COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

5636 Southern Boulevard
Virginia Beach, VA 23462
(757) 518-2000
http://www.deq.state.va.us
Fax (757) 518-2003

James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

Dennis H. Treacy
Director

Francis L. Daniel
Tidewater Regional Director

DATE: 7/14/98

I. D. NO.: 700-00071

FILE NO.: 451

Enclosed is a copy of the report generated as a result of our recent inspection of your facility. If you have any questions, please contact me at (757) 518-2158.

Sincerely,

Richard C. Craft
Air Compliance Manager

RCC (cm/air/form-cloc/inspcvr.ltr)

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION REPORT FORM

I. GENERAL INFORMATION

SOURCE NAME: Pier IX Terminal Company **REGISTRATION NO.:** 60979

LOCATION: Newport News **INSPECTION DATE:** 7/10/98

COUNTY NO. : 700 **PLANT ID:** 00071 **FILE NO.:** 451

SOURCE CLASS: __ A _X_ SM __ B __ NSPS __ PSD __ NESHAP __ MACT ____

SOURCE CONTACT: Ed E. Wolfington

WEATHER CONDITIONS: 85 Degrees F, and Sunny with a slight wind 4-5 knots

TYPE OF INSPECTION:

_X_ CMS _X_ Complete __ Permit Completion

__ Surveillance __ Follow up

__ Stack Test __ Complaint Investigation

__ CEMS Audit: _____

OTHER (EXPLAIN) _____

ANNOUNCED INSPECTION: No

INSPECTION LEVEL PERFORMED 2 **COMPLIANCE CODE** 3

VEE PERFORMED No

OPERATING RATE: @ 65% Capacity

INSPECTOR: Jerome Brooks **STAFF CODE** 0852

CODING INFORMATION FOR COMPLIANCE STATUS

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

I. INSPECTION COMMENTS:

The source has a August 1995 permit to operate a cement unloading, storage and truck and railcar loadout facility. The source also has a November 1990 permit to operate a coal storage and export facility.

Rotary Rail Car Dumper

During my inspection the rotary rail car dumper was not in operation, there was no movement of coal throughout the facility. Coal is received by railcar, the coal is removed from the railcar by a enclosed rotary railcar dumper. In addition to the enclosure, wet suppresion is used to control the emissions from the dumping of the railcars. The sources mixes a small amount of surfactant (aqueous solution or soap) with the water to be used per tandem dump. The structure enclosing the rotary dumper appeared to be in good condition. Once the coal is removed from the railcars, it is transported by shielded conveyer belt up to the gantry were it is dispersed into storage piles. The storage piles are then compacted, sealed, and truncated to minimize fugitive coal dust emissions. While canvassing the storage yard I witnessed each storage pile and the piles not being worked appeared to be compacted and truncated.

Wet Suppression System

The source uses a system of wet suppression as its primary control technique against fugitive emissions from the storage yard. The rainbirds operating on the K-Factor system are positioned along the length of the gantry in four quadrants, with each quadrant consisting of five rainbirds. During a cycle each quadrant is brought on-line for a six minute period expending 1000 gallons of water per minute. I witnessed a complete cycle of the rainbirds during my inspection. The source has 15 manual rainbirds located around the perimeter of the storage area to be used when necessary. The source also has a water truck to be used as much as needed wherever needed. Condition #11 of the permit states that the source will use at least 20,000 gallons of water per complete cycle to attain 100% coverage of the storage area. From the information provided to me during the inspection I calculate that the source uses 24,000 gallons of water per complete cycle. I requested and received the K-Factor report for the week of July 6th.

Coal Throughput & Permit Limits

Condition #4 of the permit limits the yearly throughput of coal to 30×10^6 tons. Records indicate that in 1997 the throughput of coal was 7,644,232 tons. Condition #6 of the permit limits the amount of coal in storage at any one time to 1.0×10^6 tons. Records indicate that the source averages 449,997 tons of coal on hand at any one time. The source was incompliance with both of the permit conditions during this inspection.

Cement Transport & Storage

During my inspection I witnessed the source removing cement from a ship to fill their silos. The source has three cement silos labeled 1,2 ,and 3. Silos 1 and 3 have a rated capacity of 11,800 tons. Silo #2 has a capacity rating of 12,500 tons. All of the silos appeared to be structurally sound. The cement was removed from the hull of the ship by a screw auger and then put on to a shielded conveyer belt controlled by two baghouses. The baghouses were on line with no visible emissions but did not have gauges to check the pressure drop readings. The cement was then transported by conveyer belt to the silo were it was removed by bucket elevator and taken to the top of the silo to be displaced. The silo is controlled by a baghouse. I did not witness any visible emissions from the removal of cement from the ship. There was a minimal amount of dust coming off of the conveyer belt at the junction were the bucket elevator intercepts the cement. I was able to witness a truck loadout during my inspection. The fugitive emissions from the truck loading operation is controlled by a baghouse. During the truck loading operation the baghouse was on line with a pressure drop reading of 1.5 inches of water, pulsating every 8 seconds, and with no visible emissions. The railcar loadout system was not in operation during my inspection. The entire cement operation consists of eight baghouse total. Five baghouses for the off loading and filling of the silo, one baghouse for the truck loadout, and two baghouses for the railcar loadout. All emission points inspected were not exhibiting any signs of fugitive emissions.

Cement Throughput & Permit Limit

Condition #3 of the August 1995 permit limits the annual throughput of cement to 500,000 tons, calculated as the sum of each consecutive 12 month period. Records indicate that from end of June 1997 to the end of June 1998 the throughput of cement was 310,350 tons. The source is incompliance with this permit condition.

General Notes

During my inspection I did not detect signs of fugitive coal dust emissions from any aspect of the operation. The cement facility appears to be operating adequately with minimal fugitive particulate and no emissions from the baghouses. During the inspection the source appeared to be doing a adequate job with controlling coal dust emissions by wet suppression. The storage areas and were very wet. Records are in order and accessible. I deem the source incompliance during this inspection.

