Preston Bryant
Secretary of Natural Resources

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE
5636 Southern Boulevard, Virginia Beach, Virginia 23462
(757) 518-2000 Fax (757) 518-2103
www.deq.virginia.gov

David K. Paylor
Director

Francis L. Daniel
Regional Director

April 20, 2006

Mr. D. R. Wagoner
Superintendent, Engineering/Maintenance
Dominion Terminal Associates
PO Box 967-A
Newport News, VA 23607

Location: Newport News
Registration No.: 60997
AFS Id. No.: 51-700-00074

Dear Mr. Wagoner:

This will acknowledge the receipt of your permit application dated April 3, 2006 received on April 3, 2006. The Department of Environmental Quality (DEQ) staff has reviewed your permit request. Based on this review, your facility is subject to the permitting requirements in 9 VAC 5, Chapter 80 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. This determination is subject to change upon further review.

The application appears to contain the necessary information to begin processing the application. During the application analysis, additional information may be requested.

You are reminded that construction of a source subject to permitting requirements in Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution, without a permit, can result in enforcement action.

Please reference the Registration No. above on all future correspondence dealing with your facility. If you have any questions, contact me at (757) 518-2155 or kmryan@deq.virginia.gov.

Sincerely,

Kelly M. Ryan
Senior Environmental Engineer

kmr/DominionTerminalAssociates_ack

Hand Delivered

Dominion Terminal Associates
Dan Wagoner
Superintendent Engineering/Maintenance

P.O. Box 967-A
Newport News, VA 23607
(757) 245-2275
Ext. 305
Cellular: (757) 897-8670
FAX: (757) 247-9729
E-mail: dwagoner@dominionterminal.com

ENTERED INTO CDS! #4

DTA

April 3, 2006

Ms Jane Workman
Department of Environmental Quality
5636 Southern Boulevard
Virginia Beach, VA 23462

Dear Ms Workman:

Dominion Terminal Associates (DTA) is requesting that our STATIONARY SOURCE PERMIT TO CONSTRUCT AND OPERATE, approved on September 13, 2004, be modified to reflect a few minor changes. These changes do not add any equipment, nor are we asking for any adjustment in the permitted Emission Limits as set in paragraph 27. I have included for your review, pages 1- 14 from the current permit with red-lined modifications which result from this submission

As indicated in our submission in 2004, DTA has determined that changes in the market for coal have made it imperative that we complement our continuing receipt of coal from domestic sources by rail with a transshipment facility to import coal from foreign sources. In the revision of DTA's operations permit received on September 13, 2004, the following new equipment was allowed:

- Two grab unloaders using state of the art technology
- Two negative pressure hoppers (w/ baghouses) to receive the coal from the grabs
- Up to five additional conveyer belts to move coal from the ships to the storage area.
- Two barge mounted cranes with diesel engines.

In this request for a minor revision, no additional equipment is requested; rather, several items of equipment previously permitted are being removed from the plans. The following changes are noted:

1. Eliminate the permitted synfuel production (previously submitted transfer points TP – 15 through TP – 76 inclusive from prior submission) and related equipment. All references to synfuel, synfuel production, synfuel storage and synfuel export can be deleted from the permit. The facility can be accurately described as "a coal, petroleum coke and limestone receiving, storage and shipping facility"

2. Modify description of ship unloading system (reduced number of transfer points eliminating TP – 96 through TP – 98 inclusive) and eliminating three permitted conveyors.
3. Eliminate the diesel powered cranes in favor of all-electric cranes.
4. Modify statements related to throughput and permitted ground storage.

Explanation of minor revisions requested

1. In 2002, DTA was issued a modified permit to build a synfuel plant to process 12,264,000 tons per year. Reconsideration of the market for synfuel led DTA to reduce its permitted volume of synfuel throughput in a 2004 permit modification. Since that revision, DTA has decided to forego its plans to install a synfuel plant. DTA wishes to modify its current operating permit to remove the synfuel plants and their related conveyors, storage, processing equipment and transfers. The removal of this activity would reduce the potential emissions from transfer points by 12.9 tons/year of PM controlled emissions. .
2. As mentioned above, the application for a permit modification submitted in 2004 was driven by DTA's need to add ship unloading capabilities. That permit was submitted on the basis of preliminary designs. We have now completed the detailed engineering and have revised the configuration as follows:
    a. Rather than barge-mounted cranes, we have received a permit from the Virginia Marine Resources Commission et al to construct an addition to our existing pier which will carry the cranes, hoppers and conveyors.
    b. The hoppers would be directly over the pier conveyor, so there would be no need for the feeder conveyors shown in our original submission (BC-48 and BC-49). We are also not planning to build the conveyor indicated as BC-47 in our prior submission.
    c. The attached drawing (DTA-32013000-001) indicates the totality of conveyors and transfers. Conveyor numbers and transfer numbers have been modified to coincide with our conveyor numbers and to eliminate unused numbers for transfers.
    d. These changes eliminated three conveyors and therefore, three transfer points from the 2004 permit.
3. Furthermore, we have decided that the cranes we will purchase will be electric motor driven rather than diesel engine driven. This eliminates paragraphs 19 through 23 inclusive in our permit and further reduces emissions.
4. No request for additional annual throughput is being made, however we would like to clarify some points from the permit.
    a. The coal brought to our facility by rail plus that imported by ship will not exceed the current permitted limit of 24,000,000 tons. For potential emission calculations only, 10,000,000 tons per year is assumed to arrive

on ships and 14,000,000 tons per year by train. However, since the emissions per ton handled from ship are higher than that from trains, the higher number of tons has been assigned to unloading. DTA may, in a given year, process more than 14,000,000 tons (but less than 24,000,000 tons) by train. In no case would DTA handle more than 10,000,000 tons from ships, and in no case would the sum of the two sources be higher than 24,000,000 tons.

b. There have been some variations in the terminology and numbers associated with ground storage over the years in our permits. We believe some confusion has developed and would like to clear that up at this time. Up to and including the December, 2002 permit, under the heading OPERATING/EMISSION LIMITATIONS, the storage limits imposed referenced the number 1,400,000 tons. Prior to 2002, the number was the "maximum quantity … in storage at any one time…" In the December, 2002 permit that changed to "On a daily average, the maximum quantity… (emphasis added)". In our submission for a permit modification in 1989 to accommodate our expansion, there was some discussion related to storage and the wording was as follows:

"Dominion Terminal Associates is requesting only one substantive change in the permit, i.e. an increase of the maximum allowable quantity of coal storage from a maximum 1 million tons on the ground to a maximum of 1.4 million tons on the ground… As an allowable average, there will be 975,000 tons on the ground."

The September, 2004 permit then picked up the 975,000 tons in combination with the "daily average" and gives the appearance of restricting our ability to maximize the utilization of our storage yard, an appearance which, based on our conversations with DEQ, we don't believe was the intent of the DEQ. Our emission numbers reported at year end are based upon the average daily tons in storage, but we have the ability to store more tons on the ground for short periods. As set forth more specifically below, we are requesting that DEQ clarify the language of the September, 2004 permit to reflect our mutual understanding that the maximum of 1.4 milllion tons may be stored on the ground at any given time as long as the daily allowable average is met at the end of the year.

. To protect our ability to properly manage our pile inventory, we would like permission to offset some of the emission reductions resulting from the elimination of a syn-fuel plant and certain equipment, as discussed above, by increasing our allowed daily average storage to 1.1 million tons. Our actual emissions will continue to be reported on the basis of actual average storage. Therefore we recommend that the section OPERATING/EMISSION LIMITATIONS paragraph 24 of the current permit be rewritten as follows:

On an annual average, the maximum quantity of coal, petroleum coke and limestone (combined) in storage shall not exceed 1,100,000 tons, and at no

time shall more than 1,400,000 tons of coal, petroleum coke, and limestone (combined) be stored at the facility.

We are not requesting any modification to the allowable emissions, but we point out that during the 2004 permit modification process, we recommended an estimator that is based directly upon the permit methodology of emission calculations. By the permitted estimator for Total Annual Emissions, for example, the TAE(PM) for 2005 was:

{5.866/24*56.5 + .554/.975*9.2} * 83.04/83.18 = 19.01 tons

Using the lower number of transfers, fewer pieces of processing equipment and slightly higher storage allowance, DTA requests that the estimator for TAE(PM) be changed to:

{TP/24*42.1 + GS/1.10*10.4} * 83.04/Eff =

This estimator properly reflects the new AP-42 number for the transfers in the first term and the ground storage in the second term. The attached spreadsheet indicates the derivation of these numbers.

With this formula, the TAE(PM) for 2005 would have been:

{5.866/24*42.1 + .554/1.10*10.4} * 83.04/83.18 = 15.56 tons

These formulae overstate the estimated emissions until such time as the construction is complete and the new systems are operational.

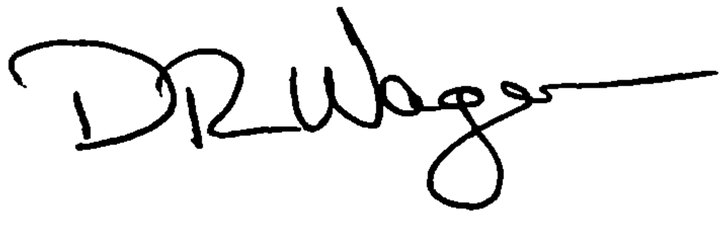
Summary

A. DTA's current Air Permit to Operate has the following conditions:
   1. 24,000,000 tons/year throughput of all permitted products
   2. 5,000,000 tons/year processing of raw coal into synfuel
   3. up to10,000,000 tons/year import of raw coal via ship (remainder would be by rail, i.e., 0 import still allows 24,000,000 by rail, 5,000,000 import allows 19,000,000 by rail, etc)
   4. 975,000 tons maximum average ground storage on the 101 acres of coal storage pad

B. DTA requests revisions to our permit as follows:
   1. 24,000,000 tons/year throughput of all permitted products.
   2. Removal of all references to synfuel processing and associated equipment
   3. up to 10,000,000 tons/year import of permitted products via ship ((remainder would be by rail, i.e., 0 import still allows 24,000,000 by rail, 5,000,000 import allows 19,000,000 by rail, etc).
   4. On an annual average, the maximum quantity of coal, petroleum coke and limestone (combined) in storage shall not exceed 1,100,000 tons, and at no time shall more than 1,400,000 tons of coal, petroleum coke, and limestone (combined) be stored at the facility.

