VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

388 C16 JPB

## Commonwealth of Virginia

**Registration No:** 60180

**Plant Name:** Norfolk Southern

**Address:** 2200 Redgate Avenue

**AFS Plant ID:** 710-00048

**Classification:** Synthetic Minor

**Region:** TRO

**Report No:** 238763

# AIR INSPECTION REPORT

**Inspection Date:** 09/27/06

**Type:** FCE With Site Visit

**Inspector:** Kenneth J Pinzel

**Inspection Result:** Out of Compliance

**Contact Name:** Ray Jones

**Contact Phone No:**

| Air Program | Subpart |
|---|---|
| SIP | |

**Reason:**
Complete FCE (Full Compliance Evaluation)

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

**Inspector Comments:**
Type of Facility: Coal Terminal
Air Permits: NSR April 6, 1992
Contact(s) during inspection: Ray Jones, Sr. General Foreman Pier Operations
Weather (if relevant): 75 deg. F., sunny, 5-10 mph winds.

Enforcement Action: Request for Corrective Action to prepare throughput records on a rolling 12-month basis.

K Pinzel

**Inspector's Electronic Signature**
**Approval Date:** Sep 28, 2006

**Manager's Electronic Signature**
**Approval Date:** 9/28/06

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

## Commonwealth of Virginia

**Registration No:** 60180

**Plant Name:** Norfolk Southern

**Address:** 2200 Redgate Avenue

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# INSPECTION CHECKLIST

| Permit Date or Basis | # | Requirement Narrative | Observation | Comp Status |
|---|---|---|---|---|

# Norfolk Southern

**#60180**

**NSR Permit April 6, 1992.**

## SEPTEMBER 27, 2006 INSPECTION

| # | Requirement Narrative | Observation | Comp Status |
|---|---|---|---|
| 2, 3 | **Equipment:**<br>7 Conveyor Belts<br>11 Transfer Points<br>2 Surge Silos<br>2 Fabric filters | 14 conveyor belts but none are new. Discrepancy may be the method of counting/designating. Most are parallel belts. | |
| 4 | **Control** for coat dust from conveyor belts is conveyor hoods & wind guards. | Belts over land have hoods. Belts over water have wind guards (side shields). | In |
| 5 | **Control** for coal dust from transfer points is wet suppression with surfactant as necessary. Continuous wetting is not mandatory. Compliance shall be achieved provided there are no visible emissions. | Wet suppression sprays observed. No coal movements during inspection, however. | In |
| 6 | **Control** for coal dust from each surge silo is a fabric filter. | OK | In |
| 6, 11b | **Monitoring:** Determine ΔP across silo fabric filters on a weekly basis. Keep records. | During demo, Silo S1 ΔP = 1.0; Silo S ΔP = 1.75. Record format is designed for determining ΔP each shift (3x/day) instead of weekly. A spot check of records showed that they are consistently completing the form. If there is no loading into a silo, they enter a horizontal line in the ΔP column. There is also an entry for noting use of wet suppression. | In |
| 7 | **Throughput** of coal ≤ 55,000,000 ton/yr. Compliance with annual limit determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months. | They have monthly totals of coal shipped for that month but no 12-month totals. As compliance assistance, a spreadsheet for tracking throughput on a 12-month basis was emailed to Mr. Jones. | **Out** |
| 9 | **Opacity** from silo fabric filters ≤ 5%. | Fans were turned on as a demo. There was no visible dust from either exhaust. | In |
| 15, 16 | **O&M:** In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment:<br>a) Develop a maintenance schedule;<br>b) Maintain records of scheduled & non-scheduled maintenance.<br>c) Maintain an inventory of spare parts.<br>d) Have written operating procedures for affected facility & air pollution control equipment;<br>e) Operator trained in proper operation of air pollution control equipment & familiar with written operating procedures. Records: names, date & nature. | a) They have a schedule;<br>b) Records of maintenance were available;<br>c) They said that they have spare bags for fabric filters.<br>d) Procedures for fabric filter are kept in the front cover of the ΔP log notebook.<br>e) Training record included signature of participants, date & nature. | In |
| 19 | **Copy** of permit on site. | They said a copy was kept in an office on site. | In |
| Rule 4-24 | **PARTS WASHER:** (Rule applicable in VOC control areas only)<br>Must have either a cover which can be opened with one hand, or an enclosed remote reservoir that is as effective as a cover. 9 VAC 5-40-3290.C1a. | ☒ Has cover which can be opened with one hand.<br>☐ Solvent drains into a drum/tank that has a small opening (enclosed remote reservoir). | In |