INSPECTOR'S SIGNATURE Jerome O. Brock **DATE:** July 13, 1998

SUPERVISOR'S COMMENTS:

SUPERVISOR'S SIGNATURE **DATE:** 7/13/98

Date: 10/ 7/ 93
vised Form 3/26/93

TARGETING DATA LONG FORM

State: VA TID #: 70000071
Data Problem: _____

I. IDENTIFICATION

Facility (plant) name: PIER IX
Location: HARBOR RD.
Address: P. O. BOX 38
City: NEWPORT NEWS Zip Code: 23607- Mobile? _____
County: NEWPORT NEWS Code: 700 Office: R6 Inspector: JAB
Description: BULK COAL STORAGE
Facility Contact: WHITTEN, C. Telephone: 804-244-8800
Applicable regulations: SIP X NSPS___ NESHAP___ PSD___ TOXIC___ OTHER____
If OTHER, describe: _____
Low Priority/Minimum Frequency code: _____

State ID: 60979
AFS ID: 035170000071
Operating Permit #: _____
- Issued: / / Expires: / /
EPA ID: 035170000071
SIC Code: 4463
ITS Source Code: MINING, COAL(INC. PREPARATIO
EPA Class (A1,A2,B,N,H): SM
State Class #1: _____
State Class #2: _____

TARGETED CONTROL/PROCESS SYSTEM: Identify 1st priority system(s): _____
Identify other priority system(s): _____

II. EMISSIONS

Emissions Data Year: ____

TARGETED POLLUTANT:*	Pollutant	Is a Control System Used to Reduce Emissions?	Are Fugitive Emissions a Priority Concern?
1st Priority:	PM	Yes	Yes
2nd Priority:			

* Identify more than one pollutant only if other pollutants are a major targeting concern. Pollutant symbols are: PM, SOX, NOX, CO, VOC, TRS, PB, HAZ, and TOX.

EMISSIONS:*

PM Cont. 9.00	SOX Cont.	NOX Cont.	CO Cont.
Uncont. 350.00	Uncont.	Uncont.	Uncont.
VOC Cont.	TRS Cont.	PB Cont.	
Uncont.	Uncont.	Uncont.	

TOX/HAZ: rate severity from 1 (lowest) to 10 (highest): _____ List major compounds: _____

* Provide emissions data in tons/year. If unknown, estimate uncontrolled emissions in tons/year according to the following scale: 1,5,15,30,50,80,125,250,500,2000,10000+.

COMMENTS: _____

III. COMPLIANCE

SELF-MONITORING REPORTS: Can the review of these reports be used in place of an inspection?..... _____
Is an inspection needed based on self-monitoring reports?..... _____
INSPECTIONS: Date of last Level 2 (or higher level) inspection (Mo/Day/Yr)..... 7-10-98 ~~8/ 29/ 97~~
Were actual or potential emissions or O&M problems identified during the last inspection?..... _____
During any other inspection conducted in the last two years?..... _____
COMPLAINTS: Do complaints indicate a potential compliance problem?..... _____
MALFUNCTIONS: Are there excessive malfunctions (in frequency or magnitude)?..... _____
ENFORCEMENT: Has any enforcement action been initiated for emissions or O&M problems recently?..... _____
Is inspection needed due to ongoing or recently-completed enforcement?..... _____
ONGOING COMPLIANCE PROBLEM: Is there an ongoing emissions or O&M problem at the facility?..... _____
ARE MORE THAN ONE POINT SOURCE EXPERIENCING PROBLEMS?..... _____
MINOR PROBLEMS: Are all compliance problems indicated above minor?..... _____
Is a follow-up inspection justified because of minor problems?..... _____
PROBLEMS RESOLVED: Are all problems indicated above now resolved?..... _____
POTENTIAL VULNERABILITY OF FACILITY TO UPSET:..... Very High_____ High_____ Average X Low _____
RATE O&M PRACTICES at the site:..... Very Poor_____ Poor_____ Average X Good_____
COMMENTS: _____

IV. AIR QUALITY

LOCATED IN A NONATTAINMENT AREA?..... PM_____ SO2_____ Ozone__X___ CO_____ NOx__X___ PB_____

IMPACT ON AIR QUALITY in principal impact area:..... Very High_____ High__X___ Moderate_____ Minor_____

POPULATION affected by facility in impact area:..... High Density__X___ Low Density_____

ARE THERE AIR QUALITY PROBLEMS INVOLVING MORE THAN ONE POLLUTANT?..... _____

COMMENTS: _____

V. SPECIAL CIRCUMSTANCES

INSPECTION NEEDED: 1. Never Inspected_____ 2. Inspection Overdue_____ 3. New Permit_____

4. Permit Renewal_____ 5. Other_____ Explain: _____

INSPECTION NOT NEEDED: 1. Temporarily Shut Down/Moved_____ 2. Permanently Shut Down/Moved_____

3. Other_____ Explain: _____

COMMENTS: _____

VI. RESOURCES

TIME FACTOR: Estimate all office and on-site time (hrs) required for one level 2 or higher inspection of the entire facility. If more than one inspection level is planned during the year, enter the average time per inspection..... 8.00

TRAVEL TIME: Estimate the travel time required per inspection (round trip). If more than one inspection will be conducted on the same trip, please apportion the time equally among all facilities to be inspected and indicate only this facility's share 2.00

QUENCY FACTOR: Number of level 2 or higher inspections needed (number/years)..... 1/ 1

MMENTS: _____

VII. INSPECTOR RANKING

INSPECTOR RANKING: Rank facility from 1 (lowest priority) to 4 (highest priority) for an inspection next year, based on your overall evaluation of the facility..... 4

UNIQUE FACTORS: Are there unique factor not considered above which affect your ranking?..... _____

Explain: _____

COMMENTS: _____

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION REPORT FORM

I. GENERAL INFORMATION

SOURCE NAME: Pier IX Terminal Company **REGISTRATION NO.:** 60979

LOCATION: Newport News **INSPECTION DATE:** 8/29/97

COUNTY NO. : 700 **PLANT ID:** 00071 **FILE NO.:** 451

SOURCE CLASS: __ A _X_ SM __ B __ NSPS __ PSD __ NESHAP __ MACT ____

SOURCE CONTACT: Charles Whitten

WEATHER CONDITIONS: 85 Degrees F, and Sunny with a slight wind 4-5 knots

TYPE OF INSPECTION:

_X_ CMS _X_ Complete __ Permit Completion

__ Surveillance __ Follow up

__ Stack Test __ Complaint Investigation

__ CEMS Audit: _____

OTHER (EXPLAIN) _____

ANNOUNCED INSPECTION: No

INSPECTION LEVEL PERFORMED 2 **COMPLIANCE CODE** 3

VEE PERFORMED Yes

OPERATING RATE: @ Capacity

INSPECTOR: Jerome Brooks **STAFF CODE** 0852

CODING INFORMATION FOR COMPLIANCE STATUS

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

I. INSPECTION COMMENTS:

The source has a August 1995 permit to operate a cement unloading, storage and truck and railcar loadout facility along with a November 1990 permit to operate a coal storage and export facility.

