



Port of Anacortes
Pier 2 Bulk Loading Facility
Dust Management Plan

May 2011

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A copy of this Dust Management Plan is available to the public on the Port's website at:
<http://www.portofanacortes.com/sulfur.shtml>

Introduction and Purpose

The Port of Anacortes (Port) hires marine terminal contract operators (currently Metropolitan Stevedore Company) to load bulk goods (primarily petroleum coke and prilled sulfur) from its Pier 2 marine terminal on the Guemes Channel. The entrance to Pier 2 is on 4th Street between R and T Avenues in Anacortes. A condition of the Northwest Clean Air Agency (NWCAA) permit (Order of Approval to Construct) to load prilled sulfur required updating the existing Dust Management Plan for coke-loading operations to include prilled sulfur loading operations. The purpose of this Plan is to enforce minimization of dust during the transfer of petroleum coke and prilled sulfur from trucks to vessels at Pier 2. The plan also provides contact persons and agencies to be notified in the event of an emergency. The Port also has a Contingency Plan that describes operations specific to the loading of prilled sulfur. It is available on the Port's web site at: <http://www.portofanacortes.com/sulfur.shtml>.

Transportation of Prilled Sulfur to Pier 2

The transportation of sulfur prills from the production and storage facilities at Marsulex is handled by a contractor to Marsulex – currently LTI Trucking. The trucking company lease-purchased a fleet of nine new sets of smooth sided double trailers to be used to transport both petroleum coke and prilled sulfur. The new design prevents accumulation of product and is easy to clean between loading events. These bottom dump trailers have tight fitting bottom gates and specially designed gate seals which prevent leakage of finely divided solid cargoes during highway transport. The truck trailers are fully covered to prevent sulfur prills from blowing out during transport. Because the prills are damp, dust release is unlikely. Marsulex is directly responsible for coordinating the response effort for any emergencies or spills that occur on the truck route, and for making associated notifications as specified under the Emergency Response Notifications section of this document.

Pier 2 Petroleum Coke and Prilled Sulfur Loading Operation

A Port of Anacortes' stevedoring contractor is responsible for receiving the bulk material from highway transport trucks and transferring it into the holds of maritime vessels at Pier 2. To accomplish this task, the stevedore has provided a covered belt conveyor that is equipped with a receiving hopper at the lower end of the belt. Each truck drives up a slight incline and advances until the materials are over the receiving hopper. The contents of the bottom dump truck are released into the hopper and onto the moving belt, which conveys the material into the ship's hold in the case of prilled sulfur, or to ships and/or barges in the case of petroleum coke. Subsequently, the second trailer in the set is positioned and dumped, and the vehicle leaves as the next truck approaches the ramp. Longshore workers clean up any spillage that occurs around the loader; however, the Port is ultimately responsible for minimizing spillage and for cleaning any areas in which spillage occurs. All practical methods to reduce spillage and potential hazards in the area are used.

Dust Control Equipment and Measures

The stevedoring company and the Port use several dust control measures during and after a loading event. These include use of a regenerative vacuum sweeper during loading events, water misters at the hopper, along the conveyor belt, and at the end of the directional “spoon” (where the material discharges into the ship or barge), a truck tire wash, and final cleanup and wash-down.

These measures begin with the first contact with material at the truck ramp and hopper. The hopper is equipped with a water spray fogging system to control particulate matter (PM) emissions at the hopper and as the material moves down the conveyor belt. In addition, the hopper has 18-inch sides to keep material from overflowing and being dropped onto the ground.

The conveyor belt system from the hopper to the ship employs three types of PM control measures. The entire belt system is completely enclosed in some areas and is covered in others. There are wipers in place at the end of each section of belt to reduce the amount of carry-back material that could fall from the return side of the belt. Bins are placed under the wiper areas to catch any material that does fall. Water spray nozzles are used at all transfer points along the conveyor belt system.

At the final stage of bulk material loading, the material is dropped through a tube into the hold of a ship or barge. Water nozzles are used again to prevent dispersal of particulate matter into the atmosphere. In addition, operators minimize the distance from which the material is dropped into the ship hold or barge so the “spoon” does not rise above the coaming level of the vessel during loading.

