



CITY OF ST. LOUIS
 DEPARTMENT OF HEALTH
 AIR POLLUTION CONTROL PROGRAM **AUG 10 2007**
 1415 NORTH THIRTEENTH STREET
 ST. LOUIS, MISSOURI 63106-4424
BASIC OPERATING PERMIT NOTIFICATION
CITY OF ST. LOUIS SOURCES ONLY

ACCEPTED 0904604

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OFFICE USE ONLY	
FILING FEE \$100.00	
CHECK NO.	CHECK RECEIVED
CHECK AMOUNT \$	CHECK DATE

PAMS# 2007-08-039

SECTION A: GENERAL NOTIFICATION INFORMATION

Section A-1: General Installation Information

4. DATE STAMP (OFFICE USE ONLY)

RECEIVED
 AUG 03 2007
AIR POLLUTION

COMPLETE
 AUG 10 2007

1. INSTALLATION NAME ACL Transportation Services	2. FIPS 510	3. PLANT NO. 0156
5. YEAR SUBMITTED 2007	(314) 389 - 1500 (314) 389-6607	
8. INSTALLATION MAILING ADDRESS 5500 Hall Street	9. PRIMARY SIC CODE 4491	
10. CITY St. Louis	STATE MO	11. ZIP CODE 63147
12. INSTALLATION STREET ADDRESS 5500 Hall Street	13. COUNTY NAME St. Louis City	
14. CITY St. Louis	STATE MO	15. ZIP CODE 63147
17. INSTALLATION CONTACT PERSON Dave Evans	18. MO REPRESENTATIVE DISTRICT NO. 57-108	
19. INSTALLATION CONTACT TELEPHONE NO. (314) 389 - 1500	20. INSTALLATION CONTACT E-MAIL Dave.evans@aclines.com	
21. PARENT COMPANY NAME American Commercial Lines LLC	22. MAILING ADDRESS 1701 East Market Street	
23. CITY Jeffersonville	24. STATE IN	25. ZIP CODE 47130
26. PARENT COMPANY CONTACT PERSON Sam George	27. PARENT COMPANY CONTACT TELEPHONE NO. (812) 288 - 1997	
28. PARENT COMPANY CONTACT E-MAIL Sam.george@aclines.com		

Section A-2: Type of Basic Operating Permit Notification

INITIAL RENEWAL MODIFICATION ADMINISTRATIVE AMENDMENT

Section A-3: Installation Description

29. Coal is unloaded from trains and re-loaded into inland river barges.

30. Has your installation submitted an EIQ in the last 5 years (including all Form 2.0's)? Yes No
 (if no, submit full EIQ packet)

Section A-4: Compliance Status

31. Will your installation be in compliance with all applicable requirements at the time of notification submittal and continue to comply with these requirements for the duration of the notification? Yes No
 (if no, submit compliance plan)

32. Will your installation be in compliance with all applicable requirements promulgated prior to this notification that contain a compliance deadline within the term of this notification? Yes No
 (if no, submit compliance plan)

Section A-5: Compliance Plan (If Installation Answers No to Items 31 and 32 Above)

33. Please specify which applicable regulations the installation is not expected to be in compliance with, including how installation shall meet compliance and enforceable measures leading to compliance.
 10 CSR 10-6.170: the facility shall meet compliance with this regulation by following the compliance plan submitted herewith. See Section C Comment Section.

34. DATE SOURCE EXPECTS TO BE IN COMPLIANCE
 August 31, 2007

Section A-6: Certification of Compliance with All Applicable Requirements and Applicant's Certification Statement for Operating Permit Notification

I hereby certify that, based on information and belief formed after reasonable inquiry, the air contaminant source identified in this application is in compliance with all applicable requirements, except as noted in compliance plan (item 34 above), if applicable.
 I certify, based on information formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

35. SIGNATURE OF RESPONSIBLE OFFICIAL OF COMPANY
Sam George

36. DATE
 7/31/07

37. TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL
 Mr. Ms. Sam George

38. TITLE OF RESPONSIBLE OFFICIAL
 Vice President Environmental Compliance

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SECTION C: COMMENT FORM (OPTIONAL)

Please use for compliance plan (item 34 above) or for additional requirements.

