

CIE 194

Commonwealth of Virginia

Registration No: 60997

AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates

Classification: Synthetic Minor

Address: Pier 11 Harbor Rd

Region: TRO

Report No: 253358

AIR INSPECTION REPORT

Inspection Date: 06/18/08

Contact Name: Dan R Wagoner

Type: FCE With Site Visit

Contact Phone No: (757) 245-2275

Inspector: Kenneth J Pinzel

Air ProgramSubpart

Inspection Result: Out of Compliance

SIP

Reason:

Complete FCE (Full Compliance Evaluation)

Additional Information is Attached

Inspector Comments:

Type of Facility: Coal Terminal

Air Permits: 9/20/06 NSR permit

Contact(s) during Inspection: Dan Wagoner & John Campbell

Weather: 80 deg. & light winds

Yet to inspect: nothing

Enforcement Action: RCA



Inspector's Electronic Signature

Approval Date: Jun 19, 2008



Manager's Electronic Signature

Approval Date: 7/1/08



Commonwealth of Virginia

Registration No: 60997 **AFS Plant ID:** 700-00074
Plant Name: Dominion Terminal Associates **Classification:** Synthetic Minor
Address: Pier 11 Harbor Rd **Region:** TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
09-20-06	2	<p>2. EQUIPMENT List - Equipment at this facility consists of the following:</p> <p>Equipment to be constructed:</p> <p>Reference No. Equipment Description Rated Capacity Air Pollution Control(s)</p> <p>UL-1 Marine vessel grab unloader 2000 tons/hr Enclosed grab</p> <p>UL-2 Marine vessel grab unloader 2000 tons/hr Enclosed grab</p> <p>BH-1 Ship unload hopper 3400 tons/hr Fabric filter (DC-2)</p> <p>BH-2 Ship unload hopper 3400 tons/hr Fabric filter (DC-3)</p> <p>BC-14 Ship unload conveyor 6800 tons/hr Fully enclosed</p> <p>BC-15 Ship unload conveyor 6800 tons/hr Fully enclosed</p> <p>Equipment permitted prior to the date of this permit:</p> <p>RD-1 Tandem rotary rail car dumper 5800 tons/hr Enclosed bldg. with water spray</p> <p>BS-1 Surge silo 1000 tons Fabric filter (DC-1)</p> <p>BS-2 Surge silo 3800 tons Fabric filter (DC-5)</p> <p>BS-3 Surge silo 4100 tons Fabric filter (DC-6)</p> <p>BC-1 through BC-13 Various coal handling and storage conveyors Largest belt 6800 tons/hr All fully enclosed (except 4, 7 and 13 ? yard belts)</p> <p>S/R-1 & S/R-2 Two (2) rotary stacker/reclaimers 5900 tons/hr</p>	<p>None of the to be constructed equipment is present. No limestone is in storage. The other equipment is present. I said that they need to contact DEQ permitting regarding an extension to construct the new process because the permit has a deadline.</p>	In Compliance



Commonwealth of Virginia

Registration No: 60997 **AFS Plant ID:** 700-00074
Plant Name: Dominion Terminal Associates **Classification:** Synthetic Minor
Address: Pier 11 Harbor Rd **Region:** TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		stacking, 6500 tons/hr reclaim Wet suppression S/R-3 Rotary reclaimer 6800 tons/hr reclaim only Wet suppression OS-1 through OS-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 Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit. (9 VAC 5-80-1180 D 3)		
09-20-06	3	3. EMISSION CONTROLS - Particulate emissions from each marine vessel grab unloader (UL-1 and UL-2) shall be controlled by using closed grab buckets. The grab buckets shall be completely closed during movement of material from marine vessels to receiving hoppers.	NA. Process has not been constructed.	
09-20-06	4	4. EMISSION CONTROLS - Particulate emissions from each marine vessel unloading hopper (BH-1 and BH-2) shall be controlled by a fabric filter (DC-2 and DC-3). The fabric filters shall be provided with adequate access for inspection.	NA. Process has not been constructed.	
09-20-06	5	5. EMISSION CONTROLS - Particulate emissions from the enclosed rotary rail car dumper building (RD-1)	They say that 150 gal are applied for each dump. In order to empty the surfactant	In Compliance



Commonwealth of Virginia

Registration No: 60997

AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates

Classification: Synthetic Minor

Address: Pier 11 Harbor Rd

Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		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.	tank which has structural problems, they are using surfactant even though it is not needed. They are still running on the original delivery of surfactant. I observed four dumps, two standing on the West side and two on the East. There were no visible emissions. A number of water nozzles were clogged. Five nozzles on the West side were not working and 12 on the East. Even with the outages, coverage was adequate on the West side. Coverage on the East side was not complete. They are planning to relocate the pipe and nozzles on the East side to give better coverage.	
09-20-06	6	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.	They said they have spray bars. They turned one on to demonstrate. They are rarely used. The ones at the far end are more likely to be used than elsewhere. Those are turned on to eliminate dust from the empty belt at the turn around. The stackers/reclaimers no longer have wet suppression. There was too much problem with them due to the movement of the equipment. I would expect the coal to have been sufficiently wetted prior to reaching that	In Compliance



