*West Virginia Department of Environmental Protection*
*Harold D. Ward*
*Cabinet Secretary*

# Construction Permit

## R13-3614

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*
**REO Processing, Inc.**
**Huntington**
**011-00243**

Laura M. Crowder

*Laura M. Crowder*
*Director, Division of Air Quality*

Laura M. Crowder

Digitally signed by: Laura M. Crowder
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Date: 2024.09.27 09:38:11 -04'00'

*Issued: September 27, 2024*

| | |
|---|---|
| Facility Location: | 20 26th Street<br>Huntington, Cabell County, West Virginia 25703 |
| Mailing Address: | 221 Industrial Park Rd<br>Parkersburg, WV 26104 |
| Facility Description: | Activated Carbon Re-Packaging Operation |
| NAICS Codes: | 493110 - General |
| UTM Coordinates: | 414.45 km Easting • 4,343.49 km Northing • Zone 17S |
| Permit Type: | Construction |
| Description of Change: | This action is for the construction of an activated carbon re-packaging operation. |

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.*

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*The source is not subject to 45CSR30.*

**Table of Contents**

## 1.0. Emission Units

| Emission Unit ID | Emission Point ID | Emission Unit Description | Year Installed | Design Capacity | Control Device |
|---|---|---|---|---|---|
| 1S | 1E | Bulk Tanker Truck Unloading | 2017 | 10.7 TPH | 2C |
| 2S | 2E | Bulk Tanker Truck Loading | 2017 | 10.7 TPH | 1C |
| 3S | 2E | Small Bag Bagging Machine | Unk | 0.75 TPH | 1C |
| 4S | 1E | Covered Hopper RailCar unloading/loading to & from FIBC (super sacks) | Unk | 10.7 TPH | 2C |
| 5S | 2E | Open Top Dump Truck Loading | 2017 | 40 TPH | 1C |
| 6S | 3E | Pneumatic Transferring from Rail Cars to Tanker Trucks | Unk | 10.7 TPH | 3C |
| 7S | 3E | Pneumatic Transferring from Transferring from Tanker Trucks to Rail Car | Unk | 10.7 TPH | 3C |
| 9S | 4E | Compression Ignition Engine for the pneumatic pump<br>Engine Mfg: Cummins<br>Engine Model: B4.5T-P99<br>Engine Model Yr.: 2007<br>Manufactured Date: 12/18/2007<br>Name Plate Output: 99 hp<br>Engine Serial No.: 46842167<br>EPA Family No: 7CEXL0275AAC | Unk | 99 hp | None |

## 2.0. General Conditions

### 2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

### 2.2. Acronyms

| | | | |
|---|---|---|---|
| **CAAA** | Clean Air Act Amendments | **$NO_X$** | Nitrogen Oxides |
| **CBI** | Confidential Business Information | **NSPS** | New Source Performance Standards |
| **CEM** | Continuous Emission Monitor | **PM** | Particulate Matter |
| **CES** | Certified Emission Statement | **$PM_{2.5}$** | Particulate Matter less than 2.5 μm in diameter |
| **C.F.R. *or* CFR** | Code of Federal Regulations | **$PM_{10}$** | Particulate Matter less than 10μm in diameter |
| **CO** | Carbon Monoxide | **Ppb** | Pounds per Batch |
| **C.S.R. *or* CSR** | Codes of State Rules | **Pph** | Pounds per Hour |
| **DAQ** | Division of Air Quality | **Ppm** | Parts per Million |
| **DEP** | Department of Environmental Protection | **$Ppm_V$ or ppmv** | Parts per Million by Volume |
| **dscm** | Dry Standard Cubic Meter | **PSD** | Prevention of Significant Deterioration |
| **FOIA** | Freedom of Information Act | **Psi** | Pounds per Square Inch |
| **HAP** | Hazardous Air Pollutant | **SIC** | Standard Industrial Classification |
| **HON** | Hazardous Organic NESHAP | **SIP** | State Implementation Plan |
| **HP** | Horsepower | **$SO_2$** | Sulfur Dioxide |
| **lbs/hr** | Pounds per Hour | **TAP** | Toxic Air Pollutant |
| **LDAR** | Leak Detection and Repair | **TPY** | Tons per Year |
| **M** | Thousand | **TRS** | Total Reduced Sulfur |
| **MACT** | Maximum Achievable Control Technology | **TSP** | Total Suspended Particulate |
| **MDHI** | Maximum Design Heat Input | **USEPA** | United States Environmental Protection Agency |
| **MM** | Million | **UTM** | Universal Transverse Mercator |
| **MMBtu/hr *or* mmbtu/hr** | Million British Thermal Units per Hour | **VEE** | Visual Emissions Evaluation |
| **MMCF/hr *or* mmcf/hr** | Million Cubic Feet per Hour | **VOC** | Volatile Organic Compounds |
| **NA** | Not Applicable | **VOL** | Volatile Organic Liquids |
| **NAAQS** | National Ambient Air Quality Standards | | |
| **NESHAPS** | National Emissions Standards for Hazardous Air Pollutants | | |

## 2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation*;

## 2.4. Term and Renewal

2.4.1. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

## 2.5. Duty to Comply

2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3614, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
**[45CSR§§13-5.10 and 10.3.]**