The coal storage and export facility of this source utilizes wet suppression solely to control fugitive coal dust. The source receives coal by railcar, the coal is removed from the railcars by a enclosed rotary railcar dumper. The fugitive coal dust is controlled by wet suppression supported by the enclosed system. During the inspection I witnessed a railcar unloading in the rail car dumper. The railcar was rolled into the dumper and the doors were closed. As the railcar is rolled to dump the coal a series of spray nozzles were activated to control any coal dust, the spray nozzles remained on line until the railcar had completed the rotation. I did not detect any fugitive emissions from the coal dumping operation during this inspection. The wet coal is then transported by shielded conveyer belt up to the gantry were it was dispersed into stockpiles with no visible emissions. The source utilizes wet suppression to control fugitive coal dust from the stockpile area. The rainbirds are positioned along the length of the gantry in four quadrants, with each quadrant consisting of five rainbirds. During a cycle each quadrant is separately put on-line for a six minute period expending 1000 gallons of water per minute. I witnessed a complete cycle of the rainbirds from the control room while reviewing the records of previous day cycles. The source also has a water truck on the facility to be used as much as needed wherever needed. The source provided me with the cycle data for the week of August 18th as I requested for DEQ evaluation. Records indicated that the source is in compliance with yearly throughput and coal storage permit limits. During this inspection there were no signs of visible emissions coming from the any aspect of the coal storage facility. The source was not reclaiming coal during this inspection.

As a part of my inspection I witnessed the source was removing cement from a ship to fill their cement silo. The cement was removed from the hull of the ship by a screw auger with no visible emissions. The cement was then dumped on to a shielded conveyer belt controlled by two baghouses with no visible emissions. The baghouses were on line with no vissible emmissions but did not have gauges to check the pressure drop readings. The cement was then transported by conveyer belt to the silo were it is then removed from the conveyer belt by a bucket elevator and taken to the top of the silo to be displaced. The silo is controlled by a baghouse with no visible emissions. I did not witness any visible emissions from the removal of cement from the ship. There was a minimal amount of dust coming off of the conveyer belt at the junction were the bucket elevator intercepts the cement. This is not a problem now, but it needs to be addressed and corrected in the near future.

I witnessed a truck loadout during my inspection with no visible emissions. The fugitive emissions from the truck loading operation is controlled by a baghouse. During the truck loading operation the baghouse was on line with a pressure drop reading of 1.5 inches of water, pulsating every 8 seconds, and with no visible emissions.

The railcar loadout of cement was in operation during my inspection. The cement was transported pneumatically from the silo through a pipe line to the railcar loader with no visible emissions. The loadout system uses a pipe within a pipe to load the rail car and to control fugitive emissions. The smaller pipe is used to pass the cement through and the pipe surrounding the smaller pipe is under negative pressure to capture any fugitive emissions. The system is controlled by a baghouse which was on line with a pressure drop reading of 5.5 inches of water, and no visible emissions. SEE VEER

The entire cement operation consists of eight baghouse total. Five baghouses for the off loading and filling of the silo, one baghouse for the truck loadout, and two baghouses for the railcar loadout all accounted for during my inspection. All emission points inspected were no exhibiting any signs of fugitive emissions.

Records indicate that the source is in compliance with the annual throughput and coal storage limit of the permit. After careful analysis of the data received from Dominion, I deem that the source is in compliance with it's permit for this inspection.

INSPECTOR'S SIGNATURE Jerome A. Brooks **DATE:** September 15, 1997

SUPERVISOR'S COMMENTS:

SUPERVISOR'S SIGNATURE **DATE:** 9/15/97

DEPARTMENT OF ENVIRONMENTAL QUALITY
VISIBLE EMISSION EVALUATION RECOF

I.D. NO. 700-00071	REG. NO. 60979	DATE: 8/29/97	
SOURCE NAME: Pier IX Terminal Company			
ADDRESS: Newport News			
EMISSION POINT NAME: Baghouse - Railcar Loadout		HEIGHT TO DISCHARGE POINT:	
OBSERVER: Jerome A. Brooks		CERTIFICATION EXPIRATION DATE:	
CLOCK TIME: 8:30 am	INITIAL : A.M./P.M.	FINAL 8 :50	A.M./P.I

VISIBLE EMISSION READINGS

HR.	MIN	SECONDS				STEAM PLUME ✓ IF APPL.		
		0	15	30	45	DET	ATT	COMMENT
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
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	22							
	23							
	24							
	25							
	26							
	27							
	28							
	29							

HR.	MIN	SECONDS				STEAM PLUME ✓ IF APPL.		
		0	15	30	45	DET	ATT	COMMENTS
8	30	0	0	0	0			
	31	0	0	0	0			
	32	0	0	0	0			
	33	0	0	0	0			
	34	0	0	0	0			
	35	0	0	0	0			
8	36	0	0	0	0			
	37	0	0	0	0			
	38	0	0	0	0			
	39	0	0	0	0			
	40	0	0	0	0			
	41	0	0	0	0			
8	42	0	0	0	0			
	43	0	0	0	0			
	44	0	0	0	0			
	45	0	0	0	0			
	46	0	0	0	0			
8	47	0	0	0	0			
	48	0	0	0	0			
	49	0	0	0	0			
	50							
	51							
	52							
	53							
	54							
	55							
	56							
	57							
	58							
	59							

