>Per day</th>
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<table>
<thead>
<tr>
<th>Season of most use (select Same if consistent)</th>
<th>Spring</th>
<th>Summer</th>
<th>Fall</th>
<th>Winter</th>
<th>Same</th>
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Fugitive Dust Control Methods

Deposition of traction and deicing materials of appropriate hardness (please attach specifications)

- Sweeping: Type & Frequency:
- Water flushing (when safety is not jeopardized): Frequency:
- Other:

Provide a full description of selected control measures:
see attached plan

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NO. 2 LOADING/UNLOADING MATERIALS THAT GENERATE FUGITIVE EMISSIONS
**Describe the type of material that is loaded and unloaded:**

**Describe the frequency and method of material loading and unloading:**

**Describe all fugitive dust control measures for site activities:**

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**NO. 3 ON-GOING SOIL FILL/BORROW OPERATIONS**

Type of fill material:

See attached plan

Describe the frequency material is brought to the site:

Describe frequency of site grading activities:

Describe all fugitive dust control measures for site activities including timeframe for site reclamation:

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**NO. 4 OTHER**

Describe the type(s) of activity involving fugitive emissions:

See attached plan

Describe all fugitive dust control measures for site activities:
Please complete the Material Handling and Stockpile tables. Identify the information for each material that is handled and stockpiled at the site.

### MATERIAL HANDLING

<table>
<thead>
<tr>
<th>Material Type</th>
<th>Number of Loads per year</th>
<th>Total trips per year</th>
<th>Distance per trip (miles)</th>
<th>Total Material per year (tons)</th>
<th>Material Wt per load (tons)</th>
<th>Avg. Vehicle Wt. Empty (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 inch ballast</td>
<td>12</td>
<td>12</td>
<td>20</td>
<td>120</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>3/4 inch base</td>
<td>12</td>
<td>12</td>
<td>20</td>
<td>120</td>
<td>10</td>
<td>10</td>
</tr>
</tbody>
</table>

### STOCKPILES

<table>
<thead>
<tr>
<th>Material Type</th>
<th>Volume of Material Stockpiled (ft³)</th>
<th>Height of Stockpile (ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 inch ballast</td>
<td>50 yards</td>
<td>10'</td>
</tr>
<tr>
<td>3 inch base</td>
<td>1.5 yards</td>
<td>3'</td>
</tr>
</tbody>
</table>
The Rapid City Area Air Quality Board and/or the Rapid City Air Quality Division reserve the right to request additional control measures if the reasonably available control technology presented above prove to be insufficient. In addition, information regarding emissions and/or emissions calculations may be requested by the Air Quality Division. When requested, the information must be provided in writing to the Air Quality Division.

The Air Quality Division will conduct annual inspections or on a complaint basis for continuous operation sites.

I hereby agree to do the proposed work as described in this application and in accordance with Pennington County Ordinance No. 12, Rapid City Municipal Code Chapter 8.34 through and/or the Administrative Rules of South Dakota Chapter 74:36:17.

<table>
<thead>
<tr>
<th>Property Owner Signature</th>
<th>Date</th>
<th>Property Owner Signature</th>
<th>Date</th>
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</thead>
<tbody>
<tr>
<td>Print Name</td>
<td>Print Name</td>
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</table>

For Corporations, Partnerships, etc.

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<th>Signature</th>
<th>Date</th>
<th>Signature</th>
<th>Date</th>
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<tbody>
<tr>
<td>Print Name</td>
<td>Print Name</td>
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</table>

<table>
<thead>
<tr>
<th>Title</th>
<th>Title</th>
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</thead>
</table>

**Authorized Agent Signature** 9-24-2020  
*John Sabo*  
*Print Name*  
*Title*  
*Mechanical Manager*

**ACTION BY RAPID CITY AREA AIR QUALITY BOARD**

This compliance plan has been reviewed and approved by the Rapid City Area Air Quality Board.