2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;

2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;

2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

## 2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

### 2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

### 2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
**[45CSR§13-4.]**

### 2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
**[45CSR§13-5.4.]**

### 2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
**[45CSR§13-5.1]**

### 2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

**[WV Code § 22-5-4(a)(9)]**

### 2.12. Reserved

### 2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

### 2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

### 2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

### 2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

### 2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1.]**

## 2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

### 2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

## 3.0. Facility-Wide Requirements

### 3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
**[45CSR§6-3.1.]**

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
**[45CSR§6-3.2.]**

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
**[40CFR§61.145(b) and 45CSR§34]**

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
**[45CSR§4-3.1]** ***[State Enforceable Only]***

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
**[45CSR§13-10.5.]**

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
**[45CSR§11-5.2.]**

### 3.2. Monitoring Requirements

*[Reserved]*

### 3.3. Testing Requirements

3.3.1. Stack testing. As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling

connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

    1. The permit or rule evaluated, with the citation number and language;
    2. The result of the test for each permit or rule condition; and,
    3. A statement of compliance or noncompliance with each permit or rule condition.

**[WV Code § 22-5-4(a)(14-15) and 45CSR13]**

## 3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support

information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
**[45CSR§4. *State Enforceable Only.*]**

## 3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by email as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**DAQ:**
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

**DAQ Compliance and Enforcement[1]:**
DEPAirQualityReports@wv.gov

**US EPA:**
Section Chief
U.S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance
Division Air Section (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

[1]For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status Reports, Initial Notifications, etc.

3.5.4. **Operating Fee**

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually,

shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for a Certificate to Operate (CTO). The CTO will cover the time period beginning with the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the CTO application.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

## 4.0. Source-Specific Requirements for the Bagging, Handling, Transferring of Activated Carbon

### 4.1. Limitations and Standards

4.1.1. The permittee is authorized to operate a loading station (Emission Unit ID: 2S & 5S) which is permitted to load bulk tanker trucks and open top dump trucks of activated carbon from flexible intermediate bulk containers (FIBC) (aks: super sack), and packing activated carbon into small bags from FIBC (Emission Unit ID: 3S) in accordance with the following limitations and specifications:

a. The PM emision rate from Emision Point 2E shall not exceed 23.66 pounds per hour nor 24.74 tons per year.

b. The $PM_{10}$ emission rate from Emision Point 2E shall not exceed 11.83 pounds per hour nor 12.37 tons per year.

c. The $PM_{2.5}$ emission rate from Emision Point 2E shall not exceed 11.83 pounds per hour nor 12.37 tons per year.

d. No visible emission shall be exhibited from Emission Point 2E.

e. Only one portable container (bulk tanker truck or open top dump truck) shall be loaded at any given time.

f. During the loading process, only two loading hatches for bulk tanker or two dump truck openings shall be open or uncovered at any given time during the loading process. One hatch/opening shall be used for loading with the other hatch/opening shall be connected to a fabric filter bag house via a flexible ductwork.
**[45 CSR §17-3.2.d.]**

g. The exhaust from the loading process and bagging machine shall be routed to fabric filter dust collect (Control Device 1C) through a closed vent system. This closed vent system shall be free of leaks and defects, which includes kinks of the flexible hoses, at all times when the permittee is engaged in loading a vehicle or bagging activated carbon.
**[45 CSR §17-3.2.d.]**

h. Prior to commencement of loading each open top dump truck, the permittee shall position a cover over the opening of the open top dump truck. This cover shall be maintained with a material that prevents dust and particulate matter passing through material and have six (6) loading openings with lids/covers.
**[45 CSR §17-3.2.d.]**

i. Once loading an open top dump truck has been completed, the payload opening of the dump truck shall be covered before the vehicle is moved from the loading station.
**[45 CSR §17-3.2.c.]**

j. The hourly loadout rate shall not exceed 10.7 tons per hour for tanker trucks and 40 tons per hour for open top dump trucks on a daily average basis.

k. The total amount of activated carbon loaded through 2S (bulk tanker trucks) shall not exceed 27,820 tons per year on a 12-month rolling total basis.

l. The total amount of activated carbon loaded through 5S (open top dump trucks) shall not exceed 13,000 tons per year on a 12-month rolling total basis.

m. The total amount of activated carbon processed through the bagging machine shall not exceed 6,570 tons per year on a 12-month rolling total basis.

n. The permittee is prohibited from loading power activated carbon into open top dump trucks.

o. Only FIBC with bottom spout shall be utilized at the loadout station.

p. The permittee shall tie off the bottom spout of the FIBC once the FIBC is emptied during the loading process.
**[45 CSR §17-3.2.c.]**

q. The permittee is prohibited from using compressed air to aid in the flow of activated carbon from the FIBC (super sack).
**[45 CSR §17-3.1.]**

r. The permittee shall develop and implement a written procedure to perform this activity at each station within 60 days after issuance of this permit in effort to minimize fugitive PM to achieve compliance with Condition 4.1.5. and incorporating applicable items of this condition into these procedures.