Thank you for your consideration. If you have any questions, or concerns, please feel free to call. I will be happy to sit with the permit writer to whom this is assigned at his/her earliest convenience to review and explain as required.

Regards,



D. R. Wagoner
Superintendent
Engineering/Maintenance

cc: G. D. Emmitt, Simpson Weather Associates, C. E. Brinley, DTA

Encl: DEQ Document Certification Form
DTA Drawing 32013000-001
Spreadsheet "Coal Handling and Storage Components"
Spreadsheet "Transfer Points"
Redlined "Stationary Source Permit to Construct and Operate"

CEDS #44
4/5/06
(F)
"NSR-Minor"
#60997
#700-00074

SIC=4491
NAICS=488310
NPI=
PSM

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

DOCUMENT CERTIFICATION FORM

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: _____ **DATE:** April 3, 2006

PRINTED NAME: Daniel R. Waggoner

TITLE: Superintendent Engineering/Maintenance

COMPANY: Dominion Terminal Associates

REGISTRATION NO: 60997 **TELEPHONE NO:** 757-245-2275

INSTRUCTIONS:

The Regulations for the Control and Abatement of Air Pollution require that certain documents submitted to the board or the Department be signed by a responsible official with certification that the information contained in the statement is accurate to the best knowledge of the individual certifying the statement (9VAC 5-80-80.G). Documents covered by this requirement include, but are not limited to, permit applications, registrations, emission statements, emission testing and monitoring reports, of compliance certifications. The certification should include the full name, title, signature, date of signature, and telephone number of the responsible official, A responsible official is defined as follows (9 VAC 5-80-60.C):

1. For a business entity, such as a corporation, association or cooperative, a responsible official is either:

   (a) The president, secretary, treasurer, or a vice-president of the business entity in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the business entity; or

   (b) A duly authorized representative of such business entity if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or (ii) the authority to sign documents has been assigned or delegated to such representative in accordance with procedures of the business entity.

2. For a partnership, or sole proprietorship, a responsible official is a general partner or the proprietor, respectively.

3. For a municipality, state, federal, or other public agency, a responsible official is either a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

5636 Southern Boulevard
Virginia Beach, VA 23462
www.deq.state.va.us

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Robert G. Burnley
Director

Francis L. Daniel
Tidewater Regional Director
(757) 518-2000

STATIONARY SOURCE PERMIT TO CONSTRUCT AND OPERATE

This permit includes designated equipment subject to New Source Performance Standards (NSPS).

This permit supersedes the permit dated December 23, 2002

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Dominion Terminal Associates
PO Box 967-A
Newport News, Virginia 23607
Registration No.: 60997
AFS Id. No.: 51-700-00074

is authorized to construct and operate

a ~~**coal synfuel production, storage and export facility and a**~~
coal, petroleum coke and limestone storage and ~~**import**~~ facility
receiving, shipping

located at

Pier 11, Harbor Road
Newport News, Virginia

in accordance with the Conditions of this permit.

Approved on **September 13, 2004**.

(for)
Director, Department of Environmental Quality

Permit consists of 26 pages.
Permit Conditions 1 to 47, plus Appendix A.
Source Testing Report Format.

PERMIT CONDITIONS - the regulatory reference or authority for each condition is listed in parentheses ( ) after each condition.

APPLICATION

1. Except as specified in this permit, the permitted facility is to be constructed and operated as represented in the permit application dated August 17, 1981, October 15, 2002 and May 8, 2004, including amendment information dated August 25, 1981, October 19, 1989, April 22, 1992, December 11, 2002 and July 13, 2004. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.
(9 VAC 5-50-390 and 9 VAC 5-80-1210 D)

PROCESS REQUIREMENTS

2. **Equipment List -**

Unit No.	Description	Maximum capacity/rating	Applicable NSPS	Air pollution Control(s)
New Ship unloading equipment to be constructed:				
UL-1	Marine vessel grab unloader	2000 tons/hr		Enclosed Grab
UL-2	Marine vessel grab unloader	2000 tons/hr		Enclosed Grab
BH-1	Ship unload hopper	3400 tons/hr		Fabric Filter
BH-2	Ship unload hopper	3400 tons/hr		Fabric Filter
BC-~~45~~14	Ship unload conveyor	6800 tons/hr		Fully enclosed
BC-~~46~~15	Ship unload conveyor	6800 tons/hr		Fully dnclosed
~~BC-47~~	~~Ship unload conveyor~~	~~6800 tons/hr~~		~~Fully enclosed~~
~~BC-48~~	~~Ship unload conveyor~~	~~3400 tons/hr~~		~~Enclosed~~
~~BC-49~~	~~Ship unload conveyor~~	~~3400 tons/hr~~		~~Enclosed~~
~~**Previously permitted equipment - Synfuel Plants #1 and #2:**~~				
~~CR-1~~	~~Synfuel crusher~~	~~1000 tons/hr~~	~~Subpart Y~~	~~Enclosed~~
~~CR-2~~	~~Synfuel crusher~~	~~1000 tons/hr~~	~~Subpart Y~~	~~Enclosed~~
~~SS-1~~	~~Screen~~	~~700 tons/hr~~	~~Subpart Y~~	~~Enclosed double deck~~
~~SS-2~~	~~Screen~~	~~700 tons/hr~~	~~Subpart Y~~	~~Enclosed single deck~~
~~SS-3~~	~~Screen~~	~~700 tons/hr~~	~~Subpart Y~~	~~Enclosed double deck~~
~~SS-4~~	~~Screen~~	~~700 tons/hr~~	~~Subpart Y~~	~~Enclosed single deck~~
~~OS-1~~	~~Storage pile~~	~~350,000 tons~~		~~Water spray~~
~~OS-2~~	~~Storage pile~~	~~350,000 tons~~		~~Water spray~~
~~OS-3~~	~~Storage pile~~	~~350,000 tons~~		~~Water spray~~
~~OS-4~~	~~Storage pile~~	~~350,000 tons~~		~~Water spray~~

~~OS-5~~	~~Storage pile~~	~~40,000 tons~~		~~Water spray~~
~~OS-6~~	~~Storage pile~~	~~50 tons~~		~~Water spray~~
~~OS-7~~	~~Storage pile~~	~~20,000 tons~~		~~Water spray~~
~~BS-4~~	~~Synplant #1 feed bin~~	~~50 tons~~		~~Enclosed, water/ surfactant spray~~
~~BS-5~~	~~Synplant #1 pugmill bin~~	~~5 tons~~	~~Subpart Y~~	~~Enclosed bldg~~
~~BS-6~~	~~Synplant #1 pugmill feed bin~~	~~5 tons~~	~~Subpart Y~~	~~Enclosed bldg~~
~~BS-7~~	~~Synplant #2 feed bin~~	~~50 tons~~		~~Enclosed, water/surf spray~~
~~BS-8~~	~~Synplant #2 pugmill bin~~	~~5 tons~~	~~Subpart Y~~	~~Enclosed bldg~~
~~BS-9~~	~~Synplant #2 pugmill feed bin~~	~~5 tons~~	~~Subpart Y~~	~~Enclosed bldg~~
~~SB-1 - 3 and SB-4 - 6~~	~~Briquette makers (3 each for each synfuel plant)~~	~~233 tons/hr each~~		~~Wet suppression~~
~~BC-15 - 18, 28 - 32, and 42 - 44~~	~~Various Synplant conveyors~~	~~Largest belts: 6800 tons/hr~~	~~Subpart Y:~~	~~All fully enclosed~~
Previously permitted equipment ~~- Non-Synfuel Plant:~~				
RD-1	Tandem rotary rail car dumper	5800 tons/hr		Enclosed bldg with water spray
BS-1	Surge Silo	1000 tons		Fabric Filter
BS-2	Surge Silo	3800 tons		Fabric Filter
BS-3	Surge Silo	4100 tons		Fabric Filter
~~BC-14~~, ~~19 - 27, and 33 - 41~~ 1-13	Various Coal handling and storage conveyors	Largest belt 6800 tons/hr		All fully enclosed, except 4, 7 and 13 (yard belts)
S/R-1 & 2	2 - Rotary Stacker/Reclaimers	5900 tons/hr stacking, 6500 tons/hr reclaim		Wet suppression
~~S/R-3~~	Rotary reclaimer	6800 tons/hr reclaim only		Wet suppression
~~OS-1 - X~~ 4	Coal, coke and limestone storage piles	Up to 350,000 tons		Wet suppression system (computerized)
SL-1	Ship/barge loader	6800 tons/hr		Wet suppression, telescoping loading chutes

3. **Emission Controls** - Particulate emissions from each marine vessel grab unloader (UL-1 and UL-2) shall be controlled by using enclosed grab buckets. The grab buckets shall be completely closed during transfer of material from marine vessels to receiving hoppers.
(9 VAC 5-50-260)

4. **Emission Controls** - Particulate emissions from each marine vessel unloading hopper (BH-1 and BH-2) shall be controlled by a fabric filter. The fabric filters shall be provided with adequate access for inspection.
(9 VAC 5-50-260)

5. **Emission Controls** - Particulate emissions from the enclosed rotary rail car dumper (RD-1) shall be controlled by wet suppression, which, if necessary, shall include the use of a surfactant. The surfactant to water ratio shall be in accordance with the manufacturer's recommendations. The minimum amount of water applied shall be 130 gallons per tandem dump. Compliance shall be achieved if there are no visible emissions.
(9 VAC 5-50-260)

6. **Emission Controls** - Particulate emissions from the transfer points and stacker/reclaimers (S/R-1, 2 and 3) shall be controlled by wet suppression as necessary and by wet suppression with surfactant as necessary. Continuous wetting is not mandatory.
(9 VAC 5-50-260)

7. **Emission Controls** - Particulate emissions from the conveyor system shall be controlled by conveyor hoods and wind guards. Ground level reclaim conveyor belts shall be controlled by wet suppression as necessary.
(9 VAC 5-50-260)

