

CIE 194



REQUEST FOR CORRECTIVE ACTION

DEQ – Air Division, 5636 Southern Blvd, Virginia Beach, VA 23462

ISSUED TO:

Owner/Company:	DOMINION TERMINAL ASSOCIATES		
Contact Person:	DAN WAGONER	Reg. No.	60997

As a result of an onsite inspection or document review, the items below were identified as needing corrective action. Please address these by the date indicated below. 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.

1. Frequency of checks for malfunctioning rainbirds is twice per month. Considering that other emission sources are monitored daily and rainbirds are operated to achieve a daily emission target, twice per month checks seems inconsistent with the objective.
2. Truncating and compacting coal piles were found to reduce emissions. To be effective, this must be done in a timely manner. Completing it within 8 working hours of stacking seems reasonable under most circumstances. This is not the current practice or goal.

RESPONSE DEADLINE: 7-23-08	
Fax reply to:	Fax (757) 518-2003
Or Email reply to:	kipinzel@deq.virginia.gov
Or Mail reply to:	DEQ – Air Division, 5636 Southern Blvd, Virginia Beach, VA 23462 Attn: K. Pinzel
RESPONSE Content:	<ol style="list-style-type: none">1. A document certification signed by a “responsible official” as defined in the regulations. (see attachment).2. Describe procedures that will assure malfunctioning rainbirds are discovered promptly (by watching a cycle or perhaps looking for dry places on the pile or more sophisticated means) so that that coal piles can be kept adequately moist at all locations by either repairing the rainbird or applying water by alternate means.3. Describe procedures that will assure the piles are groomed in a timely manner to minimize fugitive emissions.

RECEIVED BY:	Mailed	DATE:	7-2-08
INSPECTOR:	Ken Pinzel (757) 518-2191	DATE:	

Dominion Terminal Associates
Dan Wagoner
Superintendent Engineering/Maintenance

CIE 194

P.O. Box 967-A
Newport News, VA 23607
(757) 245-2275
Ext. 305
Cellular: (757) 897-8670
FAX: (757) 247-9729
E-mail: dwagoner@dominionterminal.com

DTA

July 10, 2008

Virginia Department of Environmental Quality
5636 Southern Boulevard
Virginia Beach, VA 23462

Attention: Mr Ken Pinzel
Re: Reg. No. 60997 – Request for Corrective Action

Dear Mr. Pinzel:

This responds to your June 19, 2008 Air Inspection Report and Request for Corrective Action.

First, your observation regarding compliance with paragraph 8 of our permit does not reflect the full extent of our efforts to ensure that the wet suppression system serves its intended purpose. The “inspection program” that we mentioned to you serves as a self-check of the mechanical system to see how well we are doing in maintaining a high availability of the rainbirds, and is only one of the methods that we use to identify and correct problems. Through our training program, employees are made aware of the importance of the rainbirds in our efforts to control dust. Inoperative rainbirds are promptly reported when observed by operators in the field. Operational problems with rainbirds are addressed as soon as practical, and the area impacted is given special attention with supplemental spraying by the water truck. The goal of the system is to control dust emissions to the maximum extent possible, and the monitoring data indicate that we are doing a good job of achieving this goal. As a corrective action, we will place additional emphasis on the importance of observing and reporting “out-of-service” rainbirds and placing a high priority on their repair.