The stevedoring company provides employees at the pier who are responsible for sweeping up any spillage and shoveling it back into the ship loading system. Any spillage that occurs due to improper truck dumping or belt loader malfunctions is cleaned up expeditiously to assure that the dock is continuously maintained in a clean condition and dust is not created by vehicles running over material and grinding it into fine particles. All trucks exiting the terminal after delivery of bulk material must pass through the truck wheel wash system.

A skiploader is also available at the dock for use in recovering any large spills which could occur as a result of either conveyor belt malfunctions or truck spills on the pier. In the event of any spill large enough to require the use of a skiploader for material retrieval, manual sweeping and shoveling is also used to recover any residual particles. In the event of a spill of prilled sulfur, the prills would be wetted down prior to and during the cleanup to avoid dust creation. After completion of each ship loading operation, the area is swept with a regenerative vacuum sweeper and then all equipment and paving is washed down with fresh water.

The Port is directly responsible for coordinating the response effort for any emergencies or spills that occur on Port property, and for making associated notifications as specified under the Emergency Response Notifications section of this document. In the case of prilled sulfur loading, Marsulex, Inc., and its contractors are available to assist upon request.

Control Measure Failure

All of the dust emission control equipment will be maintained in proper working condition and will be in full effect during bulk material loading operations. Any malfunction in emission control equipment will be corrected as soon as possible. If there is a failure in a control measure, the loading event may need to be stopped until the equipment can be fixed. Excess water should be visible at all control locations. If it is not, the stevedoring company operations manager will perform a visual inspection of water spray nozzles, transfer points, and enclosures to determine if a failure has taken place.

Emergency Response Notification

The Anacortes City Police Department has primary law enforcement jurisdiction on public roads that are not state highways or freeways; and the Port of Anacortes has responsibility on Port property. Emergency medical response is summoned by calling a centralized paramedic dispatch center that serves the Anacortes area (911). The following is an outline of the agencies and/or individuals to be contacted and the telephone numbers to be used in the event of emergencies.

POLICE – LAW ENFORCEMENT

In the event of a motor vehicle accident, the first contacts should be to one or both of the following:

Washington State Patrol (State Highways & Freeways)	911
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Anacortes City Police Department (Local Streets and Vicinity)	911
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FIRE PROTECTION

The fire department should be promptly notified whenever fires or the likely potential for fires exist, including after any vehicle accidents involving sulfur trucks.

Anacortes City Fire Department	911
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Skagit County Fire District No. 13	911
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MEDICAL AID

Paramedics should be promptly notified whenever an accident has occurred involving injuries.	911
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In the event of an accident, fire, personal injury, sulfur spill or other emergency that occurs at the Port of Anacortes, notify the Port for response coordination, investigation, and problem rectification.

PORT OF ANACORTES

Call in the order listed:

John Hachey, Port of Anacortes Director of Operations & Facilities
(360) 299-1829 (Office)
(360)-661-1672 (Cell)

Josh Beaner, Port of Anacortes Maintenance Manager
(360) 299-1828 (Office)
(360)-661-6274 (Cell)

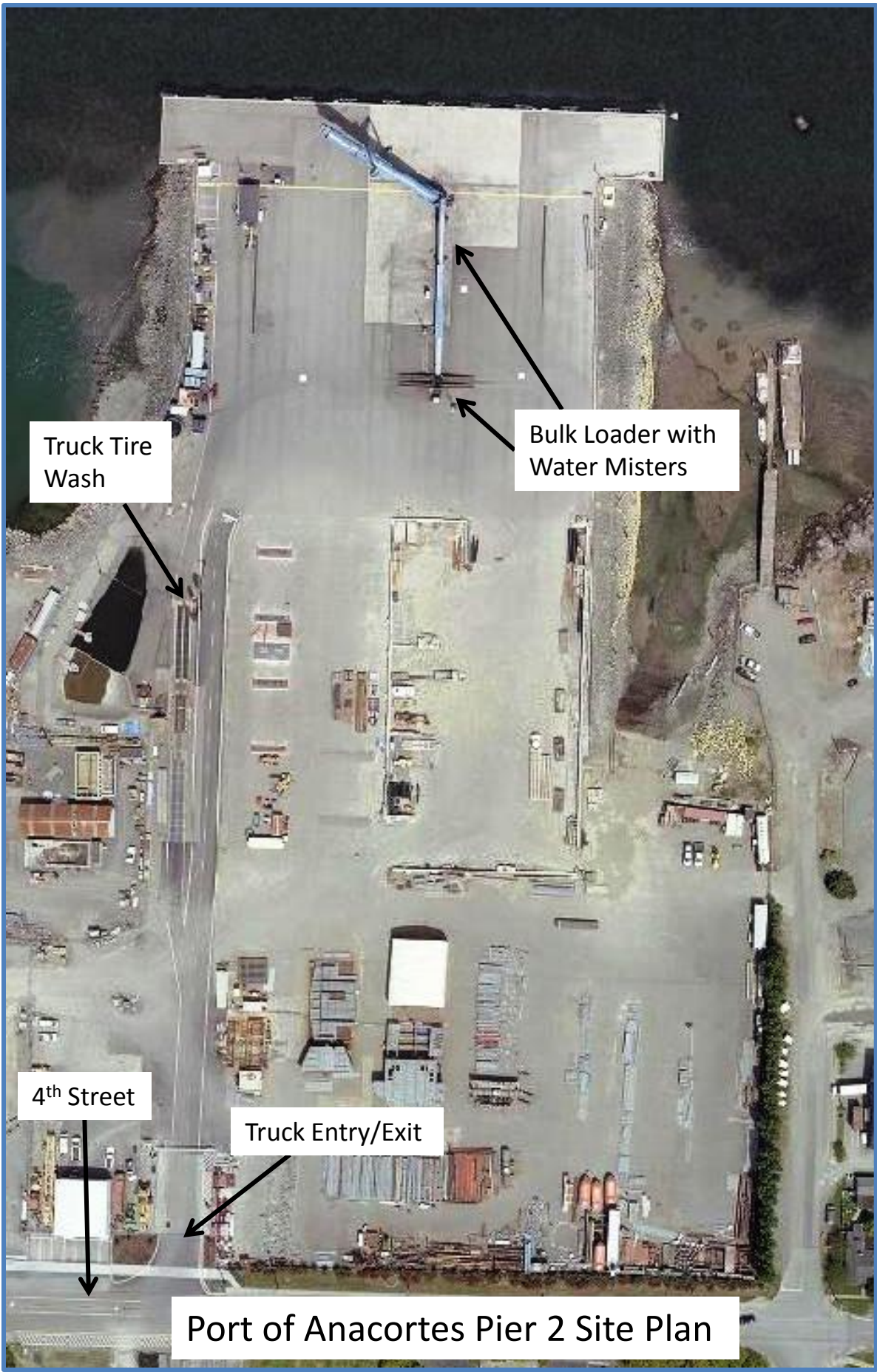
The Port will then make the following notifications. These notifications shall be made as soon as possible after the Port is aware of an incident. Call in the order listed below:

Spill to Land, Air or Water

State Department of Emergency Management	(800) 258-5990
Skagit County Dept. of Emergency Management	(360) 428-3250
Northwest Clean Air Agency (NWCAA)	(360) 428-1617 (Normal work week hours) (360) 428-1617 (Other times, leave message)
National Response Center (US Coast Guard)	(206) 217-6232

OTHER CONTACTS

LTI Trucking (trucking contractor)	(800) 327-6255
Metropolitan Stevedore Co., Shawn Bundy	(360) 299-2931 (Office) (360) 770-7230 (Cell)
Marsulex, Pat Murphy	(360) 424-5915 (Office) (360) 840-9701 (Cell)



Truck Tire Wash

Bulk Loader with Water Misters

4th Street

Truck Entry/Exit

Port of Anacortes Pier 2 Site Plan