8. ~~**Emission Controls** - Particulate emissions from the conveyor belt system associated with the synfuel operations shall be controlled by enclosed conveyors and transfer points (also may include the use of building enclosures, where possible) and by wet suppression as necessary. (9 VAC 5-50-260)~~

9. ~~**Emission Controls** - Particulate emissions from the storage bins and pugmills associated with the synfuel operations shall be controlled by wet suppression as necessary. (9 VAC 5-50-260)~~

10. ~~**Emission Controls** - Particulate emissions from the crushers, screens, spreaders, and briquette makers associated with the synfuel operations shall be controlled by enclosing such operations within buildings and by wet suppression as necessary. (9 VAC 5-50-260)~~

11. **Fugitive Dust Emission Controls** - Fugitive dust emissions from the storage piles shall be controlled by a wet suppression system capable of wetting the entire storage area. Wet suppression cycles shall be implemented in accordance with Appendix A. Each cycle shall consist of no less than 35,500 gallons of water and attain 100 percent coverage of the storage area. The wet suppression system shall be provided with adequate access for inspection. (9 VAC 5-50-260 and 9 VAC 5-50-90)

12. **Fugitive Dust Emission Controls** - All storage piles shall be truncated, stacker/reclaimers used to build flat top piles, and the top compacted to minimize fugitive emissions. (9 VAC 5-50-260 and 9 VAC 5-50-90)

13. **Emission Controls** - The permittee shall apply wet suppression as necessary to all incoming loaded railcars located within facility boundaries if they are not to be dumped within 24 hours. (9 VAC 5-50-260)

REVISED DEQ

14. **Emission Controls** - When the permittee is using a piece of auxiliary handling equipment (e.g., front end loader, bulldozer), the area to be worked shall be monitored and wet suppression shall be applied as necessary to control emissions.
(9 VAC 5-50-260)

15. **Emission Controls** - When the permittee is using a particular piece of handling equipment (e.g., a dumper, a conveyor, etc.), it shall utilize the wet suppression controls for that piece of equipment unless the use of such equipment would cause a safety hazard or damage to the equipment from freezing.
(9 VAC 5-50-260)

16. **Emission Controls** - Particulate emissions from each surge silo shall be controlled by a fabric filter. The fabric filters shall be provided with adequate access for inspection.
(9 VAC 5-50-260)

17. **Monitoring Devices** - The fabric filters for the surge silos and marine vessel unloading hoppers shall be equipped with devices to continuously measure the differential pressure drop across each fabric filter. Each monitoring device shall be installed in a readily accessible location and shall be maintained by the permittee such that they are in proper working order at all times. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating.
(9 VAC 5-80-1180, 9 VAC 5-50-20 C and 9 VAC 5-50-260)

18. **Wet Suppression System** - The wet suppression system for the storage piles shall be implemented as specified in Appendix A or by any other procedure as may be approved by the DEQ prior to use. Such approval shall be contingent on adequate documentation that any alternative procedure shall achieve at least as high an efficiency as Appendix A. This applies to all other dust control measures required by this permit. Requests for changes in procedures shall be accompanied by an explanation of the proposed changes and the anticipated effect they shall have. These requests, if approved by the DEQ, shall be subject to a test and evaluation procedure prior to being accepted as permanent changes to the control procedures.

(9 VAC 5-50-260)

OPERATING/EMISSION LIMITATIONS

19. ~~**Fuel** - The approved fuels for the crane engines are distillate oil and natural gas. A change in the fuel may require a permit to modify and operate.~~

~~(9 VAC 5-80-1180)~~

20. ~~**Fuel Throughput** - The crane engines shall consume no more than 325,000 gallons of distillate oil, or 55×10^6 cubic feet of natural gas per year, calculated monthly as the sum of each consecutive 12-month period.~~

~~(9 VAC 5-80-1180 and 9 VAC 5-50-260)~~

21. ~~**Fuel** - The distillate oil and natural gas shall meet the specifications below:~~

~~DISTILLATE OIL which meets the ASTM specification for numbers 1 or 2 fuel oil:~~

~~NATURAL GAS: which meets ASTM specification D1835~~

~~(9 VAC 5-80-1180)~~

22. ~~**Fuel Certification** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:~~

~~a. The name of the fuel supplier;~~

~~b. The date on which the distillate oil was received;~~

~~c. The volume of distillate oil delivered in the shipment;~~

~~d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications for numbers 1 or 2 fuel oil;~~

~~e. The sulfur content of the distillate oil.~~

~~(9 VAC 5-170-160)~~

23. ~~**Emission Limits - Crane Engines** - Emissions from the operation of the combined crane engines shall not exceed the limits specified below:~~

~~Particulate Matter/PM_{10}~~	~~7.0 tons/yr~~
~~Sulfur Dioxide~~	~~6.5 tons/yr~~
~~Nitrogen Oxides~~	~~98.9 tons/yr~~
~~Carbon Monoxide~~	~~98.5 tons/yr~~
~~Volatile Organic Compounds~~	~~8.1 tons/yr~~

~~These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number(s) 19, 20, 21 and 22.~~

~~(9 VAC 5-50-260)~~

24. **Storage** – On a daily average, the maximum quantity of coal, petroleum coke, ~~synfuel~~ and limestone (combined) in storage shall not exceed 975,000 tons.
(9 VAC 5-80-1180) (Modify per letter?)

REWORDED

25. **Throughput** - The coal/petroleum coke/~~synfuel~~/limestone throughput (combined) for the ship/barge loading apparatus shall not exceed 24,000,000 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180)

REWORDED

26. ~~**Throughput** - The synfuel operations (plant #1 & #2) throughput (combined) shall not exceed 5,000,000 tons per year, calculated monthly as the sum of each consecutive 12-month period.~~

~~(9 VAC 5-80-1180)~~

27. **Emission Limits** - Particulate emissions from the operations of the coal/ petroleum coke/~~synfuel~~/limestone storage, ~~production, import~~ and ~~export~~ facility shall not exceed the limits specified below: receiving, shipping

Particulate Matter	65.7 tons/yr
PM-10	11.8 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 3-18. 15

(9 VAC 5-50-260)

28. ~~**Plantwide Emission Limits** - Total emissions from the coal/petroleum coke/synfuel/limestone storage, production, import and export facility shall not exceed the limits specified below:~~

~~Particulate Matter~~	~~72.7 tons/yr~~
~~PM-10~~	~~18.3 tons/yr~~
~~Sulfur Dioxide~~	~~6.5 tons/yr~~
~~Nitrogen Oxides~~	~~98.9 tons/yr~~
~~Carbon Monoxide~~	~~98.5 tons/yr~~
~~Volatile Organic Compounds~~	~~8.1 tons/yr~~

~~(9 VAC 5-50-260)~~

29. **Visible Emission Limit** - Visible emissions from the enclosed rotary rail car dumper (RD-1) shall not exceed 0 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260)

30. **Visible Emission Limit** - Visible emissions from all fabric filters shall not exceed 0 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260)

31. **Visible Emission Limit** - Visible emissions from the conveyor belt transfer points shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260)

~~32. **Visible Emission Limit** - Visible emissions from each building containing the coal crusher/screen operations, briquette makers, or synfuel screen operations shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260)~~

~~33. **Visible Emission Limit** - Visible emissions from each storage bin and pugmill, associated with the synfuel productions, shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-260)~~

34. **Monitoring PM_{10}** - Dominion Terminal Associates shall install and operate a PM10 monitor at the Newport News Housing Authority Maintenance Building (180-J) to ascertain the ambient air quality in the area surrounding the coal/petroleum coke~~/synfuel~~ limestone terminal. Operation shall be in accordance with Appendix J of 40 CFR Part 50.
(9 VAC 5-160-170)

35. **Control of Emissions** - The following actions are considered detrimental to the control of coal/petroleum coke/~~synfuel~~/limestone emissions:

a. Failure to stop any coal/petroleum coke/~~synfuel~~/limestone movement operation when it becomes known that installed air pollution control systems are inoperative and would cause excess emissions.

b. Failure to stop a coal/petroleum coke/~~synfuel~~/limestone movement operation when it becomes known that the coal/petroleum coke/~~synfuel~~/limestone handling equipment needed for that operation is malfunctioning or operating significantly below designated specifications.

c. Failure of equipment operators to take immediate precautions to preclude fugitive dust emissions from the operation of bulldozers, front-end loaders, automobiles, or trucks (e.g., the use of water suppressant or limiting the speed of movement to below 10 miles per hour).

d. Failure of operational personnel to give precedence to designated personnel with the responsibility for controlling dust emissions.

(9 VAC 5-50-260)

RECORDS

36. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

a. Annual throughput of coal/petroleum coke/~~synfuel~~/limestone (combined) for the ship/barge loading apparatus calculated monthly as the sum of each consecutive 12-month period.

b. ~~Annual throughput of synfuel production calculated monthly as the sum of each consecutive 12-month period.~~

c. Maximum daily quantity of coal/petroleum coke/~~synfuel~~/limestone (combined) in storage.