Commonwealth of Virginia

Registration No: 60997

AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates

Classification: Synthetic Minor

Address: Pier 11 Harbor Rd

Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
			point so as to preclude the need for water there.	
09-20-06	7	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.	Hoods and wind guards are present on many of the conveyors. Due to the way the stacker/reclaimers operate, they can't have hoods or guards.	In Compliance
09-20-06	8	8. 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, with assistance from other equipment, attain 100 percent coverage of the storage area. The wet suppression system shall be provided with adequate access for inspection.	They ran through a cycle. One rainbird failed to spray. The pile near that rainbird appeared dry. They said they check rainbirds twice per month and one is due now. If daily checks on potential dust emission points must be checked daily for problems, it seems reasonable to expect the piles to be checked to see if the rainbirds are getting them wet that often. Waiting two weeks is too long.	Out of Compliance
09-20-06	9	9. 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.	Several piles were peaked. Coal had been received 2 days prior. It seems reasonable that piles should be groomed within 8 hrs. of receipt of coal. Mr. Wagoner said that the stacker generally produces a flat top pile. They will compact the pile when they get around to it.	Out of Compliance



Commonwealth of Virginia

Registration No: 60997 **AFS Plant ID:** 700-00074
Plant Name: Dominion Terminal Associates **Classification:** Synthetic Minor
Address: Pier 11 Harbor Rd **Region:** TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
09-20-06	10	10. EMISSION CONTROLS - Wet suppression shall be applied as necessary to all incoming loaded railcars located within facility boundaries if they are not to be dumped within 24 hours.	They said the average wait time is 12 hr. If water were needed, they would use the water cannon on the back of the water truck to apply water.	In Compliance
09-20-06	11	11. EMISSION CONTROLS - Work areas shall be monitored and wet suppression applied as necessary to control emissions while operating a piece of auxiliary handling equipment (e.g., front end loader, bulldozer, etc.).	If water were needed, they would use the water cannon on the back of the water truck to apply water. I did not see a dust problem anywhere during the inspection.	In Compliance
09-20-06	12	12. EMISSION CONTROLS - Wet suppression shall be utilized when operating a particular piece of handling equipment (e.g., a dumper, a conveyor, etc.), unless the use of such controls would cause a safety hazard or damage to the equipment from freezing.		
09-20-06	13	13. EMISSION CONTROLS - Particulate emissions from each surge silo (BS-1, BS-2 and BS-3) shall be controlled by a fabric filter (DC-1, DC-5 and DC-6). The fabric filters shall be provided with adequate access for inspection.	Fabric filters are in use.	In Compliance
09-20-06	14	14. MONITORING - MARINE VESSEL UNLOADING HOPPERS ? Once per ship, within the initial 2 hours after unloading begins, the permittee shall observe the baghouse fan motor amperage for the marine vessel unloading hoppers (BH-1 and	NA. Process has not been constructed.	



Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074
Plant Name: Dominion Terminal Associates Classification: Synthetic Minor
Address: Pier 11 Harbor Rd Region: TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		BH-2). An acceptable range shall be established that reflects good air pollution control practice. An observation outside the acceptable range shall indicate the need for corrective action. The permittee shall maintain a log of the date, time, location, name of person performing the observation, the motor amperage reading, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be current for the most recent five years.		
09-20-06	15	15. MONITORING - FABRIC FILTERS ? Once per day, when in operation, the exhaust from each surge silo fabric filter (DC-1, DC-5 and DC-6) shall be observed by the permittee for a period of no less than one minute for the presence of visible emissions. If visible emissions are observed, the permittee shall perform corrective actions to eliminate the cause of the visible emissions. The permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be current for the	Checks are being made daily. See a copy of the form they use. A review of records for 2008 to date found very few problems (maybe only 1).	In Compliance



Commonwealth of Virginia

Registration No:	60997	AFS Plant ID:	700-00074
Plant Name:	Dominion Terminal Associates	Classification:	Synthetic Minor
Address:	Pier 11 Harbor Rd	Region:	TRO
		Report No:	253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		most recent five years.		
09-20-06	16	16. MONITORING - FABRIC FILTERS - Once per day, when in operation, the exhaust from each marine vessel unloading hopper fabric filter (DC- 2 and DC-3) shall be observed by the permittee for a period of no less than one minute for the presence of visible emissions. If visible emissions are observed, the permittee shall perform corrective actions to eliminate the cause of the visible emissions. The permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be current for the most recent five years.	NA. Process has not been constructed.	
09-20-06	17	17. MONITORING - PROCESS EQUIPMENT - Once per day, when in operation, particulate emissions from the marine vessel grab unloaders (UL-1 and UL-2), the enclosed rotary rail car dumper building (RD-1) and the conveyor systems shall be observed by the permittee for a period of no less than one minute for the presence of visible emissions. If visible emissions are observed, the permittee shall perform corrective	Checks are being made daily. See a copy of the form they use. A review of records for 2008 to date found very few problems.	In Compliance

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		actions to eliminate the cause of the visible emissions. The permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be current for the most recent five years.		
09-20-06	18	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. Request 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.	No changes have been made.	In Compliance
09-20-06	19	19. STORAGE - On a daily annual average basis, the maximum quantity of coal, petroleum coke and	Attached is a copy of a database report. The max. on	In Compliance



Commonwealth of Virginia

Registration No:	60997	AFS Plant ID:	700-00074
Plant Name:	Dominion Terminal Associates	Classification:	Synthetic Minor
Address:	Pier 11 Harbor Rd	Region:	TRO
		Report No:	253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		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.	site for 2007 was 730,466.82 and the highest avg was 484,572.63 tons.	
09-20-06	20	20. THROUGHPUT - The throughput of coal/petroleum coke/limestone (combined), via rail and ship, shall not exceed 24,000,000 tons per year, calculated monthly as the sum of each consecutive 12-month period. No more than 10,000,000 tons per year of coal/petroleum coke/limestone (combined) shall be imported via ship. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.	The max 12-month total for June 2008 is 11,383,227.23 tons.	In Compliance
09-20-06	22	22. VISIBLE EMISSION LIMIT - There shall be no detectable visible emissions from the enclosed rotary rail car dumper building (RD-1). Failure to meet this limitation due to the presence of water vapor shall not be a violation.	I saw no visible dust.	In Compliance
09-20-06	23	23. VISIBLE EMISSION LIMIT - There shall be no detectable visible emissions from any fabric filter exhaust stack	I observed no visible dust.	In Compliance