4.1.2. The permittee is authorized to operate a bulk tanker truck unloading (Emission Unit ID: 1S) and cover hopper railcar unloading/loading station (4S) in accordance with the following specifications and requirements.

a. The PM emission rate from the Emission Point 1E shall not exceed 11.98 pounds per hour nor 16.12 tons per year.

b. The $PM_{10}$ emission rate from the Emission Point 1E shall not exceed 5.99 pounds per hour nor 8.06 tons per year.

c. The $PM_{2.5}$ emission rate from the Emission Point 1E shall not exceed 5.99 pounds per hour nor 8.06 tons per year.

d. No visible emission shall be exhibited from Emission Point 1E.

e. Only one emission unit shall be in operation at any given time at the station.

f. The hourly unloading/loading rate shall not exceed 10.7 tons per hour.

g. The total amount of material unloaded from tankers shall not exceed 27,820 tons per year on a 12-month rolling total basis.

h. The total amount of material unloaded or loading from or to covered hopper railcars shall not exceed 1,900 tons per year on a 12-month rolling total basis.

i. The unloading of any tanker truck or cover hopper railcar shall be conducted using a closed vent system where any discharge air due to the unloading operation is vented through Control Device 2C, which is a fabric filter baghouse, before being discharged to the atmosphere. This closed vent system shall be free of leaks and defects, which includes kinks of the all flexible

hoses used in this operation, at all times when the permittee is engaged in unloading either portable container.
**[45 CSR §17-3.2.d.]**

j. The loading of any covered hopper railcar shall be conducted using a closed vent system where any discharge air due to the unloading operation is vented through Control Device 2C, which is a fabric filter baghouse, before being discharged to the atmosphere. This closed vent system shall be free of leaks and defects, which includes kinks of the all flexible hoses used in this operation, at all times when the permittee is engaged in loading a portable container.
**[45 CSR §17-3.2.d.]**

k. The permittee shall develop and implement a written procedure to perform this activity at each station within 60 days after issuance of this permit in effort to minimize fugitive PM to achieve compliance with Condition 4.1.5. and incorporating applicable items of this condition into these procedures.

4.1.3. The permittee shall install and operate pneumatic transfer operation (Emission Unit ID: 6S & 7S) in accordance with the following specifications and requirements.

a. Particulate matter emissions discharged from the Emission Point 3E shall not exceed 5.99 lb/hr nor 1.08 tons per year.

b. $PM_{10}$ emissions discharged from the Emission Point 3E shall not exceed 3.00 lb/hr nor 0.54 tons per year.

c. $PM_{2.5}$ emissions discharged from the Emission Point 3E shall not exceed 3.00 lb/hr nor 0.54 tons per year.

d. No visible emission shall be exhibited from Emission Point 1E.

e. The pneumatically conveyed activated carbon and exhaust from the transfer operation shall be contained to a closed vent system with the exhaust routed to Control Device 3C, fabric filter dust collector. This closed vent system shall be free of leaks and defects, which includes kinks of the all flexible hoses used in this operation, at all times when the permittee is engaged in pneumatically transferring activated carbon from one portable container to another portable container.

f. The hourly average transfer rate shall not exceed 10.7 tons of material per hour on a daily operating day basis.

g. The total amount of material transfer shall not exceed 1,920 tons per year on a 12-month rolling total basis.

h. The permittee shall develop and implement a written procedure to perform this activity at each station within 60 days after issuance of this permit in effort to minimize fugitive PM to achieve compliance with Condition 4.1.5. and incorporating applicable items of this condition into these procedures.

4.1.4. The permittee shall not allow fugitive particulate matter beyond the boundary lines of the facility.
**[45 CSR §17-3.1.]**

4.1.5. The storage of activated carbon at the facility shall be either within an enclosed structure or under a secondary cover (e.g., trap).
**[45 CSR §17-3.2.c.]**

4.1.6. Discard FIBCs (super sacks) shall be stored in a dedicated enclosed container in a manner that FIBC is not being compressed until the FIBC can be shipped off-site for re-used or disposal. The permittee shall have 30 calendar days after issuance of this permit to implement this requirement.
**[45 CSR §17-3.2.c.]**

4.1.7. The permittee shall maintain fugitive dust control of the premises and owned, leased or controlled haul roads and access roads by paving, utilization of a water truck and/or other suitable measures. Such other suitable measures shall not include the use of dry sweeping methods or techniques on plant controlled roadways. Good operating methods, practices and general maintenance shall be observed in relation to stockpiling, truck, railcar or barge loading, grinding, breaking and screening to effectively minimize the emission of particulate matter.
**[45 CSR §17-3.2.b.]**

4.1.8. The permittee shall comply with all requirements within the Dust Control Plan (See Appendix A of this permit) and all measures/requirements stated in this permit upon issuance of this permit unless stated otherwise in this permit or approved by the Secretary through a revised dust control plan pursuant by 45CSR17. This requirement shall include maintaining records and results of all required inspections per the Dust Control Plan. These records shall be maintained in accordance with Condition 3.4.1. of this permit.

4.1.9. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
**[45CSR§13-5.10.]**

## 4.2. Monitoring Requirements

4.2.1. The permittee shall monitor and record the differential pressure across each control device (baghouse) once per operating day; and determine if the differential pressure (pressure drop) is within the acceptable operating range. Such records and any maintenance performed to restore the differential pressure back within the acceptable range shall be maintained in accordance with Condition 3.4.1. of this permit.