INSTALLATION NAME ACL Transportation Services	FIPS 510	PLANT NO. 0156	YEAR SUBMITTED 2007
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COMPLIANCE PLAN FOR 10 CSR 10-6.170 BASED ON LETTER DATED 10 APRIL 2007

1. ADDITIONAL LIGHTING FOR NIGHT TIME OPERATIONS AND MONITORING

The two 1000-watt floodlights installed at the convergence of ACL's yard conveyors are to be used to monitor potential emissions during low or no light conditions. This lighting should provide adequate illumination to see any dust that may be in the atmosphere during the hours after dark. When excessive levels of dust are noted, ACL personnel will take immediate action to water the coal and reduce the dust. Excessive emissions shall be defined as any dust seen in the beam of the new flood lights. Dust visible in these lights will indicate that emissions are in the air. Supervisors will take all action required to provide adequate control immediately and document corrective actions in a written log.

2. MAINTENANCE OF STRICT WATERING SCHEDULE

A set schedule for spraying the storage piles and low-lying areas using water and crusting agent will be developed. Watering will be done no less than once in any nine (9) day period, regardless of weather conditions or stack height. Crusting agent will be utilized at least every other week. ACL personnel will keep records of all spraying for review by the office of the City of St. Louis – Air Pollution Control. Supervisors shall, no less than once per week, water any existing coal piles with water using surfactant or crusting agent. Chemical used shall be determined by expected time coal shall lay dormant. If coal is expected to be reclaimed within seven days, surfactant shall be used. If coal is expected to remain dormant for more than seven days, crusting agent shall be used. Supervisors shall log the events in a log book. Supervisors shall document the amounts of water, surfactant or crusting agent used during this process. During times when the ambient temperature falls below 32°F, the facility will make note of the actions taken to continue the watering schedule. The water wagon shall be used to deliver the surfactant and crusting agent as usual during these times, and stored in the shop area to prevent freezing. Supplemental water will be used as necessary from the fire lines along the east access road. Once water is delivered the hoses will be drained and returned to the shop to prevent freezing.

3. INCREASE STAFF AWARENESS OF AIR POLLUTION CONTROL

ACL Transportation Services will conduct weekly job awareness briefings and document specifically that dust control was discussed each week with the crews on all shifts. The facility will seek feedback from employees on how to better control dust. Supervisors shall include the names of all employees present during these briefings. The meeting shall be documented in a written log.

4. AUTOMATION UP-GRADE TO STACKER/RECLAIMER

ACL will install equipment allowing more flexibility in operating techniques to reduce dust during different operating conditions. Laser sensor devices will be used to reduce the total distance the coal falls from the stacker to the coal stockpile, thus reducing dusting. Additionally, the stacker will be used as a windbreak when stockpiling by building coal piles, from the north to the south on the east storage area, and from the south to the north on the west storage area. Additionally, the speed of the reclaimer will be reduced during windy conditions when loading barges from the stockpile. Supervisors shall monitor the conditions associated with the stockpiling of coal and during reclaim operations. If conditions are observed where dust is visibly migrating into the air during stockpiling, supervisors will ensure the laser is adequately controlling the distance from the stacker to the stockpile, adjust direction to allow the bucket wheel to be used as a windbreak, and ensure that all water nozzles and watering practices described in the Compliance Plans are being utilized. If conditions are observed where dust is visibly migrating from the Stacker/Reclaimer during reclaiming operations, supervisors shall initiate the Stacker/ Reclaimer to be used in the "low" or "slow" speed mode. (Reduced RPMs of the actual bucketwheel equal to ½ of normal speed; normal operating speed is 52.5 RPMs.) Supervisors shall document such occurrences by placing a written report in the file.

AIR QUALITY MANUAL

The facility will follow the operating procedures in the Air Quality Manual prepared May 11, 2007 to conform with the Compliance Plan dated April 10, 2007. The Air Quality Manual shall incorporate all standard operating procedures that address all Compliance Plans currently in effect for this facility.