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| 0 - UNKNOWN | 6 - IN VIOLATION, NOT MEETING SCHEDULE |
| 1 - IN VIOLATION - NO SCHEDULE | 7 - IN VIOLATION, UNKNOWN WITH RESPECT TO SCHEDULE |
| 2 - IN COMPLIANCE BY SOURCE TEST | 8 - NO APPLICABLE REGULATION |
| 3 - IN COMPLIANCE BY INSPECTION | 9 - IN COMPLIANCE, CLOSED |
| 4 - IN COMPLIANCE BY CERTIFICATION | |
| 5 - IN VIOLATION, MEETING SCHEDULE | |

I. INSPECTION COMMENTS:

This source has a September 1992 permit to modify and operate a coal storage and export facility. The source utilizes a sophisticated K-Factor program designed with input from the Department of Environmental Quality and implemented by Simpson Weather Service consulting firm to control fugitive coal dust.

Rotary Rail Car Dumper

Coal is received by railcar, the coal is removed from the rail cars by a enclosed rotary rail car dumper. In addition to the enclosure, wet suppression is used to control the emissions from the dumping of the rail cars. During my inspection the rotary rail dumper was on-line with minimal signs of fugitive dust. The wet suppression system appeared to be working adequately. The source mixes a small amount of surfactant (aqueous solution or soap) with 150 gallons of water to be used per tandem dump. Condition # 4 of the permit sets a minimal limit of 130 gallons of water applied per tandem dump. The source satisfies and exceeds the minimal limit of the permit for condition #4. The structure of the rotary dumper appeared to be in good condition, the rotary dumper is scheduled to be shut down the week of July 4th for repairs and painting. All nozzles and manifolds in the rotary dumper have been converted to stainless steel to prevent corrosion and frequent clogging. Once the coal is removed from the rail car, it is transported by shielded conveyer belt to the stacker/reclaimer where it is distributed into piles. The storage piles are then compacted, sealed, and truncated to minimize fugitive coal dust emissions. I witnessed each of the storage piles from the control room and each pile not being worked was truncated and appeared to be compacted.

Mixing Silos

The source has three silos which are primarily used to blend different grades of coal per the buyers specifications. SS1 is a 1000 ton capacity silo located at the rail car dumper. SS2 and SS3 are both 4000 ton capacity silos located near the shipping pier. All three silos were in operation during my inspection without signs of fugitive emissions. All silos appeared to be structurally sound. Silos SS2 and SS3 appeared to have had some recent trouble with the capacity alarm system because of the amount of coal deposited on the top of the silo. The source agreed that there had been a recent problem and that they had corrected the problem and were in the process of initiating a cleanup. I did not witness any problems with the silos during my inspection. During the inspection the source was using silos SS1 and SS2 to mix coal. I did not detect fugitive emissions from the transferring of coal from the storage yard to the silos and back to the storage yard. Two stacker/reclaimers were in operation during the inspection with no signs of fugitive emissions.

Bag Houses

The source has three baghouses located on top of the silos to control fugitive emissions. Baghouse #1 is located on silo SS1. Baghouse #1 was operating with no signs of fugitive emissions. Baghouses 2 and 3 are located on the twin silos SS2 and SS3. Baghouse #2 was on line with a Δp of 1.5 inches of water gauge, pulsating every 8 seconds. Baghouse #3 was on line pulsating every 8 seconds with a Δp of 1.0 inches of gauge water. I did not detect fugitive emissions from either baghouse. SEE VEER

Wet Suppression System

The source uses a system of wet suppression as its primary control technique against fugitive emissions from the storage yard. Fugitive coal dust emissions are controlled by 75 rain birds located along the perimeter of the storage yard. The source also has four high mast rainbirds that can spray water on the top of the coal piles. During my inspection I witnessed a cycle of the rainbirds. A water truck is utilized to clean the roadway in and out of the facility to keep down road traffic emissions. The roadway was being cleaned during my inspection. The water truck is also used to provide water when needed in places within the stockpile area which cannot be sufficiently reached by the rainbirds. Condition #8 of the permit states that the source will use no less than 35,000 gallons of water per cycle to attain 100% coverage of the coal storage area. The source indicated that they use 35,000 gallons of water per cycle. I requested and received the K-Factor daily report for the previous day 06/22/98.

Coal Throughput

Condition #9 of the permit limits the yearly throughput of coal to 24×10^6 tons. Records indicated that at the end of May the throughput of coal was 14,198,246.76 tons. Condition #10 of the permit limits the amount of coal in storage at any one time to 1.4×10^6 tons. Records indicated that the source had 725,446.31 tons of coal on hand for the entire month of May. The source was in compliance with both of the permit conditions during this inspection.

General Notes

During my inspection I did not detect signs of fugitive coal dust emissions from any aspect of the operation. During the inspection the source appeared to be doing a adequate job with controlling emissions by wet suppression. The storage areas and the roadways were very wet. Records are in order and easily accessible. I deem the source in compliance during this inspection.

INSPECTOR'S SIGNATURE James A. Brooks

DATE: July 6, 1998

SUPERVISOR'S COMMENTS: _____

SUPERVISOR'S SIGNATURE _____

DATE: / /

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INSPECTOR'S SIGNATURE, @ @-@ DATE: July 6, 1998
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SUPERVISOR'S COMMENTS:

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