

Commonwealth of Virginia

6/17/10
JAm

Registration No: 60979 AFS Plant ID: 700-00071

Plant Name: Kinder Morgan Bulk Terminals - Classification: Synthetic Minor

Pier IX Region: TRO

Address: Pier 9 Harbor Rd Report No: 269056

AIR INSPECTION REPORT

Inspection Date: 05/28/10 Contact Name: Joseph P DeMatteo

Type: FCE With Site Visit Contact Phone No: (757) 928-1520

Inspector: Kenneth J Pinzel Air Program Subpart

Inspection Result: In Compliance SIP

Reason:
Complete FCE (Full Compliance Evaluation)

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

Inspector Comments:

Were EPA Brochures Provided? yes, mailed along with a copy of this inspection.

Arrived: 5/21/10 & 5/28/10 about 9 AM
Departed: about noon and 11:15 respectively
Weather Conditions: warm and mostly sunny.

Name/Title of contact during inspection: See "Contact Name" above.

Purpose: See "Reason" above.

Facility & Process Description: Coal and cement terminal.

Permitting & Regulatory Standards: See "Air Programs & Subparts" list above and citations in the applicable requirements that follow. Current permits are a 8/8/95 and a 12/21/06.

Compliance History: Nothing in last 3 years.

Inspection Notes: See the observations on the following pages.

Recommendations:

1. The "Pre-Shift Dumper Environmental Inspection" form should be revised to make clear the meaning of check marks. Ex. Add a footnote stating check marks for spraybars and sprays indicate that each nozzle is functioning properly and a check mark for vault blowers means a filter is installed and has no holes or gaps that would allow particulate to bypass the filter.
2. When the permit is opened some time in the future, take the opportunity to request certain changes such as: a) Correct the equipment list; b) Include the 20 mph wind speed alarm strategy and remove the 5 min. avg wind speed requirement; c) Remove the requirement for a TOTAL enclosure for the dumper since total means no openings and replace with more accurate wording; d) Remove the requirement for wet wet suppression for the coal unloading conveyors.

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AIR INSPECTION REPORT

Inspector Comments:

Attachments: Internal audits of compliance and other documents described in the inspection report.

Compliance Assistance: A copy of an Excel spreadsheet for tracking throughputs on a rolling 12-month basis was provided.

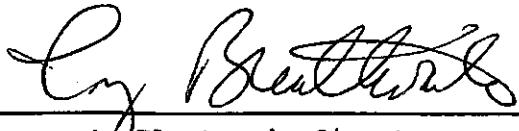


Inspector's Electronic Signature

Approval Date: Jun 7, 2010

Manager's Electronic Signature

Approval Date:


6/11/10



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08-08-95	02	<p>2. EQUIPMENT to be constructed at the permanent facility consists of: and one railcar load-out, not cyclone type alleviator -pipe line from silos to railcar loadout building -railcar loadout system -pumps and blowers Permitted equipment consists of: Permanent facility: - three (3) air slides, one (1) loading spout and one (1) baghouse - ship unloader, screw elevator, controlled by fabric filter #1 two (2) conveyer belts, bucket elevator, six (6) silo airslides, three (3) storage silos and two (2) truck loadout systems - six (6) baghouses - one (1) silo pressure relief/vent filter Temporary facility: (to be terminated upon the construction of #3), the permanent facility) -truck to railcar loadout system - two (2) filtering socks</p>	<p>There is one truck load-out and one railcar load-out, not cyclone type alleviator -pipe line from silos to railcar loadout building -railcar loadout system -pumps and blowers The temporary facility is gone.</p> <p>Ship Unloading: ? Screw elevator to remove cement from ship hold, ? Transfer to covered conveyor #1 (enclosed transfer located on moving unloader), ? Transfer to covered conveyor #2 (enclosed transfer controlled by fabric filter #2). ? Transfer to enclosed bucket elevator (enclosed transfer controlled by fabric filter #3), ? Transfer to distribution box (totally enclosed transfer) controlled by fabric filter #4), ? Transfer to 1 of 3 airslides (totally enclosed transfer), ? Transfer into 1 of 3 silos (totally enclosed transfer). Storage: ? 3 Silos (controlled by fabric filter #4). Truck Loading from Silos: ? Transfer from silo to the silo's discharge airslide (totally enclosed transfer), ? Transfer to truck telescoping load-out spout</p>	In Compliance



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		(totally enclosed transfer), ? Transfer to truck (controlled by fabric filter #5) Railcar Loading from Silos: ? Transfer from 1 or 3 silo discharge airslides to railcar airslide (totally enclosed transfer), ? Transfer to pneumatic line (totally enclosed transfer), ? Transfer to cyclone alleviator (totally enclosed transfer), ? Transfer to railcar telescoping load-out spout (totally enclosed transfer), ? Transfer to railcar (enclosed transfer controlled by fabric filter #6 via the alleviator)		
08-08-95	03	3. THROUGHPUT LIMIT: The annual throughput of cement shall not exceed 500,000 tons, calculated as the sum of each consecutive 12 month period. (Section 120-02-11 of State Regulations)	Max 12-month throughput was 51,539 tons for the period ending April 2010. A copy of monthly throughputs is attached.	In Compliance
08-08-95	04	4. FABRIC FILTERS -: Particulate emissions shall be controlled by baghouses from each of the following operations: ship unloader to conveyer # 1 through screw elevator	There were no visible emissions. Therefore, necessary fabric filters were in use.	In Compliance