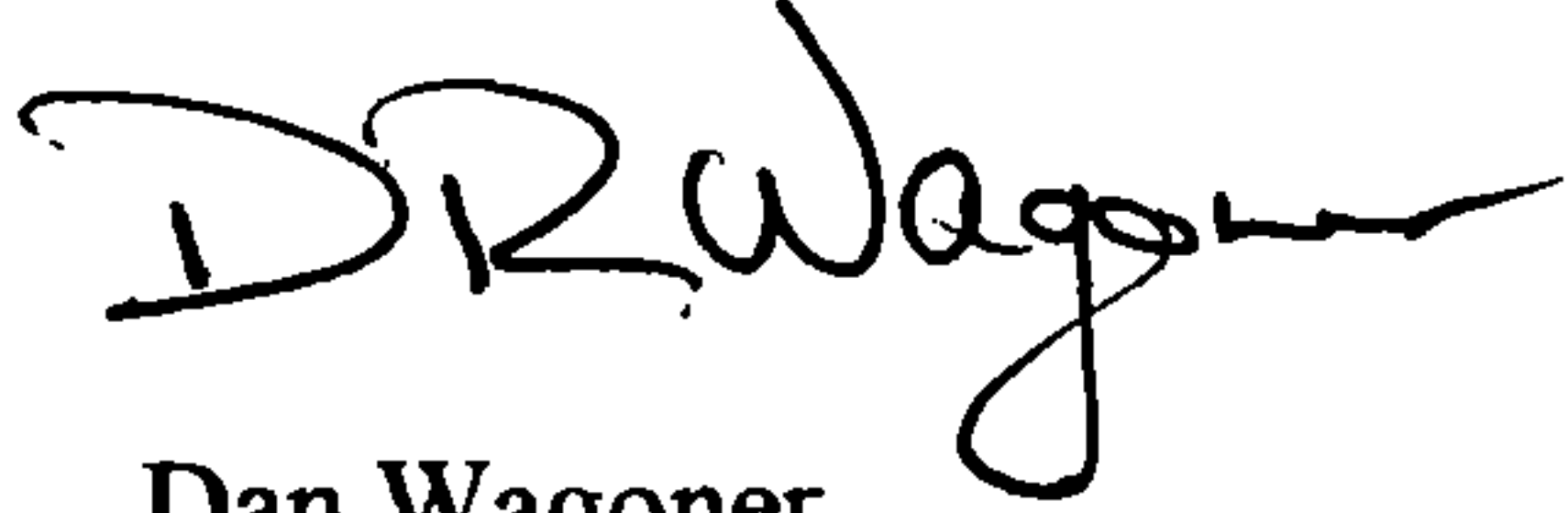
Turning to compliance with paragraph 9 of our permit, again, your observations do not reflect the full extent of our efforts to minimize dust emissions with pile grooming. We place an emphasis on flat-topping piles that are more likely to emit dust. Our three dozers are used for pile grooming as well as for assisting stacker/reclaimers by moving the coal either toward or away from the machines. We do not have a particular time frame for getting piles flat-topped; however, we strive to groom the piles as soon as possible based on dozer and operator availability with priority given to “dusting piles” and finer grades of coal. As a corrective action, we will place additional emphasis on truncating piles as soon as practical after their profiles are modified.

Even though our records of calculated emissions and PM-10 readings indicate that we are doing a good job of controlling emissions to levels well below the standards, we are always looking for ways to improve. If, in visits to other similar operations, you or your



colleagues in other regions learn of any methods employed that would be useful to us in achieving additional reductions of emissions, we would be eager to hear of them and how they may be employed at our facility.

