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Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074
Plant Name: Dominion Terminal Associates Classification: Synthetic Minor
Address: Pier 11 Harbor Road Region: TRO

AIR INSPECTION REPORT

Inspection Date: 08/20/02 Contact Name: Derris Bradshaw
Type: FCE With Site Visit Contact Phone No: (757) 245-2275
Inspector: Daniel B Gaidos Air Program Subpart
Inspection Result: In Compliance SIP

Reason:

Complete FCE (Full Compliance Evaluation)

Inspector Comments:

Dominion Terminal Associates currently has a February 2000 permit to operate a coal storage and petroleum storage and export facility in Newport News. Coal and petroleum coke material is transported to the facility by rail cars. The rail cars are unloaded and the material is transported to a surge silo. From there the material is placed into areas in the facility by a stacker/reclaimer. The material from the stacker/reclaimer is transported by conveyors to two storage silos. Once filled the material is transport by conveyors to the pier where the material is unloaded into a cargo ship or barge. The facility is equipped with the K-Factor program, which was implemented by Simpson Weather Service consulting/research firm to control fugitive coal dust. This computerized system considers weather conditions such as temperature, wind speed, wind direction, and humidity to determine the number of cycles required to adequately control fugitive emissions. All of the air emission points were in operation and observed during the inspection.

Dominion Terminal Associates operates, maintains, supplies, and retrieves filters from a PM 10 monitor located approximately 200 feet across from the facility on the top of the Newport News Housing Authority Maintenance building. This monitor runs synonymously with the other PM 10 monitors located throughout the region. The monitoring results are submitted to DEQ-TRO on a quarterly basis for review.

Inspector's Electronic Signature
Approval Date: Sep 10, 2002

Manager's Electronic Signature

9/11/02



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Region: TRO

INSPECTION CHECKLIST

Permit Date	#	Requirement Narrative	Observation	Comp Status
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02-14-00	3	Particulate emissions from the enclosed rotary rail car dumper shall be controlled by wet suppression, which shall include the use of a surfactant. The surfactant detected during the dumping of rail cars. The minimum amount of water applied shall be 130 gallons per tandem dump. Compliance shall be achieved if there are no visible emissions.	Particulate emissions from the dumper is controlled by wet suppression. No fugitive emissions were detected during the dumping of rail cars.	In
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02-14-00	4	Particulate emission from the transfer points and stacker/reclaimers shall be controlled by wet suppression as necessary and by wet suppression with surfactant as necessary. Continuous wetting is not mandatory.	The transfer points can be controlled by wet suppression if necessary. No fugitive emissions were detected during the inspection.	In
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02-14-00	5	Particulate emissions from the conveyor belts shall be controlled by conveyor hoods and wind guards. Ground level reclaim conveyor belts shall be controlled by wet suppression as necessary.	The conveyor belts can be controlled by wet suppression. No visible emissions were detected from the conveyor belts.	In
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02-14-00	6	Fugitive coal/coke dust emissions from the storage piles shall be controlled by a wet suppression system capable of wetting the entire coal and petroleum coke 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 coal and petroleum coke storage area. The wet suppression system shall be provided with adequate access for inspection.	The fugitive emissions from the storage piles is controlled by the K-Factor system. The K-Factor cycles the 75 rainbirds located throughout the facility. One cycle applies 36,000 gallons of water to the storage piles. The cycle was started for DEQ evaluation and it appeared to cover the storage piles completely.	In
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02-14-00	7	All coal piles shall be truncated and the top compacted to minimize fugitive coal dust emissions.	The storage piles were stacked accordingly and no fugitive emissions were detected from the piles.	In
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Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
02-14-00	8	All petroleum coke storage piles shall be truncated using the stacker/reclaimers to build flat top piles to minimize fugitive coke emissions.	The storage piles were stacked accordingly and no fugitive emissions were detected from the piles.	In
02-14-00	9	The permittee shall apply wet suppression as necessary to all incoming loaded coal and petroleum coke trains located within facility boundaries if they are not to be dumped within 24 hours.	The source has an automatic water sprayer which activates when rail cars enter the facilities property. The source maintains a water truck which can apply water as needed to specific areas.	In
02-14-00	10	When the permittee is using a piece of auxiliary coal and/or petroleum coke 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.	No fugitive emissions were detected from the handling of coal or petroleum coke during the inspection.	In
02-14-00	11	When the permittee is using a particular piece of coal and/or petroleum coke handling equipment (e.g., a dumper, a conveyor, ect), 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.	No fugitive emissions were detected from the handling of coal or petroleum coke during the inspection.	In
02-14-00	12	Particulate emissions from each surge silo shall be controlled by a fabric filter with at least 99% collection efficiency. The fabric filters shall be provided with adequate access for inspection.	The each silo does have a fabric filter installed. During the inspection the fabric filter read a differential pressure of 2 inches of water for the silo was being loaded with coal from the rail car dumper. The other two silos which store coal for loading of barges/ships read a differential pressure of 2.8 (SS2) and 0.7 (SS3) inches of water.	In