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		<p>conveyer # 1 to conveyer # 2</p> <p>silos # 1 & 2 and conveyer # 2 to bucket elevator</p> <p>bucket elevator to aerated bottom distribution box</p> <p>distribution box to silos # 1, 2 and 3 through air slides</p> <p>silos # 1, 2 & 3 (through airslide) to truck loading spout</p> <p>silo # 3 to alleviator through air slide and pipeline</p> <p>Each baghouse shall be provided with adequate access for inspection. Each conveyer shall be completely enclosed.</p> <p>(Sections 120-08-01 H and 120-05-0403 of State Regulations)</p>		
08-08-95	05	<p>5. FILTER SOCK CONTROLS - Particulate emissions from the transfer of cement from trucks to railcars at the temporary facility shall be controlled by two (2) filtering socks. The temporary facility shall be terminated upon the construction of the permanent facility.</p> <p>(Sections 120-08-01 H and 120-05-0403 of State Regulations)</p>	<p>The temporary facility has been removed.</p>	<p>In Compliance</p>
08-08-95	06	<p>6. TRUCK LOADOUT FUGITIVE EMISSIONS - Fugitive particulate emissions from each truck loadout system shall be controlled by automatically maintaining negative pressure in the retractable chute for not less than 15 seconds after</p>	<p>A retractable chute (double chute, one inside the other) drops down to the truck hatch opening. Cement flows into the truck through the inner chute while dust laden air</p>	<p>In Compliance</p>



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		truck loading is complete. (Section 120-02-11 of State Regulations)	flows to the fabric filter through the space between the inner and outer chutes. After loading is complete, the operator lets the dust control system run while he prepares the BOL, which takes about a minute they estimate. I observed no dust when the delivery chute was retracted.	
08-08-95	07	7. TRUCK TRAFFIC FUGITIVE EMISSIONS - Fugitive particulate emissions from truck traffic shall be controlled by industrial vacuum cleaners or by wet suppression. (Section 120-02-11 of State Regulations)	They said that a vacuum would be used for spill cleanup but that does not really occur for this operation. The road to the truck load-out was not a source of dust. They do have a water truck should a wash be needed.	In Compliance
08-08-95	08	8. EMISSION LIMITS - Total emissions from the operation of the cement unloading, storage and truck and railcar loadout shall not exceed the limits specified below: Total Suspended Particulate 1.6 lb/hr 0.8 tons/yr PM-10 1.6 lb/hr 0.8 tons/yr (Section 120-05-0403 of State Regulations)	These are estimates of emissions based on throughput and other limits in the permit.	In Compliance
08-08-95	09	9. OPACITY LIMIT - Visible emissions from any baghouse exhaust or vent filter shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).	There were no visible emissions from any baghouse exhaust emissions.	In Compliance



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(Sections 120-02-11 and 120-05-02 of State Regulations)				
08-08-95	11	<p>11. RECORDS - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to, the yearly throughput of cement, calculated as the sum of each consecutive twelve month period. These records shall be available for inspection by DEQ and shall be current for the most recent five years.</p> <p>(Section 120-05-05 of State Regulations)</p>	Records of cement throughput were available.	In Compliance
08-08-95	13	<p>13. ACCESS - 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>	Access was provided.	In Compliance



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		<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> <p>(Section 120-02-11 of State Regulations)</p>		
08-08-95	14	<p>14. MALFUNCTION NOTIFICATION - If, They could not recall any for any reason, the permitted facility or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Tidewater Regional Office within four business hours of the occurrence. In addition, the owner shall provide a written statement, within fourteen days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shut down.</p> <p>(Section 120-02-34 of State Regulations)</p>	cement system malfunctions.	In Compliance



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08-08-95	15	<p>15. MAINTENANCE - In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:</p> <p>a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request, and</p> <p>b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.</p> <p>(Section 120-02-11 of State Regulations)</p>	<p>They use a computerized maintenance management system which schedules maintenance. It generates a record of scheduled and non-scheduled maintenance. These records are kept "forever."</p> <p>All critical spare parts are said to be present. They confirmed that spare bags for all the fabric filters are on hand.</p>	In Compliance
08-08-95	16	<p>16. OPERATION - The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training.</p> <p>(Section 120-02-11 of State</p>	<p>They have operating procedures, some manufacturer generated and some generated by them.</p> <p>Training records were available. They included names, dates and the nature. See the attached copy.</p>	In Compliance



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Regulations)				
08-08-95	18	18. INFORMATION SUBMITTALS - Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate your prompt response to requests for information to include, as appropriate: process and production data; changes in control equipment, and operating schedules. Such requests for information from DEQ will either be in writing or by personal contact. The availability of information submitted to DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, ?? 2.1- 340 through 2.1-348 of the Code of Virginia, ? 10.1-1314 (addressing information provided to the Board), and ? 120-02-30 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information. (Section 120-02-31 of State Regulations)	Information is submitted as requested.	In Compliance
08-08-95	20	20. PERMIT COPY - A copy of this permit shall be maintained on the premises of the facility to which	Copy is kept in a notebook.	In Compliance