Respectfully,

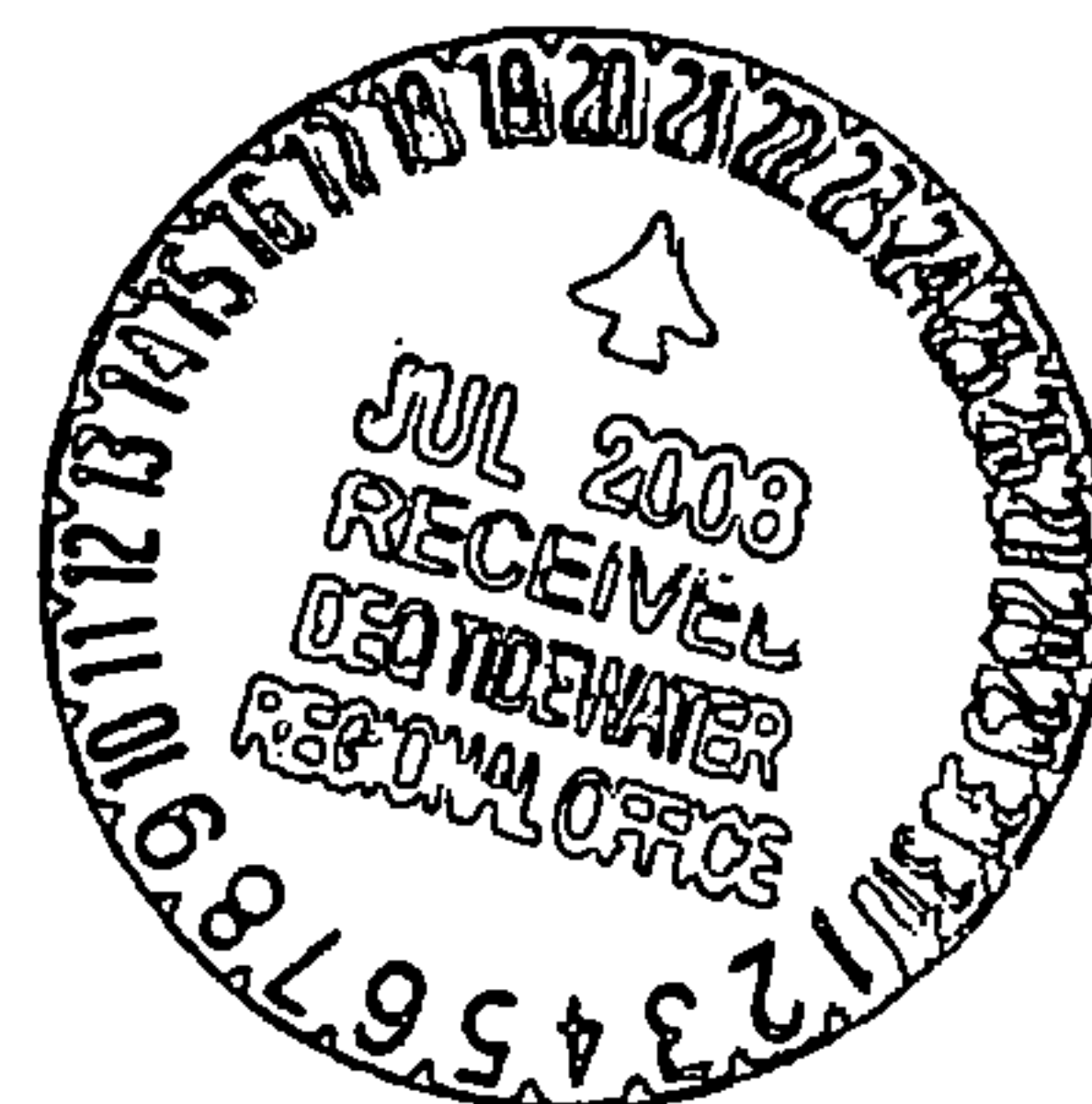
A handwritten signature in black ink, appearing to read "D. Wagoner", with a stylized flourish at the end.

Dan Wagoner
Superintendent Engineering/Maintenance



VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

DOCUMENT CERTIFICATION FORM



I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Facility Name: Dominion Terminal Associates Registration No.: 60997

Printed Name of Responsible Official: Daniel R. Wagoner

TITLE: Superintendent Engineering/Maintenance TELEPHONE NO: 757-245-2275

SIGNATURE: DR Wagoner DATE: 7/18/2008

The following is optional; its purpose is to assist in determining whether a person is a "Responsible Official as defined by the Regulations for the Control and Abatement of Air Pollution, section 9 VAC 5-20-230.

- A. 1. This facility is (☐ a corporation, ☐ an association, or ☐ a cooperative), **AND**
2a. I am (☐ president, ☐ secretary, ☐ treasurer, ☐ a vice-president) of the business entity in charge of a principal business function, **OR**
2b. ☐ I am a person who performs similar policy or decision-making functions for the business entity.
(Qualified if can check a box in 1, and either a box in 2a or the box in 2b.)

