



Commonwealth of Virginia

Registration No:	60979	AFS Plant ID:	700-00071
Plant Name:	Pier IX Terminal Company	Classification:	Synthetic Minor
Address:	Pier 9 Harbor Road	Region:	TRO

AIR INSPECTION REPORT

Inspection Date:	09/23/05	Contact Name:	Doug Sterrit
Type:	FCE With Site Visit	Contact Phone No:	(767)928-1520
Inspector:	Philip S Murphy	<u>Air Program</u>	<u>Subpart</u>
Inspection Result:	In Compliance	SIP	
Reason:	Complete FCE (Full Compliance Evaluation)		

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

Inspector Comments:

Kinder-Morgan Bulk Terminals, Incorporated operates Pier IX in Newport News, VA. The facility operates under three permits: A November 1987 permit for a coal storage and export facility; an August 1995 permit for a cement unloading, storage, and truck and railcar loadout facility; and an October 2004 permit for an alternative fuel plant.

Coal at this facility is received by railcar and is unloaded within an enclosed rotary railcar dumper. Arrays of nozzles located on a header that runs the length of the dumping area spray water at the open ends as the coal is being dumped to control fugitive dust emissions. A small amount of surfactant is sometimes added per tandem dump to increase the effectiveness of the wet suppression system. A computer controls the coal transport system, but can be manually overridden if needed. During the inspection, the rail car dumper was operating. Dumping was observed. The spray nozzle arrays at both ends of the dumper building created an effective barrier preventing the coal dust from escaping the building. After removal from the railcar, the coal is transported by a shielded conveyor belt, at a maximum rate of 1000 ft/min, up to the gantry and is dispersed into the storage piles by a retractable chute. This system can stack the coal into piles at a rate of 4800 tons per hour. A bulldozer is used to compact and truncate the piles to reduce fugitive emissions. The coal is transported from the piles to cargo ships on shielded conveyor belts. Underneath the coal piles are hoppers covered by hatches that open, allowing the coal to drop onto a conveyor belt. From there, the coal travels to the ship. Portions of the conveyor belt are equipped with a wet suppression system, which is activated when necessary to reduce fugitive coal dust.

The facility employs a computer controlled wet suppression system that is based upon factors as defined in Appendix A of the 1987 permit system. The system takes into consideration weather conditions, such as temperature, relative humidity, wind speed, and wind direction. Based on the hourly readings of these parameters, the computer determines how often the rain birds must cycle. The yard is divided into four quadrants. During a wetting cycle, water is



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applied to each quadrant for six minutes at a rate of 1000 gallons per minute. Approximately 24,000 gallons of water reaches the coal piles in a cycle. There are also 22 manually controlled rainbirds located around the perimeter of the coal piles that are turned on when necessary and water truck to supply water to areas where the rainbirds cannot adequately reach. During the inspection the wet suppression system cycled through one operation and appeared to adequately cover the area. No fugitive emissions were detected.

The facility receives cement by ship. The cement is offloaded unto a covered conveyor belt then to a bucket elevator that deposits it into three storage silos. Silos 1 and 3 have a rated capacity of 11,800 tons and Silo 2 has a rated capacity of 12,500 tons. All silos appeared structurally sound. From the silos the cement is gravity fed into trucks or is pumped underground to the railcar loadout and loaded into railcars. The cement loadout area was operating during the inspection. Fugitive emissions from the cement operation are controlled by eight baghouses; five for the silo filling and offloading, one for the truck loadout, and two for the railcar loadout. The railcar system is not regularly used and was not in operation during the inspection and no ships were being unloaded during the inspection. The truck loadout baghouse was operating at a differential pressure of 2.5 inches of water with no visible emissions.

