FRI - Best Management Practices for Processed IPPC fuel cubes

The following best management practices are proposed for the trials of IPPC fuel cubes at the FRI TSB Cement Plant.

BEST MANAGEMENT PRACTICES (BMP) PLAN FOR MINIMIZATION OF FUGITIVE DUST, PILE MANAGEMENT AND FIRE PREVENTION

Practice	Description
Minimization of Fugitive Dust	1) Drop points to storage areas shall be designed to minimize the overall exposed (or exposed to atmosphere) drop height. 2) Periodic equipment maintenance shall be performed to maintain offloading locations and associated drop point integrity. Appropriate plant records shall be maintained on transportation equipment maintenance performed. 3) Daily observations of the off/up-loading and transportation and associated drop point integrity to identify any equipment abnormalities. 4) Plant personnel shall be trained on identification of warning signs for potential equipment malfunction. 5) Signs shall be posted identifying potential warning signs of equipment malfunction. 6) Plant personnel shall visually observe truck offloading operations and if excessive fugitive dust is detected appropriate fugitive dust minimization techniques shall be implemented including water spray. Plant personnel shall be trained on procedures for defining and minimizing excessive dust from the truck unloading operations.
Storage Pile Management	1) IPPC fuel cubes storage areas shall be managed to avoid excessive wind erosion. The IPPC fuel cubes will be stored in the coal shed L1 which is covered and protected from wind. 2) Mechanical moving by front end loaders and other supporting equipment shall be minimized on high wind event days. 4) Daily visual observations of the IPPC fuel cubes storage areas shall be performed and if conditions are right for fugitive dust formation, procedures shall be implemented including water spray or storage pile relocation or coverage.

Fire Prevention /Spontaneous Combustion Minimization	1) The current Emergency Response Plan includes: a) requirement to train onsite personnel to handle incipient fires (or contact local fire department as needed) and training on the identification of potential fire hazards; and, b) install and maintain equipment for plant personnel to handle incipient fires. 2) Daily observations of the IPPC fuel cubes storage areas shall be performed by plant personnel to identify potential fire hazards. Plant personnel shall be trained on identification of potential fire hazards. 4) Compaction of IPPC fuel cubes in the storage areas shall be minimized.
Quality Assurance of IPPC fuel cubes	1) The IPPC fuel cubes will be delivered to the Plant in vehicles designed to prevent fugitive release. 2) For each shipment of IPPC fuel cubes, the permittee shall record the date, quantity and a description of the material received. 3) The permittee shall inspect each shipment of IPPC fuel cubes. If the permittee identifies any such material that is not IPPC fuel cubes as defined in Attachment C of the AC permit application, the material shall be rejected and returned to the supplier. Rejected materials shall be moved off site in a logistically reasonable time period. 4) The permittee shall maintain records of rejected shipments and disposition thereof. Such records shall be made available to the Department upon request.