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		<p>it applies.</p> <p>(Section 120-02-11 of State Regulations)</p>		
12-21-06	02	<p>2. EQUIPMENT LIST - Equipment at this facility consists of the following:</p> <p>Equipment to be Constructed</p> <p>Reference No. Equipment Description</p> <p>Rated Capacity</p> <p>Air Pollution control(s)</p> <p>B-1 and B-2 Marine vessel grab unloaders 3500 tons/hr Sealed buckets</p> <p>H-1 and H-2 Pier-side Hoppers 3500 tons/hr Wet suppression, hinged baffles on hoppers</p> <p>C-15 through C-19 Conveyor belts transporting product from hoppers to storage yard 3500 tons/hr Wet suppression, covered</p> <p>Equipment permitted prior to the date of this permit</p> <p>R-1 Rail car rotary dumper 5000 tons/hr Wet suppression</p> <p>C-1 through C-14 Conveyor belts transporting product to ships or storage yard 5000 tons/hr Enclosure and wet suppression</p> <p>SL-1 and SL-2 Shiploaders 12,000 tons/hr combined Wet suppression prior to loader</p> <p>SP Storage piles (numerous)</p> <p>2,500,000 tons Wet suppression in accordance with Appendix A</p>	<p>A. To be constructed:</p> <ul style="list-style-type: none"> + B-1 and B-2, Marine vessel grab unloaders, + H-1 and H-2, Pier-side Hoppers + C-15 through C-19, Conveyor belts transporting product from hoppers to storage yard <p>B. Permitted prior:</p> <ul style="list-style-type: none"> + R-1, Rail car rotary dumper + C-1 through C-12, Conveyor belts transporting product to ships or storage yard <p>DISCREPANCY: (C-13 & 14 are for cement, separately permitted)</p> <p>+ SL-1 Shiploader</p> <p>DISCREPANCY: There is only 1 shiploader.</p> <p>+ SP Storage piles (numerous)</p>	<p>In</p> <p>Compliance</p>



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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)				
12-21-06	03	3. MARINE GRAB UNLOADER EMISSION CONTROLS - Particulate emissions from each marine vessel grab unloader (B-1 and B-2) shall be controlled by using totally enclosed grab buckets. (9 VAC 5-80-1180 and 9 VAC 5-50-260)	The grab buckets are totally enclosed per Mr. DeMatteo.	In Compliance
12-21-06	04	4. MARINE UNLOADING HOPPER EMISSION CONTROLS - Particulate emissions from each marine vessel unloading hopper (H-1 and H-2) shall be controlled by the use of hinged baffles on the hoppers. The hoppers shall be provided with adequate access for inspection. (9 VAC 5-80-1180 and 9 VAC 5-50-260)	Mr. DeMatteo says there are hinged baffles on the hoppers.	In Compliance
12-21-06	05	5. MARINE UNLOADING CONVEYOR EMISSION CONTROLS - Particulate emissions from the conveyor belt system associated with marine vessel unloading shall be controlled by wet suppression and covered or enclosed conveyor belts. The conveyors shall be provided with adequate access for	The conveyor belts are enclosed but ther is no wet suppression.	In Compliance



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		inspection. (9 VAC 5-80-1180 and 9 VAC 5-50-260)		
12-21-06	06	6. RAILCAR DUMPER EMISSION CONTROLS - Particulate emissions from the rotary rail car dumper shall be controlled by an enclosed building with wet suppression. (9 VAC 5-80-1180 and 9 VAC 5-50-260)	Rail cars are dumped inside a building whose only openings are the entrance and exit doorways. Water is sprayed during dumping.	In Compliance
12-21-06	07	7. FUGITIVE EMISSION CONTROLS - Particulate emissions from all bulk materials storage piles shall be controlled by a permanent wet suppression system capable of wetting the entire bulk materials storage area. All bulk materials storage piles shall be truncated and compacted so as to minimize fugitive emissions. The wet suppression system shall be provided with adequate access for inspection. (9 VAC 5-50-260 and 9 VAC 5-50-90)	The wet suppression system is permanent. I viewed a cycle from above the piles and the water seemed to cover all pile surfaces. Piles were truncated. The process of truncating causes compaction.	In Compliance
12-21-06	08	8. STORAGE PILE 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	They said that the wet suppression system is controlled by computer using the Appendix A algorithm.	In Compliance



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		<p>procedure shall achieve at least as high a control efficiency as Appendix A. This applies to all other dust control measures required by this permit. Requests for changes in procedures shall be accompanied by an explanation of the proposed changes and the anticipated effect they shall have.</p> <p>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.</p> <p>(9 VAC 5-50-260)</p>		
12-21-06	09	<p>9. OPERATING WORK PRACTICES:</p> <p>SHIP/BARGE UNLOADING - The following best management practices (BMPs) shall be taken to minimize fugitive emissions from coal ship/barge unloading operations:</p> <p>a. Unloading shall not take place when the sustained wind speed (5-minute average) exceeds 20 mph or results in excessive fugitive emissions. The permittee shall continuously monitor wind speed during ship/barge unloading operations by using an onsite anemometer. The anemometer readings shall be reduced to 5-minute averages which shall be recorded using an automated recordkeeping system.</p> <p>b. The clam shell bucket shall be shaken entirely within the ship</p>	<p>Wind speed is continuously monitored and recorded by the Compliance weather station atop the control tower. Five minute averages are not generated, however. The crane has an anemometer the speed is shown on the operator's display. It has the capacity to alarm. Currently the alarm is set above 20 mph but they plan to get it set to 20 mph before the end of the month.</p> <p>Two barges and 1 ship have been unloaded to date. They do not expect any deliveries this year because US coal is currently cheaper than imported coal.</p>	In