Inspector's Electronic Signature
Approval Date: Oct 31, 2005

Manager's Electronic Signature
Approval Date: 10/1/05

Commonwealth of Virginia

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INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
11-07-87	4	The yearly throughput of coal shall not exceed 30×10^6 tons.	The highest 12-month rolling throughput for coal was 7,077,839 tons in May 2005.	In Comp
11-07-87	5	The maximum quantity of coal in storage at any time shall not exceed 1.0×10^6 tons.	The highest amount of coal in storage was 402,988 tons in May 2005.	In Comp
11-07-87	6	Fugitive coal dust emissions from the storage piles shall be controlled by a permanent wet suppression system capable of wetting the entire coal storage area.	The facility employs a computer controlled wet suppression system which uses rainbirds to control fugitive emissions from the storage piles.	In Comp
11-07-87	7	Coal dust emissions from the rotary dumper and transfer points shall be controlled by wet suppression which shall include the use of a surfactant.	The emissions from the rotary dumper and transfer points are very effectively controlled by wet suppression combined with a surfactant.	In Comp
11-07-87	9	Opacity at all emission points shall be limited to less than 5 percent.	No detectable visible emissions were observed at any operating point during the inspection.	In Comp
11-07-87	11	Each spray cycle shall attain 100 percent coverage of the coal storage area and shall consist of at least 20,000 gallons of water, except for assurance cycles.	During a wetting cycle, water is applied to each quadrant for six minutes at a rate of 1000 gallons per minute. Approximately 24,000 gallons of water reaches the coal piles in a cycle.	In Comp



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Permit Date	#	Requirement Narrative	Observation	Comp Status
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11-07-87	12	Whenever Pier IX Terminal Company is using a particular piece of coal handling equipment (e.g., a dumper, coal handling equipment. No a conveyor, etc.), it shall utilize safety hazards were the wet suppression controls for observed.	that piece of equipment unless the use of the equipment would cause a safety hazard or damage to the equipment from freezing.	In Comp
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Region: TRO

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
11-07-87	14	<p>The following actions are considered detrimental to the control of coal emissions, but are not limited to:</p> <p>a. Failure to stop any coal movement operation when it becomes known that installed air pollution control systems are inoperative and would cause excess emissions.</p> <p>b. Failure to stop a coal movement operation when it becomes known that pieces of coal handling equipment needed for that operation are malfunctioning or operating significantly below designed specifications.</p> <p>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 through the use of water suppression to control the dust, or limiting the speed of movement to below 10 miles per hour.</p> <p>d. Failure of personnel to give precedence to controlling fugitive dust emissions over routine coal operations to personnel designed with the responsibility of controlling fugitive emissions.</p>	<p>Personnel understood the emphasis on pollution control. Upon inquiry equipment operators and supervisory personnel were aware of actions and precautions necessary in order to minimize excess emissions. No vehicular traffic was observed traveling at speeds which would create fugitive emissions.</p>	In Comp



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11-07-87	16	All coal storage piles shall be truncated and compacted so as to minimize fugitive coal dust emissions.	Storage piles were truncated In Comp and compacted with bulldozers. No fugitive emissions were observed during truncating and compacting operations.	
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08-08-95	3	The annual throughput of cement shall not exceed 500,000 tons, calculated as the sum of each consecutive 12 month period.	The highest 12-month rolling In Comp throughput for cement was 350,161 tons in August 2005.	
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08-08-95	6	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.	The truck loadout was observed in operation. Fugitive emissions were not observed during or after the truck loading.	In Comp
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08-08-95	7	Fugitive particulate emissions from truck traffic shall be controlled by industrial vacuum cleaners or by wet suppression.	Fugitive emission from truck traffic was not observed. The facility uses wet suppression and minimizing the speed of vehicles.	In Comp
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08-08-95	8	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(TSP) 1.6 lbs/hr PM-10 1.6 lbs/hr	These emissions are derived from the estimated overall emission contribution from operating limits. Self monitoring, recordkeeping, and required reporting are complete. Operation within the permit limits shall be considered credible evidence of the compliance with the emission limits.	In Comp
08-08-95	9	Visible emissions from any baghouse exhaust or vent filter shall not exceed five percent opacity as determined by EPA Method 9.	The cement operations were observed during the inspection. No detectable visible emissions were observed from the baghouses.	In Comp
08-08-95	11	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.	All records were available and reviewed. Records were available for more than five years.	In Comp



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INSPECTION CHECKLIST

Permit Date # or Basis	Requirement Narrative	Observation	Comp Status
10-22-04 3	Particulate emissions from the Alternative Fuel Plant shall be controlled by partial enclosures and wet suppression. The pollution control devices shall be in operation when the Alternative Fuel Plant is operating.	The Alternative Fuel Plant was not in operation during the inspection; however, there are partial enclosures and wet suppression apparatus for control of particulate emissions. The surrounding area showed evidence of recent operation.	In Comp