~~d. Annual throughput of distillate oil and natural gas used in the crane engines calculated monthly as the sum of each consecutive 12-month period.~~

~~e. All fuel supplier certifications.~~

c f. Records of dust control measures as required by Appendix A.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50)

INITIAL COMPLIANCE DETERMINATION

37. **Visible Emissions Evaluation** – Initial performance tests of Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conducted by the permittee on the following items: marine vessel unloading operations ~~and each crusher/screen building.~~ Each test shall consist of 30 sets of 24 consecutive observations (at 15 second intervals) to yield a six minute average. The details of the tests are to be arranged with the TRO Air Compliance Manager. The evaluation shall be performed to demonstrate compliance within 60 days after achieving the maximum production rate but in no event later than 180 days after start-up of the permitted facility. One copy of the test result shall be submitted to the TRO Air Compliance Manager within 45 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-50-30, 9 VAC 5-80-1200, and 9 VAC 5-50-410)

NOTIFICATIONS

38. **Initial Notifications** - The permittee shall furnish written notification to the TRO Compliance Manager:

a. The actual date on which construction of the marine unloading facilities ~~and synfuel plants~~ commenced, within 30 days after such date.

b. The anticipated start-up date of the marine unloading facilities ~~and synfuel plants~~, postmarked not more than 60 days nor less than 30 days prior to such date.

c. The actual start-up dates of the marine unloading facilities ~~and synfuel plants, respectively~~, within 15 days after such date~~s~~.

d. The anticipated dates of the VEE performance tests for the marine unloading facilities ~~and the crusher/screen buildings~~, postmarked at least 30 days prior to such date. Copies of the written notifications referenced in items a through d above are to be sent to:

Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency, Region III
Attention: NSPS Subpart Y Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-50-50)

GENERAL CONDITIONS

39. **Permit Invalidation** - The portions of this permit regarding construction of the marine unloading facilities ~~and the synfuel plants~~ shall become invalid, unless an extension is granted by the DEQ, if:

a. A program of continuous construction is not commenced before the latest of the following:

i. 18 months from the date of this permit;

ii. Nine months from the date that the last permit or other authorization was issued from any other governmental agency;

iii. Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or

b. A program of construction is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

(9 VAC 5-80-1210)

40. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130)

Coal Handling and Storage Components

Unit Ref #	Description	Eqip Code	Storage (Ktons)	Through Kton(hr)	Through Kton(day)	Through Kton(yr)	Ctrld Eff %	PM ctrld (tons/yr)	PM unctrld (tons/yr)	PM10 ctrld (tons/yr)	PM10 unctrld (tons/yr)
[redacted]	See Drawings	SW-CS	350			24,000	[redacted]				
	See Drawings	SW-CS	350			24,000					
	See Drawings	SW-CS	350			24,000					
	See Drawings	SW-CS	350			24,000					
	See Drawings	SW-FE	1	2.740	38.356	14,000					
	See Drawings	SW-FE	3.8	2.740	32.877	12,000					
	See Drawings	SW-FE	4.1	2.740	32.877	12,000					
	See Drawings	TC-FC		2.740	38.356	14,000					
	See Drawings	TC-BH		2.740	38.356	14,000					
	See Drawings	TC-PC		2.740	38.356	14,000					
	See Drawings	TC-PE		2.740	57.534	21,000					
	See Drawings	TC-PE		2.740	57.534	21,000					
	See Drawings	TC-PC		2.740	30.137	11,000					
	See Drawings	TC-PC		2.740	30.137	11,000					
	See Drawings	TC-PC		2.740	84.932	31,000					
	See Drawings	TC-PC		2.740	84.932	31,000					
	See Drawings	TC-PC		2.740	65.753	24,000					
	See Drawings	TC-BH		2.740	65.753	24,000					
	See Drawings	TC-PE		2.740	65.753	24,000					

Unit Ref #	Description	Eqip Code	Storage (Ktons)	Through Kton(hr)	Through Kton(day)	Through Kton(yr)	Ctrld Eff %	PM ctrld (tons/yr)	PM unctrld (tons/yr)	PM10 ctrld (tons/yr)	PM10 unctrld (tons/yr)
[redacted]	See Drawings	LO-FC		2.740	65.753	24,000	[redacted]				
	See Drawings	TC-BH		2.740	32.877	12,000					
	See Drawings	TC-BH		2.740	65.753	24,000					
	See Drawings	TC-PC		2.740	30.137	11,000					
	See Drawings	TC-PC		2.740	30.137	11,000					

New coal handling components for import of raw coal

Unit Ref #	Description	Eqip Code	Storage (Ktons)	Through Kton(hr)	Through Kton(day)	Through Kton(yr)	Ctrld Eff %	PM ctrld (tons/yr)	PM unctrld (tons/yr)	PM10 ctrld (tons/yr)	PM10 unctrld (tons/yr)
[redacted]	See Drawings	UL-FE			13.699	5,000	70	0.8575616	2.8585386	0.1543611	0.514537
	See Drawings	UL-FE			13.699	5,000	70	0.8575616	2.8585386	0.1543611	0.514537
	See Drawings	TC-BH			13.699	5,000	99	0.0285854	2.8585386	0.0051454	0.514537
	See Drawings	TC-BH			13.699	5,000	99	0.0285854	2.8585386	0.0051454	0.514537
	See Drawings	TC-PC			27.397	10,000	[redacted]				
	See Drawings	TC-PC			27.397	10,000					

	PM ctrld (tons/yr)	PM unctrld (tons/yr)	PM10 ctrld (tons/yr)	PM10 unctrld (tons/yr)
Piles (See 1989 permit application adjusted by 9.2 X 1.1/.975)	10.38	103.79	1.8683077	18.68308
Total intermediate storage/processing	1.7722939	11.434154	0.3190129	2.058148
Transfers	41.856373	222.4425	7.5341472	40.03965
Total PM & PM10 (tons/yr)	54.008154	337.67153	9.7214678	60.78087

E factors	[redacted]		[redacted]	
Crushers	0.013	lbs/ton		
Transfers	0.0011434	lbs/ton		
Screens	0.08	lbs/ton		
Throughput	14,000	Ktons	10,000	Ktons
Silt	3.5	%	not used	
Moisture	6.7	%	Based upon average moisture content as measured at DTA	
Avg Wind	10.5	mph	Based upon local weather data	
k	0.74		AP-42	
base	0.0032		AP-42	
EF trans	0.0011434	lbs/ton	AP-42	

Notes: The labels used for components are based upon EPA's suggested categories of dust control and the % control values are consistent with those published as "EPA Accepted Control Device Listing"

The emission factor at transfer points is computed using equations in AP-42
.0014 for conveyors/transfer points Used .00114

Transfer Points

Transfer Point	Control Type	Raw Rail (Ktons)	Raw Ship (Ktons)	Raw reclm (Ktons)	Contrl Eff %	PM Ctrld (tons)	PM Unctrld (tons)	PM-new Ctrld (tons)	PM-new Unctrld (tons)	PM10 Ctrld (tons)	PM10 Unctrld (tons)	PM10-new Ctrld (tons)	PM10-new Unctrld (tons)
1	UD-FC				99	0.040	3.990			0.007	0.718		
2	UD-FC				99	0.040	3.990			0.007	0.718		
3					99	0.080	7.980			0.014	1.436		
4					99	0.080	7.980			0.014	1.436		
5	TC-PC				95	0.399	7.980			0.072	1.436		
6					95	0.399	7.980			0.072	1.436		
6A			5,000		50	3.424	6.840	1.429	2.85	0.616	1.231	0.257	0.513
6B			5,000		50	5.989	11.970	1.429	2.85	1.078	2.155	0.257	0.513
7	LO-RC		5,000		80	2.396	11.970	0.572	2.85	0.431	2.155	0.103	0.513
8		0			95	0.114	2.280			0.021	0.410		
9		0			50	1.710	3.420			0.308	0.616		
10		0			80	0.684	3.420			0.123	0.616		
11	TC-PC	0			95	0.171	3.420			0.031	0.616		
12					95	0.200	3.990			0.036	0.718		
12A			5,000		50	3.424	6.840	1.429	2.85	0.616	1.231	0.257	0.513
12B			5,000		50	5.989	11.970	1.429	2.85	1.078	2.155	0.257	0.513
13			5,000		80	2.396	11.970	0.572	2.85	0.431	2.155	0.103	0.513
15	TC-PC				95	0.271	5.415			0.049	0.975		
16					95	0.271	5.415			0.049	0.975		
17					99	0.024	2.423			0.004	0.436		
18	TC-PC				95	0.271	5.415			0.049	0.975		
19	TC-PC				95	0.271	5.415			0.049	0.975		
20					99	0.054	5.415			0.010	0.975		
21	TC-PC				95	0.271	5.415			0.049	0.975		
22					95	0.684	13.680			0.123	2.462		
23					50	6.840	13.680			1.231	2.462		
24					80	2.736	13.680			0.492	2.462		
New Pts													
25	UL-FE		5,000		70	0.858	2.850	0.858	2.85	0.154	0.513	0.154	0.513
26	UL-FE		5,000		70	0.858	2.850	0.858	2.85	0.154	0.513	0.154	0.513
27	TC-BH		5,000		99	0.029	2.850	0.029	2.85	0.005	0.513	0.005	0.513
28	TC-BH		5,000		99	0.029	2.850	0.029	2.85	0.005	0.513	0.005	0.513
29	TC-PC		5,000		95	0.143	2.850	0.143	2.85	0.026	0.513	0.026	0.513
30	TC-PC		5,000		95	0.143	2.850	0.143	2.85	0.026	0.513	0.026	0.513
31			10,000		95	0.286	5.700	0.286	5.7	0.051	1.026	0.051	1.026
32			~~10,000~~		~~95~~	~~0.286~~	~~5.700~~	~~0.286~~	~~5.7~~	~~0.051~~	~~1.026~~	~~0.051~~	~~1.026~~
Totals (tons/year) for new import functions only					=			9.490	45.6			1.708	8.208
						PM ctrl	PM unctrl					PM10 ctrl	PM10 unctrl
Totals (tons/year) for all transfers, old and new					=	41.856	222.44			7.534	40.040		
						PM ctrl	PM unctrl			PM10 ctrl	PM10 unctrl		

		coal ship	
EF trans	0.00114 lbs/ton	0.00114 lbs/ton	
Ktons/yr	14,000	10,000	
	7,000	5,000	

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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALIYT
TIDEWATER REGIONAL OFFICE
Prmon Bryant 5636 Southem Boulevard, Virginia Beach, Virginia 23462 David L Pa ylor
Secmimy ofNatural Resources (757) 518-2000 Fax (757) 518-2103 Du=tor
www.deq.vir&ia.gov
Francis L. Daniel
April 20, 2006 Regional Diredor

Mr. D. R. Wagoner
Superintendent, Engineering/Maintenance
Dominion Terminal Associates
PO Box 967-A
Newport News, VA 23607
Location: Newport News
Registration No.: 60997
AFS Id. No.: 51-700-OW74
Dear Mr. Wagoner:

This wiR acknowledge the receipt of your permit application dated April 3, 200 6 received on April 3, 2006. The
Department of Envi-ronmental Quality (DEQ) staff has reviewed your permit requ est. Based on this review, your facility is
subject to the permitting requirements in 9 VAC 5, Chapter 80 of the Commonwea lth of Vi-rginia Regulations for the
Control and Abatement of Air Pollution. This determination is subject to chan ge upon further review.