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		<p>hold prior to each transfer in order to dislodge any attached loose material. The clam shell bucket shall be lowered into the material handling hopper on the dock as far as possible without damaging the hopper's baffle system before dumping.</p> <p>c. The permittee shall maintain an optimum level of material in the hopper to minimize emissions.</p> <p>d. Spilled material from the hopper or clam shell shall be removed within 24 hours after completion of ship unloading. Spilled material shall be removed by sweeping, vacuuming, or other best management practice which minimizes fugitive dust emissions.</p> <p>(9 VAC 5-50-50, 9 VAC 5-50-80, and 9 VAC 5-50-260)</p>		
12-21-06	10	<p>10. OPERATING WORK PRACTICES: ROTARY RAIL CAR DUMPER BUILDING (R1) - The following best management practices (BMPs) shall be taken to minimize fugitive emissions from the R1 building:</p> <p>a. All dumping operations shall be totally enclosed;</p> <p>b. All enclosed suppression sprays shall be fully functional and maintained;</p> <p>c. All entry and exit sprays shall be fully functional and maintained; and</p> <p>d. All fan driven air shall be</p>	<p>One dump was observed.</p> <p>1. Dumping was inside a building; the entrance and exit doorways remain open to allow the railcars movement.</p> <p>2. All sprays appeared to be working. One was shooting a stream instead of a spray.</p> <p>3. Entrance and exit sprays appeared to all be working.</p> <p>4. Mr. DeMatteo said there is 1 fan. They are currently rebuilding the frame for the filter.</p>	<p>In Compliance</p>



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		filtered and the filtration systems shall be maintained. (9 VAC 5-50-50, 9 VAC 5-50-80, and 9 VAC 5-50-260)		
12-21-06	11	11. WET SUPPRESSION EXEMPTION - When the permittee is using a particular piece of handling equipment (e.g., a dumper, a conveyor, etc.), it shall utilize the wet suppression controls for that piece of equipment unless the use of such equipment would cause a safety hazard or damage to the equipment from freezing. (9 VAC 5-50-260)	The equipment operates on the piles which are kept wet.	In Compliance
12-21-06	12	12. OPERATING PRACTICES - When the permittee is using a piece of auxiliary handling equipment (e.g., front end loader, bulldozer), the area to be worked shall be monitored and wet suppression shall be applied as necessary to control emissions. (9 VAC 5-50-260)	The equipment operates on the piles which are kept wet.	In Compliance
12-21-06	13	13. OPERATING PRACTICES - The following actions shall be taken to comply with these. maintain control of bulk material dust emissions: a. The permittee shall stop any material movement operation when it becomes known that installed air pollution control systems are inoperative and would cause excess	a. Mr. DeMatteo says they	In Compliance



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		<p>emissions.</p> <p>b. The permittee shall stop a material movement operation when it becomes known that the material handling equipment needed for that operation is malfunctioning or operating significantly below designated specifications.</p> <p>c. The permittee's equipment operators shall 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).</p> <p>d. The permittee shall institute a policy that instructs operational personnel to give preference to designated personnel with the responsibility for controlling dust emissions.</p> <p>(9 VAC 5-50-260)</p>		
12-21-06	14	<p>14. RESPONSIBLE PERSON - One person The control tower tech is each shift shall be designated as responsible. Appendix A is responsible for compliance with the implemented automatically by procedures of Appendix A. Required the computer without human actions in support of these control involvement. However, they procedures shall take precedence run assurance cycles manually over routine coal handling procedures.</p> <p>(9 VAC 5-50-50, 9 VAC 5-50-80, and 9 VAC 5-50-260)</p>		In Compliance

12-21-06 14 14. RESPONSIBLE PERSON - One person The control tower tech is each shift shall be designated as responsible. Appendix A is responsible for compliance with the implemented automatically by procedures of Appendix A. Required the computer without human actions in support of these control involvement. However, they procedures shall take precedence run assurance cycles manually over routine coal handling procedures.

(9 VAC 5-50-50, 9 VAC 5-50-80, and 9 VAC 5-50-260)



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12-21-06	15	15. GRAB BUCKETS - The grab buckets shall be completely closed during transfer of material from marine vessels to receiving hoppers. (9 VAC 5-80-1180 and 9 VAC 5-50-260)	An unloading event was not observed. They do not expect any deliveries this year because US coal is currently cheaper than imported coal.	In Compliance
12-21-06	16	16. WET SUPPRESSION CYCLES - Each wet suppression cycle shall consist of no less than 20,000 gallons of water and attain 100 percent coverage of the storage area. (9 VAC 5-50-90, 9 VAC 5-80-1180, and 9 VAC 5-50-260)	They have recently installed flow meters and have confirmed that 20K gals are being applied. When the meters were installed, they discovered they were applying much more water than necessary. The reason is probably that when they relocated the rainbirds from atop the steel structure last year, they added rainbirds. Instead of 4 per quadrant, they have 6, one between each pair of concrete towers. In response, they reduced the cycle time from 6 to 4 minutes. This time results in 20K gal being applied.	In Compliance
12-21-06	17	17. STORAGE LIMIT - The maximum aggregate quantity of bulk materials in ground storage piles at any time shall not exceed 1,000,000 tons as determined by daily calculations. (9 VAC 5-80-260 and 9 VAC 5-80-1180)	See attached copies of daily reports. 5/7/10: 677,011 tons 5/14/10: 704,486 tons 5/21/10: 571,095 tons 5/28/10: 563,833 tons Mr. DeMatteo said they reached 800,000 tons a couple of weeks ago.	In Compliance