4.2.2. The permittee shall conduct a visible emissions check in accordance with Method 22 once a calendar quarter from discharge vent (Emission Point ID: 1E, 2E, and 3E) of each baghouse (Control Device ID: 1C, 2C and 3C). Time of this observation shall be no less than one minute in total length. Should any visible emissions be observed during this check, the permittee shall evaluate the operation of the control device (baghouse) and make all necessary repairs to restore the operation to no visible emissions as soon as practicable, but within five calendar days of the visual emission check. Records of such visible emission checks or observations shall be maintained in accordance with Condition 3.4.1. of this permit.

4.2.3. The permittee shall monitor and record the total amount of material processed for each operating day of each permitted activity and determine the hourly average processing rate for each operation

for demonstrating compliance with Conditions 4.1.1.j., 4.1.2.f., and 4.1.3.f., respectively and the emission limits of items a., b., and c. of Conditions 4.1.1., 4.1.2, and 4.1.3. with respective control device. Such records shall be maintained in accordance with Condition 3.4.1. of this permit.

4.2.4. The permittee shall monitor and record the amount and type of material loaded out into tanker trucker and open top dump trucks for the purpose of demonstration compliance with the requirements item a., b., c., and d. of Condition 4.1.2. Records of each loading event shall consist of the following:

a. The time and date loading began.

b. The time and date loading conclude.

c. The station used for this loading event.

d. Amount of material loaded during the loading event.

e. Type of activated carbon loaded.

f. Total time for the loading event.

4.2.5. The permittee shall conduct an inspection of the closed vent system, which shall include pneumatic piping system and capture hoods/covers if applicable, for the emission units 1S, 2S, 3S, 4S, 5S, 6S, and 7S at least once per calendar month. Such inspections shall utilize audio and visual inspection techniques to detect leaks and/or defects of the pneumatic system. Record of inspection shall include date/time, emission unit being inspected, and inspector, a list of leaks and/defects, and date any repairs made to the system with description of the repair made as result of the inspection. Such records shall be maintained in accordance with Condition 3.4.1. of this permit.

## 4.3. Testing Requirements

*[Reserved]*

## 4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit, and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. The permittee by no later than the 15th of the previous month shall determine the monthly processing rate and the 12-month rolling total throughput of each permittee operation. These records shall be used to determine the compliance status of Condition 4.1.1.k., 4.1.1.l, 4.1.2.,g., 4.1.2.h., and 4.1.4.g. Such records shall be maintained in accordance with the Condition 3.4.1. of this permit.

4.4.5. The permittee shall maintain records of all instances that a FIBC reputed, a portable container was overfilled, or small bag busting on the bagging machine. Such records shall include: date/time of the instance, brief description of the situation, activities used to clean up any spill activated carbon, and corrective action taken to eliminate such instances. Such records shall be maintained in accordance with the Condition 3.4.1. of this permit.

## 4.5. Reporting Requirements

4.5.1. Any exceedance(s) of the allowable visible emission requirement for any emission source discovered during observations using **Method 22** or any exceedance of any requirement in this permit must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions or exceedance of the permitted limit/requirement/measure, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

# 5.0. Specific Requirements for the RICE (9S) for the Pneumatic Transfer System for Cover Hopper Railcars.

## 5.1. Limitations and Standards

5.1.1. The following conditions and requirements are specific to the internal combustion engine for the pneumatic pump (ID 9S):

a. Emissions shall not exceed the following:

i. $NO_x$ + Non-Methane Hydrocarbons (NMHC) emissions from the engine shall not exceed 6.4 grams of $NO_x$ per kilowatt-hour (g/kW-hr).
**[40 CFR §60.4205(b) and §60.4202(b)(2); 40 CFR 1039, Appendix I, Table 2 – Tier 2 Emission Standards]**

ii. CO emissions from the engine shall not exceed 3.5 g/kW-hr.
**[40 CFR §60.4205(b) and §60.4202(b)(2); 40 CFR 1039, Appendix I, Table 2 – Tier 2 Emission Standards]**

iii. PM/PM10 emissions from the engine shall not exceed 0.20 g/kW-hr.
**[40 CFR §60.4205(b) and §60.4202(b)(2); 40 CFR 1039, Appendix I, Table 2 – Tier 2 Emission Standards]**

iv. Sulfur dioxide emissions from the engine shall not exceed 0.01 pounds per hour. Compliance with this limit is satisfied through compliance with Condition 5.1.3. of this permit.
**[40 CFR §60.4207(d)]**

b. The permittee shall satisfy compliance with the emission standards in item a of this condition, except for the sulfur dioxide limit in item a. subitem iv., by purchasing an engine certified to 40 CFR part 89 or 40 CFR 94, as application for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.
**[40 CFR 60.4211(b)(1)]**

c. Mass Hourly emissions from the engine shall not exceed the following rates on a 3-hour average basis.

| **Table 5.1.1.c. Mass Emissions Limits for 9S** | |
|---|---|
| **Pollutant** | **Hourly Rate (lb/hr)** |
| Oxides of Nitrogen ($NO_x$) | 0.80 |
| Carbon Monoxide (CO) | 0.23 |
| Volatile Organic Compounds (VOCs) | 0.04 |
| $PM/PM_{10}/PM_{2.5}$ | 0.03 |
| Total Hazardous Air Pollutants (HAPs) | 0.01 |

d. The engine shall not have a nameplate power greater than the 99 bhp.