| | | | |
|---|---|---|---|
| Rule 4-24 | **PARTS WASHER**: Drainage facilities (either internal or external) to collect and return the solvent to a closed container or the solvent cleaning machine. If solvent volatility is > 0.6 psi, measured at 100 deg F, the drainage facilities should be internal, so that parts are enclosed under the cover while draining. The drainage facilities may be external for applications where an internal type cannot fit into the cleaning system. 9 VAC 5-40-3290. C1b. | ☒ Parts drain inside the machine, i.e. internal drainage.<br>☐ External drainage where solvent returns to an closed container AND volatility is ≤ 0.6 psi @ 100 deg F.<br>☐ External drainage with solvent returning to a closed container AND internal type would not fit into the cleaning system. | In |
| Rule 4-24 | **PARTS WASHER**: A permanent label, summarizing required operating procedures (items C2a-c) should be placed in a conspicuous location on or near the degreaser. 9 VAC 5-40-3290.C1c. | ☐ Sign is posted in an acceptable location and it has the required content.<br>☒ PROBLEM: A sign was posted in an acceptable location but the content was deficient. It mentioned keeping the top closed. A label of instructions on the side of the washer included a sentence that said parts should be left inside until dry. The 3rd required item was not addressed.<br>☒ As compliance assistance, I provided to Mr. Jones a sign via email upon returning to the office. | **OUT** |
| Rule 4-24 | **PARTS WASHER:** Any solvent spray should be a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause excessive splashing. 9 VAC 5-40-3290.C1d. | ☒ Spray meets requirements<br>☐ Has no spray. | |
| Rule 4-24 | **PARTS WASHER**: If the open area is greater than 20 $ft^2$ and if the solvent volatility is > 0.6 psi measured at 100 deg. F, or if solvent is heated above 120 deg. F, other control methods must be employed. One acceptable method is a freeboard ratio >= 0.7. Freeboard ratio means freeboard height divided by width or degreaser. 9 VAC 5-40-3290. C1e. | ☒ Exempt; open area is less than 20 sq. ft. | NA |
| Rule 4-24 | **PARTS WASHER:** Waste solvent should not be disposed of or transferred to another party, such that greater than 20% of the waste (by weight) can evaporate into the atmosphere. Store waste solvent only in closed containers. 9 VAC 5-40-3290. C2a. **(Required content of label.)** | According to Mr. Jones<br>☒ The vendor removes dirty solvent directly from the washer; waste solvent is not stored elsewhere. | In |
| Rule 4-24 | **PARTS WASHER**: Cover must be closed whenever not handling parts in the cleaner. 9 VAC 5-40-3290. C2b. **(Required content of label.)** | ☒ Cover was found closed.<br>☐ PROBLEM: Cover was found OPEN. | In |
| Rule 4-24 | **PARTS WASHER**: Cleaned parts should drain for at least 15 seconds or until dripping ceases. 9 VAC 5-40-3290. C2c. **(Required content of label.)** | ☒ Washer was not in use at the time of the inspection. | In |
| Rule 4-24 | **PARTS WASHER**: Disposal of waste solvent should be by one of the following: 1) reclamation (either by outside services or in-house); 2) Incineration. 9 VAC 5-40-3290. D. | According to Mr. Jones,<br>☒ Solvent is removed by a vendor who reclaims it. | In |

**Fugitive Dust Control:**
STANDARD FOR FUGITIVE DUST/EMISSIONS: During the construction, modification or operation phase of a stationary source or any other building, structure, facility or installation, no owner shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to the following:

1. Use, where possible, of water, or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition.
3. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sand blasting or other similar operations.
4. Open equipment for conveying or transporting materials likely to create objectionable air pollution when airborne shall be covered, or treated in an equally effective manner at all times when in motion.
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

**Observations:**

| | |
|---|---|
| Roadways | Roadways are paved and were relatively clean. Mr. Jones said a sweeper truck cleans the paved areas and a vacuum truck vacuum truck is used to clean out things like storm drains. |
| Dumper | The dumper was not in use during the inspection. Mr. Jones said the spray is a mixture of water and surfactant. He said that the spray is used except when it is freezing or if rain is sufficient to keep dust down. He said they have a log of times when they call DEQ to say the water is not being used due to freezing. |
| Conveyors | Conveyors are covered. Transfer points have sprays. No coal was being moved today. |
| Rail Cars | Mr. Jones said that coal in some rail cars have been treated with a crusting agent to minimize emissions in transit and while sitting in the yard. No visible emissions were noted. |
| Ship | No ship was present. I was told that the delivery chute should be lowered at least down to the level of the ship hold opening. He said a deck foreman is present to make sure the chute is at kept at the proper height because the operator can not accurately determine its position from his location. |
| Complaints | Mr. Jones said that the 800 complaint hotline is still in operation. He said that they have not received a complaint in about 7 yrs. |