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Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
12-21-06	18	<p>18. THROUGHPUT LIMIT - The annual throughput of bulk materials shall not exceed 30,000,000 tons per year combined, 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 prior 11 months.</p> <p>(9 VAC 5-80-1180)</p>	The 12-month total for the period ending April, 2010 was 8,167,795 tons.	In Compliance
12-21-06	19	<p>19. OPACITY at all emission points shall be limited to less than 5 percent.</p> <p>(9 VAC 5-50-20 and 9 VAC 5-50-80)</p>	I observed no dust.	In Compliance
12-21-06	20	<p>20. 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 Tidewater Regional Office. These records shall include, but are not limited to:</p> <p>a. Daily records of the maximum quantity of all bulk materials in storage.</p> <p>b. Annual throughput of each bulk material separately, calculated monthly as the sum of each consecutive 12-month period.</p> <p>Compliance for the consecutive 12-</p>	<p>a. Daily records were available. See attached data and operating parameters as copies of a few.</p> <p>b. Throughput records on a rolling 12-month basis were available.</p> <p>c. There is a log for each ship/barge unloading event (copy attached). It includes:</p> <ul style="list-style-type: none"> ? Unloading starting date and time, ? Unloading completion date and time, ? Any cessations would be noted in the "Reclaim Operations Log Report," a copy of which is attached. It would 	In Compliance



Commonwealth of Virginia

Registration No: 60979

AFS Plant ID: 700-00071

Plant Name: Kinder Morgan Bulk Terminals -
Pier IXClassification: Synthetic Minor
Region: TRO

Address: Pier 9 Harbor Rd

Report No: 269056

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		month period shall be demonstrated include the date and time monthly by adding the total for the periods of ceased operation most recently completed calendar and include the reason. month to the individual monthly ? Name of the person entering totals for the preceding 11 months. the information but not the c. A log for each ship/barge time of entries. unloading event which shall include d. Wind speed is continuously the unloading starting date and monitored and recorded by the time, unloading completion date and weather station atop the time, any date and time periods of control tower. A graph of ceased operation due to excessive speed is displayed on the wind speed, and the date and name monitor. They do not have 5 of the person entering the minute averages.		
		information.	e. Attached is a checklist.	
		d. Records of all 5-minute wind speed averages recorded during each ship/barge unloading event.	? 1. The checklist gets check marks for "spraybars entry dumper," "spraybars exit dumper," "door sprays" and "vault blowers." Since total enclosure is permanent barring removal of a wall, there is no need for monitoring.	
		e. A checklist for rail car unloading events, which shall include the following information: A daily inspection of the first rail car unloading event of each operating day to ensure the equipment referenced in 10a.-10d. is fully functional and maintained in proper working order, including the name of the observer, the date and the time the observation was made and corrective actions taken on observed equipment malfunctions.	? 2. Observer is included.	
		A copy of the facility's current BMPs and completed checklists shall be maintained at the terminal and shall be available for inspection by the DEQ.	? 3. Date and the time of observation are included; sometimes time was omitted.	
		f. Records of malfunctions and notifications as prescribed by conditions 27 and 28.	? 4. There is a place for comments where corrective actions can be described.	
			f. Mr. DeMatteo said there have been no such malfunctions.	



Commonwealth of Virginia

Registration No: 60979 AFS Plant ID: 700-00071

Plant Name: Kinder Morgan Bulk Terminals - Classification: Synthetic Minor
Pier IX Region: TRO

Address: Pier 9 Harbor Rd Report No: 269056

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		<p>These records shall be available for inspection by the DEQ and shall be current for the most recent five years.</p> <p>(9 VAC 5-50-50)</p>		
12-21-06	25	<p>25. RIGHT OF ENTRY - The permittee Access was provided. 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>		In Compliance



Commonwealth of Virginia

Registration No: 60979 AFS Plant ID: 700-00071
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 Pier IX Region: TRO
 Address: Pier 9 Harbor Rd Report No: 269056

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
(9 VAC 5-170-130 and 9 VAC 5-80-1180)				
12-21-06	26	<p>26. MAINTENANCE/OPERATING PROCEDURES - At all times, including periods of start-up, shutdown and malfunction, the 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.</p> <p>a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.</p> <p>b. Maintain an inventory of spare parts.</p> <p>c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendation, at a minimum.</p> <p>d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior 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.</p> <p>Records of maintenance and training shall be maintained on site for a</p>	<p>a. They use a computerized maintenance management system Compliance which schedules maintenance. It generates a record of scheduled and non-scheduled maintenance.</p> <p>b. Spare parts: rainbirds, piping, motors, valves, pumps, nozzles.</p> <p>c. Operating procedures are available.</p> <p>d. Training records were available. See the attached copy. Included are names, dates & nature.</p>	In



Commonwealth of Virginia

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INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		period of five years and shall be made available to DEQ personnel upon request. (9 VAC 5-50-20 E and 9 VAC 5-80-1180 D)		
12-21-06	27	27. RECORD OF MALFUNCTIONS - The permittee shall maintain records of malfunctions. 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. (9 VAC 5-20-180 J and 9 VAC 5-80-1180 D)	They could not recall any such malfunctions.	In Compliance
12-21-06	28	28. NOTIFICATION FOR FACILITY OR CONTROL EQUIPMENT MALFUNCTION - The permittee shall furnish notification to the 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 or telegraph. Such notifications shall be made as soon as practicable but no later than four daytime business hours after the	They could not recall any such malfunctions.	In Compliance



Commonwealth of Virginia

Registration No: 60979 AFS Plant ID: 700-00071

Plant Name: Kinder Morgan Bulk Terminals - Classification: Synthetic Minor

Pier IX Region: TRO

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INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		<p>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.</p> <p>(9 VAC 5-20-180 C and 9 VAC 5-80-1180)</p>		
12-21-06	29	<p>29. VIOLATION OF AMBIENT AIR QUALITY STANDARD - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.</p> <p>(9 VAC 5-20-180 I and 9 VAC 5-80-1180)</p>	No request was made.	In Compliance
12-21-06	31	<p>31. PERMIT COPY - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.</p> <p>(9 VAC 5-80-1180)</p>	They had a copy in a notebook.	In Compliance