Commonwealth of Virginia

Registration No: 60997

AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates

Classification: Synthetic Minor

Address: Pier 11 Harbor Rd

Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status																								
09-20-06	24	24. VISIBLE EMISSION LIMIT - There shall be no detectable visible emissions from the conveyor belt transfer points. Failure to meet this limitation due to the presence of water vapor shall not be a violation.	I saw no visible dust.	In Compliance																								
09-20-06	25	25. MONITORING PM10 - 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/limestone terminal. Operation shall be in accordance with Appendix J of 40 CFR Part 50.	Runs are conducted every 6 days. Simpson Weather Service prepares a report. The following results were obtained: <table><tr><td>Qtr</td><td>Max</td><td>Avg</td><td>Min</td></tr><tr><td>1st 08</td><td>50.02</td><td>22.80</td><td>8.01</td></tr><tr><td>4th 07</td><td>47.44</td><td>24.95</td><td>8.05</td></tr><tr><td>3rd 07</td><td>45.18</td><td>26.00</td><td>14.07</td></tr><tr><td>2nd 07</td><td>36.95</td><td>21.08</td><td>9.42</td></tr><tr><td>1st 07</td><td>32.72</td><td>14.46</td><td>7.38</td></tr></table> Wind direction can have a significant impact on results.	Qtr	Max	Avg	Min	1st 08	50.02	22.80	8.01	4th 07	47.44	24.95	8.05	3rd 07	45.18	26.00	14.07	2nd 07	36.95	21.08	9.42	1st 07	32.72	14.46	7.38	In Compliance
Qtr	Max	Avg	Min																									
1st 08	50.02	22.80	8.01																									
4th 07	47.44	24.95	8.05																									
3rd 07	45.18	26.00	14.07																									
2nd 07	36.95	21.08	9.42																									
1st 07	32.72	14.46	7.38																									
09-20-06	26	26. CONTROL of Emissions - The following actions are considered detrimental to the control of coal/petroleum coke/limestone emissions: a. Failure to stop any coal/petroleum coke/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/limestone movement operation when it becomes known that the coal/petroleum coke/limestone handling equipment needed for that																										



Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074
Plant Name: Dominion Terminal Associates Classification: Synthetic Minor
Address: Pier 11 Harbor Rd Region: TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		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.		
09-20-06	27	27. 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/limestone (combined), via rail and ship, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly	All records were available.	In Compliance

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		totals for the preceding 11 months.		
		<p>b. Annual throughput of imported coal/petroleum coke/limestone (combined), via ship, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.</p> <p>c. Records of visible emission observations for fabric filters (DC-1, DC-5 and DC-6) as required in Condition 15.</p> <p>d. Records of visible emission observations for fabric filters (DC-2 and DC-3) as required in Condition 16.</p> <p>e. Records of visible emission observations for the process equipment as required in Condition 17.</p> <p>f. Records of baghouse fan motor amperage measurement observations for the marine vessel unloading hoppers (BH-1 and BH-2) as required in Condition 14.</p> <p>g. Records of PM10 monitoring operations as required by Appendix J of 40 CFR Part 50.</p> <p>h. Maximum daily quantity of coal/petroleum coke/limestone (combined) in storage.</p> <p>i. Annual daily average of coal/petroleum coke/limestone</p>		



Commonwealth of Virginia

Registration No: 60997

AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates

Classification: Synthetic Minor

Address: Pier 11 Harbor Rd

Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		(combined) in storage. j. 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.		
09-20-06	28	28. VISIBLE EMISSIONS EVALUATION - Initial performance tests of fugitive visible emissions shall be conducted by the permittee on each grab unloader (UL-1 and UL-2), conveyor transfer points and hopper (BH-1 and BH-2) used to unload vessels. There shall be no visible emissions or releases from the grab unloaders while materials are being transferred from the vessel to the hoppers or from the hoppers while receiving materials being transferred. Observations shall be made over six (6) consecutive unloading cycles. 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 results 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	NA. The equipment has not been installed.	



Commonwealth of Virginia

Registration No: 60997

AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates

Classification: Synthetic Minor

Address: Pier 11 Harbor Rd

Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		this permit.		
09-20-06	29	<p>29. INITIAL NOTIFICATIONS - The permittee shall furnish written notification to the Tidewater Regional Office of:</p> <p>a. The actual date on which construction of the marine unloading facilities commenced within 30 days after such date.</p> <p>b. The anticipated start-up date of the marine unloading facilities postmarked not more than 60 days nor less than 30 days prior to such date.</p> <p>c. The actual start-up date of the marine unloading facilities within 15 days after such date.</p> <p>d. The anticipated date of the VEE performance tests of the marine unloading facilities postmarked at least 30 days prior to such date.</p> <p>Copies of the written notification referenced in items a through d above are to be sent to:</p> <p>Associate Director Office of Air Enforcement (3AP10) U. S. Environmental Protection Agency Region III 1650 Arch Street Philadelphia, PA 19103-2029 (9 VAC 5-50-50 and 9 VAC 5-80-1180)</p>	NA The equipment has not been installed.	