Comments:

__________________________
Board Chair Signature/Date

**RAPID CITY AREA AIR QUALITY BOARD SIGNATURE APPROVAL**
Canadian Pacific Compliance Plan

January 2013

GENERAL INFORMATION:
Main Office: Canadian Pacific
2430 E. Kimberly Rd., Suite #45
Betten, IA 52722
Phone: 563-441-5921
Fax: 563-441-7555

Local Office: Canadian Pacific
2230 Campbell Street
P.O. Box 3970
Rapid City, SD 57709
Phone: 605-342-4398

Contacts: Chad Livingston
Environmental Engineer
Cell: 605-321-8413
(904) 234-0417

Mike Heley
Manager, Mechanical Operations
Office: 605-342-0010
Cell: 605-321-8415

Bill Held
Roadmaster
Office: 605-342-4284
Cell: 605-321-8403

Facility Locations: 2230 Campbell Street - Main Yard
East Main Street - Roundhouse
Maple Avenue - Storage Yard
Rail lines within the Control Zone

INTRODUCTION:
A Compliance Plan is required by the Rapid City Municipal Ordinance Chapters 8.34 through 8.40. The purpose of the Compliance Plan for the Canadian Pacific is to identify the fugitive dust-generating activities and utilize methods to control fugitive emissions.

OPERATIONS:
There are three CP facilities located in the Air Quality Control Zone: the Main Street Facility, the Campbell Street Facility and the Maple Avenue Facility. The following are sources of fugitive dust emissions: paved and unpaved parking lots and unpaved storage areas, access roads, gate repair area, ballast placement / regulation and open storage piles.
Main Street Facility

The Main Street facility is located between Steele and Maple Avenues along a narrow strip (less than 200 feet wide by about 2100 feet long) adjacent to Main Street. The facility area consists of a roundhouse, a sealed sand delivery system, and several material storage areas. Access points to the facility along Main Street have paved entry areas. The access roads along Maple and Steele Avenues are gravel and are used infrequently. Material storage includes clean ballast material of greater than one-inch size and has a negligible amount of fugitive dust associated with it. The roundhouse has four operational stalls which are used to do locomotive engine gear box maintenance. A sealed sand delivery system is located at the facility to fill the sand compartments on the locomotives as necessary. The system is closed and fugitive emissions from the operation are minimal during the filling or emptying of the sand storage container. Sand is delivered to the locomotives by a 5-gallon bucket and manually dumped. A gravel roadway runs parallel to Main Street through the facility area and is used to a lesser extent than the paved access areas.

Potentially Significant Fugitive Emission Sources at the Main Street Facility:

- Dust from use of onsite gravel roads;
- Track out of dirt/dust from site onto Main Street or Maple or Steele Avenues;
- Dust from the yard cleaner/ballast placement and regulation operation.

Emission controls employed at the Main Street facility include:

- **Open-top Railcars:** Finely divided materials like bentonite, cement and flour are transported in closed top railcars and represent a low source of fugitive emissions. Larger sized materials like wood, coal, ballast rock, and coarse bentonite are transported in open top railcars. A railcar speed of 5 to 7 MPH through the Air Quality Zone keeps fugitive emissions minimized.

- **Sand Use:** The sand delivery system is closed and produces minimal fugitive emissions. Locomotive fill is irregular, only in small amounts and is done manually, producing minimal fugitive emissions. The sand is a #10 Sieve Unimin Grade material, which is on the order of 2 millimeters in diameter particle size.

- **Track Out:** Entry to the area is completely paved and minimizes the potential for track out of dust/dirt to Main Street. The access road to the roundhouse is paved and minimizes track out. Paved areas are swept on a regular basis to keep track out at a minimum.

- **Use of Gravel Roads at the Facility:** Graveled roads are maintained in good working condition with regular maintenance (fresh gravel addition) and repair. During the season of highest potential fugitive dust, a chemical stabilizer solution or water is regularly applied in
sufficient quantity and frequency to keep dust generation minimized from use of secondary roadways.

- **Open Storage Piles:** Ballast materials of greater than 1-inch diameter are stored at the facility and present minimal contribution to fugitive dust levels. If materials are to be stored onsite that have a greater potential to produce fugitive emissions, a chemical stabilizer solution will be employed in sufficient quantity and frequency to keep dust generation minimized.

- **Ballast Placement/Regulation and Yard Cleaner:** These activities are related to track maintenance and occur on an infrequent basis. The activities are scheduled around Air Quality Alerts and during periods of high winds.

**Cambell Street Facility**

The Cambell Street facility is located east of Highway 79 from approximately the intersection of Cambell and St. Joseph Streets south about 2300 feet along a narrow strip (maximum width of 500 feet). The facility area consists of a depot, a gate repair area, a repair, inspection, and paint (RIP) area, a railcar repair building, and several material storage areas. The main access to the facility is from Cambell Street and is paved. Secondary roads on the site are gravel. Material storage areas include clean ballast material of greater than one-inch size, dirty ballast material contaminated primarily with coarse/fine bentonite, and rail maintenance components (ties, signals, metal parts, etc). Of the stored materials on site, the piles of coarse/fine bentonite and ballast material contaminated with bentonite present the most probable sources of fugitive emissions. The majority of material storage is over a grassy or gravel area. The parking area around the depot is paved and the rail tie storage area to the south of the depot is concrete. The area in the vicinity of the RIP area paved as well. Other parking areas are gravel. The amount of painting at the facility is negligible. The railcar repair operations are conducted indoors, and particulate emissions are not expected to be emitted from these activities.

**Potentially Significant Fugitive Emission Sources at the Cambell Street Facility:**

- Dust from open pile storage;
- Dust from use of onsite gravel roads;
- Track out of dirt/dust from site onto Cambell Street;
- Dust from the yard cleaner/ballast placement and regulation operation;

**Emission controls employed at the Cambell Street facility include:**

- **Open Top Railcars:** Finely divided materials like bentonite, cement and flour are transported in closed top railcars and represent a low source of fugitive emissions. Larger sized materials like wood, coal, ballast rock, and coarse bentonite are transported in open top
railcars. A railcar speed of 5 to 7 MPH through the Air Quality Zone keeps fugitive emissions minimized.

- **Track Out**: Entry to the facility area is paved and minimizes the potential for track out of dust/dirt to Campbell Street. All secondary roads are gravel. Paved areas are swept on a regular basis to keep track out at a minimum.

- **Use of Gravel Roads at the Facility**: Gravel secondary roads are kept in good working condition with regular maintenance (fresh gravel addition) and repair. During the season of highest potential fugitive dust, a chemical stabilizer solution or water is regularly applied to secondary roadways in sufficient quantity and frequency to keep dust generation at a minimum.

- **Open Storage Piles**: Ballast materials of greater than 1-inch diameter are stored at the facility and present minimal contribution to fugitive dust levels. Materials with potential fugitive dust emissions include the coarse/fine bentonite and bentonite contaminated ballast piles. During periods of high dust generating potential, a chemical stabilizer solution will be employed in sufficient quantity and frequency to keep dust generation minimized.

- **Ballast Placement/Regulation and Yard Cleaner**: These activities are related to track maintenance and occur on an infrequent basis. The activities are scheduled around Air Quality Alerts and during periods of high winds.

- **Parking Lot Winter Sanding Operation**: No sand is needed. Snow removal is effective from the paved areas and keeps area free of dust forming debris. Other parking areas are gravel.

- **RIP Area**: The RIP area is swept monthly to keep dust producing materials minimized. Snow removal from other paved areas is sufficient to remove dust producing materials during the winter months.

**Maple Avenue Facility**

The Maple Avenue facility is located along a narrow strip parallel to and approximately midway between Omaha and Main Streets (90 feet wide by 1000 feet long) and between Maple Avenue and East Boulevard. The facility area consists of a storage building and several material storage areas. Most stored material is used to service the rails. Two ballast piles are stored at the site, one contaminated with bentonite and the other is new ballast. All three access areas to the site are gravel. The secondary roads on the site are gravel. The majority of material storage is over a gravel area. The parking area around the storage building is gravel.

**Potentially Significant Fugitive Emission Sources at the Maple Avenue Facility:**

- Track out;
- Use of gravel roads at facility;
- Open storage piles;
- Ballast placement/regulation and yard cleaner
Canadian Pacific Compliance Plan

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Emission controls employed at the Maple Avenue facility include:

- **Open Top Railcars**: Finely divided materials like bentonite, cement and flour are transported in closed top railcars and represent a low source of fugitive emissions. Larger sized materials like wood, coal, ballast rock, and coarse bentonite are transported in open top railcars. A railcar speed of 5 to 7 MPH through the Air Quality Zone keeps fugitive emissions minimized;

- **Track Out**: Entry areas to the facility area are gravel. All secondary roads are gravel. The site is used infrequently and track out is minimal. Gravel secondary roads are kept in good working condition with regular maintenance (fresh gravel addition) and repair. During the season of highest potential fugitive dust, a chemical stabilizer solution or water is regularly applied to secondary roadways in sufficient quantity and frequency to keep dust generation at a minimum;

- **Open Storage Piles**: Ballast materials of greater than 1-inch diameter are stored at the facility and present minimal contribution to fugitive dust levels. Materials with potential fugitive dust emissions include the bentonite contaminated ballast pile. During periods of high dust generating potential, a chemical stabilizer solution will be employed in sufficient quantity and frequency to keep dust generation minimal.