PIER IX

I. CEMENT

REQUIREMENT	OBSERVATION
COPY of permit on site. (Condition 19 of 8/8/95 permit)	Copy is kept in a notebook.
PERMITTED EQUIPMENT: A. To be constructed at the permanent facility consists of: Cyclone type alleviator Pipe line from silos to Railcar loadout building Railcar loadout system Pumps and blowers B. Permitted equipment consists of Permanent facility: 3 air slides [??] 1 loading spout [chute for loading cement into truck?] 1 baghouse [on ship unloader?] Ship unloader Screw elevator [for ship unloading] 2 conveyer belts Bucket elevator [to deliver into silo] 6 silo air slides [3 on top for loading into silo & 3 on bottom for unloading into trucks] 3 storage silos 2 truck loadout systems [one for truck and 1 for rail?] 6 baghouses 1 silo pressure relief/vent filter C. Temporary facility: (to be terminated upon the construction of the permanent facility) <input type="checkbox"/> Truck to railcar loadout system <input type="checkbox"/> 2 filtering socks (Condition 2 of 8/8/95 permit)	There is one truck load-out and one railcar load-out, not two truck load-outs. The temporary facility is gone. Ship Unloading: ✓ Screw elevator to remove cement from ship hold, ✓ Transfer to covered conveyor #1 (enclosed transfer controlled by fabric filter #1 located on moving unloader), ✓ Transfer to covered conveyor #2 (enclosed transfer controlled by fabric filter #2), ✓ Transfer to enclosed bucket elevator (enclosed transfer controlled by fabric filter #3), ✓ Transfer to distribution box (totally enclosed transfer controlled by fabric filter #4), ✓ Transfer to 1 of 3 airslides (totally enclosed transfer), ✓ Transfer into 1 of 3 silos (totally enclosed transfer). Storage: ✓ 3 Silos (controlled by fabric filter #4). Truck Loading from Silos: ✓ Transfer from silo to the silo's discharge airslide (totally enclosed transfer), ✓ Transfer to truck telescoping load-out spout (totally enclosed transfer), ✓ Transfer to truck (controlled by fabric filter #5) Railcar Loading from Silos: ✓ Transfer from 1 or 3 silo discharge airslides to railcar airslide (totally enclosed transfer), ✓ Transfer to pneumatic line (totally enclosed transfer), ✓ Transfer to cyclone alleviator (totally enclosed transfer), ✓ Transfer to railcar telescoping load-out spout (totally enclosed transfer), ✓ Transfer to railcar (enclosed transfer controlled by fabric filter #6 via the alleviator)

<p>CONTROLS for particulate is a fabric filter for:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Ship unloader to conveyer # 1 through screw elevator <input checked="" type="checkbox"/> Conveyer # 1 to conveyer # 2 <input checked="" type="checkbox"/> Silos # 1 & 2 and conveyer # 2 to bucket elevator <input checked="" type="checkbox"/> Bucket elevator to aerated bottom distribution box <ul style="list-style-type: none"> Distribution box to silos # 1, 2 and 3 through air slides Silos # 1, 2 & 3 (through airslide) to truck loading spout <input type="checkbox"/> Silo # 3 to alleviator through air slide and pipeline (Condition 4 of 8/8/95 permit) 	<p>Fabric filters were present as described above.</p>
<p>TRUCK LOADOUT FUGITIVE EMISSIONS - Fugitive particulate emissions from each truck loadout system shall be controlled by automatically maintaining negative pressure in the retractable chute for not less than 15 seconds after truck loading is complete. (Condition 6 of 8/8/95 permit)</p>	<p>A retractable chute (double chute, one inside the other) drops down to the truck hatch opening. Cement flows into the truck through the inner chute while dust laden air flows to the fabric filter through the space between the inner and outer chutes. After loading is complete, the operator lets the dust control system run while he prepares the BOL, which takes about a minute they estimate. I observed no dust when the delivery chute was retracted.</p>
<p>TRUCK TRAFFIC FUGITIVE EMISSIONS - Fugitive particulate emissions from truck traffic shall be controlled by industrial vacuum cleaners or by wet suppression. (Condition 7 of 8/8/95 permit)</p>	<p>They said that a vacuum would be used for spill cleanup but that does not really occur for this operation. The road to the truck load-out was not a source of dust. They do have a water truck should a wash be needed.</p>
<p>OPACITY from any baghouse exhaust or vent filter <= 5%. (Condition 9 of 8/8/95 permit)</p>	<p>There were no visible emissions.</p>
<p>THROUGHPUT: Cement \leq 500,000 tons, calculated on a rolling 12-month basis, i.e. compliance is demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. RECORDS: Keep throughput records as described; records to be available for inspection. (Conditions 3 & 11 of 8/8/95 permit)</p>	<p>Max 12-month throughput was 51,539 tons for the period ending April 2010. A copy of monthly throughputs is attached.</p>
<p>MALFUNCTION NOTIFICATION of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour 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. (Conditions 14 of 8/8/95 permit)</p>	<p>They could not recall any cement system malfunctions.</p>