Region: TRO

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
10-22-04	4	<p>Unless otherwise specified, dust emission controls specific to synfuel operations shall include the following, or equivalent, as a minimum:</p> <p>a. Dust from all material handling, transfers, load-outs and traffic areas, shall be controlled by wet suppression or equivalent (as approved by the Director, Tidewater Regional Office). There shall be no exemption from this requirement due to cold weather.</p> <p>b. All material being stockpiled shall be kept moist to control dust during storage and handling or covered at all times to minimize emissions.</p> <p>c. Haul roads shall be controlled by wet suppression, or equivalent (as approved by the DEQ).</p> <p>d. Reasonable precautions shall be taken to prevent deposition of coal dust and dirt on public roads and subsequent dust emissions. Coal and dirt spilled or tracked onto public paved surfaces shall be promptly removed to prevent particulate matter from becoming airborne.</p>	<p>Wet suppression is used to control fugitive emissions. Material is kept moist and/or covered when stockpiled. Haul roads were moist from wet suppression, and there was no evidence of tracking coal or dirt onto the public roads.</p>	In Comp



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10-22-04	5	The production of synfuel shall not exceed 4 million tons per year, calculated monthly as the sum of each consecutive 12-month period.	The Synfuel plant began production in February 2004. The highest 12-month production level since operations began was 3,439,278.77 tons in June 2005. Spreadsheets are attached.	In Comp
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10-22-04	6	The throughput of latex binder shall not exceed 10,000 tons per year, calculated monthly as the sum of each consecutive 12-month period.	The Synfuel plant began production in February 2004. The highest 12-month throughput for latex binder since operations began was 8,992.87 tons in June 2005.	In Comp
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10-22-04	7	Emissions from the operation of the Alternative Fuel Plant shall not exceed the limits specified below: Particulate Matter(PM) 13.7 T/yr operating limits. Self PM-10 5.3 T/yr monitoring, recordkeeping, and required reporting are Volatile Organic Compounds (VOC) complete. Operation within (as Vinyl acetate monomer)1.0 T/yr the permit limits shall be considered credible evidence of the compliance with the emission limits.	These emissions are derived from the estimated overall emission contribution from operating limits. Self monitoring, recordkeeping, and required reporting are complete. Operation within the permit limits shall be considered credible evidence of the compliance with the emission limits.	In Comp
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10-22-04	8	The permittee is limited to use of the following volatile toxic compounds or hazardous air pollutants (HAPs) in the latex emulsion binder specified as FTH-300 for the Alternative Fuel Plant: Volatile Toxic Compounds or HAPs CAS Number 108054 Vinyl state	Review of records show that only the latex binder with the Vinyl Acetate is used. No other HAPs are used at this time. The facility is operated in compliance with Toxics and HAP regulations.	In Comp
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10-22-04	9	Hazardous air pollutant (HAP) emissions, as defined by ?112(b) of the Clean Air Act, from the Alternative Fuel Plant shall not exceed 10 tons per year of any individual HAP or 25 tons per year of any combination, calculated monthly as the sum of each consecutive 12-month period. HAPs which are not accompanied by a specific CAS number shall be calculated as the sum of all compounds containing the named chemical when determining compliance with the individual HAP emissions limitation of 10 tons per year	These emissions are derived from the estimated overall emission contribution from operating limits. Self monitoring, recordkeeping, and required reporting are complete. Operation within the permit limits shall be considered credible evidence of the compliance with the emission limits.	In Comp
10-22-04	10	Visible emissions from the Alternative Fuel Plant shall not exceed 10 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction	The Alternative Fuel Plant was no in operation during the inspection; therefore, no visible emissions could be observed.	In Comp

Annual Throughputs

The annual throughput of cement shall not exceed 500,000 tons,
calculated monthly as the sum of each preceding 12-month period.

The yearly throughput of coal shall not exceed 30 million tons,
calculated monthly as the sum of each preceding 12-month period.

The maximum quantity of coal in storage at any time shall not exceed 1,000,000 Tons.