e. The operation of the engine shall not exceed 500 hours per year on a 12-month rolling total basis.

f. The engine shall be equipped and maintained with a non-resettable hour-meter prior within 60 days after issuance of this permit.

g. The permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate each engine and associated control device (if equipped) in a manner consistent with good air pollution control practice for minimizing emissions.
**[40 CFR §60.4243(b)(2)(ii)]**

h. The diesel fuel consumed by the engine shall meet the following standards.

i. Sulfur standard. Maximum sulfur content of 15 ppm.
**[40 CFR 60.4207(b), 40 CFR 1090.305(b)]**

ii. Cetane index or aromatic content. and
**[40 CFR 60.4207(b), 40 CFR 1090.305(c)]**

iii. Minimum cetane index of 40; or
**[40 CFR §60.4207(b), 40 CFR §1090.305(c)(1)]**

iv. Maximum aromatic content of 35 volume percent.
**[40 CFR §60.4207(b), 40 CFR §1090.305(c)(2)]**

## 5.2. Monitoring Requirements

5.2.1. The permittee shall keep records of the hours of operation for the engine (9S) on a monthly basis. The records must document hours of operation of the engine at the end of every calendar month. Such records shall be maintained in accordance with Condition 3.4.1. and must be in a manner to demonstrate compliance with the operating limits of Condition 5.1.1.e.
**[40 CFR §60.4214(b)]**

## 5.3. Recordkeeping Requirements

5.3.1. The permittee shall maintain records of any maintenance performed on the engine (9S). Such records shall be maintained in accordance with Condition 3.4.1.
**[40 CFR §60.4 (a)(2)]**

5.3.2. The permittee shall maintain records of all diesel fuel shipments and such records shall identify whether the diesel does or does not meet the specifications in Condition 5.1.1.g. Such records shall be maintained in accordance with Condition 3.4.1.

# Appendix A - Dust Control Plan

**Dated: April 9, 2024**

**REO Processing, Inc.**

Dust Control Plan Rev 8

REO Processing, Inc. 20 26th Street
Huntington, West Virginia

April 9, 2024

## TABLE OF CONTENTS

## 1. INTRODUCTION

This Dust Control Plan has been prepared to address the control of fugitive and airborne dust emissions from the REO Processing, Inc. facility located in Huntington, West Virginia (the Site). This Plan complies with the West Virginia Legislative Rule 45CSR17 ("Rule 17"), "To Prevent and Control Particulate Matter Air Pollution from Materials Handling , Preparation, Storage and Other Sources of Fugitive Particulate Matter." The primary objective of this plan is to present a strategy for controlling, to the greatest extent practicable, fugitive or airborne dust emissions at the Site through specific source identification and activities that have a high potential to produce or generate fugitive or airborne dust emissions. This plan describes the engineering and administrative controls necessary to minimize and control dust emissions from these sources and activities.

The plan will be modified and/or revised as site conditions change or changes in dust control strategy arise. This plan will be implemented in conjunction with the project Site Health and Safety Plan.

## 2. SITE DESCRIPTION/BACKGROUND

REO Processing, Inc. operates a warehouse and re-packaging plant at 20 26th Street, Huntington, West Virginia. The Site stores, re-packages, and loads activated carbon by emptying super-sacks to trailers.

**Bulk Truck filling-Process Description**

Bulk trucks are fully enclosed trucks with built in filling ports.

Depending on the size of the customer order will depend on how much material is staged for loading. This can be in 1000 or 2000 lb Sacks. Sacks are verified for correct Batches and a funnel is placed on the Bulk Truck Trailer Filling ports on top the trailer and dust collector hose (the hose is attached to a cover that is sealed to the hatch) attached to unused port on trailer. Once Sacks are verified correct, utilizing a Forklift the sacks are then picked up from the lifting ears and brought over and centered above the funnel placed on top the trailer. Once centered correctly, an employee then opens the bottom of the sack to allow the material to empty into the bulk trailer.

Once the bag is opened and material is flowing, the bottom of the sack is lowered down into the funnel to reduce dust escaping. Once the sack is empty, the spout is then re-tied to prevent any carbon from coming out of the sack when removing from the funnel, the forklift driver then returns, and employee

removes the empty sack to discard and the driver repeats until all sacks are emptied into the trailer. Once all is completed, the funnel is removed and the trailer fill ports are closed, and the truck is verified for cleanliness.

During loading of bulk trucks, dust is captured and evacuated to a baghouse from the time material begins flowing into the truck until the funnel is removed and the trailer fills port(s) are closed.

**Bulk Dump Truck filling-Process Description**

Bulk dump trucks are open top trailers with a soft-top cover or tarp that is removed, pulled back, or rolled up to allow loading. Once loading has been completed, the open top of the dump truck is re-covered prior to transporting loaded material.