Commonwealth of Virginia

Registration No: 60997 **AFS Plant ID:** 700-00074
Plant Name: Dominion Terminal Associates **Classification:** Synthetic Minor
Address: Pier 11 Harbor Rd **Region:** TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
09-20-06	32	<p>32. RIGHT OF ENTRY - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:</p> <p>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;</p> <p>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;</p> <p>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</p> <p>d. To sample or test at reasonable times.</p> <p>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.</p>	Access was provided.	In Compliance
09-20-06	33	33. MAINTENANCE/OPERATING PROCEDURES - At all times, including periods of start-up, shutdown, and malfunction, the	a) They use a maintenance management program. It prints out work orders. The mechanic or electrician signs the form	In Compliance



Commonwealth of Virginia

Registration No:	60997	AFS Plant ID:	700-00074
Plant Name:	Dominion Terminal Associates	Classification:	Synthetic Minor
Address:	Pier 11 Harbor Rd	Region:	TRO
		Report No:	253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.	when the work is completed and the date is entered into the computer. b) They said they have in stock filter bags, rainbirds, actuators, solenoids, pumps, motors and valve fittings. c) They have written operating procedures. d) They provided a sign-in sheet for a training session. It included a date and said that it was for "Air Pollution Prevention Training."	
		During each shift, one designated person shall be responsible for compliance with the procedures of Appendix A. Actions required in support of these procedures shall take precedence over routine coal, petroleum coke and limestone handling procedures. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices and process equipment which affect such emissions: a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. b. Maintain an inventory of spare parts. c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum. d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior		



Commonwealth of Virginia

Registration No: 60997 **AFS Plant ID:** 700-00074
Plant Name: Dominion Terminal Associates **Classification:** Synthetic Minor
Address: Pier 11 Harbor Rd **Region:** TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training. Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.		
09-20-06	34	34. RECORD OF MALFUNCTIONS - The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.	Mr. Wagoner says it has been their practice to send an email to the air inspector.	In Compliance
09-20-06	35	35. NOTIFICATION FOR FACILITY OR CONTROL EQUIPMENT MALFUNCTION - The permittee shall furnish notification to the Director, Tidewater Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, telegraph or other	Mr. Wagoner says it has been their practice to send an email to the air inspector.	In Compliance



Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074
Plant Name: Dominion Terminal Associates Classification: Synthetic Minor
Address: Pier 11 Harbor Rd Region: TRO
Report No: 253358

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		electronic communication. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Tidewater Regional Office.		
09-20-06	39	39. PERMIT COPY - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.	OK	In Compliance

Dumping Activity Inspection

Monitoring – Once per day, when in operation, particulate emissions from the enclosed rotary rail car dumper building (RD-1), the exhaust from the surge silo fabric filter and the conveyor systems ... shall be observed by the permittee for a period of no less than one minute each for the presence of visible emissions. If visible emissions are observed, the permittee shall perform corrective actions to eliminate the cause of the visible emissions. The permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary.

Are there visible emissions coming from the dumper building?

Yes _____ (If yes list the corrective actions taken below) No ☒

Are there visible emissions from the fabric filter: BAG HOUSE

Yes _____ (If yes list the corrective actions taken below) No ☒

Are there visible emissions from any conveyors?

Yes _____ (If yes list the conveyors and corrective actions) No ☒

Corrective actions: _____

Employee Name (Print): CURTIS V. REEVES

Employee Signature: Curtis V. Reeves

Date & Time: 6-17-08 0705

Shift Supervisor Signature: [Signature]

2007 Inventory Status

	<u>Monthly Avg</u>	<u>High on Ground</u>	<u>YTD Average</u>
January	470,425.75	535,886.09	470,425.75
February	381,270.97	484,748.48	425,848.36
March	429,842.20	503,409.95	427,179.64
April	403,477.40	504,216.57	421,254.08
May	442,701.35	569,387.95	425,543.53
June	639,881.42	729,446.94	461,266.51
July	486,599.03	640,306.87	464,885.44
August	485,361.09	563,244.41	467,444.90
September	453,867.09	569,027.09	465,936.26
October	485,690.33	589,788.32	467,911.66
November	560,090.26	632,862.97	476,291.54
December	575,664.67	730,466.82	484,572.63

2008 Inventory Status

	<u>Monthly Avg</u>	<u>High on Ground</u>	<u>YTD Average</u>
January	558,483.25	691,736.61	558,483.25
February	368,968.66	505,232.79	463,725.95
March	471,248.82	550,670.18	466,233.58
April	458,654.49	520,132.21	464,338.80
May	702,331.55	891,956.02	511,937.35

Dominion Terminal Associates

6/18/2008



Terminal Activity Report

6/1/2007 To 6/1/2008

Month	Coal + Coke	Throughput Tons
June 2007		398,795.46
July 2007		486,339.78
August 2007		791,687.66
September 2007		858,638.86
October 2007		846,184.82
November 2007		819,550.76
December 2007		1,039,718.31
January 2008		1,153,997.00
February 2008		1,132,705.64
March 2008		1,387,751.02
April 2008		1,401,564.54
May 2008		1,066,293.38
		11,383,227.23

OCR

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

Run-date 06/19/2008 03:17 PM Page 1 of 19

WN,
VIRGINLADE RTMENTOF
ENVIROMME QUAWTY
Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

AIR INSPECTION REPORT

Inspection Date: 06/18/08 Contact Name: Dan R Wagoner
Type: FCE with Site Visit Contact Phone No: (757)245-2275
Inspector: Kenneth J Pinzel Air Program Subpart
Inspection Result: Out of Compliance SIP

Reason:
Complete FCE (Full Compliance Evaluation)

****Additional Information is Attached****

Inspector Conunents:
Type of Facility: Coal Terminal

Air Permits: 9/20/06 NSR permit

Contact(s) during Inspection: Dan Wagoner John Ca-mpbell

Weather: 80 deg. & light winds

Yet to inspect: nothing

Enforcement Action: RCA

Inspector's Electronic Signature Manager'sVElectronic Si nature

Approval Date: Jun 19, 2008 Approval Date: oi

VIRGINIA D PARTHIENT 0
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Requirement Narrative Observation Status

09-20-06 2. EQUIPMENT List - Equipment at None of the to be constructed In
this facility consists of the equipment is present. No Compliance

following: limestone is in storage. The

other equipment is present.