Month/Year	Cement Tons	12-month Running Total Tons	Coal Received Tons	12-month Running Total Tons	Coal in Storage Tons	Iron Oxide Tailings Tons
Jan-04	29,762.0	60,175.0	423,417.0	1,704,042.0	138,619.0	
Feb-04	29,695.0	89,870.0	455,908.0	2,159,950.0	226,563.0	
Mar-04	0.0	89,870.0	665,888.0	2,825,838.0	270,835.0	
Apr-04	0.0	89,870.0	580,490.0	3,406,328.0	243,408.0	
May-04	28,512.0	118,382.0	600,873.0	4,007,201.0	233,927.0	
Jun-04	29,280.0	147,662.0	583,239.0	4,590,440.0	93,626.0	
Jul-04	0.0	147,662.0	470,721.0	5,061,161.0	129,959.0	
Aug-04	28,929.0	176,591.0	589,603.0	5,650,764.0	136,117.0	
Sep-04	28,875.0	205,466.0	670,296.0	6,023,994.0	162,622.0	
Oct-04	25,197.0	206,737.0	654,012.0	6,305,107.0	158,959.0	
Nov-04	29,212.0	229,462.0	570,850.0	6,571,065.0	172,064.0	
Dec-04	54,220.0	283,682.0	503,375.0	6,768,672.0	305,201.0	
Jan-05	0.0	253,920.0	560,967.0	6,906,222.0	328,507.0	
Feb-05	28,920.0	253,145.0	593,071.0	7,043,385.0	315,137.0	
Mar-05	31,323.0	284,468.0	615,791.0	6,993,288.0	376,061.0	
Apr-05	34,096.0	318,564.0	553,991.0	6,966,789.0	231,692.0	
May-05	0.0	290,052.0	711,923.0	7,077,839.0	402,988.0	
Jun-05	28,589.0	289,361.0	521,745.0	7,016,345.0	269,334.0	7375.0
Jul-05	59,064.0	348,425.0	513,738.0	7,059,362.0	315,367.0	22034.0
Aug-05	30,665.0	350,161.0	539,662.0	7,009,421.0	402,797.0	22043.0
Sep-05		321,286.0		6,339,125.0		
Oct-05		296,089.0		5,685,113.0		
Nov-05		266,877.0		5,114,263.0		
Dec-05		212,657.0		4,610,888.0		

PRODUCTION

The production of synfuel shall not exceed 4 million tons per year,
calculated monthly as the sum of each consecutive 12-month period.

The throughput of latex binder shall not exceed 10,000 tons per year,
calculated monthly as the sum of each consecutive 12-month period.

Month/Year	Synfuel Production Tons	12-month Running Total Tons	Latex Binder Received Tons	12-month Running Total Tons
Feb-04	188,375.00	188,375.00	678.73	678.73
Mar-04	282,312.00	470,687.00	685.29	1,364.02
Apr-04	241,305.00	711,992.00	619.13	1,983.15
May-04	211,978.00	923,970.00	523.56	2,506.71
Jun-04	250,332.00	1,174,302.00	596.26	3,102.97
Jul-04	325,448.00	1,499,750.00	849.08	3,952.05
Aug-04	324,105.00	1,823,855.00	802.64	4,754.69
Sep-04	253,140.66	2,076,995.66	827.55	5,582.24
Oct-04	318,977.77	2,395,973.43	732.19	6,314.43
Nov-04	295,483.59	2,691,457.01	800.77	7,115.20
Dec-04	320,542.63	3,011,999.64	893.65	8,008.85
Jan-05	307,278.87	3,319,278.51	758.41	8,767.26
Feb-05	273,576.61	3,404,480.12	666.64	8,755.17
Mar-05	215,881.06	3,338,049.18	552.88	8,622.76
Apr-05	201,834.98	3,298,579.16	412.51	8,416.14
May-05	304,671.42	3,391,272.57	869.99	8,762.57
Jun-05	298,338.20	3,439,278.77	826.56	8,992.87
Jul-05	303,776.85	3,417,607.61	780.11	8,923.90
Aug-05	302,871.37	3,396,373.99	781.95	8,903.21
Sep-05		0.00		0.00
Oct-05		0.00		0.00
Nov-05		0.00		0.00
Dec-05		0.00		0.00

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VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Complete FCE (Full Compliance Evaluation)

"Additional Information is Attached**

Inspector Comments:

Kinder-Morgan Bulk Terminals, Incorporated operates Pier IX in Newport News, VA. The facility

operates under three permits: A November 1987 permit for a coal storage and export facility;

an August 1995 permit for a cement unloading, storage, and truck and railcar loadout facility;

and an October 2004 permit for an alternative fuel plant.