OBSERVER LOCATION	INITIAL	FINAL
DISTANCE TO DISCHARGE	15'	
DIRECTION TO DISCHARGE	Ø	
HEIGHT OF OBSERVATION POINT	—	

BACKGROUND DESCRIPTION

Sky

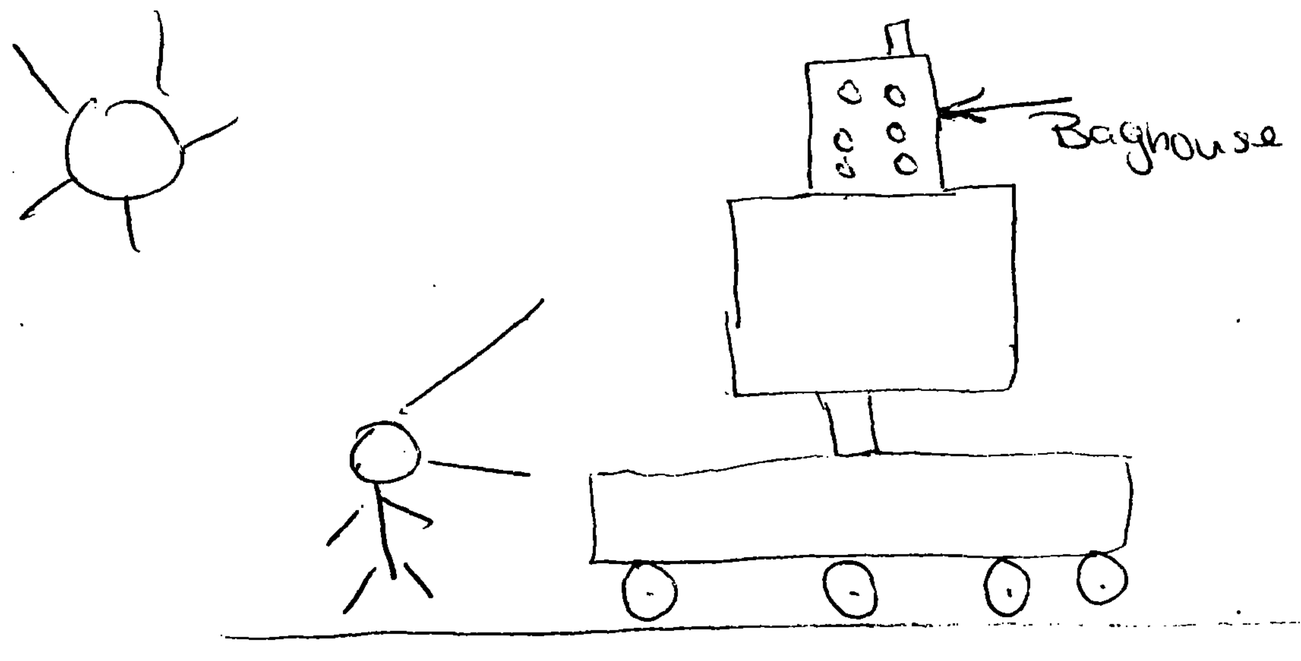
WEATHER CONDITIONS	INITIAL	FINAL
WIND DIRECTION	SSW	—
WIND SPEED	4-5 knots	—
AMBIENT TEMPERATURE	90°F	—

SKY CONDITIONS

Clear

PLUME DESCRIPTION	INITIAL	FINAL
COLOR	Ø	Ø
DISTANCE VISIBLE	Ø	Ø

DIAGRAM OF OBSERVER AND EMISSION POINT



COMMENTS

Stack from baghouse was clean.

OBSERVER SIGNATURE [signature] DATE 8/29/97

SUPERVISOR SIGNATURE [signature] DATE 8/29/97

(FORMS/VEE)

Date: 10/ 7/ 93
Revised Form 3/26/93

TARGETING DATA LONG FORM

State: VA TID #: 70000071
Data Problem: _____

I. IDENTIFICATION

Facility (plant) name: PIER IX
Location: HARBOR RD.
Address: P. O. BOX 38
City: NEWPORT NEWS Zip Code: 23607- Mobile? _____
County: NEWPORT NEWS Code: 700 Office: R6 Inspector: ~~JBT~~ JTB
Description: BULK COAL STORAGE
Facility Contact: WHITTEN, C. Telephone: 804-244-8800
Applicable regulations: SIP X NSPS___ NESHAP___ PSD___ TOXIC___ OTHER___
If OTHER, describe: _____
Low Priority/Minimum Frequency code: _____
TARGETED CONTROL/PROCESS SYSTEM: Identify 1st priority system(s): _____
Identify other priority system(s): _____

State ID: 60979
AFS ID: 035170000071
Operating Permit #: _____
- Issued: / / Expires: / /
EPA ID: 035170000071
SIC Code: 4463
ITS Source Code: MINING, COAL(INC. PREPARATIO
EPA Class (A1,A2,B,N,H): SM
State Class #1: _____
State Class #2: _____

II. EMISSIONS

Emissions Data Year: ____

TARGETED POLLUTANT:*	Pollutant	Is a Control System Used to Reduce Emissions?	Are Fugitive Emissions a Priority Concern?
1st Priority:	PM	Yes	Yes
2nd Priority:			

* Identify more than one pollutant only if other pollutants are a major targeting concern. Pollutant symbols are: PM, SOX, NOX, CO, VOC, TRS, PB, HAZ, and TOX.

EMISSIONS:*

PM Cont. 9.00	SOX Cont.	NOX Cont.	CO Cont.
Uncont. 350.00	Uncont.	Uncont.	Uncont.
VOC Cont.	TRS Cont.	PB Cont.	
Uncont.	Uncont.	Uncont.	

TOX/HAZ: rate severity from 1 (lowest) to 10 (highest): ____ List major compounds: _____

* Provide emissions data in tons/year. If unknown, estimate uncontrolled emissions in tons/year according to the following scale: 1,5,15,30,50,80,125,250,500,2000,10000+.

COMMENTS: _____

III. COMPLIANCE

SELF-MONITORING REPORTS: Can the review of these reports be used in place of an inspection?..... ____
Is an inspection needed based on self-monitoring reports?..... ____
INSPECTIONS: Date of last Level 2 (or higher level) inspection (Mo/Day/Yr)..... 8/29/97 ~~6/ 19/ 96~~
Were actual or potential emissions or O&M problems identified during the last inspection?..... ____
During any other inspection conducted in the last two years?..... ____
COMPLAINTS: Do complaints indicate a potential compliance problem?..... ____
MALFUNCTIONS: Are there excessive malfunctions (in frequency or magnitude)?..... ____
ENFORCEMENT: Has any enforcement action been initiated for emissions or O&M problems recently?..... ____
Is inspection needed due to ongoing or recently-completed enforcement?..... ____
ONGOING COMPLIANCE PROBLEM: Is there an ongoing emissions or O&M problem at the facility?..... ____
ARE MORE THAN ONE POINT SOURCE EXPERIENCING PROBLEMS?..... ____
MINOR PROBLEMS: Are all compliance problems indicated above minor?..... ____
Is a follow-up inspection justified because of minor problems?..... ____
PROBLEMS RESOLVED: Are all problems indicated above now resolved?..... ____
RATE VULNERABILITY OF FACILITY TO UPSET:..... Very High____ High____ Average X Low ____
RATE O&M PRACTICES at the site:..... Very Poor____ Poor____ Average X Good____
COMMENTS: _____

IV. AIR QUALITY

LOCATED IN A NONATTAINMENT AREA?..... PM_____ SO2_____ Ozone__X___ CO_____ NOx__X___ PB_____

IMPACT ON AIR QUALITY in principal impact area:..... Very High_____ High__X___ Moderate_____ Minor_____

POPULATION affected by facility in impact area:..... High Density__X___ Low Density_____

ARE THERE AIR QUALITY PROBLEMS INVOLVING MORE THAN ONE POLLUTANT?..... _____

COMMENTS: _____

V. SPECIAL CIRCUMSTANCES

INSPECTION NEEDED: 1. Never Inspected_____ 2. Inspection Overdue_____ 3. New Permit_____

