REO Processing, Inc.

Dust Control Plan Rev 8

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

April 9, 2024

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Appendices

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 Filters Preventive maintenance
Exterior truck loading/unloading area and small bag filling areas	Baghouse Completed under cover Under a hood connected to Bag House to create negative pressure Visual inspection of hoses and valves Preventive maintenance
Exterior railcar loading/unloading area	Dust collection system Preventive maintenance
Interior super sack filling area	Baghouse Completed in enclosed building Visual inspection for PM accumulation Preventive maintenance
Plant Grounds	Daily cleanup

	Visual Inspection 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 Monthly inspection
Exterior railcar loading/unloading area	Monthly inspection
Exterior super sack filling area	Monthly inspection
Plant Grounds	Daily inspection 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

Attachment E – Plot Plan

REO Processing

20 26th St Huntington, WV 25703

UTM-Northing (KM): 4253322.1343248
UTM-Easting (KM): 373842.353341909
Elevation: 550-580 feet

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. 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. 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?		