<p>MAINTENANCE - In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:</p> <ul style="list-style-type: none"> a) Develop a maintenance schedule b) Maintain records of all scheduled and non-scheduled maintenance. c) Keep records on site for at least five years d) Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns. <p>(Conditions 15 of 8/8/95 permit)</p>	<p>They use a computerized maintenance management system which schedules maintenance. It generates a record of scheduled and non-scheduled maintenance. These records are kept "forever."</p> <p>All critical spare parts are said to be present. They confirmed that spare bags for all the fabric filters are on hand.</p>
<p>OPERATION -</p> <ul style="list-style-type: none"> a) Have available written operating procedures, based on mfg's recommendations at a minimum; b) Train operators in proper operation of all such equipment & familiarize with written operating procedures. Records: names, date & nature. <p>(Conditions 16 of 8/8/95 permit)</p>	<p>They have operating procedures, some manufacturer generated and some generated by them.</p> <p>Training records were available. They included names, dates and the nature. See the attached copy.</p>

PIER IX

II. MARINE UNLOADING + COAL HANDLING & STORAGE:

REQUIREMENT	OBSERVATION
COPY of permit on site. (Condition 19 of 12/21/06 permit)	A copy was in a notebook.
PERMITTED EQUIPMENT: A. To be constructed: B-1 and B-2, Marine vessel grab unloaders, H-1 and H-2, Pier-side Hoppers C-15 through C-19, Conveyor belts transporting product from hoppers to storage yard B. Permitted prior: R-1, Rail car rotary dumper C-1 through C-14, Conveyor belts transporting product to ships or storage yard SL-1 and SL-2 Shiploaders SP Storage piles (numerous) (Condition 2 of 12/21/06 permit)	A. To be constructed: ✓ B-1 and B-2, Marine vessel grab unloaders, ✓ H-1 and H-2, Pier-side Hoppers ✓ C-15 through C-19, Conveyor belts transporting product from hoppers to storage yard B. Permitted prior: ✓ R-1, Rail car rotary dumper ✓ C-1 through C-12, Conveyor belts transporting product to ships or storage yard DISCREPANCY: (C-13 & 14 are for cement, separately permitted) ✓ SL-1 Shiploader DISCREPANCY: There is only 1 shiploader. ✓ SP Storage piles (numerous)
MARINE UNLOADING PARTICULATE CONTROLS: 1. Totally enclosed grab buckets for (B-1 and B-2) unloading buckets. 2. Hinged baffles on the unloading hoppers (H-1 & 2). 3. Wet suppression and covered or enclosed conveyor belts. (Conditions 3 - 5 of 12/21/06 permit)	1. Mr. DeMatteo says the grab buckets are enclosed. 2. I observed the hopper from the top of the cement silos. They appeared to have hinged baffles. I was told this was so. 3. The conveyor is enclosed but does not have wet suppression.

MARINE UNLOADING BMP's

1. Continuously monitor wind speed during unloading with an onsite anemometer. Reduce readings to 5 min. averages & record using an automated recordkeeping system.
Records of all 5-minute wind speed averages recorded during each ship/barge unloading event.
2. Unloading shall not take place when the sustained wind speed (5-minute average) exceeds 20 mph or results in excessive fugitive emissions.
Records: A log for each ship/barge unloading event which shall include the unloading starting date and time, unloading completion date and time, any date and time periods of ceased operation due to excessive wind speed, and the date and name of the person entering the information.
3. The clam shell bucket shall be shaken entirely within the ship hold prior to each transfer in order to dislodge any attached loose material.
4. Grab buckets shall be completely closed during transfer of material from marine vessels to receiving hoppers.
5. The clam shell bucket shall be lowered into the material handling hopper on the dock as far as possible without damaging the hopper's baffle system before dumping.
6. The permittee shall maintain an optimum level of material in the hopper to minimize emissions.
7. Spilled material from the hopper or clam shell shall be removed within 24 hours after completion of ship unloading. Spilled material shall be removed by sweeping, vacuuming, or other best management practice which minimizes fugitive dust emissions.

(Condition 9 & 15 of 12/21/06 permit)

X 1. Wind speed is continuously monitored and recorded by the weather station atop the control tower. Five minute averages are not generated, however. The crane has an anemometer the speed is shown on the operator's display. It has the capacity to alarm. Currently the alarm is set above 20 mph but they plan to get it set to 20 mph before the end of the month.

✓ 2. SOP states that no unloading will take place during sustained wind speeds in excess of 20 mph (5 min. avg.). Also, if lighter winds are causing dust emission, the system is to be shutdown.

There is a log for each ship/barge unloading event (copy attached). It includes:

- ✓ Unloading starting date and time,
- ✓ Unloading completion date and time,
- ✓ Any cessations would be noted in the "Reclaim Operations Log Report," a copy of which is attached. It would include the date and time periods of ceased operation and include the reason.
- ✓ Name of the person entering the information but not the time of entries.

Two barges and 1 ship have been unloaded to date. They do not expect any deliveries this year because US coal is currently cheaper than imported coal.