The appHcation appears to contain the necessary information to begin processin g the apphcation. During the
application analysis, additional information may be -requested.

You are reminded that construction of a source subject to pennitting requireme nts in Chapter 80 of the Virginia
Regulations for the Control and Abatement of Air PoBution, without a permit, c an result in enforcement action.

Please reference the Registmtion No. above on aU future correspondence dealing with your faeffity. If you
have any questions, contact me at (757) 518-2155 or kmryan@dQ.virginiaxov.

Sincerely,

Kelly M. Ryan
Senior Environmental Engineer

kmr/DominionTerminalAssociates ack

.9c@rd DtNepx6

Dominion Terminal Asswiates P.O. BoxS'67-A
Dan Wagoner
Supedntendent EngineorkxjVMaintenence N0WP0ftAW^ VA ;3607
(757) 245-2275
Ed 305
Cohier (757) 89 7-8670
FAX (757) 247-9729
E4rW-' dWagorw1@0wnki0nftrnndcarn

U ri@ DTA

APEU 3, 2006

Ms Jane Workman
Depwtment of Environmental Quality PR 200(i

5636 Southem Boulevard RECEIVE[)

Virginia Beach, VA 23462 HR

Dear Ms Workman:

Dominion Terminal Amciates (DTA) is requesting that our STATIONARY SOURCE PERNUT TO CONSTRUCT AND OPERATE, approved on Septernber 13, 2004, be modified to reflect a few minor changes. These changes do not add any equipme nt, nor are we askmg for any adjustment m the permoed Emmon Lmift as sd m puagraph 27.

I have included for your review, pages 1- 14 from the current permit with red-lined modifications which resWt from this submission
As indicated in our submission in 2004, DTA has determined that changes in the market for coal have made it imperative that we compkment our cDnbmnng receipt of coa l from domestic sources by raH with a transshipment facility to iinport coal from for eign sources.
In the revision of DTA's operations permit received on September 13, 2004, the following new equipment was allowed:

• Two grab unloaders using state of the art technology

• Two negative pressure hoppers (w/ baghouses) to receive the coal from the gr abs

• Up to five additional conveyer belts to move coal from the ships to the stor age area.

• Two barge mounted cnwes with diesel engines.
In this request for a niinor revision, no additional equipment is requested; r ather, several iteins of eqwpment previously perfmtted are bemg rernoved from the plans. The following changes are noted:
1. FJiminate the pennitted synfiiel production (previously subnfitted transfer poinu TP - 15 through TP - 76 inclusive from prior submission) and related equipment .
AU references to synfueL synfuel production, synfuel storage and synfuel expor t

can be deleted from the pmnit. The fimifity c-an be accurately dewdbed as "a cow,
petrolmm coke and lknestone receiviM storW and shipping &cW

2. Modify description of ship unloading system (reduced number of b-dnsfer points aim@g Tp - 96 thrmo Tp - 98 inckiive) and aiminating three pemitted conveyors.
3. Ehminate the diesel powered cranes in favor of all-electric cranes.

4. Modify sweinents reh-ited to throughput and permitted ground storage.
Explwmtion of minor revisions requested
I . In 2002, DTA was issued a modified pemiit to build a synfuel plant to process 12,264,000 tons per year. Reconsideration of the market for synfuel led DTA to reduce its permitted volume of rynfuel throughput in a 2004 pemiit modification.
Siwe that rrvision, DTA has decided to forego its pim to mstaD a synfuel plant.
DTA wishes to modify its current operating pennit to rernove the synfuel plants and their related conveyors, storage, processing equipment and transfers. The removal of this activity would reduce the potenfial emissions from transfer points by 12.9 tons/year of PM controffed emissions. .

2. As mentioned above, the application for a permit modification submitted in 2004 was driven by DTA's need to add ship unloading capabilities. That pennit was submitted on the basis of prehminary designs. We have now completed the detwied engmeennng and have revLwd the configuration as foffows:
a. Rather than barge-mounted cranes, we have received a permit from the Virginia Marine Resources Commission et al to construct an addition to our eNisting pier which wiU carry the cranes, hoppers and conveyors.

b. The hoppers would be direedy over the pier conveyor, so there would be no need for the feeder conveyors shown in our original submission (BC-48 and BC-49). We are also not planning to bufld the conveyor indicated as BC-47 in our prior subniission.
c. The attached drawing (DTA-32013000-001) indicates the totality of conveyors and transfers. Conveyor numbers and transfer numbers have been modified to coincide with our conveyor numbers and to eliniinate unused numbers for trweers.
d. These changes ehmmated three conveyors and therefore, three hinsfer points from the 2004 permit.

3. Furthefmore, we have decided that the cranes we wiU purchase wiff be electric motor dnven rather than (hesd cogine dnverL This dmunates paragraphs 19 through 23 inclusive in our perrnit and flirther reduces eniissions.
4. No request for additional annual throughput is being made, however we would fike to chu* some points from the perniit.

a. The coal brought to our fiwility by rail plus that imported by slup wdi not exceed the cuffent pennitted liniit of 24,000,000 tons. For potential emission calculations only, 10,000,000 tons per year is assurned to arrive

on ships and 14,000,000 tons per year by train. However, since the emumom per ton handled fi-om stup are Wgtw dm that from trwns, the higher number of tons has been assigned to unloading. DTA may, in a given year, process more than 14,000,000 tons (but less than 24,000,000 tons) by train. In no case would DTA handle more than 10,000,000 tons from ships, and in no case would the sum of the two sources be Wgher dun 24,000,000 tons.

b. There halve been some variations in the tenninology and numbers associated vvith ground storage over the years m our pemuts. We beheve some coffusion has developed and would like to cim that up at this time. Up to and including the December, 2002 perniit, under the heading OPERATING/EhfiSSION LMTATIONS the storage hmits imposed referenced the number 1,400,000 tons. Ptior to 2002, the number was the I'maxiintim quantity ... in storage at any one fime..." in the December, 2002 permit that changed to "On a dafly average, the maximum quantity... (emphasis added)". In our submission for a peffnit modification in 1989 to accommodate our expansion, there was some discussion related to Morage and the wording was as foffows:

'Dominion Teffninal Associates is requesfing only one substardive change in th
e
permit, i.e. an increase of the maximum allowable quantfty of coal storage fro
m
a maximum 1 million tons on the ground to a maximum of 1.4 million tons on the

ground... As an allowable average, there vAll be 975,000 tons on the ground.'

The September, 2004 pamiit then picked up the 975,000 tons in combination with the "dafly average" and gives the appearance of restricting our ability to maximize the utifintion of our storage yard, an appearance which, based on our conversations with DEQ, we don't believe was the kftw of the DEQ. Our emmon mmibm reported at year end are based upon the average daffy tons in storage, but we have the ability to store more tons on the ground for short periods. As sd forth more specificaUy below, we are requesfing that DEQ chwify the language of the September, 2004 permit to reflect our nwhW andin-9 that the maximum of 1.4 milffion tons may be stored on the ground at any given time as long as the daily allowable average is met at the end of the year. . To protect our ability to properly manage our pile inventory, we would hke permimon to offset some of the emmwn reductions remAtmg from the ehmination of a syn-fuel plant and certain equipment, as discussed above, by increasing our allowed daily average storage to 1. I miHion tons. Our actual emissions wiff confinue to be reported on the basis of actual average storage. Therefore we recommend that the section OPERATING/FMSSION LUvffrATIONS paragraph 24 of the cuffent pennit be rewritten as follows:

On an annual average, the niaximm quantity of coaL petroleum coke and limestone (combined) in storage shaU not exceed 1, I 00,000 tons, aM at no

tilne Shan more than 1,400,000 tons of coal, petroleum coke, and limestone (combined) be swed at the fidlity.

We are not requesting any modification to the allowable eniissions, but we poi nt out that during the 2004 permit modification process, we recommended an estitnator that is based directly upon the pertnit methodology of emission calaAations. By the permitt ed esfimator for Total Anmud Emissions, for example, the TAE(PM) for 2005 was:

(5.866/24*56.5 +.554/.975*9.21 * 83.04/83.18 = 19.01 tons

Using the lower number of transfers, fewer pieces of processing equipment and sfightly higher storage allowance, DTA requests that the emmator for TAE(PM) be changed to:

(TP/24*42.1 + GS/I. IO* 10.4) * 83.04/Eff =

This estimator properly reflects the new AP-42 number for the transfers in the first term and the ground storage in the second term. The attached spreadsheet indicates the detivation of these numbers.

With this formula, the TAE(PM) for 2005 would have been:

(5.866/24*42.1 +.554/1. 10* 10.4) * 83.04/83.18 = 15.56 tons

These formulae overstate the estimated emissions untff such tirne as the const ruction is complete and the new systems are operational.

Summary

A. DTA's cuffent Air Perrnit to Operate has the following condifions:

I . 24,000,000 tons/year throughput of aH pennitted products

2. 5,000,000 tons/year processing of raw coal into synfuel

3 . up to I 0,000,000 tons/year kaport of raw coal via ship (remainder would be by rail, i.e., 0 iinport stiH allows 24,000,000 by rafl, 5,000,000 iinport aflows 19,000,000 by raiL etc)

4. 975,000 tons maxinmm average ground storage on the IO 1 acres of coal storage pad

B. DTA requests revisions to our pemiit as follows:

I . 24,000,000 tons/year throughput of all permitted products.

2. Removal of all references to synfuel processing and associated equipment

3. up to 10,000,000 tons/year import of permitted products via ship ((remainder would be by rail, i.e., 0 import stiff aflows 24,000,000 by rail, 5,000,000 import allows 19,000,000 by rafl, etc),

4. On an annual average, the maximuni quantity of coaL petroleum coke and Ihnestone (combined) in storage shaU not exceed 1,100,000 tons, and at no time shall more than 1,400,000 tons of coal, petroleum coke, and limestone (combined) be stored at the facility.

Thank you for your consideration. If you have any questions, or concems, plea se feel free
to call. I wiff be happy to sit with the permit writer to whom this is assign ed at his/her
earliest convenience to review and expWn as required.