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Permit Date	#	Requirement Narrative	Observation	Comp Status
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02-14-00	14	The fabric filter for the surge silo Each silo has a differential In shall be equipped with devices to pressure gauge installed on the baghouse to continuously measure the pressure drop. differential pressure drop across the 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.		
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02-14-00	16	The maximum quantity of coal and petroleum coke in storage at any one time shall not exceed 1.4 x 10 ⁶ tons. 12 months was 681,076.7 tons.	The highest amount of coal In petroleum coke in storage during the last Based on records provided by In coke shall not exceed 24 x 10 ⁶ tons the source, the throughput per year, calculated monthly as the of coal and coke was sum of each consecutive 12 month 15,242,730 tons. period.	
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02-14-00	19	Visible emissions from the enclosed rotary rail car dumper shall not exceed 0 percent opacity as determined by the EPA Method 9.	No visible emissions were detected during the dumping of rail cars during the inspection.	In
02-14-00	20	Visible emissions from the fabric filter shall not exceed 0 percent opacity as determined by the EPA Method 9.	No visible emissions were detected from the fabric filters during the inspection.	In

02-14-00	24	The permittee shall maintain records All records listed were 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:	All records listed were provided during the inspection. The computer system contained all of the parameters listed in Appendix A.	In
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- a. Annual throughput of coal and petroleum coke, calculated monthly as the sum of each consecutive 12 month period.
- b. Maximum daily quantity of coal and petroleum coke in storage.



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Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		c. 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.		

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Run Date: 09/10/2002 02:40 PM Page 1 Of 5

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VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY
Commonwealth of Virginia

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Page 2 Of 5
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Permit Date Requirement Narrative Observation Comp
or Basis Status

02-14-00 3 Particulate emissions from the Particulate emissions from In enclosed rotary rail car dumper the dumper is controlled by shall be controlled by wet wet suppression. No suppression, which shall include the fugitive emissions were use of a surfactant. The surfactant detected during the dumping to water ratio shall be in of rail cars. 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.

02-14-00 4 Particulate emission from the The transfer points can be In transfer points and controlled by wet stacker/reclaimers shall be suppression if necessary. controlled by wet suppression as No fugitive emissions were necessary and by wet suppression detected during the with surfactant as necessary. inspection. Continuous wetting is not mandatory.

02-14-00 5 Particulate emissions from the The conveyor belts can be In conveyor belts shall be controlled controlled by wet by conveyor hoods and wind guards. suppression. No visible Ground Level reclaim conveyor belts emissions were detected from shall be controlled by wet the conveyor belts. suppression as necessary.