Coal at this facility is received by railcar and is unloaded within an enclosed rotary railcar

dumper. Arrays of nozzles located on a header that runs the length of the dumping area spray

water at the open ends as the coal is being dumped to control fugitive dust emissions. A small

amount of surfactant is sometimes added per tandem dump to increase the effectiveness of the

wet suppression system. A computer controls the coal transport system, but can be manually

overridden if needed. During the inspection, the rail car dumper was operating. Dumping was

observed. The spray nozzle arrays at both ends of the dumper building created an effective

barrier preventing the coal dust from escaping the building. After removal from the railcar,

the coal is transported by a shielded conveyor belt, at a maximum rate of 1000 ft/min, up to

the gantry and is dispersed into the storage piles by a retractable chute. This system can

stack the coal into piles at a rate of 4800 tons per hour. A bulldozer is used to compact and

truncate the piles to reduce fugitive emissions. The coal is transported from the piles to

cargo ships on shielded conveyor belts. Underneath the coal piles are hoppers covered by

hatches that open, allowing the coal to drop onto a conveyor belt. From there, the coal

travels to the ship. Portions of the conveyor belt are equipped with a wet suppression system,

which is activated when necessary to reduce fugitive coal dust.

The facility employs a computer controlled wet suppression system that is based upon factors

as defined in Appendix A of the 1987 permit system. The system takes into consideration

weather conditions, such as temperature, relative humidity, wind speed, and wind direction.

Based on the hourly readings of these parameters, the computer determines how often the rain

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controlled rainbirds located around the perimeter of the coal piles that are turned on when

necessary and water truck to supply water to areas where the rainbirds cannot adequately

reach. During the inspection the wet suppression system cycled through one operation and

appeared to adequately cover the area. No fugitive emissions were detected.

The facility receives cement by ship. The cement is offloaded onto a covered conveyor belt

then to a bucket elevator that deposits it into three storage silos. Silos 1 and 3 have a

rated capacity of 11,800 tons and Silo 2 has a rated capacity of 12,500 tons. All silos

appeared structurally sound. From the silos the cement is gravity fed into trucks or is pumped

underground to the railcar loadout and loaded into railcars. The cement loadout area was

operating during the inspection. Fugitive emissions from the cement operation are controlled

by eight baghouses; five for the silo filling and offloading, one for the truck loadout, and

two for the railcar loadout. The railcar system is not regularly used and was not in operation

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Inspector's Electronic Signature Manage@-Is Electronic Signature
Approval Date: Oct 31, 2005 Approval Date: /-, ell /,@, -/ @ -

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11-07-87 6 Fugitive coal dust emissions from The facility employs a In Comp
the storage piles shall be computer controlled wet
controlled by a permanent wet suppression system which
suppression system capable of uses rainbirds to control
wetting the entire coal storage fugitive emissions from the
area. storage piles.

11-07-87 7 Coal dust emissions from the rotary The emissions from the In Comp
dumper and transfer points shall be rotary dumper and transfer
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11-07-87 9 Opacity at all emission points shall No detectable visible In Comp
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11-07-87 14 The following actions are considered Personnel understood the In C
omp

detrimental to the control of coal emphasis on pollution

emissions, but are not limited to: control. Upon inquiry

a. Failure to stop any coal equipment operators and

movement operation when it becomes supervisory personnel were

known that installed air pollution aware of actions and

control systems are inoperative and precautions necessary in

would cause excess emissions. order to minimize excess

b. Failure to stop a coal movement emissions. No vehicular

operation when it becomes known that traffic was observed

pieces of coal handling equipment traveling at speeds which

needed for that operation are would create fugitive

malfunctioning or operating emissions.

significantly below designed

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 through the use of water suppression to control the dust, or limiting the speed of movement to below 10 miles per hour.

d. Failure of personnel to give precedence to controlling fugitive dust emissions over routine coal operations to personnel designed with the responsibility of controlling fugitive emissions.