Reg"s,

D. R. Wagoner
Superintendent
Engineffirq@tmance

cc: G. D. Emmitt, Sitnpson Weather Asweiates, C. E. Brinley, DTA

Encl: DEQ Document Certification Forin

DTA Dmwing 32013000-001
Spreadsheet "Coal Handling and Storage Components"

Spreadsheet "Transfer Points"
Redlined "Stationary Source Pennit to Cznsauct and OperzW'

?008
VIRGIMA DEPARTWNT OF Rep&
ftnQ
. ;
ENVIRONMENTAL QUALITY

IO DOCUMENT CERTIFICATION FORM 7f

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified pomonnel properly gather and evaluate the lnfonnation submitted. Based on my inquiry of the pemon or pemons who manage the system, or those pomons directly responsible for gathering and evaluating the inforinatio n, the inforrnation submifted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are signfflcant penalties for submitting false inforFnation, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: DATE: Avril 3,2006

PRINTED NAME: Daniel R. W414ner

TITLE: Superintendent Engineering/Maintenance

COMPANY: Dominion Terminal Associates

REGISTRATION NO: 60997 TELEPHONE NO: 757-245-2275

fNSTRUCTIONS:
The Regulations for the Control and Abatement of Air Pollution require that certain docwnents submitted to the board or the Departinent be signed by a responsible official with certification that the inforrnation contained in the statement is accurate to the best knowledge of the individual certifying the statement (9VAC 5-80-80.G).
Documents covered by this requirement include, but are not Iiinited to, permit applications, registrations, eniission statements, emission testing and monitoring reports, of compliance certifications. The certification should include the full name, title, signature, date of signature, and telephone number of the responsible ofricial, A responsible official is defined as follows (9 VAC 5-80-60.Q:

I .For a business entity, such as a corporation, association or cooperative, a responsible official is either:

(a) The president, secretary, treasurer, or a vice-president ofthe business entity in charge of a principal business function, or any other person who performs siinitar policy or decision-making functions for the business entity;
or

(b) A duly authorized Tepresentative of such business entity if the Tepresentative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either (i) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or (ii) the authority to sign do

cuments has been assigned or
delegated to such representative in accordance with procedures of the business entity.

2. For a partnership, or sole proprietorship, a responsible official is a gene mi partner or the proprietor, respectively.

3. For a municipality, state, federal, or other public agency, a responsible o fficial is either a principal executive
officer or ranking elected official. A principal executive officer of a feder al agency includes the chief executive
officer having responsibility for the overall operations of a principal geogra phic unit of the agency.

APR 200S
RECEIVED

COMMONWEALTH of VIRGRqIA ftalkwa
I

DEPAR TWNT OF ENVIRONAENTAL Q UALIYY
5636 Southern Boulevard
W. Tayloc Murphy, Jr. Virginia Beach, VA 23462 Robert G. Bumley
Secretuy of Naunal Resources www.deq.state.va.us Director
Francis L Daniel
Tidewater Regional Disectot
(757) 518-2000

STATIONARY SOURCE PERAUT TO CONSTRUCT AND OPERATE
This permit includes designated equipment subject to
New Source Performance Standards (NSPS).

This 12ennit sLiRersedes the pennit dated December 23, 2002

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abateinent of Air Pollution,

Dominion Terminal Associates
PO Box 967-A
Newport News, Virginia 23607
Registration No.: 60997
AFS Id. No.: 51-700-00074

is authorized to construct and operate

a eeal synfae4 prodoetien; storage and expert &6hty md
coal, petroleum coke and limestonVtor@ge and facility
located at Pier I 1, Harbor Road
Newport News, Virginia

in accordance with the Conditions of this permit.

Approved on September 13, 2004.

(for)
Director, Department of Enviromnental Quality
Permit consists of 26 pages.
Permit Conditions I to 47, plus Appendix A.
Source Testing Report Fonnat.

PERMYr CONDrrIONS - the regulatory reference or authority for each condition i s listed in
parentheses ( ) after each condition.

APPLICATION

,1. Except as specified in this pemiit, the pennitted facility is to be constr ucted and operated as
represented in the pennit application dated August 17, 198 1, October 15, 2002 and May 8,
2004, including amendment information dated August 25, 198 1, October 19, 1989 , April 22,
1992, December 11, 2002 and July 13, 2004. Any changes in the permit applicat ion
specifications or any existing facilities which alter the impact of the facili ty on air quahty
may require a permit. Failure to obtain such a permit prior to construction m ay result in
enforcement action.
(9 VAC 5-50-390 and 9 VAC 5-80-1210 D)

PROCESS REOUIREMENTS

2. Equipment List -

Unit No. Description Maximum Applicable -FJ@@-pollution
I capacity/rating NSPS Control(s)
New Shi unloading equipment to be constructed:
LTL- I Marine vessel grab 2000 ton&lhr Enclosed Grab
unloader
UL-2 Marine vessel grab 2000 tons/hr Enclosed Grab
unloader
,,13ji- 1 Ship unload hopper 3400 tons/br Fabric Filter
/f3H-2 Ship unload hopper 3400 tonsAhr Fabric Filter
13C-'* Ship unload conveyor 6800 tons/hr Fully enclosed
Ship unload conveyor 6800 ton&lhr Fully dnclosed
-BC-4? ship unload conveym 6800 tonsALL -ft
BC-46 I Ship unload caii v eyojL 3 i(E) t""AU Bed
Ail
3400 tonOw &WW664-
IUW;jMt
quip ants N naRd #2..-
-GR 1 Synfttel etwha !NO tonsAll Subpmt Y Efflaw'.
GR 2 6"fttc4 e rwher !ON i8topm Sttbpmt * -Enekme4-
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Cl" -4 - 14ant)-
BE3 15 'Vwiotts Synpimit fmgest beftr.- Stibpart Y. Ml My efiAltar.&A-
18,28 - eetweyers- 6800 tana%
32, anEt
-*2-44--
Previous permitted equipment Nem--S-zjm-A.MeI Plant;
Rb- I Tandem rotary rail car 5800 tons/hr Enclosed bldg with
duinper water spmy
Surge Silo 1000tons Fabric Filter
]@S-2 Surge Silo -3800 tons Fabric Filter
"'BS-3 Surize Silo 4 1 00 tons Fabric Filter
Various Coal handling Largest belt 6800 All fidly enclosed,
19 2?, and storage conveyors tonsAhr except 4, 7 and 13
mrd 33 (yard belts)
-*I. 1- 13

_S/R-1 & 2 - Rotary 5900 tons/hr Wet suppression
2 Stacker/Reclaimers stacldng, 6500
tonsAhr reciann
-S/R-3 Rotary reclaimer 6800 tons/hr Wet suppression
reclaim only
oal, coke and Up to 350,000 Wet suppression
limestone stomge piles tons system
(computerized)
SL-1 Ship/barge loader 6800 tons/hr Wet suppression,
telescoping loading
chutes

/3. Emission Controb - Particulate emissions from each marine vessel grab unlo ader (UL-1 and

UL-2) shall be controlled by using enclosed grab buckets. The grab buckets sh all be

completely closed during transfer of material from marine vessels to receiving hoppers.

(9 VAC 5-50-260)

4/,/ Eniission Controls - Particulate emissions from each marine vessel unload ing hopper (BH-1

and BH-2) shall be controlled by a fabric filter. The fabric filters shall be provided with

adequate access for inspection.

(9 VAC 5-50-260)

Emission Controls - Particulate emissions from the enclosed rotary rail car du mper (RD-1)

shaR be controlled by wet suppression, which, if necessary, shall include the use of a

surfactant. The surfactant to water ratio shall be in accordance with the man ufacturees

recommendations. The minimwn amount of water applied shall be 130 gallons per tandem

dump. Compliance shall be achieved if there are no visible emissions.

(9 VAC 5-50-260)

Emission Controls - Particulate emissions from the U-ansfer points and stacker /reclaimers

(S/R-1, 2 and 3) shall be controlled by wet suppression as necessary and by we t suppression

with surfactant as necessary. Continuous wetting is not mandatory.

(9 VAC 5-50-260)

/7. Emission Controls - Particulate eniissions from the conveyor system shall be controlled by

conveyor hoods and wind guards. Ground level reclaim conveyor belts shall be controlled by

wet suppression as necessary.

(9 VAC 5-50-260)

8. Em-las-io-n-Gentfels

rynfitd operafiens simH be contraffed by enclosed conveyon and ti misfer peitf t (also nmtr

inekide the we of bttiiatg onelostires, where possible) mid by wet a Hteeewmy -

(9 *AG 260)

9. Ends.,ioneuntiiuts-piuti,@-,utateeirribaivirsfioirithe.,to,,ageb'"i,i@oandp tigirkilisasseeiated-

with the synf6el operatiora sha4l be eantrelled by wet is neeessary.-

-f9 VAE3 5 50-260)

,,sion eont. ois - Particulate emissions fiom tire CL Mbrm, sci cm, sprevAers, md

bfiqume mdfm asseeieW with the synfite4 operatiew 91WI be eentrelled by onsies ing msk

atiom within bttildinp and by wet s 9 neeessery.

(9 VAe 5 50 260)

1)/Vagitive Dust Emission Controls - Fugitive dust emissions from the stomge p iles shall be

controlled by a wet suppression system capable of wetting the entire storage a rea. Wet

suppression cycles shall be implemented in accordanr-e with Appendix A. Each c ycle shall

consist of no less dm 35,500 gallons of water and attain 100 percent covemge o f the stomge

area. The wet suppression system shaU be provided with adequate access for in spection.

(9 VAC 5-50-260 and 9 VAC 5-50-90)

12-Fugitive Dust Emission Controb - All stomge piles shall be truncated, stack er/reclaimers

used to build flat top piles, and the top compacted to minimize fugitive emiss ions.

(9 VAC 5-50-260 and 9 VAC 5-50-90)

j,3'Emission Controls - The permittee shall apply wet suppression as necessary to all incoming

loaded railcars located within facility boundaries if they are not to be dumpe d widiin 24

hours.

(9 VAC 5-50-260)

li('Emission Controls - When the permittee is using a piece of auxiliary handf ing equipment

(e.g., front end loader, bulldozer), the area to be worked shall be monitored and wet

suppression shall be applied as necessary to control emissions.

(9 VAC 5-50-260)

15. Emission Controls - When the pennittee is using a particular piece of hand ling equipment

(e.g., a dumper, a conveyor, etc.), it shall utilize the wet suppression contr ols for that piece of

VR equi e a safety hazard or dainage to the

equipment from freezing.

(9 VAC 5-50-260)

16/imission Controls - Particulate emissions fro.m each surge silo shall be co ntrolled by a

fabric filter. The fabric filters shall be provided with adequate access for inspection.

(9 VAC 5-50-260)

onitoring Devices - The fabric filters for the surge silos and marine vessel u nloading

hoppers shall be equipped with devices to continuously measure the differentia l pressure

drop across each fabric filter. Each monitoring device shall be ffistalled in a readily

accessible location and shall be maintained by the permittee such that they ar e in proper

worldng order at all times. Each monitoring device shall be provided with ade quate access

for inspection and shall be in operation when the fabric filter is operating.

(9 VAC 5-80-1180,9 VAC 5-50-20 C and 9 VAC 5-50-260Y@@@@@@@

I "et Suppression System - The wet suppression system for the storage piles sh all be

implemented as specified in Appendix A or by any other procedure as may be app roved by

the DEQ prior to use. Such approval shall be contingent on adequate documenta tion that any

altemative procedure shall achieve at least as high an efficiency as Appendix A. This applies

to all other dust control measures required by this peimit. Requests for chan ges in

procedures shall be accompanied by an explanation of the proposed changes and the

anticipated effect they shall have. These requests, if approved by the DEQ, s hall be subject

to a test and evaluation procedure prior to being accepted as permanent change s to the

control procedures.

(9 VAC 5-50-260)

OPERATING/EMISSION LIMITATIONS

19. Feel The "proved ftiels for the c are distillate oil and rAtweJ gas. Areha nge-in

-4he ftiel a perinit to we&Fy arA epeFeAs.

(9 *AG 5 80 1 180)

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distilkto W,-er 55 3t 10 eubie fed ofnattual gas Fe. year, calctdated monffily as the sm of

eseh eemwtftiye 12 menth period.

(9 ;.@*e 5-se-t too uzd 9 "e 5-so-269@-

2l.-Fool The disfillate oil and natuM gas simil ineet the specifi Aions beta w --

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-)WT6TcA@6 GAS: whieh meefle ASTM spesifiemien DI 835
(9 3V*e 5_8(_ t t 80)

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7:1 1%
ewh shipinent of distiiiate oil. Eadi ftiet supplier certificatioiLi strail i nclude Om fbilawing:

b. 9Rre date an vvhictt the diatiHate oil was reeeive&,-

e. The volume of distillee oil delivered in die shipment,-
4. A-statanent timt tite distiiiate oil complies with tite Amierieen Seeiety F erTesting and-

--Materials speeifiestiatm fe. numbets t at 2 fuel-oil-,

e. The stdfur emitent of 9-fe distillate oil.

(9 Y*e5-t?()-t6O)

ErnissionsfrointiteopetatioLiofthee@.@ainede.ene

es shvM not emeeed the hrftits speeified below:

PartietHate MafterAlMm- 4.0 tonsAr

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NitrOSCUftides 90.9 tan!Oyr-

4GOrbeft M 98.5 talm@@

W-elatile ftenie C-empetmds 8. 1 to"O@w

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hmiis. E-meeedenee of the operating fir6ts sh&H be cotmidered credible e-fide ttee of the

emeeedanee of emissioLLtimits. E3mVfimee with titese entission limits may be detern-iined-as

sto-ed iit Gendition muriber(s) 19, 20, 21 and 22.

fg Y*e5-50-260)

@4.' Storage - On a daily average, the maxiinum quantity of coal, petroleum co ke,-wfafiwIqmd

limestone (combined) in storage shall not exceed 975,0
_N tons.

(9 VAC 5-80-1180)

/2@' Throughput - The coal/petroleum coke&ynfimUlimestone throughput (combined) for the

ship/barge loading apparatus shall not exceed 24,000,000 tons per year, calcul ated monthly

as the sum of each consecutive 12-month period.

(9 VAC 5-80-1180)

26. Tha oughput - 9HYe synfact oFerafions (jp@ 01 & 02) *ffe'd9hPut Eeefflbi"O d) BhAll glat
exceed 5,@N,OW tmm pui yviu, c2deubted iuvjutbiy iib tijiv bLun uf vadt consee titive4a-mmW!

(9 iv*e s se. i i BE))

27/Emission Limits - Particulate eniissions from the operations of the coaY pe troleum

cokeloy WYfimestonvtorage', pfeduation; import and qnmrt facility shall not ex ceed the

litnits specified below: I V) Y\ 5v, @f ?'I %@I

Particulate Matter 65.7 to ns/yr

PM-10 11.8 tons/yr
These emissions are derived from the esfimted overall emission contribufion fr om operating

limits. Exceedance of the operating limits shall be considered credible evide nce of the..

exceedance of emission limits. Compliance with these emission limits may be d etemiined as

stated in Condition numbers 3-X

(9 VAC 5-50-260)

28. Plentwide Emission 161n9ts TeW emissiens fi"m the eoeYpetrok-wn

eekeloynfeebqiineftene pterage, ptedoetion, iinpeft and exMt fwility shall not exeeed the

fimits speeified below:

Pwtictflate Matter

PM-to t 8.5 tulmtyL
Scdfm Dioxide 6. 5 t o r-s @JT. 6 -

Nitrogen E)Xides 98.9 tefts@yr-

emba. Mmwxide 98.5 temiyf

Volokile gfganie GempoufWa 8.1 tens4v

-(9 VAG 5

2 ible Exiihsion Limit - Visible emissions from the enclosed rotary rail car dumper (RD-1)

shall not exceed 0 percent opacity as determined by the EPA Method 9 (referenc e 40 CFR

60, Appendix A).

(9 VAC 5-50-260)

Visible Eniission Limit - Visible emissions from all fabric filters shall not exceed 0 percent

opacity as detemiined by the EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-50-260)

Visible Endssion Limit - Visible emissions fi-om the conveyor belt trawfer poi nts shall not
exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 6 0,
Appendix A).

(9 VAC 5-50-260)

32. Visible Embsion Un2ft Visible emissions fiem eaeh bttilding eemakniRg the Goal

embeFleefeen opffations, briquefte Of 9Yft,%ej "MM opp-m4mir, P.W111 not axc"d 5

iGity as detefmined by the EPA Methed 9 (refererm 40 GFR 60, Appendix A).
v e

33.44Whle Evaission Limit Visible emissiong fi4m enh 9terW bin and pugrail@ sa wsiated

'With the -J-66e! FMddCtiOM, shaff not exceed 5 poicent opacity as deteraimed boy the EPA
Medied 9 (referenee 40 GFR 60, Appendix A@.
(9 VAG 5 50 260)

@4. Monitoring PM,e - Dominion Tenninal Associates shall install and operate a PMIO monitor

at the Newport News Housing Authority Maintenance Building (I 80-J) to ascerta in the
t ju@,e
arnbient air quality in the area surrounding the coal/petroleum cok& ----inal.

Operation shall be in accordance with Appendix J of 40 CFR Part 50.
(9 VAC 5-160-170)

3@/Control of Emissions - The following acfions are considered detrimental to the control of

coaL/petroleum cokehynfimUlimestone emissions:

a. Failure to stop any coaYpetroleum cokekewfftfiwYlimestone movement operatio n when it

becomes known that installed air pollution control systems are inoperative and would

cause excess emissions.

b. Failure to stop a coaYpctroleum cokels@@Iimestone movement operation when i t

becomes known that the coaVpetroleum cokeAyfW6eWimestone handling equipment

needed for that operation is malfunctioning or opemting significantly below de signated

specifications.

c. Failure of equipment operators to take inimediate precautions to preclude f ugitive dust

emissions from the operation of bulldozers, front-end loaders, automobiles, or trucks

(e.g., the use of water suppressant or limiting the speed of movernent to belo w 10 miles

per hour).

d. Failure of operational personnel to give precedence to designated persomel with the

responsibifity for controlling dust emissions.

(9 VAC 5-50-@260)

RECORDS

36. On Site Records - The permittee shall maintain records of emission data an d operating

parameters as necessary to demonstrate compliance with this pennit. The conte nt and format

of such records shall be arranged with the Director, Tidewater Regional Office . These

records shall include, but are not limited to:

Annual throughput of coaVpetroleum coke4yofimMimestone (combined) for the

ship/barge loadmg apparatus calculated monthly as the sum of each consecutive 12-

month period.

b. -A -a; n i M I tHhwe ughp at e f a yih% el p to de a ti o t i o eA e ti 1 a t e d me n+A y a s the 9 e m o f e neh
14 ow"th Pefied

Maximuin daily quantity of coaYpetroleum cokePYfn#6eVIimestone (combined) in storage.

threttfttd of distillate oil and naturni gm used in die cimic engines cafctdit

meaWy as the sum ef omh eenseettii-ve 12 menfit period.

supplier eertifiestions.

Records of dust control measures as required by Appendix A.

These records shall be available for inspection by the DEQ and shall be curren t for the most

recent five years.

(9 VAC 5-50-50)

IMTIAL COMPLIANCE DETERNUNATION

,@/7. Visible Emissions Evaluation - Initial performance tests of Visible Emi ssion Evaluations

(VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conduc ted by the

permittee on the following items: marine vessel unloading operations -ad aach

fffflhff@wrem builditg. Each test shall consist of 30 sets of 24 consecutive observations (at

15 second intervals) to yield a six minute average. The details of the tests are to be an-anged

with the TRO Air Comphance Manager. The evaluation shall be perforined to dem onstrate

compliance wifliin 60 days after achieving the maximum production rate but in no event later

than 180 days after start-up of the penuitted facility. One copy of the test result shall be

submitted to the 'IRO Air Comphance Manager within 45 days after test complefi on and

shall conform to the test report format enclosed with this perrnit.