4. Permit Renewal_____ 5. Other_____ Explain: _____

INSPECTION NOT NEEDED: 1. Temporarily Shut Down/Moved_____ 2. Permanently Shut Down/Moved_____

3. Other_____ Explain: _____

COMMENTS: _____

VI. RESOURCES

TIME FACTOR: Estimate all office and on-site time (hrs) required for one level 2 or higher inspection of the entire facility. If more than one inspection level is planned during the year, enter the average time per inspection..... 8.00

TRAVEL TIME: Estimate the travel time required per inspection (round trip). If more than one inspection will be conducted on the same trip, please apportion the time equally among all facilities to be inspected and indicate only this facility's share 2.00

FREQUENCY FACTOR: Number of level 2 or higher inspections needed (number/years)..... 1/ 1

COMMENTS: _____

VII. INSPECTOR RANKING

INSPECTOR RANKING: Rank facility from 1 (lowest priority) to 4 (highest priority) for an inspection next year, based on your overall evaluation of the facility..... 4

UNIQUE FACTORS: Are there unique factor not considered above which affect your ranking?..... _____

Explain: _____

COMMENTS: _____

OCR

The following pages contain the Optical Character Recognition text of the preceding scanned images.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
James S. Gilmore, IR 5636 Southem Boulevard Dennis H. Treacy
Govemor Virginia Beach, VA 23462 Director
(757) 518-2000
John Paul Woodley, Jr. http://www.deq.state.va.us Francis L. Daniel
Secretary of Natural Resources Fax (757) 518-2003 Tidewatcr Regional Director

DATE: .7// ///?V

1. D. NO.: 7052 -000

FILE NO.:

Enclosed is a copy of the report generated as a result of our recent inspection of your facility.. -If you have any questions, please contact me at (757)
518-2158.

Sincerely,

X2
A. ;@@

Richard C. Craft
Air Compliance Manager

RCC (cm/air/form-doc/inspcvr.Itr)

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION REPORT FORM

1. GENERAL INFORMATION

SOURCE NAME: Pier TX Terminal Company REGISTRATION NO.: 60979

LOCATION: Newoort Ne-ws INSPECTION DATE: 7/10/98

COUNTY NO. : 700 PLANT ID: 00071 FILE NO.: 451

SOURCE CLASS: - A -X- SM - B - NSPS PSD - NESHAP - MACT

SOURCE CONTACT: Ed F- Wolfington

WEATHER CONDITIONS: 85 Degrees F, and Siinny with a slight wind 4-5 knots

TYPE OF INSPECTION:

-X-- CMS -X- Complete Permit Completion

- Surveillance Follow up

- Stack Test Complaint Investigation

- CEMS Audit:

OTHER (EXPLAM

ANNOUNCED INSPECTION: No

INSPECTION LEVEL PERFORMED 2 COMPLIANCE CODE 3

VEE PERFORMED No

OPERATING RATE: 0 65% Capacity

INSPECTOR: Jp-rome Brooks STAFF CODE 0952

CODING INFORMATION FOR COMPLIANCE STATUS

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

INSPECTION COMMEN'i S:

The source has a AuRust 1995 Dermit to olDerate a cement unloadin2, storaRe and truck and railcar loadout
facility, The source also has a Novemher 1990 I)ermit to operate a coal storaRe and exl)ort facility

Rotary Rail Car Dumper
DurinR 2tion the rotary rail car dumper was not in ooeration, there was no movement of coa]
throudout the facility- Coal is received hy railcar, the coal is removed from the railcar hy a enclosed rotary
railcar duml)er. In addition to the enclosure, wet s i is used to control the emissions from the
dumDinR of the railcars- The sources mixes a small amount of surfactant (aqueous solution or soaD) with the
water to he used I)er tandem duml)- The structure enclosinR the rotary dumner appeared to be in 2ood
condition- Once the coal ig removed from the railcars, it is transDorted by shielded conveyer belt un to the
Rantry were it is disl2ersed into stora2e viles. The storaRe 1)iles are then compacted, sealed, and truncated to
fuiZitive coal dust emussions- While canvasmnR the stora2e yard I witnessed each storajZe Dile an
the viles not bein2 worked al)l)eared to be coml)acted and truncated-

Wet Suppression System
The source i i st-s a system of wet su as its 1)rimar-y control technique -against fuizitive emissions from
the stora2e yard- The rainhirds nj)erafinjZ on the K-Factor system are IDositioned aloniZ the lenRth of the
2antry in four quadrants, with each quadr-ant consisfin2 of five rainbirds. During2 a cycle each quadrant is
brou%Zht on-line for a six minute 1)eriod exl)endinR 1000 Rallons of water per minute- I witnessed a complete
cycle of the rainbirds duri ,nection. The source has 15 manual rainbirds located around the-
lierimeter of the storajZe area to he used when necessary, The source also has a water trnck to be used as
much as needed wherever needed- Condition &I 1 of the permit states that the source will use at least 20,000
Rallons of water per complete cycle to attain 100% coverage of the stonage qrea- From the inforynation
1)rovided to me durinR the insl)ection I calculate that the soiirce uses 24,000 2allons of water lier coml)lete
cvcle- I requested and received the K-Factor reDort for the week of July 6th-

Coal Throughput & Permit Limits
Condition #4 of the Dermit limits the yearly throujzhnut of coal to 30 x 106 tons- Records indicate that in
1997 the tbrouRhj)ut of coal was 7,644,232 tons, Condition #6 of the I)ermit limits the amount of coal in
storaRe at any one time to 1.0 X 106 tons- Records indicate that the source nverq2es 449,997 tons of coal on
hand at any one time- The source was incomDfiance with both of the Dermit conditions durin2 this
insnection,

Cement Transport & Storage
Durin2 my insI)ection I witnessed tht- soiircp cement from a shil) to fill the ir silos, The source ba
three cement silos labeled 1,2 and 3- Silos I and 3 have q rated cal)acity of I 1,800 tons- Silo #2 has a
cal)acity rating of 12,500 tons- All of the silos appeared to be stractnrally sound- The cement was removed
from the hull of the shiD by a screw aiiger and then Dut on to a shielded conv eyer belt controlled by two
baghouses- The baghouses were on line with no visible emigsions but did not ha ve gaiiges to check the
pressiire drol) readinas- The cement was then transl)orted by conveyer belt to the silo were it was removed
by bucket elevator and tnken to the toD of the silo to be disI)Iaced- The silo is controlled hy a ha house- I
9
did not witness any visibi ns from the removal of cement from the ship- There wqsq -minimal
amount of dust comin2 off of the conveyer helt at the junction were the bucket elevator interceDts the cement,
I was able to witness a truck loadout durinR 2tion- The fti%zitive emimions fr om the truck loadin
- I - 9
ol)eration is controlled by a baghouse- DurinR the truck loadinR ol)eration th e haahouse was on line with-a
pressure drol) reading of 1.5 inches of water, 1)ulsafing every 9 seconds, and with no visible emissions- The
railcar loadout system was not in during my inspection, The entire cement ol)e ration consists of
eiaht baRhouse total - Five baabouses for the off loadina and fillina of the s ilo, one baabouse for the trLick
loadout, and two baghouses for the railcar loadout- All emigsion I)ointq insIn ected were not exhibiting any
siRns of fuaitive