- B. 1. This facility is (☐ a corporation, ☐ an association, or ☐ a cooperative), **AND**
2. ☐ I am a duly authorized representative of such business entity, **AND**
3. ☐ I am responsible for the overall operation of one or more manufacturing, production, or operating facilities) **AND** either:
4a. ☐ the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars [\$60 million in 2005 dollars]),
OR
4b. ☐ the authority to sign documents has been assigned or delegated to me in accordance with procedures of the business entity.
(Qualified if can check a box in 1, plus the box in 2, plus the box in 3, and either the box in 4a or 4b.)

- C. ☐ This facility is a partnership, and ☐ I am a general partner. (Qualified if can check both boxes.)

- D. ☐ This facility is a sole proprietorship, and ☐ I am the proprietor. (Qualified if can check both boxes.)

- E. 1. This facility is (☐ a municipality, ☐ a state agency, ☐ a federal agency, or ☐ an other public agency), **AND**
2. I am (☐ a principal executive officer, or ☐ a ranking elected official). A principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency. (Qualified if can check a box in 1 and 2.)

OCR

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

52@ REQUEST FOR CORRECTIVE ACTION
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DEQ - Air Division, 5636 Southern Blvd, Vlrinia Beach, VA 23462

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Owner/Company: DOMINION TERMINAL ASSOCIATES

Contact Person: DAN WAGONER Reg. No. 60997

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RESPONSE DEADLINE: -7- 23-0

Fax reply to-. Fax (757) 519-2003

Or Email reply to: k'pinzel(@,deq.virginia.Po

Or Mail reply to: DEQ - Air Division, 5636 Southem Blvd, Virginia Beach, VA 23 462 Attn: K. Pinzel

RESPONSE Content: 1. A document certification signed by a "responsible officia l" as defined in the regulations. (see attaclunent).

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RECEIVED BY: Mailed DATE: C)

INSPECTOR: Ken Pinzel (757) 518-2191 DATE:

C(&

Dominion Terminal Associates
Dan Wagoner P.O. Box 967-A.
Superintendent Engineering/Maintenance Newport News, VA 23607
(757) 245-2275
. Ext. 305
Cellular., (757) 897-8670
FAX. (757) 247-9729
E-mail- dwagoner@dominionterminal.com

DTA

July 10, 2008

Virginia Department of Environmental Quality
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Respectfully,

Dan Wagoner
Superintendent Engineering/Maintenance

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

DOCUMENT CERTIFICATION FORM

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Registration No.:
Facility Name: C-t 0-

U)910
Printed Name of Responsible Official:

TITLE: TELEPHONE NO: 7S-7 - 24E--ZZT@l
u
SIGNATURE: DATE:

The following is optional; its purpose is to assist in determining whether a person is a "Responsible Official as defined by the Regulations for the Control and Abatement of Air Pollution, section 9 VAC 5-20-230.

A. 1. This facility is (F-1 a corporation, F1 an association, or Fj a cooperative), AND

2a. I am (F-1 president, Fj secretary, El treasurer, F a vice-president) of the business entity in charge of a principal business function, OR

2b. F I am a person who performs similar policy or decision-making functions for the business entity.

(Qualified if can check a box in 1, and either a box in 2a or the box in 2b.)

B. 1. This facility is (El a corporation, F an association, or El a cooperative), AND

2. I am a duly authorized representative of such business entity, AND

3. I am responsible for the overall operation of one or more manufacturing, production, or operating facilities)

AND either:

4a. F1 the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25

million (in second quarter 1980 dollars [\$60 million in 2005 dollars]),

OR

4b. F the authority to sign documents has been assigned or delegated to me in accordance with procedures of the business entity.

(Qualified if can check a box in 1, plus the box in Z plus the box in 3, and either the box in 4a or 4b.)

C. This facility is a partnership, and El I am a general partner. (Qualified if can check both boxes.)

D. This facility is a sole proprietorship, and F I am the proprietor. (Qualified if can check both boxes.)

E. 1. This facility is (F a municipality, F a state agency, F a federal agency, or F1 an other public agency), AND

2. I am (F a principal executive officer, or F a ranking elected official). A principal executive officer of a federal

agency includes the chief executive officer having responsibility for the over

all operations of a principal geographic
unit of the agency. (Qualified if can check a box in 1 and 2.)