Depending on the size of the customer order will depend on how much material is staged for loading. This can be in 1000 or 2000 lb Sacks. Sacks are verified for correct batches and a custom made, solid fill (fill cover) cover is placed on the bulk dump truck. The fill cover has multiple filling ports on top and dust collector hose is positioned close the filling port. Once Sacks are verified correct, utilizing a Forklift the sacks are then picked up from the lifting ears and brought over and centered over the filling port, once centered correctly, an employee then opens the bottom of the sack to allow the material to empty into the dump truck.

Once the sack is empty, the spout is then re-tied to prevent any carbon from coming out of the sack. The forklift driver then returns, and employee removes the empty sack to discard and the driver repeats until all sacks are emptied into the trailer.
Once all is completed, the fill cover is removed and the dump trailer tarp is positioned over the load.

During loading of bulk dump trucks, dust is captured and evacuated to a baghouse from the time material begins flowing into the truck until the funnel is removed and the trailer fills port(s) are closed.

**Bulk Truck Unloading-Process Description**

Depending on the size of the customer order will depend on how much material is available for unloading. The trailer is positioned to access the ports with pneumatic pumps. Seals are verified, hoses are attached and the pumps are activated pulling the material from inside the bulk truck to a funnel shaped hopper just inside the building. The machine weighs the material to designated weight and then releases material into the super sack that is attached to the neck of the funnel hopper. Once

Sack if filled, operator seals the sack, labels it and sets it aside until to order is complete. The filled sacks are then warehoused until the customer requests them. Dust collection routed to a baghouse is in place at the sack fill station and utilized during unloading.

**Small Bagging-Process Description**

Material is staged and verified to be correct. Once verified the 1000 or 2000lb Sacks (depending on customer order) are then transferred into a tote bin. Once tote is loaded, the tote is then raised above the bagger and placed on a stand. The Operator will then open the valve on the bottom of the tote and the material will flow into the bagger hopper.

When the bagger is loaded the operator then places a bag over the spout and actuates the filler. The machine fills the bags to the correct weight and then the bags are sealed and palletized. Once a full pallet is completed, the pallet is set aside for inspection. Dust collection routed to a baghouse is in use at the bag filling station.

## 3. POTENTIAL FUGITIVE DUST SOURCES AND CONTROLS

The primary contaminant of concern, with respect to fugitive dust emissions at the Site, is black particulate matter (PM). The following project work areas/tasks have been identified as potential sources of PM emissions and are expanded upon further below:

| Source | Controls |
|---|---|
| Exhaust fans located on the roof and eastern exterior wall of the warehouse building | □ Visual inspection for PM accumulation<br>□ Filters<br>□ Preventive maintenance |
| Exterior truck loading/unloading area and small bag filling areas | □ Baghouse<br>□ Completed under cover<br>□ Under a hood connected to Bag House to create negative pressure<br>□ Visual inspection of hoses and valves<br>□ Preventive maintenance |
| Exterior railcar loading/unloading area | □ Dust collection system Preventive maintenance |
| Interior super sack filling area | □ Baghouse<br>□ Completed in enclosed building<br>□ Visual inspection for PM accumulation<br>□ Preventive maintenance |
| Plant Grounds | □ Daily cleanup |

| | |
|---|---|
| | □ Visual Inspection<br>□ Immediate work stoppage on spills greater than 5lbs, with immediate cleanup actions |

Preventive maintenance of the fugitive dust equipment is completed by following the manufacturer's recommended operations and maintenance plans associated with the equipment. Contractors or Site employees complete these tasks as needed. Tasks may include:

- Inspection and/or repair of the structure integrity including vents, stacks, hoods
- Inspection and/or repair of the filtration systems such as motors, belts, fans, filters, etc.
- Review and/or measurement of air flow velocity
- Inspection and/or repair of measurement equipment such as magnehelic meters, flow meters, etc.

Records of these preventive maintenance actions are maintained by the Plant Manager.

**Small Bagging** - Dust collection is used in this process and is completed entirely indoors to prevent material from leaving the site.

**Bulk Truck Unloading/Bulk Sack filling** – Dust collection is used in this process and all sources of emissions are indoors to prevent material from leaving the site.

**Bulk truck Loading** - Dust collection is used on this process, this process is performed outdoors, however it is completed under a hood connected to a bag house to prevent emissions Additionally, REO has installed dust netting to prevent dust from escaping the breezeway area between buildings.

**Exhaust Fans in main warehouse** – The main warehouse has 5 Exhaust fans, 2 which exhaust out of the roof and 3 which exhaust out of the rear wall –

- Filter frames and filters connected to each exhaust fan.
- Filters are to be Pleated filters with a Merv 8 rating.
- Filters are to be entered into REO's E-maint. program which will send out monthly Preventative Maintenance work orders for filter inspections monthly. Inspections to be completed by Maintenance personnel, Plant Manager or their designee.
- If filters are soiled and restricting proper air flow, Work orders are to be entered into E-maint for replacement.

**Vibration of Super Sacks** – REO is currently using a vibrator mounted on the outside of the hopper which the material is transferred through to keep the material fluidized this reduces the amount of pressurization. Any dust escaping the bag is under the hood.

**Plant Grounds** – The bulk truck loading area is to be cleaned daily to prevent material escaping facility on vehicles. Any spills larger than 5lbs, work is to stop, and immediate spill cleanup is to be initiated. This requirement is for all processing/handling of materials at REO facility.