(9 VAC 5-50-30,9 VAC 5-80-1200, and 9 VAC 5-50-410)

NOTIFICATIONS

3 'cadons - The penrnittee shall flunish written nofification to the TRO ".9. Initial Notifi

Compliance Manager:

a/ The actual date on which constiuction of the marine unloading facilities ol d symfitei

-plants C ommenced, within 3 0 days after such date.

The anticipated start-up date of the marine unloading facilities aad pWats,

postinarked not more than 60 days nor less than 30 days prior to such date.

,q/ The actual start-up dates of the marine unloading faciliti md synfeelplant s

iLespecti v ely-, widiin 15 days after such date&

The anticipated dates of the VEE performance tests for the marine unloading fa cilities

widtheeitudm@wteenbttfldkW,postmarkedatleast3Odayspriortosuchdate. Copies

of the written notifications r-eferenced in items a through d above are to be sent to:

Office of Air Enforcement (3AP Io)

U.S. Environmental Protection Agency, Region IH

Attention: NSPS Subpart Y Coordinator

1650 Arch Street

Philadelphia, PA 19103-2029

(9 VAC 5-50-50)

GENERAL CONDMONS

Permit Invalidation - The portions of this permit regarding construction of th e marine

unloading facifitk'a G"ld t)JL%, O.T nft?Ci FiMits shall become invalid, unles s an extension is
granted by the DEQ, if.

a. A program of continuous construction is not commenced before the latest of the

following:

i. 18 months from the date of this permit;

ii. Nine months from the date that the last perTnit or other authorization was issued from

any other govemmentat agency;

iii. Nine months from the date of the last resolution of any litigation conce ming any such

permits or authorization; or

b/ A program of construction is discontinued for a period of 18 months or more , or is not

completed widiin a reasonable time, except for a DEQ approved period between p hases

of a phased construction project.

(9 VAC 5-80-1210)

40. Right of Entry - The permittee shall allow authorized local, state, and fe deral

representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any

records are required to be kept under the terms and conditions of this pennit;

b. To have access to and copy at reasonable tiznes any records required to be kept under the

terms and conditions of this permit or the State Air Pollution Control Board R egulations;

c. To inspect at reasonable tixnes any facihty, equipment, or process subject to the tenns and

conditions of this pennit or the State Air Pollution Control Board Regulations ; and

d. To sainple or test at reasonable times.

For purposes of this condition, the tixne for inspection shall be deemed reaso nable during

regular business hours or whenever the facility is in operafion. Nodiing cont ained herein

shall make an inspection time unreasonable dunng an einergency.

(9 VAC 5-170-130)

Coal Handling and Storage Components

Storage Through Through Through Ctrid Eff Pm cm PM unctrld PMIO ctrid PM10 unc
trid
Unit Ref Description Eqip Code (Ktons) Kton(hr) Kton(day) Kton(yr) % (ton (to
nstyr) (tonstyr)
Sm Drawings SW-CS 350
See DravAngs SW-CS 350 2,1:.'000
See DroMngs SW-CS 350 24,000
See Drawings SW-CS 350 24,000
See DrovAngs SW-FE 1 2.740 38.356 '4:0001
see Drwmngs SW-FE 3.8 2.740 32.877 12 0

See Drwmngs SW-FE 4.1 2.740 32.877 12,000
See DravAngs TC-FC 2.740 38.356 14,000
See DravAngs TC-BH 2.740 38.356 14
See DravAngs TC-PC 2.740 38.356 14: 0=0
See DravAngs TC-PE 2.740 57.534 21,000
Sm DraWngs TC-PE 2.740 57.534 21,000
See Drawings TC-PC 2.740 30.137
2.740 30.137
See DrffMngs TC-PC I, ooo
See Drawngs TC-PC 2.740 84.932 31,000
See DraWngs TC-PC 2.740 84.932 31,000
See Drawings TC-PC 2.740 65.753 24:001
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See DraWngs TC-BH 2.740 65.753 24 0
See DraWngs TC-PE 2.740 65.753 24,000

Storage Through Through Through Ctrid Eff Pm ctrid PM unctrid PM IO ctrid PMI
0 unctM
Unit Ref Description Eqip Code (Ktons) Kton(hr) Kton(day) Ktan(yr) % (tonslyr)
 (tonstyr) (tonstyr) (tonstyr)
see Drawngs LO-FC 2.740 65.753 24,000
see Drawngs TC-BH 2.740 32.877 12,000
See DraWngs TC-BH 2.740 65.753 24,000
See DraWngs TC-PC 2.740 30.137 11,000
See Dmwings TC-PC 2.740 30.137 11,000
New coal handling components for import of raw coal
Storage Through Through Through Ctrid Eff Pm ctru PM unddd PMIO eM PMIO uncM
Unft Ref Descripbon Eqip Code (Ktons) Kton(hr) Kton(day) Kton(yr) % (tonstyr)
(tonslyr) (tonstyr) (tonstyr)
See DravAngs UL-FE 13.699 5,000 70 0.8575616 2.8585386 0.1543611 0.514537
See DraWngs UL-FE 13.699 5,000 70 0.8575616 2.8585386 0.1543611 0.514537
See DraWngs TC-BH 13.699 5,000 99 0.0285854 2.8585386 0.0051454 0.514537
See DraWngs TC-BH 13.699 5,000 99 0.0285854 2.8585386 0.0051454 0.514537
See Drawings TC-PC 27.397
 s TC-PC -27 397

PM ctrid PM uncbM PMI 0 cbid PMIO urm*W
(tonW) (tonW) (tons/yr) (tonW)

Piles (Sm 1989 pormft apphcgon adjuded by 9.2 X 1.1/.975) 10.38 103.79 1.86830
77 18.GM
Total intemiediate sk"gelpmosoft 1.7722M 11.434154 0.3190129 2.00148
Transfers 4LS@ ---222A425 _113kAn-AMQW@_
_-Total PM & PMIO (tonstyr) 54.006154 337.67163 9.7214678 60.7W87

E factors
Crushers 0.013 lbstton
Transfers 0.0011434 lbatton
Screens 0.08 lbstton

Throughput 14,000 Ktons 10,000 Ktons

Silt 3.5 % notused
Moisture 6.7 % Based upon average moisture content as measured at DTA
Avg Wind 10.5 mph Based upon local weather data
k 0.74 AP-42
base 0.0032 AP-42
EF trans 0.0011434 lbstton AP-42

Notes: The labels used for components are based upon EPA's suggested categorie
s of dust control and the
% control values are consistent with those published as "EPA Accepted Control
Device Lisfing"

The emission factor at transfer points is computed using equations in AP-42
.0014 for conveyorsftransfer points Used.00114

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Transfer Points APR 2008
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Transfer Point	Control Type	Raw Rail	Raw Ship	Raw recim	Contri Eff %	PM Ctrid (Ktons)	PM Unctrid (Ktons)	PM-new Ctrid (Ktons)	PM-new Unctrid (tons)	PM10 Ctrid (tons)	PM10 Unctrid (tons)	Pmlo-now Ctrid (tons)	Pmlo-new Unctrid (tons)
1	UD-FC	99	0.040	3.990	0.007	0.718							
2	UD-FC	99	0.040	3.990	0.007	0.718							
3		99	0.080	7.980	0.014	1.436							
4		99	0.080	7.980	0.014	1.436							
5	TC-PC	95	0.399	7.980	0.072	1.436							
6		95	0.399	7.980	0.072	1.436							
6A		5,000	50	3.424	6.840	1.429	2.85	0.616	1.231	0.257	0.513		
6B		5,000	50	5.989	11.970	1.429	2.85	1.078	2.155	0.257	0.513		
7		5,000	80	2.396	11.970	0.572	2.85	0.431	2.155	0.103	0.513		
8		0	95	0.114	2.280	0.021	0.410						
9		0	50	1.710	3.420	0.308	0.616						
10		0	80	0.684	3.420	0.123	0.616						
11	TC-PC	0	95	0.171	3.420	0.031	0.616						
12		95	0.200	3.990	0.036	0.718							
12A		5,000	50	3.424	6.840	1.429	2.85	0.616	1.231	0.257	0.513		
12B		5,000	50	5.989	11.970	1.429	2.85	1.078	2.155	0.257	0.513		
13		5,000	80	2.396	11.970	0.572	2.85	0.431	2.155	0.103	0.513		
15	TC-PC	95	0.271	5.415	0.049	0.975							
16		95	0.271	5.415	0.049	0.975							
100*1		17	99	0.024	2.423	0.004	0.436						
18	TC-PC	95	0.271	5.415	0.049	0.975							
19	TC-PC	95	0.271	5.415	0.049	0.975							
20		99	0.054	5.415	0.010	0.975							
21	TC-PC	95	0.271	5.415	0.049	0.975							
22		95	0.684	13.680	0.123	2.462							
23		50	6.840	13.680	1.231	2.462							
24		80	2.736	13.680	0.492	2.462							
New Pts													
25	UL-FE	5,000	70	0.858	2.850	0.858	2.85	0.154	0.513	0.154	0.513		
26	UL-FE	5,000	70	0.858	2.850	0.858	2.85	0.154	0.513	0.154	0.513		
27	TC-BH	5,000	99	0.029	2.850	0.029	2.85	0.005	0.513	0.005	0.513		
28	TC-BH	5,000	99	0.029	2.850	0.029	2.85	0.005	0.513	0.005	0.513		
29	TC-PC	5,000	95	0.143	2.850	0.143	2.85	0.026	0.513	0.026	0.513		
30	TC-PC	5,000	95	0.143	2.850	0.143	2.85	0.026	0.513	0.026	0.513		
31		10,000	95	0.286	5.700	0.286	5.7	0.051	1.026	0.051	1.026		
32		10,	96	0.286	5.70G	0.286	5.7	O.G54	-	COW--	-0.051	1.026	
Totals (tons/yw) for now Import functions only						9.490	45.6	1.708	8.208				

Pm ctri PM unctd PMIO cbi PMIO unctri
Totals (tons/year) fbr all transfers, old and now 41.856 222.44 7.534 40.040
PM Ctri PM UnCtFl PM10 cbl PMIO uncbi

coal ship
EF trans 0.001 14 lbstton 0.00114 lbsftn
Ktons/yr 14,000 10,000
7,000 5,000