CIE380 ltr

# DEQ

# REQUEST FOR CORRECTIVE ACTION

**ISSUED TO:**

| | | | |
|---|---|---|---|
| Owner/Company: | **NORFOLK SOUTHERN** | | |
| Contact Person: | **Ray Jones** | Reg. No. | **60180** |

**As a result of an onsite inspection or document review, the items below were identified as needing corrective action. Please address these promptly. This request is issued in order to assist your facility in maintaining compliance with regulatory requirements. If you have any questions or concerns about this request, please contact the inspector below.**

Coal throughputs were not being totaled on a rolling 12-month basis.

| | |
|---|---|
| **RESPONSE DEADLINE:** | **October 20, 2006** |
| **Fax reply to:** | Fax (757) 518-2003 |
| **Or Email reply to:** | kjpinzel@deq.virginia.gov |
| **RESPONSE Content:** | 1. A document certification signed by a "responsible official" as defined in the regulations. (see attachment).<br>2. A copy of coal throughput 12-month totals all each month in 2005 and each month in 2006, January through August. That is a 20 twelve month totals. |

**RECEIVED BY:** Mailed **DATE:** 9-28-06

**INSPECTOR:** Ken Pinzel (757) 518-2191 **DATE:** 9-28-06

***OCR***

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

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY 1@
Commonwealth of Virginia 10
Registration No: 60180 AFS Plant ID: 7 10-00 048

Plant Name: Norfolk Southern Classification: Synthetic Minor

Address: 2200 Redgate Avenue Region: TRO

Report No: 238763

AIR INSPECTION REPORT

Inspection Date: 0 9 / 2 7 / 0 6 Contact Name: RXj j-(@Ie5

Type: FCE With Site Visit Contact Phone No:

Inspector: Kenneth J Pinzel Air Program Subpart

Inspection Result:Out of Compliance SIP

Reason:
Complete FCE (Full Compliance Evaluation)

**Additional information io Attached**

Inspector Conanents:

Type of Facility: Coal Terminal

Air Permits: NSR April 6, 1992

Contact(s) during inspection: Ray Jones, Sr. General Foreman Pier Operations

Weather (if relevant): 75 deg. F., sunny, 5-10 mph winds.

Enforcement Action: Request for Corrective Action to prepare throughput record
s on a rolling

12-month basis.

Inspector's Electronic Signature Manager's Electronic Signature
Approval Date: Sep 28, 2006 Approval Date: f4 i-I)C)6

"..,Lk DEPARTMENT 0
ENVIRONMENTAL QUALITY

Conmonwealth of Virginia

Registration No: 60180 APS Plant ID: 710-0004 8

Plant Name: Norfolk Southern Classification: Synthetic Minor

Address: 2200 Redgate Avenue Region: TRO

Report No: 238763

INSPECTION CHECKLIST

Permit Date

or Basis Requirement Narrative Observation Comp

Status

Norfolk Southern
#60180
NSR Permit April 6,1992.
SEPTEMBER 27,2006 INSPECTION

| Requirement | Narrative Observation | Comp Status |
|---|---|---|
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| 4 Control for coat dust from conveyor belts is conveyor hoods & wind guards. | Belts over land have hoods. Belts over water have wind guards (side shields). | |
| 5 Control for coal dust from transfer points is wet suppression with surfactant as necessary. Continuous wetting is not mandatory. Compliance shall be achieved provided there are no visible emissions. | Wet suppression sprays observed. No coal movements during inspection, however. | In |
| 6 Control for coal dust from each surge silo is a fabric filter. | OK | In |
| 6, Monitoring: Determine AP across silo fabric filters 1 1 b on a weekly basis. Keep records. Record format is designed for determining AP each shift (3x/day) instead of weekly. A spot check of records showed that they are consistently completing the form. If there is no loading into a silo, they enter a horizontal line in the AP column. There is also an entry for noting use of wet suppression. | During demo, Siio SI AP = 1.0; Silo S AP = 1.75. | In |
| 7 Throughput of coal < 55,000,000 ton/yr. Compliance with annual limit determined on a monthly basis from the sum of the data for the current month plus the preceding 1 1 months. | They have monthly totals of coal shipped for that assistance, a spreadsheet for tracking throughput on a 12-month basis was emailed to Mr. Jones. | Out |
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| 16 | | |

facility & air pollution control equipment;
e) Operator trained in proper operation of air
pollution control equipment & familiar with written
operating procedures.  Records: names, date &
nature.

19 Copy of permit on site. They said a copy was kept in an office on site. In
Rule PARTS WASHER: (Rule applicable in VOC control Z Has cover which can be op
ened with one hand. In
4-24 areas only) r-1 Solvent drains into a drum/tank that has a small
Must have either a cover which can be opened with opening (enciosed remote res
ervoir).
one hand, or an enclosed remote reservoir that is
as effective as a cover. 9 VAC 5-40-3290. C 1 a.