Equipment to be constructed: said that they need to contact

Reference No. Equipment Description DEQ permitting regarding an

Rated Capacity extension to construct the new

Air Pollution Control(s) process because the permit has

UL-1 Marine vessel grab unloader a deadline.

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 (DC-2)

BH-2 Ship unload hopper 3400

tons/hr Fabric filter (DC-3)

BC-14 Ship unload conveyor 6800

tons/hr Fully enclosed

BC-15 Ship unload conveyor 6800

tons/hr Fully enclosed

Equipment permitted prior to the

date of this permit:

RD-1 Tandem rotary rail car dumper

5800 tons/hr Enclosed bldg. with
water spray

BS-1 Surge silo 1000 tons Fabric
filter (DC-1)

BS-2 Surge silo 3800 tons Fabric
filter (DC-5)

BS-3 Surge silo 4100 tons Fabric
filter (DC-6)

BC-1 through BC-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 & S/R-2 Two (2) rotary
stacker/reclaimers 5900 tons/hr

Run Date: 06/19/2008 03:17 PM
Page 3 Of 19

MN'
VIRGINIA DE TMENT 0
ENVIRONMENTAL QUALITY
Conimonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Recluirement Narrative observation Status

stacking, 6500 tons/hr reclaim Wet
suppression
S/R-3 Rotary reclaimer 6800 tons/hr
reclaim only Wet suppression
OS-1 through OS-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
Specifications included in the
permit under this Condition are for
informational purposes only and do
not form enforceable terms or
conditions of the permit.
(9 VAC 5-80-1180 D 3)

09-20-06 3 3. EMISSION CONTROLS - Particulate NA. Process has not been
emissions from each marine vessel constructed.
grab unloader (UL-1 and UL-2) shall
be controlled by using closed grab
buckets. The grab buckets shall be
completely closed during movement
of material from marine vessels to
receiving hoppers.

0 9 -2 0 - 0 64 4. EMISSION CONTROLS - Particulate NA. Process has not been
emissions from each marine vessel constructed.
unloading hopper (BH-1 and BH-2)
shall be controlled by a fabric
filter (DC-2 and DC-3). The fabric
filters shall be provided with
adequate access fot inspection.

0 9 -2 0 - 0 65 5. EMISSION CONTROLS - Particulate They say that 150 gal are I
n
emissions from the enclosed rotarY applied for each dump. In Compliance
rail car dumper building (RD-1) orde'r' to empty the surfactant

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp

or Basis Requirement Narrative Observation
Status

shall be controlled by wet tank which has structural suppression, which, if necessary, problems, they are using shall include the use of a surfactant even though it is surfactant. The surfactant to not needed. They are still water ratio shall be in accordance running on the original with the manufacturer's delivery of surfactant. T recommendations. The minimum observed four dumps, two amount of water applied shall be standing on the West side and 130 gallons per tandem dump. two on the East. There were Compliance shall be achieved if no visible emissions. A there are no visible emissions. number of water nozzles were clogged. Five nozzles on the West side were not working and 12 on the East. Even with the outages, coverage was

adequate on the West side.

Coverage on the East side was not complete. They are planning to relocate the pipe and nozzles on the East side to give better coverage.

09-20-06 6' 6. EMISSION CONTROLS - Particulate They said they have spray In emissions from the transfer points bars. They turned one on to Compliance and stacker/reclaimers (S/R-1, 2 demonstrate. They are rarely and 3) shall be controlled by wet used. The ones at the far end suppression as necessary and by wet are more likely to be used suppression with surfactant as than elsewhere. Those are necessary. Continuous wetting is turned on to eliminate dust not mandatory. from the empty belt at the turn around. The stackers/reclaimers no longer have wet suppression. There was too much problem with them due to the movement of the equipment. I would expect the coal to have been sufficiently wetted prior to reaching that

IW"
VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Requirement Narrative observation
Status

point so as to preclude the
need for water there.

09-20-06 7 7. EMISSION CONTROLS - Particulate Hoods and wind guards are In
emissions from the conveyor system present on many of the Compliance
shall be controlled by conveyor conveyors. Due to the way the
hoods and wind guards. Ground stacker/reclaimers operate,
level reclaim conveyor belts shall they can't have hoods or
be controlled by wet suppression as guards.
necessary.

09-20-06 8 8. FUGITIVE DUST EMISSION CONTROLS They ran through a cycle. One out of

- Fugitive dust emissions from the rainbird failed to spray. The Compliance
storage piles shall be controlled pile near that rainbird
by a wet suppression system capable appeared dry. They said they
of wetting the entire storage area. check rainbirds twice per
Wet suppression cycles shall be month and one is due now. If
implemented in accordance with daily checks on potential dust
Appendix A. Each cycle shall emission points must be
consist of no less than 35,500 checked daily for problems, it

gallons of water and, with seems reasonable to expect the assistance from other equipment, piles to be-checked to see if attain 100 percent coverage of the the rainbirds are getting them storage area. The wet suppression wet that often. Waiting two system shall be provided with weeks is too long. adequate access for inspection.