02-14-00 6 Fugitive coal/coke dust emissions The fugitive emissions from In from the storage piles shall be the storage piles is controlled by a wet suppression controlled by the K-Factor system capable of wetting the entire system. The K-Factor system coal and petroleum coke storage cycles the 75 rainbirds area. Wet suppression cycles shall located throughout the be implemented in accordance with facility. One cycle applies Appendix A. Each cycle shall 36,000 gallons of water to consist of no less than 35,500 the storage piles. The gallons of water and attain 100 cycle was started for DEQ percent coverage of the coal and evaluation and it appeared petroleum coke storage area. The to cover the storage piles wet suppression system shall be completely. provided with adequate access for inspection.

02-14-00 7 All coal piles shall be truncated The storage piles were In and the top compacted to minimize stacked accordingly and no fugitive coal dust emissions. fugitive emissions were detected from the piles.

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Permit Date Requirement Narrative observation Comp
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02-14-00 8 All petroleum coke storage piles The storage piles were In
shall be truncated using the stacked accordingly and no
stacker/reclaimers to build flat top fugitive emissions were
piles to minimize fugitive coke detected from the piles.
emissions.

02-14-00 9 The permittee shall apply wet The source has an automatic In
suppression as necessary to all water sprayer which
incoming loaded coal and petroleum activates when rail cars
coke trains located within facility enter the facilities
boundaries if they are not to be property. The source
dumped within 24 hours. maintains a water truck
which can apply water as
needed to specific areas.

02-14-00 10 When the permittee is using a piece No fugitive emissions were In
of auxiliary coal and/or petroleum detected from the handling
coke handling equipment (e.g., front of coal or petroleum coke
end loader, bulldozer), the area to during the inspection.
be worked shall be monitored and wet
suppression shall be applied as
necessary to control emissions.

02-14-00 11 When the permittee is using a No fugitive emissions were In
particular piece of coal and/or detected from the handling
petroleum coke handling equipment of coal or petroleum coke
(e.g., a dumper, a conveyor, ect), during the inspection.
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.

02-14-00 12 Particulate emissions from each The each silo does have a In
surge silo shall be controlled by a fabric filter installed.
fabric filter with at least 99% During the inspection the
collection efficiency. The fabric fabric filter read a
filters shall be provided with differential pressure of 2
adequate access for inspection. inches of water for the silo
was being loaded with coal
from the rail car dumper.

The other two silos which store coal for loading of barges/ships read a differential pressure of 2.8 (SS2) and 0.7 (SS3) inches of water.

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02-14-00 14 The fabric filter for the surge silo Each silo has a differential In
shall be equipped with devices to pressure gauge installed on
continuously measure the the baghouse to continuously
differential pressure drop across measure the pressure drop.
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device shall be installed in a
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provided with adequate access for
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when the fabric filter is operating.

02-14-00 16 The maximum quantity of coal and The highest amount of coal In
petroleum coke in storage at any one in storage during the last
time shall not exceed 1.4×10^6 12 months was 681,076.7
tons. tons.

02-14-00 17 The throughput of coal and petroleum Based on records provided by In
coke shall not exceed 24×10^6 tons the source, the throughput
per year, calculated monthly as the of coal and coke was
sum of each consecutive 12 month 15,242,730 tons.
period.

02-14-00 19 Visible emissions from the enclosed No visible emissions were In
rotary rail car dumper shall not detected during the dumping
exceed 0 percent opacity as of rail cars during the
determined by the EPA Method 9. inspection.

02-14-00 20 Visible emissions from the fabric No visible emissions were In
filter shall not exceed 0 percent detected from the fabric
opacity as determined by the EPA filters during the
Method 9. inspection.

02-14-00 24 The permittee shall maintain records All records listed were In
of emission data and operating provided during the
parameters as necessary to inspection. The computer
demonstrate compliance with this system contained all of
permit. The content and format of the parameters listed in
such records shall be arranged with Appendix A.
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Office. These records shall include, but are not limited to:

a. Annual throughput of coal and petroleum coke, calculated monthly as the sum of each consecutive 12 month period.

b. Maximum daily quantity of coal and petroleum coke in storage.

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Permit Date Requirement Narrative Observation Comp
ot Basis Status

C. 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.