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VIRGINIA DE TME
EnIRONMENTAL QUALITY

Commonwealth of Virginia

Registration No: 60979 AFS Plant ID: 700-00071

Plant Name: Pier IX Terminal Company Classification: Synthetic Minor

Address: Pier 9 Harbor Road Region: TRO

INSPECTION CHECKLIST

Permit Date Comp

or Basis Requirement Narrative Observation Status

11-07-87 16 All coal storage piles shall be Storage piles were truncated In Co
mp

truncated and compacted so as to and compacted with
minimize fugitive coal dust bulldozers. No fugitive
emissions. emissions were observed
during truncating and
compacting operations.

08-08-95 3 The annual throughput of cement The highest 12-month rolling In Com
p

shall not exceed 500,000 tons, thoughput for cement was
calculated as the sum of each 350,161 tons in August 2005.
consecutive 12 month period.

08-08-95 6 Fugitive particulate emissions from The truck loadout was In Comp
each truck loadout system shall be observed in operation.

controlled by automatically Fugitive emissions were not
maintaining negative pressure in the observed during or after the
retractable chute for not less than truck loading.

15 seconds after truck loading is
complete.

08-08-95 7 Fugitive particulate emissions from Fugitive emission from In Comp
truck traffic shall be controlled by vehicular traffic was not
industrial vacuum cleaners or by wet observed. The facility uses
suppression. wet suppression and
minimizing the speed of
vehicles.

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08-08-95 8 Total emissions from the operation These emissions are derived In C
omp

of the cement unloading, storage, from the estimated overall
and truck and railcar loadout shall emission contribution from
not exceed the limits specified operating limits. Self

below: monitoring, recordkeeping,

Total Suspended Particulate(TSP) and required reporting are

1.6 lbs/hr 0.8 T/yr complete. Operation within

PM-10 1.6 lbs/hr 0.8 T/yr the permit limits shall be

considered credible evidence

of the compliance with the

emission limits.

08-08-95 9 Visible emissions from any baghouse The cement operations were In C
omp

exhaust or vent filter shall not observed during the

exceed five percent opacity as inspection. No detectable

determined by EPA Method 9. visible emissions were

observed from the baghouses.

08-08-95 11 The permittee shall maintain records All records were available In
Comp

of all emission data and operating and reviewed. Records were
parameters necessary to demonstrate available for more than five
compliance with this permit. The years.

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.

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10-22-04 3 Particulate emissions from the The Alternative Fuel Plant In Comp
Alternative Fuel Plant shall be was not in operation during
controlled by partial enclosures and the inspection; however,
wet suppression. The pollution there are partial enclosures
control devices shall be in and wet suppression
operation when the Alternative Fuel apparatus for control of
Plant is operating. particulate emissions. The
surrounding area showed
evidence of recent
operation.

'GuaogaTP buTwooaq woa; aaqqpui
aqPTnoTqapd qUOAaad oq PaAOW@a
A,Tqduioad aq TTPT4s SG3P;anS PGApd
OTTqnd oquo paNopaq aO POITTDs qatp
PuP TPOO -suoTssTwa qsnP quanbasqns
PuP SPPOa OTTqnd uo qaip pup qsnP
TPOO ;O UOTqTsodap -4U0A0jd oq ua-.[Pq
aq TTPLis suoTqnpDaad GTqpuospad p
.(Oac eqq Aq PGAOaddp
sP) qu@TPATnbe ao luoTsseaddns gam
Aq P@TTOaquOD aq TTPqs sPPOa TnPH 'o
suoissluie
@zTwTu'uI 0l sOuITq TTP qP PaaaAOD
-To bUTTPuPq Pup abpaoqs buTanp
qsnP TOaquOD Oq qSToul qdaX aq TTPqs
PGTTdXDoqs bUTaq TPTaGqPw TTV q
-aOLDPOm PTOD Oq
anp quewaaTnbea siij; uioaj uoTqdwaxa
ou aq TTPqs eaOLII (ODTJ@O TPuOlba'd
J@qPmaPTJ, laolooaici aLIq Aq PGAOaddp
'sPPOa D'Tqnd aq-3 Sp) quGTPATnba jo uoisseaddns
OquO q3TP aO TPOO bUTNOP3:1 gam Aq POTTOJquOD aq TTPLis 'sPGaP
90 aDuGPTAO OU SPM eaGqq PUP oTgjpaa pup sqno-PPOT 'saOJsuPJq
luoTsseaddns gem woag qSToui 'buTTPuPT4 TPTJGqPw TTP uIOJJ qsnai p
aJGM SPPOa TnPH -PGTTdN3oqs :wnwTuTw
U8LjM POaeAOD aO/PUP P sP 'quOTPATnbG ao lbu-imOTTOJ
qSTOW qdaX ST TPTJGqeN Oqq apnTDuT TTVqs suoTqpaadO Tenjurs
'SUOTSSTUIG GATqTbn4 TOaquOD Oq DT;TDads sTO-TquOD uOTSSTUIG
dwoD uj oq pasn ST UOTSSOaddns -@aM qsnP 'POT-4Toads aSTMaOqqO SSGTuf1 T7 VO-Z
Z-OT