09-20-06 9 9. FUGITIVE DUST EMISSION CONTROLS Several piles were peaked. Out of

- All storage piles shall be Coal had been received 2 days Compliance truncated, stacker/reclaimers used prior. It seems reasonable to build flat top piles, and the that piles should be groomed top compacted to minimize fugitive within 8 hrs, of receipt of emission s. coal. Mr. Wagoner said that the stacker generally produces a flat top pile. They will compact the pile when they get around to it.

%9RrINIA DEPARTMENT 0
E5VIRONMENTAL QUALITY

Conunonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp

or Basis Requi-rement Narrative Observation
Status

09-20-06 10 10. EMISSION CONTROLS - Wet They said the average wait In
suppression shall be applied as time is 12 hr. If water were Compliance
necessary to all incoming loaded needed, they would use the
railcars located within facility water cannon on the back of
boundaries if they are not to be the water truck to apply
dumped within 24 hours. water.

0 9 - 2 0 - 0 611 11. EMISSION CONTROLS - Work areas If water were needed, the
y In
shall be monitored and wet would use the water cannon on Compliance
suppression applied as necessary tO the back of the water truck to
control emissions while operating a apply water. I did not see a
piece of auxiliary handling dust problem anywhere during
equipment (e.g., front end loader, the inspection.
bulldozer, etc.).

09-20-06 12 12. EMISSION CONTROLS - Wet suppression shall be utilized when operating a particular piece of handling equipment (e.g., a dumper, a conveyor, etc.), unless the use of such controls would cause a safety hazard or damage to the equipment from freezing.

09-20-06 13 13. EMISSION CONTROLS - ParticulateFabric filters are in use. In emissions from each surge silo (BS- Compliance 1, BS-2 and BS-3) shall be controlled by a fabric filter (DC- 1, DC-5 and DC-6). The fabric filters shall be provided with adequate access for inspection.

09-20-06 14 14. MONITORING - MARINE VESSEL NA. Process has not been UNLOADING HOPPERS ? Once per ship, constructed. within the initial 2 hours after unloading begins, the permittee shall observe the baghouse fan motor amperage for the marine vessel unloading hoppers (BH-1 and

VIRGJNLA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates- Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date

or Basis Requirement Narrative Observation Comp
Status

BH-2). An acceptable range shall be established that reflects good air pollution control practice. An observation outside the acceptable range shall indicate the need for corrective action. The permittee shall maintain a log of the date, time, location, name of person performing the observation, the motor amperage reading, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be

current for the most recent five years.

09-20-06 15 15. MONITORING - FABRIC FILTERS ? Checks are being made daily. In Once per day, when in operation, See a copy of the form they Compliance the exhaust from each surge silo use. A review of records for fabric filter (DC-1, DC-5 and DC-6) 2008 to date found very few shall be observed by the permittee problems (maybe only 1). for a period of no less than one minute for the presence of visible emissions. If visible emissions are observed, the permittee shall perform corrective actions to eliminate the cause of the visible emissions. The permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be current for the

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Reclamation Narrative Observation
Status

most recent five years.

09-20-06 16 16. MONITORING - FABRIC FILTERS - NA. Process has not been
Once per day, when in operation, constructed.

the exhaust from each marine vessel
unloading hopper fabric filter (DC-
2 and DC-3) shall be observed by
the permittee for a period of no
less than one minute for the
presence of visible emissions. If
visible emissions are observed, the
permittee shall perform corrective
actions to eliminate the cause of
the visible emissions. The

permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

09-20-06 17 17. MONITORING - PROCESS EQUIPMENT Checks are being made daily. In

- Once per day, when in operation, See a copy of the form they Compliance particulate emissions from the use. A review of records for marine vessel grab unloaders (UL-1 2008 to date found very few and UL-2), the enclosed rotary railproblems. car dumper building (RD-1) and the conveyor systems shall be observed by the permittee for a period of no less than one minute for the presence of visible emissions. If visible emissions are observed, the permittee shall perform corrective

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Tetra Tech Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date

or Basis Requirement Narrative Observation COMP

Status

actions to eliminate the cause of the visible emissions. The permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary. These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

09-20-06 18 18. WET SUPPRESSION SYSTEM - The No changes have been made. In wet suppression system for the Compliance 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. Request 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.

09-20-06 19 19. STORAGE - On a daily annual Attached is a copy of a In average basis, the maximum quantity database report. The max. on Compliance of coal, petroleum coke and

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date

or Basis Requirement Narrative Observation Comp

Status

limestone (combined) in storage site for 2007 was 730,466.82

shall not exceed 1,100,000 tons, and the highest avg was

and at no time shall more than 484,572.63 tons.

1,400,000 tons of coal, petroleum

coke and limestone (combined) be

stored at the facility.

09-20-06 20 20. THROUGHPUT - The throughput Of The max 12-month total for In

coal/petroleum coke/limestone June 2008 is 11,383,227.23 Compliance

(combined), via rail and ship, tons.

shall not exceed 24,000,000 tons

per year, calculated monthly as the

sum of each consecutive 12-month

period. No more than 10,000,000

tons per year of coal/petroleum

coke/limestone (combined) shall be imported via ship. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

09-20-06 22 22. VISIBLE EMISSION LIMIT - There I saw no visible dust. In shall be no detectable visible Compliance emissions from the enclosed rotary rail car dumper building (RD-1). Failure to meet this limitation due to the presence of water vapor shall not be a violation.

0 9 - 2 0 - 0 623 23. VISIBLE EMISSION LIMIT - There I observed no visible dust. In shall be no detectable visible Compliance emissions from any fabric filter exhaust stack

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date

Comp

or Basis Requirement Narrative Observation Status

09-20-06 24 24. VISIBLE EMISSION LIMIT There I saw no visible dust. In shall be no detectable visible Compliance emissions from the conveyor belt

transfer points. Failure to meet

this limitation due to the presence

of water vapor shall not be a

violation.

09-20-06 25 25. MONITORING PM10 - Dominion Runs are conducted every 6 In Terminal Associates shall install days. Simpson weather Service Compliance

and operate a PM10 monitor at the prepares a report. The

Newport News Housing Authority following results were

maintenance Building (180-J) to obtained:

ascertain the ambient air quality Qtr Max Avg Min

in the area surrounding the 1st 08 50.02 22.80 8.01

coal/petroleum coke/limestone 4th 07 47.44 24 .9 58 .0 5

terminal. operation shall be in 3rd 07 45.18 26.00 14.07

accordance with Appendix J of 40 2nd 07 36.95 21.08 9.42

CFR Part 50. 1st 07 32.72 14.46 7.38

Wind direction can have a

significant impact on results.

09-20-06 26 26. CONTROL of Emissions - The

following actions are considered detrimental to the control of coal/petroleum coke/limestone emissions:

- a. Failure to stop any coal/petroleum coke/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/limestone movement operation when it becomes known that the coal/petroleum coke/limestone handling equipment needed for that

%9RGI%'LA D PARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Requirement Narrative observation
Status

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.

09-20-06 27 27. ON SITE RECORDS - The permitteeAll records were available. In shall maintain records of emission Compliance 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/limestone (combined), via rail and ship, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Requirement Narrative Observation Status

totals for the preceding 11 months.

b. Annual throughput of imported
coal/petroleum coke/limestone
(combined), via ship, calculated
monthly as the sum of each
consecutive 12-month period.
Compliance for the consecutive 12-
month period shall be demonstrated
monthly by adding the total for the
most recently completed calendar
month to the individual monthly
totals for the preceding 11 months.

c. Records of visible emission
observations for fabric filters
(DC-1, DC-5 and DC-6) as required
in Condition 15.

d. Records of visible emission observations for fabric filters (DC-2 and DC-3) as required in Condition 16.

e. Records of visible emission observations for the process equipment as required in Condition 17.

f. Records of baghouse fan motor amperage measurement observations for the marine vessel unloading hoppers (BH-1 and BH-2) as required in Condition 14.

g. Records of PMIO monitoring operations as required by Appendix J of 40 CFR Part 50.

h. Maximum daily quantity of coal/petroleum coke/limestone (combined) in storage.

i. Annual daily average of coal/petroleum coke/limestone

p 05--

NIRGINIA DE TMENT OF
EWIRONNIENTAL QUALITY
Conunonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date
or Basis Requirement Narrative observation Comp
Status

(combined) in storage.
j. 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.

09-20-06 28 28. VTSIBLE EMTSSIONS EVALUATION - NA. The equipment has not
Initial performance tests of been installed.
fugitive visible emissions shall be
conducted by the permittee on each
grab unloader (UL-1 and UL-2),
conveyor transfer-points and hopper
(BH-1 and BH-2) used to unload
vessels. There shall be no visible
emissions or releases from the grab
unloaders while materials are being
transferred from the vessel to the
hoppers or from the hoppers while
receiving materials being
transferred. Observations shall be
made over six (6),consecutive
unloading cycles. 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 results 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

n
VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor
C

Address: pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Recluirement Narrative Observation status

this permit.

09-20-06 29 29. INITIAL NOTIFICATIONS - The NA The equipment has not been
permittee shall furnish written installed.

notification to the Tidewater

Regional Office of:

- a. The actual date on which
construction of the marine
unloading facilities commenced
within 30 days after such date.
- b. The anticipated start-up date of
the marine unloading facilities
postmarked not more than 60 days
nor less than 30 days prior to such
date.
- c. The actual start-up date of the
marine unloading facilities within
15 days after such date.
- d. The anticipated date of the VEE
performance tests of the marine

unloading facilities postmarked at
least 30 days prior to such date.

Copies of the written notification
referenced in items a through d
above are to be sent to:

Associate Director

office of Air Enforcement (3AP10)

U. S. Environmental Protection

Agency

Region III

1650 Arch Street

Philadelphia, PA 19103-2029

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

%qRGIN'LA D PARTNIENT 0
ENVIRONMENTAL QUALITY

Conunonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date

or Basis Recruirement Narrative Observation Comp

Status

09-20-06 32 32. RIGHT.OF ENTRY - The permittee Access was provided. In shall allow authorized local, Compliance 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.

09-20-06 33 33. MAINTENANCE/OPERATING a) They use a maintenance In PROCEDURES - At all times, management program. It prints Compliance including periods of start-up, out work orders. The me'chanic shutdown, and malfunction, the or electrician signs the form

WZ
VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report NO: 253358

INSPECTION CHECKLIST

Permit Date Comp
or Basis Requirement Narrative observation
Status

permittee shall, to the extent when the work is completed and practicable, maintain and operate the date is entered into the the affected source, including computer.

associated air pollution control b) They said they have in equipment, in a manner consistent stock filter bags, rainbirds, with good air pollution control actuators, solenoids, pumps, practices for minimizing emissions. motors and valve fittings.

c) They have written operating

During each shift, one designated procedures.

person shall be responsible for d) They provided a sign-in compliance with the procedures of sheet for a training session.

Appendix A. Actions required in It included a date and said support of these procedures shall that it was for "Air Pollution take precedence over routine coal, Prevention Training.-,

petroleum coke and limestone

handling procedures. The permittee

shall take the following measures

in order to minimize the duration

and frequency of excess emissions,

with respect to air pollution

control equipment, monitoring devices and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior

Run Date: 06/19/2008 03:40 PM
Page 18 Of 19

VIRGINIA DEPARTMENT
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic Minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date

or Basis Requirement Narrative observation Comp

Status

to their first operation of such
equipment. The permittee shall
maintain records of the training
provided including the names of
trainees, the date of training and
the nature of the training.

Records of maintenance and training
shall be maintained on site for a
period of five years and shall be
made available to DEQ personnel
upon request.

09-20-06 34 34. RECORD OF MALFUNCTIONS - The Mr. Wagoner says it has been In
permittee shall maintain records Of their practice to send an Compliance

the occurrence and duration of any email to the air inspector.

bypass, malfunction, shutdown or

failure of the facility or its

associated air pollution control

equipment that results in excess

emissions for more than one hour.

Records shall include the date,

time, duration, description

(emission unit, pollutant affected,

cause), corrective action,

preventive measures taken and name

of person generating the record.

09-20-06 35 35. NOTIFICATION FOR FACILITY OR Mr. Wagoner says it has been In

CONTROL EQUIPMENT MALFUNCTION - The their practice to send an Compliance

permittee shall furnish email to the air inspector.

notification to the Director

Tidewater Regional office of

malfunctions of the affected

facility or related air pollution

control equipment that may cause

excess emissions for more than one

hour, by facsimile transmission,

telephone, telegraph or other

VIRGINIA DE TMENTOF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60997 AFS Plant ID: 700-00074

Plant Name: Dominion Terminal Associates Classification: Synthetic minor

Address: Pier 11 Harbor Rd Region: TRO

Report No: 253358

INSPECTION CHECKLIST

Permit Date

or Basis Requirement Narrative Observation Comp
Status

electronic communication. Such
notification shall be made as soon
as practicable but no later than
four daytime business hours after
the malfunction is discovered. The
permittee shall provide a written
statement giving all pertinent
facts, including the estimated
duration of the breakdown, within
two weeks of discovery of the
malfunction. When the condition
causing the failure or malfunction
has been corrected and the
equipment is again in operation,
the permittee shall notify the

Director, Tidewater Regional
office.

09-20-06 39 39. PERMIT COPY - The permittee OK In
shall keep a copy of this permit on Compliance
the premises of the facility to
which it applies.

Dum@ ping Activity
Inspection

monitoring.- Once per day, when in operation, particulate emissions from the enclosed rotary rail car dust separator building (RD-1), the exhaust from the surge silo fabric filter and the conveyor system shall be observed by the permittee for a period of no less than one minute each for the presence of visible emissions. If visible emissions are observed, the permittee shall perform corrective actions to eliminate the cause of the visible emissions. The permittee shall maintain a log of the date, time, location, name of person performing the observation, whether or not visible emissions were detected, and any corrective actions taken, if necessary.

Are there visible emissions coming from the dumper building?

Yes (If yes list the corrective actions taken below) No

Are there visible emissions from the fabric filter: RA, (,

Yes (If yes list the corrective actions taken below) No

Are there visible emissions from any -conveyors?

Yes (If yes list the conveyors and corrective actions) No

Corrective actions:

Employee Name (Print): &a4ris

Employee Signature:

Date & Time:

Shift Supervisor Signature

2007 Inventory Status

Monthly Avg High on Ground YTD Average

January	470,425.75	535,886.09	470,425.75
February	381,270.97	484,748.48	425,848.36
March	429,842.20	503,409.95	427,179.64
April	403,477.40	504,216.57	421,254.08
May	442,701.35	569,387.95	425,543.53
June	639,881.42	729,446.94	461,266.51
July	486,599.03	640,306.87	464,885.44
August	485,361.09	563,244.41	467,444.90
September	453,867.09	569,027.09	465,936.26
October	485,690.33	589,788.32	467,911.66
November	560,090.26	632,862.97	476,291.54
December	575,664.67	730,466.82	484,572.63

2008 Inventory Status

Monthly Avg High on Ground YTD Average

January	558,483.25	691,736.61	558,483.25
February	368,968.66	505,232.79	463,725.95
March	471,248.82	550,670.18	466,233.58
April	458,654.49	520,132.21	464,338.80
May	702,331.55	891,956.02	511,937.35

Dominion Terininal Associates mw .

6/18/2008 A

Terminal Activity Report

6/1/2007 To 6/1/2008

Month co a Ca Throughput Tons

7@
777 7 77 77U@
,5 46
7T
2 W. mm
.198,9
47
A

u
UP
@@WRN
M@
+.4
@3

Ar. 'S'

4 W. k. 7-
40,687.U

5 fem er- A'. @85%63,&
Wl S.
-1@74Z -V
.97 U
h 'J667 W7777

:Z

4
v Icwbir',2007,
0 F

W
'20
0@

819x550J6 AM60
b
T4,

. '03
N
9
W
Wcernb@001 ..

.7
Z M
P@
VM
1 J'53 M7-
206
anuary:

'65
@-1&3;7
64
M
e imarY.-
F

7
-7-77-7
-774

?
41
c 7w
P

.
740 V
U.
-1-2008:'
@y ... '@@ :::: 1%:...f
'A
PP

438 O. "
-,@93
4
041.

'o k Ij066

11,383,227.23