In addition, residual material inside the building and associated structures that has the potential to become airborne fugitive PM will be addressed through the completion of daily walkthroughs that will include housekeeping inspections to facilitate cleaning needs. REO personnel will address the housekeeping through this daily inspection and REO can begin a cleaning regiment from findings.

## 4. VERIFICATION OF CONTROLS

The following methods will be used to verify the working condition of dust control measures. Forms can be found in Appendix B.

| Source | Verification Method |
|---|---|
| Exhaust fans located on the roof and eastern exterior wall of the warehouse building | □ Monthly inspection |
| Exterior truck loading/unloading area and small bag filling areas | □ Weekly inspection<br>Monthly inspection |
| Exterior railcar loading/unloading area | □ Monthly inspection |
| Exterior super sack filling area | □ Monthly inspection |
| Plant Grounds | □ Daily inspection<br>□ Any spill greater than 5lbs. requires a stop work action until the spill is cleaned up |

In addition, the listed items will be incorporated into the daily walkthrough form where blank copies will be placed in the warehouse and bulk loading area for any employees to note any process/facility issues or concerns. These completed forms are to be given to the Plant Manager for review and to address any issues/concerns immediately.

## 5 TRAINING

Prior to the implementation of this Dust Control Plan, REO will conduct training for REO personnel. REO will provide a large-group training sessions before each work crew begins work with the different fugitive source areas with periodic follow-up training for groups of newly

assigned personnel. The training sessions will include a review of the operation and maintenance procedures for each fugitive emissions source area, reporting/record keeping requirements, and potential corrective actions.

Training to the Dust Control Plan and all required documents is to be performed on hire of new employees and continued on a semi-annual basis. This re-occurring training is to be scheduled and set by the Plant Manager and the Director of Safety & Quality.

## 6 RECORDKEEPING

The Director of Safety and Quality and Plant Manager, will be responsible for the implementation of the Dust Control Plan. Records and inspection logs will include documentation of all inspections, maintenance and completed work practices (including the name of the person conducting the activity), weather conditions, time of observation, area or operation observed, and corrective actions taken, if any.

A documented daily walkthrough by the Plant Manager or their designee will be performed, and any issues or concerns are to be addressed immediately by supervision. This daily walkthrough will include housekeeping inspections to facilitate cleaning needs. Forms have been developed to assist in daily walkthrough inspections and documentation.

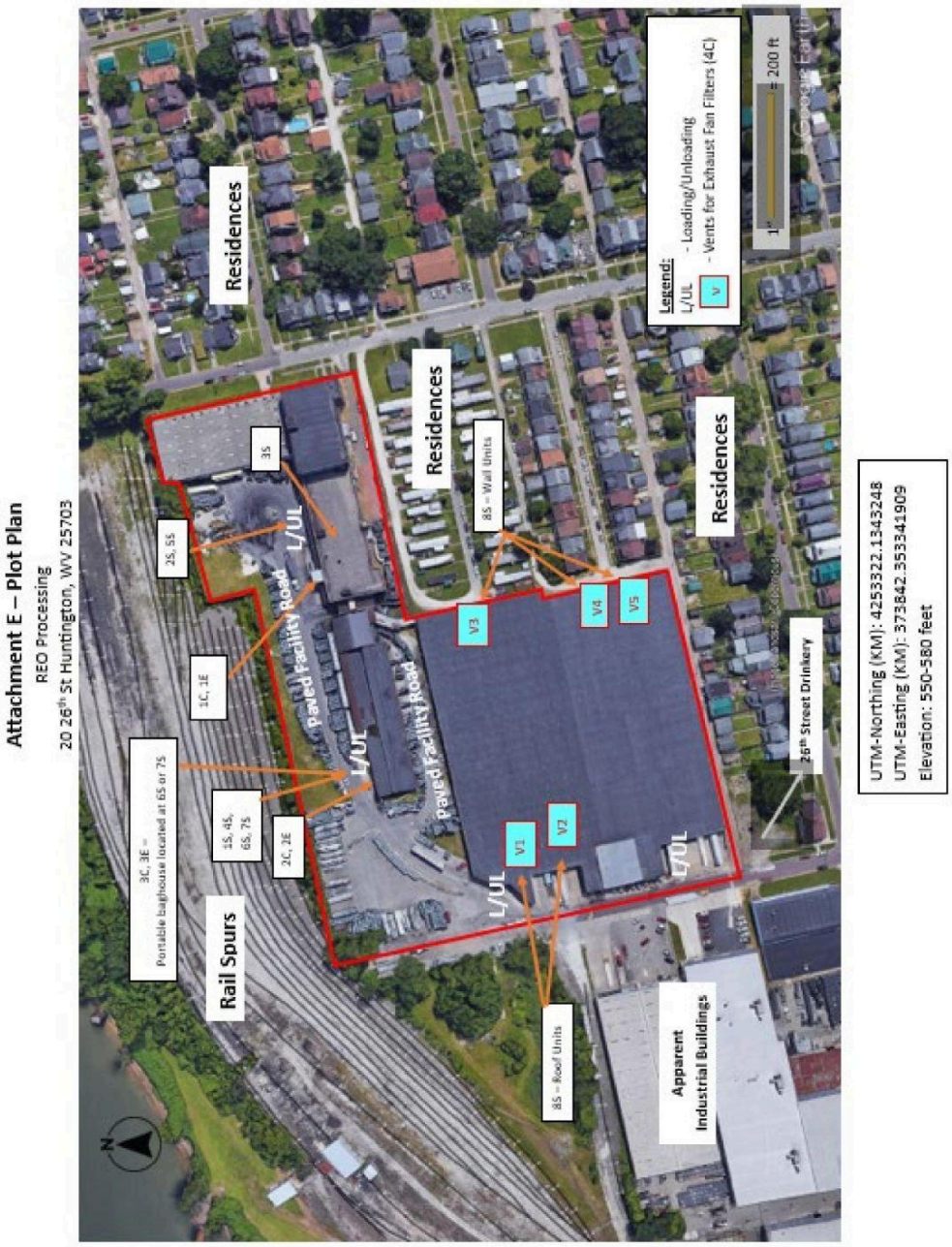
This daily walkthrough form will be placed in the warehouse and bulk loading area for any employees to note any process/facility issues or concerns. These completed forms are to be given to the Plant Manager for review and to address any issues/concerns immediately.