Rule PARTS WASHER: Drainage facilities (either Parts drain inside the machine, i.e. internal In
4-24 internal or external) to collect and return the solvent drainage.
to a closed container or the solvent cleaning El External drainage where solvent returns to an
machine. If solvent volatility is > 0.6 psi, measured closed container AND volatility is < 0.6 psi @ 100
at 100 deg F, the drainage facilities should be deg F.
internal, so that parts are enclosed under the cover El External drainage with solvent returning to a
while draining. The drainage facilities may be closed container AND internal type would not fit into
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cannot fit into the cleaning system.
9 VAC 5-40-3290. C lb.

Rule PARTS WASHER: A permanent label, Sign is posted in an acceptable location and it OUT
4-24 summarizing required operating procedures (items has the required content.
C2a-c) should be placed in a conspicuous location Z PROBLEM: A sign was posted in an acceptable
on or near the degreaser. 9 VAC 5-40-3290.C 1 c. location but the content was deficient. It mentioned
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the side of the washer included a sentence that said
parts should be left inside until dry. The 3 rd required
item was not addressed.
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Jones a sign via email upon returning to the office.

Rule PARTS WASHER: Any solvent spray should be a Z Spray meets requirements
4-24 solid, fluid stream (not a fine, atomized or shower r-I Has no spray.
type spray) and at a pressure which does not
causeexcessivesplashing. 9VAC5-40-3290.Cld.

Rule PARTS WASHER: If the open area is greater than Z Exempt; open area is less than 20 sq. ft. NA
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measured at 100 deg. F, or if solvent is heated
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employed. One acceptable method is a freeboard
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(Required content of label.)

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(Required content of label.)

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4-24 should be by one of the following: 1) reclamation Solvent is removed by a
vendor who reclaims it.
(either by outside services or in-house); 2)
Incineration.
9 VAC 5-40-3290. D.

Fugitive Dust Control:
STANDARD FOR FUGITIVE DUSPEMISSIONS: During the construction, modification or operation
phase of a stationary source or any other building, structure, facility or ins tallation, no owner shall
cause or permit any materials or property to be handled, transported, stored, used, constructed,
altered, repaired or demolished without taking reasonable precautions to preve nt particulate mafter
from becoming airborne. Such reasonable precautions may include, but are not limited to the
following:
1 . Use, where possible, of water, or chemicals for control of dust in the dem olition of existing
buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of asphalt, oil, water or suitable chemicals on dirt roads, mat erials stockpiles and other
surfaces which may create airborne dust; the paving of roadways and the mainta ining of them in a
clean condition.
3. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty
materials. Adequate containment methods shall be employed during sand blastin g or other similar
operations.
4. Open equipment for conveying or transporting materials likely to create obj ectionable air pollution
when airborne shall be covered, or treated in an equally effective manner at a ll times when in
motion.
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried
sediments resulting from soil erosion.

Observations:
Roadways Roadways are paved and were relatively clean. Mr. Jones said a sweepe r truck cleans the paved areas
and a vacuum truck vacuum truck is used to clean out things like storm drains.

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down. He said they have a log of times when they call DEQ to say the water is not being used due to
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Ship No ship was present. I was told that the delivery chute should be lowered at least down to the level of the
ship hold opening. He said a deck foreman is present to make sure the chute i s at kept at the proper
height because the operator can not accurately determine its position from his location.
Complaints Mr. Jones said that the 800 complaint hotline is still in operation . He said that they have not received a
complaint in about 7 yrs.

REQUEST FOR CORRECTIVE ACTION

ISSUED TO:
Owner/Company: NORFOLK SOUTHERN
Contact Person: Ray Jones Reg. No. 60180
As a result of an onsite inspection or document review, the items below were identified as needing
corrective action. Please address these promptly. This request is issued in order to assist your
facility in maintaining compliance with regulatory requirements. If you have any questions or
concerns about this request, please contact the inspector below.
Coal throughputs were not being totaled on a rolling 12-month basis.

RESPONSE DEADLINE: October 20, 2006

Fax reply to: Fax (757) 518-2003

Or Email reply to: kjpinze1(a-),deq.virginia.gov

RESPONSE Content: 1. A document certification signed by a "responsible official" as defined in the
regulations. (see attachment).
2. A copy of coal throughput 12-month totals all each month in 2005 and each month
in 2006, January through August. That is a 20 twelve month totals.

RF-CEIVED BY: Mailed DATE:
INSPECTOR: K en Pinzel (757) 518-2191 DATF-