<p>ROTARY RAIL CAR DUMPER BUILDING BMP's:</p> <ol style="list-style-type: none"> 1. All dumping operations shall be totally enclosed; 2. All enclosed suppression sprays shall be fully functional and maintained; 3. All entry and exit sprays shall be fully functional and maintained; and 4. All fan driven air shall be filtered and the filtration systems shall be maintained. <p>EXEMPTION: utilize the wet suppression controls unless the use of such equipment would cause a safety hazard or damage to the equipment from freezing.</p> <p>Records:</p> <p>A checklist for rail car unloading events. Contents:</p> <ol style="list-style-type: none"> a. The 4 items listed here to ensure the equipment referenced is fully functional and maintained in proper working order. b. Observer. c. Date and the time of observation. d. Corrective actions taken on observed equipment malfunctions. <p>Copy of current BMPs & completed checklists. (Conditions 10, 11 & 20e of 12/21/06 permit)</p>	<p>One dump was observed.</p> <ul style="list-style-type: none"> ✓ 1. Dumping was inside a building but the entrance and exit doorways were open. This is not a total enclosure. ✓ 2. All sprays appeared to be working. However, one was shooting a stream instead of a spray. ✓ 3. Entrance and exit sprays were working. ✓ 4. Mr. DeMatteo said there is 1 fan. They are currently rebuilding the frame for the filter. <p>Attached is a checklist.</p> <ul style="list-style-type: none"> ✓ a. The checklist gets check marks for "spraybars entry dumper," "spraybars exit dumper," "door sprays" and "vault blowers." Except for the permit requirement, there is no value in monitoring this enclosure since changes are not possible without removal of a wall. ✓ b. Observer is included. ✓ c. Date and the time of observation are included; sometimes time was omitted. ✓ d. There is a comments section to record corrective actions. <p>✓ The BMP is in the permit. Completed checklists were available. They appear to be generated daily.</p>
<p>COAL HANDLING CONTROLS for particulate:</p> <ol style="list-style-type: none"> 1. Dump railcars in an enclosed building with wet suppression. 2. Use a permanent wet suppression system capable of wetting the entire bulk materials storage area. 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. 3. Each wet suppression cycle \geq 20,000 gallons 4. Each wet suppression cycle shall attain 100 percent coverage of the storage area. 5. Truncate and compact storage piles. <p>EXEMPTION: utilize the wet suppression controls unless the use of such equipment would cause a safety hazard or damage to the equipment from freezing.</p> <p>MONITORING: When using a piece of auxiliary handling equipment (e.g., front end loader, bulldozer), the area to be worked shall be monitored and wet suppression shall be applied as necessary to control emissions. (Conditions 6 - 8, 11, 12 & 16 of 12/21/06 permit)</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> 1. Rail cars are dumped inside a building whose only openings are the entrance and exit doorways. <input checked="" type="checkbox"/> 2. I viewed a cycle from above the piles and the water seemed to cover all pile surfaces. <input checked="" type="checkbox"/> 3. They have recently installed flow meters and have confirmed that 20K gals are being applied. When the meters were installed, they discovered they were applying much more water than necessary. The reason is probably that when they relocated the rainbirds from atop the steel structure last year, they added rainbirds. Instead of 4 per quadrant, they have 6, one between each pair of concrete towers. In response, they reduced the cycle time from 6 to 4 minutes. This time results in 20K gal being applied. <input checked="" type="checkbox"/> 4. It appears that coverage was 100%. <input checked="" type="checkbox"/> 5. Piles were truncated. The process of truncating causes compaction. <input checked="" type="checkbox"/> Piles are monitored. If needed, extra water is applied with the water truck or with ground mounted water guns.

<p>RESPONSIBLE PERSON - One person each shift shall be designated as responsible for compliance with the procedures of Appendix A. Required actions in support of these control procedures shall take precedence over routine coal handling procedures.</p> <p>(Condition 14 of 12/21/06 permit)</p>	<p>The control tower tech is responsible. Appendix A is implemented automatically by the computer without human involvement. However, they run assurance cycles manually.</p>
<p>STORAGE LIMIT \leq 1,000,000 tons determined <u>daily</u>.</p> <p>Records: Keep records.</p> <p>(Condition 17 & 20a of 12/21/06 permit)</p>	<p>See attached copies of daily reports.</p> <p>5/7/10: 677,011 tons 5/14/10: 704,486 tons 5/21/10: 571,095 tons 5/28/10: 563,833 tons Mr. DeMatteo said they reached 800,000 tons a couple of weeks ago.</p>
<p>THROUGHPUT: Bulk materials \leq 30,000,000 tons, calculated on a rolling 12-month basis, i.e. compliance is 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>Records of each bulk material separately.</p> <p>(Conditions 18 & 20b of 12/21/06 permit)</p>	<p>The 12-month total for the period ending April, 2010 was 8,167,795 tons.</p>
<p>OPACITY from all emission points $<$ 5%.</p> <p>(Condition 9 of 12/21/06 permit)</p>	<p>I observed no dust.</p>
<p>VOC HANDLING: Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.</p> <p>9 VAC-40-20 F.</p>	<p>I saw no VOC containing liquids.</p>
<p>MALFUNCTION NOTIFICATION of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour 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.</p> <p>Records of notifications.</p> <p>(Conditions 28 & 20 of 12/21/06 permit)</p>	<p>Mr. DeMatteo said there have been no such malfunctions.</p>
<p>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.</p> <p>Records of malfunctions.</p> <p>(Conditions 27 & 20 of 12/21/06 permit)</p>	<p>Mr. DeMatteo said there have been no such malfunctions.</p>

MAINTENANCE - In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

- a) Develop a maintenance schedule
- b) Maintain records of all scheduled and non-scheduled maintenance.
- c) Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.
- d) Have available written operating procedures, based on mfg's recommendations at a minimum;
- e) Train operators in proper operation of all such equipment & familiarize with written operating procedures. Records: names, date & nature.

(Conditions 26 of 12/21/06 permit)

They use a computerized maintenance management system which schedules maintenance.

It generates a record of scheduled and non-scheduled maintenance.

Spare parts: rainbirds, piping, motors, valves, pumps, nozzles.

Operating procedures.

Training records; See the attached copy.

Names,

Date

Nature.