Cement Throughput & Permit Limit
Condition #3 of the AuRust 1995 Dermit limits the annual throuahout of cement to 500,000 tons, calculated-as
the sum of each consecutive 12 month neriod, Records indicate that from end of June 1997 to the end o
June 1998 the throughDut of cement was 310,350 tons- The incomDfiance with thi s liermi
condition-

General Notes
DurinR :!tion T did not detect -,iiznq of fulzitive coal dust emissions from a ny aspect of the olDeration
The cement facilit_v aDI)ears to be onerafin2 adequately with minimal fugitive Darticulate and n ns
from the baiZhouses- During the insI)ection the source appeared to be doing a adeqwite job with controlling
coaldustemissionsbywets=Dression- ThestorageareasandweTeverywet, Recordsareino rderand
accessible- T deem the source incoml)liance durin%Z this insI)ection-

I
INSPECTOR'S SIGNATURk3@--S@@U. "RJ4 DATE: July 13, 1998

SUPERVISOR'S COMMENTS:

- -@q 4 1-7 "
-, @z,
,@x
SUPERVISOR'S SIGNATURE @Iz I- - DATE:
I -

Date: 10/ 7/ 93 TARGETING DATA State: VA TID 70000071
-vised Form 3/26/93 IjONG FORK Data Problem:

1. IDENTIFICATION
Facility (ptant) name: PIER IX State ID: 60979
Location: HARBOR RD, AFS ID: 035170000071
Address: P. 0. BOX 38 Operating Permit C
City: NEWPORT NEWS Zip Code: 23607- Mobile? - Issued: I Expires: I
County: NEWPORT NEWS Code: 700 Office: R6 Inspector: JAB EPA ID: 035170000071
Description: BULK COAL STORAGE SIC Code: 4463
FaciLity Contact: WHITTEN, C. Telephone: W-244-8800 ITS Source Code: MINING, C
OALONC. PREPARATIO
Appticabie regulations: SIP X NSPS NESHAP PSD TOXIC OTHER EPA Ctass (A1,A2,B,N
,H): SM
If OTHER, describe: State Ctass #1:
Low Priority/Miniom Frequency code: State Class #2:
TARGETED CONTROLIPROCESS SYSTEM: Identify lst priority systm(a):
Identify other priority system(s):

II. EMISSIONS Emissions Data Year:
TARGETED POLLUTANT:* Is a ControL System Used Are Fugitive Emissions
PoLLutant to Reduce Emissions? a Priority Concern?
lst Priority: PM Yes Yes
2nd Priority:
* identify more than one poltutant onty if other poLtutants are a major target
ing concern. PotLutant sywbots are:
PM, SOX, NOX, CO, VOC, TRS, PB, MAZ, and TOX.
EMISSIONS-*
PM Cont.- 9.00 SOX Cont. NOX Cont. CO Cont.
Uncont. 350.00 Uncont. Uncont. Uncont.
'OC Cont. TRS Cont. PB Cont.
Uncont. Uncont. Uncont.
TOX/HAZ; rate severity from 1 (towest) to 10 (highest): List major compounds:

* Provide emissions data in tons/year. if unknown, estimate uncontro[Led emiss
ions in tons/year according to the
foiLowing scaLe: 1,5,15,30,50,W,125,250,500,2000,10000+.
COMMENTS:

III. COMPLIANCE
SELF-MONITORING REPORTS: Can the review of these reports be used in place of a
n inspection?
is an inspection needed based on self-monitorirkg reports?
-: !@j -78
INSPECTIONS: Date of tast Levet 2 (or higher teveL) fnspection (No/Day/Yr) 7@
.. -SA-294-2L
Were actuat or potential emissions or O&M probteme identified during the tast
inspection?
During any other inspection conducted in the tast two years?
COMPLAINTS: Do compLaints indicate a potentiaL compLiame probtein?
NALFUNCTIONS: Are there excessfve maLfunctions (in frequency or magnitude)?
ENFORCEMENT: Has any enforcement action been initiated for emissions or O&M pr
oblems recentLy?
is inspection needed due to ongoing or recentLy-compteted enforcement?
ONGOING CONPLIANCE PROBLEM: Is there an ongoing emissions or O&M problem at th
e facility?
ARE MORE THAN ONE POINT SOLJRCE EXPERIENCING PROBLEMS?
NINOR PROBLEMS: Are att coWtiame problem indicated above minor?
Is a follow-up inspection justified because of minor probLems?
"BLEMS RESOLVED: Are aLL problems indicated above now resotved?
4E VULNERABILITY OF FACILITY TO UPSET: Very Wigh.. High.. Average X Low -
RATE O&M PRACTICES at the site: Very Poor Poor Average. X Good

C014MENTS:

__J

IV. AIR QUALITY
LOCATED IN A NONATTAINMENT AREA? pH S02 Ozone X co Nox x Pe
IMPACT ON AIR QUALITY in principaL impact area: Very High High X Moderate 14 i nor
POPULATION affected by facitity in impact area: High Density_j_ Low Density..
ARE THERE AIR QUALITY PROBLEMS INVOLVING MME THAN ONE POLLUT&NT?
COMMENTS:

V. SPECIAL CIRCUMSTANCES
INSPECTION NEEDED: 1. Never Inspected 2. inspection overdue 3. New Permit
4. Permit RenewaL 5. Other.. Exptain:
INSPECTION NOT NEEDED: 1. Te"rarity Shut Down/Moved 2. Permanently Shut Down/M oved
3. other- Explain:
COMMENTSe

VI. REBOURCIES
TIME FACTOR: Estimte aLt office and on-site time (hrs) roWired for one teveL 2 or higher inspection of the entire
faciLity. if more then am inspection teveL is ptanrwd during the year. enter t he average tfme per inspection 8.00
TRAVEL TIME: Eatimte the traveL time required per ird4nction (round trip). if more than one inspection wiLt be conducted
on the saw trip, please apportion the time equaLLy among aLt faciLitfes to be inspected and indicate onLy
this facitity's share 2.00
7QUENCY FAETOR: Number of levet 2 or higher inspections needed (number/years)
I/ 1
-.,MENTS:

VII. INSPECTOR PJWKING
INSPECTOR RANKING: Rank facility from I (Lowest prfority) to 4 (highest priori ty) for an inspection next year, based on
your overatt evaLuatfon of the faciLity 4
UNIQUE FACTORS: Are, there unique factor not corksidered above which affect yo ur ranking?
Exptafn:
COMENTS:

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION REPORT FORM

1. GENERAL INFORMATION

SOURCE NAME: Pier IX Terminal C-ompany REGISTRATION NO.: 60979

LOCATION: Newmrt Newq INSPECTION DATE: 97

COUNTY NO. : 700 PLANT ID: 00071 FELE NO.: 451

SOURCE CLASS: - A -X- SM - B - NSPS PSD - NESHAP - MACT

SOURCE CONTACT: C-baries Whitten

WEATHER CONDITIONS: 85 Deizree-, F, and Sunny with asliaht wind 4-5 knots

TYPE OF INSPECTION:

-X- CMS -X- Complete Permit Completion

- Surveillance Follow up
S E rr 1977
- Stack Test Complaint Investigation

- CEMS Audit:
i'oec
OTHER (EXPLAM

ANNOUNCED INSPECTION: No

INSPECTION LEVEL PERFORMED 2 COMPLL4,NCE CODE 3

VEE PERFORMED Yes

OPERATING RATE: 6D Capacity

INSPECTOR: Jerome Brooks, STAFF CODE 0,952

CODING INFORMATION FOR COMPLIANCE STATUS

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

I. INSPECTION COMMENTS:

The source has a AuMist 1995 Dermit to oDerate a cement uninadinIZ, storage and truck and railcar loadout
facility along with a November 1990 nermit to ol)erate q coal qtorage and exDort facility-

The coal storage and exoort facilit-V of this source utilizes wet)n solely to control fugitive coal dust
The source receives coal by railcar, the coal is removed from the railcars hy a enclosed rotary railca
dumner- The fugitive coal dust is controlled hy wet s n suDDorted by the enclosed system - During
the insDection I witnessed a railcar unloadinR in the rail car dumlDer- The railc fled into the dumper
and the door-, were closed- As the railcar is rolled to duml) the coal a -,eries of soray nozzles were activated
to control any coal dust, the sl)ray noz7les remained on line until the railcar had coml)leted the rotation- I di
not detect any fugitive emissions from the coal dumID' tion during this insl)ection- The wet coal is
then transIDorted hy shielded convaer belt un to the gantry were it was disDersed into stockniles witb no
visibleernissions- Thesourceutilimswets n to control fugitive coal dust from the stockl)ile area-
The -rainbirds are Dositioned along the lenjZth of the ganta in four Quadrants, with each quadrant consistin
five rainbirds. D Vcle each quadrant is selDarately put on-line for a six minute period exl)ending I OM
gallons of water Der minute- T witnessed a coml)lete cycle of the rainhirds from the control room while
the records of T)revious day cycles- The source also has a water tmck on the faciliLv to be used as
much as needed wherever needed- The -gource Drovided me with the cyr-le data for the week of August 1 gth
as T reQuested for DEQ evaination- Records indicated that the source is in com iDliance with yearly throughiDut
and coal storage I)ennit limits- DurinR this insl)ection there we is of visible emissions coming from
the any asl)ect of the coal storage facility- The source was not reclai I during this insDection-

As a Dart of my insIDection I witnessed the source wa-, remoy' it from a shin to fill their cement silo-
The cement was removed from the hull of the shiD by a screw auger with no visible emissions- The cemen
was then duml)ed on to a shielded conveyer belt controlled by two baghouses, with no visible emissiong- The
baghouses were on line with no vissible emmissions hut did not have gauges to check the pressiire drol)
readings- The cement was then transliorted by conveyer belt to the silo u@ere it is then removed from the
conveyer helt by a bucket elevator and taken to the tolD of the silo to be dis IDlaced, The silo is controlled by-a
baghouse with no visible e T did not witness any visible emissions from the removal of cement from
the shilD- There was, q minimal amount of dust cominjZ off of the conveyer belt at the junction Jere the
hucket elevator intercelDt.-, the cement- This is not a Droblem now. but it needs to be Mdressed and corrected
in the near future-

I witjiessed a tmck lngdoiit during r tion with no visibl ns- 'fhe fuRitive fr om the
truck loadinR oDeration ig controlled by a ba-9bouse- Durin2 the trnr-k loadin jZ operation the ba2house was on
line with a pressure dron readinIZ of 1-5 inches of water, jiulsatin2 every 9 seconds, and with no visible
emigsions,

The railcar loadout of cement was in operation durinR 2tion- The cement was tr ansl)orte
I)neumatically from the silo tbroujZh a I)il)e line to the railcar loader witb no visible emissions, The loadou
system u within a DiDe to load the rail car and to control fulZitive emiss ons - The smailer pipe v;
used to pass the cement throu2b and the I)ipe surroundina the small under nelZ ative 1)resgure to
caDtnre any fuRitive emissions- The system is controlled hy a haRhouse which w as on line with a I)ressure
drol) readin2 of 5-5 inches of water, and no visible emissions- SEE, VFFR

The entire cement operati ts of ei2ht ba2house total- Five baRhouses for the o ff loadinR and filling
of the silo, one hajzhouse for the trtick loadout, and two ha2houses for the r ailcar loadout all accounted for
durin2 2tion- All emission 1)oints insl)ected were no exhibitin s of fu%titive ernissions-
- I - g any siRn

Records indicate that the s n comliliance with the annual throujZhl)ut and coa l stora%ze limit of the
1)ermit- After careful analysis of thf, data re-ceived from Dominion, I deem t hat the sourc ml)liance
with it's IDermit for this insDection-

INSPECTOR'S SIGNATUIRE DATE: September 15, 1997
SUPERVISOR'S COMMENTS:
SUPERVISOR'S SIGNATURE DATE:

DEPARTMENT OF ENVIRONMENTAL QUALITY
VISIBLE EMISSION EVALUATION RECOF

REG. NO. DATE:
1. .0. NO. C) CKZ)
SOURCE NAME: c-
ADDRESS:

EMISSION POINT NAME: HEIGHT TO DISCHARGE POINT:

OBSERVER: CERTIFICATION EXPIRATION DATE:

CLOCKTIME: INITIAL A.MJP.M. FINAL A.M./P.1

VISIBLE EMISSION READINGS

HR. MIN SECONDS STEAM PLUME IF APPL. HR. MIN SECONDS STEAM PLUME IF APPL.
0 15 30 45 DET ATT COMMENT 0 15 30 45 DET ATT COMMENTS
0 30

31
2 32
3 33 C
4 34 C) C) C)
5 35
6 36 0 0
7 37
8 38 0 0 'c@ C
9 39 0 0
10 40 0 0 C)

1 1 41

12 42 0

13 43 C) C,

14 44 Z C)

15 45 Q-1

16 46

17 47 0

18 48 C)

19 49 (3 C-)

20 50

21 51
22 52
23 53
24 54
25 55
26 56
27 57
28 58

29 59

OBSERVER LOCATION INITIAL FINAL DIAGRAM OF OBSERVER AND EMISSION POINT
DISTANCE TO DISCHARGE
DIRECTION TO DISCHARGE
HEIGHT OF OBSERVATION POINT
BACKGROUND DESCRIPTION
8k

WEATHER CONDITIONS INITIAL FINAL
WIND DIRECTION
WIND SPEED
AMBIENT TEMPERATURE C)
SKY CONDITIONS

PLUME DESCRIPTION INITIAL FINAL
COLOR
OISTANCE VISIBLE
COMMENTS

OBSERVER SIGNATURE DATE zc@

'\J
SUPERV TURE
ISOR SIGNA DATE

IFORMSIVEEI

'Date: '10/ 71 93 TARGETING DATA State: VA TID #: 70000071
Revised Form 3/26/93 LONG FORM Data Probtem:

1. IDENTIFICATION
Facitity (ptant) name: PIER IX State ID: 60979
Location: HARBOR RD. AFS ID: 035170000071
Address: P. 0. BOX 38 Operating Permit C
City: NEWPORT NEWS Zip Code: 23607- MobiLe? - Issued: / / - Expires:
County: NEWPORT NEWS Code: 700 Office: R6 Inspector:-d57-- EPA ID: 03517000007
1
Description: BULK COAL STORAGE -jF0 SIC Code: 4463
Facility Contact: WHITTEN, C. Telephone: 804-244-8800 ITS Source Code: MINING,
 COALONC. PREPARATIO
Applicabie regulations: SIP X NSPS NESHAP PSD TOXIC OTHER EPA CLass (A1,A2,B,
N,H): SM
if OTHER, describe: State Class #1:
Low Priority/Minimum Frequency code: State Class #2:
TARGETED CONTROUPROCESS SYSTEM: identify lst priority system(s):
identify other priority system(s):

II. EMISSIONS Emissions Data Year:
TARGETED POLLUTANT:* Is a Control Systern Used Are Fugitive Emissions
Pottutant to Reduce Emissions? a Priority Concern?
lst Priority: PM Yes Yes
2nd Priority:
* Identify more than one pottutant onty if other poLlutants are a major target
ing concern. Pollutant symbots are:
PM, SOX, NOX, CO, VOC, TRS, PB, HAZ, and TOX.
EMISSIONS:*
PM Cont.- 9.00 SOX Cont. NOX Cont. CO Cont.
 Uncont. 350.00 Uncont. Uncont. Uncont.
VOC Cont. TRS Cont. PB Cont.
 Uncont. Uncont. Uncont.
TOX/HAZ: rate severity from 1 (towest) to 10 (highest): _ List major compound
s:

Provide emissions data in tons/year. if unknown, estimate uncontrotted emissio
ns in tons/year according to the
foLlowing scate: 1,5,15,30,50,80,125,250,500,2000,10000+.
COMMENTS:

III. COMPLIANCE
SELF-MONITORING REPORTS: Can the review of these reports be used in place of a
n inspection?
is an inspection needed based on seLf-monitoring reports?
INSPECTIONS: Date of Last Level 2 (or higher levet) inspection (Mo/Day/Yr) 7-
ay 19Y.9&
Were actuaL or potentiat emissions or O&M probLems identified during the Last
inspection?
During any other inspection conducted in the Last two years?
COMPLAINTS: Do complaints indicate a potentiat compLiance probLem?
MALFUNCTIONS: Are there excessive malfunctions (in frequency or magnitude)?
ENFORCEMENT: Has any enforcement action been initiated for emissions or O&M pr
obLems recentLy7
is inspection needed due to ongoing or recentty-compLeted enforcement?
ONGOING COMPLIANCE PROBLEM: Is there an ongoing emissions or O&M problem at th
e facitity?
ARE MORE THAN ONE POINT SOtJRCE EXPERIENCING PROBLEMS?
MINOR PROBLEMS: Are aLL compLiance problems indicated above minor?
is a fottow-up inspection justified because of minor problems?
PROBLEMS RESOLVED: Are att probtems indicated above now resotved?
RATE VULNERABILITY OF FACILITY TO UPSET: Very High.. High.. Average X Low
RATE O&M PRACTICES at the site: Very Poor Poor Average X Good

COMMENTS:

IV. AIR QUALITY
LOCATED IN A NONATTAINMENT AREA? PM S02 Ozone X co NOx X Ps
IMPACT ON AIR QUALITY in principal iffipact area: Very High.. High X Moderate Minor
POPULATION affected by faciLity in impact area: High Density-_&_ Low Density..

ARE THERE AIR QUALITY PROBLEMS INVOLVING MORE THAN ONE POLLUTANT?
COMMENTS:

V. SPECIAL CIRCUMSTMCES
INSPECTION NEEDED: 1. Never Inspected 2. inspection overdue 3. New Permit
4. Permit Renewat 5. other Explain:
INSPECTION NOT NEEDED: 1. Temporarily Shut Down/Moved 2. Permanently Shut Down /Moved
3. Other- Exptain:
COMMENTS:

VI. RESOURCES
TIME FACTOR: Estimate att office and on-site time (hrs) required for one tevet 2 or higher inspection of the entire
facility. if more than one inspection leveL is pianned during the year, enter the average time per inspection 8.00
TRAVEL TIME: Estimate the travet time required per inspection (round trip). If more than one inspection wiLt be conducted
on the same trip, pLease apportion the time equatLy among aLl facilities to be inspected and indicate only
this facitity's share 2.00
FREQUENCY FACTOR: Number of level 2 or higher inspections needed (number/years) I/ I
COMMENTS:

VII. INSPECTOR RMKING
INSPECTOR RANKING: Rank faciLity from 1 (lowest priority) to 4 (highest priority) for an inspection next year, based on
your overaLt evaluation of the facility 4
UNIQUE FACTORS: Are there unique factor not considered above which affect your ranking?
ExpLain:
COMMENTS: