

Dominion

Memorandum To : Executive Director  
From : Director, Region VI  
Subject : Coal Dust Study Report  
Reference : (a) Wallace Reed memo of March 6, 1987  
containing suggested outlines for  
technical and legislative reports  
Date : March 12, 1987  
Serial No. : 145-87


This office has reviewed the reference outlines and offers the following comments concerning the final report.

1. The Region VI draft report contains nearly all the information in the suggested outline. This office concurs that the specific sprinkling criteria developed during the study should be included in the Final Report.
2. The organization of topics is a matter of preference of different individuals. The existing draft is organized in a standard technical report format accepted by most technical writers.
3. The absence of the CSX Terminal influence in the suggested outlines diminishes the credibility of the report as it pertains to Massey and Dominion. In refining the analysis of the Massey and Dominion terminals, every effort was made to account for apparent errors in calculated coal loadings. During this process, evaluations were made for reentrainment of coal dust that originated from the Massey and Dominion terminals. During this process, anomalies were observed in the sector where CSX is located and after substantial evidence was collected, it was reasonably determined that CSX was the source of these emissions. It is further noted, that during the course of this study, Massey and Dominion terminal operators made a point, on several occasions, of reminding this office that CSX was also responsible for coal dust emissions.
4. If CSX is to remain in the final report, then mention of the influence of a similar but much larger operation in Norfolk seems logical, and to ignore it would seem to make the report incomplete. Admittedly, the influence of Norfolk & Western has not been researched sufficiently to generate equations for dust emissions, and we feel this area should probably be addressed in another study.

5. The current report has been distributed to the coal companies and various others for technical review and comment. If the final version fails to acknowledge the existing terminals, it may lead some to say we are engaged in a cover up of some sort. This is particularly true from the Chesapeake Bay Foundation, who is represented by Mrs. Beverly Mann.
6. At this point, the report needs review for technical content, before a rewrite would seem appropriate. To skip the technical review process at this time would seem to be generating more work for the staff at a later date.
7. If the technical report contains material of political import, than those issues might be better addressed in the political arena. To remove facts from a report because of political sensitivities leaves us open to criticism of technical incompetence or collusion with industry.
8. We feel that the draft report opens many questions which should be researched. This is normal for any technical report and shouldn't be considered a liability.
9. This office has no comment on what the report to the General Assembly should contain. That report should be addressed by those more closely in touch with the political arena.

These comments are forwarded for your consideration before a decision on how to proceed is made. It is hoped that the inputs of various points of view will assist you in making the best possible decision.

As previously discussed with you we have monitoring data not the result of our study which clearly defines a problem at Norfolk & Western terminal. These data and the evaluation are company confidential and will be provided to you separately. We recommend that it be reviewed by you and Deb Field prior to disclosure of any of the material.



Ramon P. Minx  
Director, Region VI

RPM/cf

cc: Mrs. Elizabeth H. Haskell

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