sn-4-e-4s UOTj-eAa9sq0 GATIexx-eN jueumaTnbeg sTs-eg ao
dum:) 94-ea iT=ec1

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auTN olqGqquAs :UOTlV0TJTSSvT3 AupdwoD TPuTwaGI XI aGTd OureN -W-e T cl
TLOOO-OOL :ai wvw say 6L609 :ON UOT.-4V-'-4STB8H

VT.UT.BaT.A 90 q4TV9MUOUUnU00

OL wiHvd3clvlKK)HtA

T T 90 6 OBecl NO Wd 6S:PO S00UTUOT :9wea unu

VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY

Commonwealth of Virginia

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INSPECTION CHECKLIST

Permit Date Comp

or Basis Requirement Narrative observation Status

10-22-04 5 The production of synfuel shall not The Synfuel plant began In Comp
exceed 4 million tons per year, production in February 2004.
calculated monthly as the sum of The highest 12-month
each consecutive 12-month period. production level since
operations began was
3,439,278.77 tons in June
2005. Spreadsheets are
attached.

10-22-04 6 The throughput of latex binder shall The Synfuel plant began In Com
P
not exceed 10,000 tons per year, production in February 2004.
calculated monthly as the sum of The highest 12-month
each consecutive 12-month period. throughput for latex binder

since operations began was
8,992.87 tons in June 2005.

10-22-04 7 Emissions from the operation of the These emissions are derived In
Comp

Alternative Fuel Plant shall not from the estimated overall
exceed the limits specified below: emission contribution from
Particulate Matter(PM) 13.7 T/yr operating limits. Self
PM-10 5.3 T/yr monitoring, recordkeeping,
Volatile Organic Compounds (VOC) and required reporting are
(as Vinyl acetate monomer)1.0 T/yr complete. Operation within
the permit limits shall be
considered credible evidence
of the compliance with the
emission limits.

10-22-04 8 The permittee is limited to use of Review of records show that In C
omp

the following volatile toxic only the latex binder with
compounds or hazardous air the Vinyl Acetate is used.
pollutants (HAPs) in the latex No other HAPs are used at
emulsion binder specified as FTH-300 this time. The facility is
for the Alternative Fuel Plant: operated in compliance with
Volatile Toxic Compounds or Toxics and HAP regulations.
HAPs CAS Number
Vinyl @tate 108054

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INSPECTION CHECKLIST

Permit Date Comp

or Basis Recluirement Narrative Observation Status

10-22-04 9 Hazardous air pollutant (HAP) These emissions are derived In Comp
emissions, as defined by ?112(b) of from the estimated overall
the Clean Air Act, from the emission contribution from
Alternative Fuel Plant shall not operating limits. Self
exceed 10 tons per year of any monitoring, recordkeeping,
individual HAP or 25 tons per year and required reporting are
of any combination, calculated complete. Operation within
monthly as the sum of each the permit limits shall be
consecutive 12-month period. HAPs considered credible evidence
which are not accompanied by a of the compliance with the
specific CAS number shall be emission limits.
calculated as the sum of all
compounds containing the named
chemical when determining compliance

with the individual HAP emissions
limitation of 10 tons per year

10-22-04 10 Visible emissions from the The Alternative Fuel Plant In Comp
Alternative Fuel Plant shall not was no in operation during
exceed 10 percent opacity as the inspection; therefore,
determined by the EPA Method 9 no visible emissions could
(reference 40 CFR 60, Appendix A). be observed.