- **Ballast Placement/Regulation and Yard Cleaner**: These activities are related to track maintenance and occur on an infrequent basis. The activities are scheduled around Air Quality Alerts and during periods of high winds.

**Sand Car Fill and Use Operations**

Traction sand is provided to locomotives that are serviced at the Main Street facility. The sand (Unimin Grade of #10 Sieve) is admitted to and stored in a covered container. Sand is removed from the storage container and placed into a 5-gallon bucket for manual introduction into the locomotive. Because of the closed nature of the process and the small quantities of sand handled, fugitive emissions are minimal.

**Open Top Hopper Cars**

Open top hopper cars are used to transport materials like wood, coal, ballast rock, and coarse bentonite. The approximate dimensions of the open top area are 12 feet by 70 feet. Fugitive emissions can be generated as a result the wind blowing over the top of the product or from product leaking past the hopper gates during transport. However, the total fugitive emissions is negligible.
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Access Roads Summary

- **Main Street Facility:** Four access roads service the facility. Access to the site from Maple and Steele Streets is gravel. These access roads are used infrequently. The two paved access roads along Main Street service the roundhouse and the railroad unload areas. The paved access area that serves the roundhouse is the most frequently used. Secondary roads on the site are gravel and are used infrequently.

- **Cambell Street Facility:** One main access road off of Cambell Street serves the facility and is paved all the way to the depot parking area. A less used gravel access road enters/exits the south most part of the facility. The paved road handles the majority of vehicular traffic at the site. All secondary roads are gravel and see less traffic than the paved main access road.

- **Maple Avenue Facility:** Two gravel access roads enter the site from Maple Avenue. One gravel access road enters the site from East Boulevard. All access roads to the Maple Avenue Facility are used infrequently.

Emission controls employed for the access roads include:

Paved access areas are regularly swept free of debris/dirt to minimize track out. Gravel secondary roads are kept in good working condition with regular maintenance (fresh gravel addition) and repair. During the season of highest potential fugitive dust, a chemical stabilizer solution or water is regularly applied in sufficient quantity and frequency to keep dust generation at a minimum. The speed limit on all access roads within the facilities is 15 miles per hour.

Ballast Placement and Regulation

Ballast placement and regulation is a track maintenance function. The purpose of the activity is to remove debris and dirt from the interstices of the ballast rock. Within the Air Quality Zone of Rapid City, the majority of the debris or dirt is likely bentonite material. The machinery lifts the ballast, schedules it free of debris, and places it back onto the track area. Most of the debris is vacuumed into a container for disposal but some fugitive dust is generated. Approximately 150 tons of fresh ballast is placed per year within the Air Quality Zone of Rapid City. Dirty ballast is stored in small amounts at the Maple and Cambell facilities. Clean ballast is stored in open piles at each site (Main, Cambell and Maple). The ballast regulator is used approximately 10 days per year.

Yard Cleaning System

The yard cleaner (sweeper) is used as a maintenance function to keep the area between the rails clean within the Air Quality Zone and is done an annual basis. Regular yard cleaning is intended to reduce the need for the use of the ballast regulator. This is done approximately one time per year.

Locomotives

- **Hopper Summary:** Open top hopper cars are used to transport materials like wood, coal, ballast rock, and coarse bentonite. The approximate dimensions of the open top area are 12 feet by 70 feet. Fugitive emissions can be generated as a result the wind blowing over the
Canadian Pacific Compliance Plan

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top of the product.

- **Gate Repair:** Fugitive emissions can be generated from the product leaking past the hopper gates during transport. An aggressive schedule of gate repairs has resulted in an 85-80% reduction on spills and material leaks along the rail line. When leaks occur, usually at crossings, the material is cleaned up with a shovel and a five gallon bucket. No fugitive emissions were calculated from spills due to unavailability of information.

- **Locomotive Summary:** Approximately 140,000 gallons of diesel fuel are consumed by the locomotives annually. Table II-2-1 of AP 42 for Internal Combustion Engine Sources lists an emission factor of 25 pounds of particulates per 1000 gallons of fuel. The PM emissions from the locomotives are calculated to be 3500 pounds or 1.75 tons per year.