## 7 REPORTING REQUIREMENTS

Deviations from this Dust Control Plan and/or corrective actions required to address known episodes of fugitive dust emissions beyond the Site perimeter will be reported in writing to the DAQ Director within ten (10) days of occurrence. When fugitive emissions are noted, as part of the written notification to the DAQ Director the following items should be included: what emission(s) were observed; when the emissions were observed; duration of event; and what corrective actions were implemented. It should be noted that once the facility completes the DAQ permit application, reporting requirements may be subject to those requirements.

## Appendix A - Facility Layout

Dust Control Plan
REO Processing, Inc.
Huntington, West Virginia



DUST CONTROL PLAN
REO PROCESSING, INC.
Huntington, West Virginia

| Operation | | Emission Point Number | Control Device | Control Device Number |
|---|---|---|---|---|
| From | To | | | |
| Bulk Truck | FIBC | 1S | Bag House by FIBC Line | 2C |
| FIBC | Bulk Tanker | 2S | Bag House Outside | 1C |
| FIBC | Small Baggine | 3S | Bag House OUtside | 1C |
| Rail Car | FIBC | 4S | Bag House by FIBC Line | 2C |
| FIBC | Dump Truck | 5S | Bag House OUtside | 1C |
| Rail Car | Tanker Truck | 6S | Mobile Filter System | 3C |
| Tanker Truck | Rail Car | 7S | Mobile Filter System | 3C |

## Appendix B – Inspection Forms

| REO PROCESSING, INC.<br>MONTHLY INSPECTION FORM – DUST CONTROL PLAN | |
|---|---|
| Date/Time: | Weather Conditions: |
| Inspector (Name and Title): | Inspector Signature: |

| Areas Inspected | Dust Control Measure | Observation | Corrective Actions Taken |
|---|---|---|---|
| Truck Loading/Unloading | Are the baghouse hoses in good working order (e.g., no cracks, structurally sound)? | | |
| | Are the baghouse valves in good working order (e.g., able to be shut)? | | |
| | Are the baghouse doors in good working order (e.g., seals/gaskets in place and working)? | | |
| | Do the filters require change out? | | |
| | Are there visible emissions coming from the process? | | |
| | Review the previous months weekly inspections – have corrective actions been completed? | | |
| Super Sak Filling Area | Is the filtration system in good working order (e.g., running, filters in place and properly seated)? | | |
| | Do the filters require change out? | | |
| | Are there visible emissions coming from the process? | | |
| Warehouse Exhaust Fans (roof) | Are the fans in good working order (e.g., running, filters in place and properly seated)? | | |
| | Do the filters require change out? | | |

| | | | |
|---|---|---|---|
| | Are there visible emissions coming from the process? | | |
| | Is there evidence of dust build up near the exhaust fans? | | |

| Areas Inspected | Dust Control Measure | Observation | Corrective Actions Taken |
|---|---|---|---|
| Warehouse Exhaust Fans (eastern) | Are the fans in good working order (e.g., running, filters in place and properly seated)? | | |
| | Do the filters require change out? | | |
| | Are there visible emissions coming from the process? | | |
| | Is there evidence of dust build up near the exhaust fans? | | |
| Exterior Railcar Filling (if used in the month) | Is the dust collection system in good working order (e.g., running, filters in place and properly seated)? | | |
| | Do the filters require change out? | | |
| | Is there evidence of dust build up near the area? | | |
| | Is the dust collection drum more than 75% full and require changing? | | |

| REO PROCESSING, INC.<br>WEEKLY INSPECTION FORM – DUST CONTROL PLAN | |
|---|---|
| Date/Time: | Weather Conditions: |
| Inspector (Name and Title): | Inspector Signature: |

| Areas Inspected | Dust Control Measure | Observation | Corrective Actions Taken |
|---|---|---|---|
| Truck Loading/Unloading | Differential pressure reading in the baghouse | | |
| | Any pressure reading 2.9 or above warrants a filter changeout. | | |
| | Are the dust level sensor's in the small bag filling area in good working order (e.g., running, readings are below an action level)? | | |
| | Are there visible emissions coming from the process? | | |

## CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] _____ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name & Title _____ _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

---

[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

(ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.