This condition applies at all times
except during startup, shutdown, and
malfunction

Annual Throughputs

The annual throughput of cement shall not exceed 500,000 tons, calculated monthly as the sum of each preceding 12-month period.

The yearly throughput of coal shall not exceed 30 million tons, calculated monthly as the sum of each preceding 12-month period.

The maximum quantity of coal in storage at any time shall not exceed 1,000,000 Tons.

	Cement	12-month	Coal Received	12-month	Coal in Storage	Iron Oxide
	Running	Total	Running	Total	Tailings	
Month	Near	Tons	Tons	Tons	Tons	Tons
Jan-04	29,762.0	60,175.0	423,417.0	1,704,042.0	138,619.0	
Feb-04	29,695.0	89,870.0	455,908.0	2,159,950.0	226,563.0	
Mar-04	0.0	89,870.0	665,888.0	2,825,838.0	270,835.0	
Apr-04	0.0	89,870.0	580,490.0	3,406,328.0	243,408.0	
May-04	28,512.0	118,382.0	600,873.0	4,007,201.0	233,927.0	
Jun-04	29,280.0	147,662.0	583,239.0	4,590,440.0	93,626.0	
Jul-04	0.0	147,662.0	470,721.0	5,061,161.0	129,959.0	
Aug-04	28,929.0	176,591.0	589,603.0	5,650,764.0	136,117.0	
Sep-04	28,875.0	205,466.0	670,296.0	6,023,994.0	162,622.0	
Oct-04	25,197.0	206,737.0	654,012.0	6,305,107.0	158,959.0	
Nov-04	29,212.0	229,462.0	570,850.0	6,571,065.0	172,064.0	
Dec-04	54,220.0	283,682.0	503,375.0	6,768,672.0	305,201.0	
Jan-05	0.0	253,920.0	560,967.0	6,906,222.0	328,507.0	
Feb-05	28,920.0	253,145.0	593,071.0	7,043,385.0	315,137.0	
Mar-05	31,323.0	284,468.0	615,791.0	6,993,288.0	376,061.0	
Apr-05	34,096.0	318,564.0	553,991.0	6,966,789.0	231,692.0	
May-05	0.0	290,052.0	711,923.0	7,077,839.0	402,988.0	
Jun-05	28,589.0	289,361.0	521,745.0	7,016,345.0	269,334.0	7375.0
Jul-05	59,064.0	348,425.0	513,738.0	7,059,362.0	315,367.0	22034.0
Aug-05	30,665.0	350,161.0	539,662.0	7,009,421.0	402,797.0	22043.0
Sep-05	321,286.0	6,339,125.0				
Oct-05	296,089.0	5,685,113.0				
Nov-05	266,877.0	5,114,263.0				
Dec-05	212,657.0	4,610,888.0				

PRODUCTION

The production of synfuel shall not exceed 4 million tons per year, calculated monthly as the sum of each consecutive 12-month period.

The throughput of latex binder shall not exceed 1 0,000 tons per year, calculated monthly as the sum of each consecutive 12-month period.

Month/Year	Synfuel Production 12-month Running Total	Latex Binder Received 12-month Running Total
Feb-04	188,375.00	678.73
Mar-04	282,312.00	685.29
Apr-04	241,305.00	619.13
May-04	211,978.00	523.56
Jun-04	250,332.00	596.26
Jul-04	325,448.00	849.08
Aug-04	324,105.00	802.64
Sep-04	253,140.66	827.55
Oct-04	318,977.77	732.19
Nov-04	295,483.59	800.77
Dec-04	320,542.63	893.65
Jan-05	307,278.87	758.41
Feb-05	273,576.61	666.64
Mar-05	215,881.06	552.88
Apr-05	201,834.98	412.51
May-05	304,671.42	869.99
Jun-05	298,338.20	826.56
Jul-05	303,776.85	780.11
Aug-05	302,871.37	781.95
Sep-05	0.00	0.00
Oct-05	0.00	0.00
Nov-05	0.00	0.00
Dec-05	0.00	0.00