

Memorandum To : Director, Division of Compliance

From : Director, Region VI

Subject : Proposed change to the Permits issued to the Massey Coal Terminal Corporation, the Dominion Terminal Associates and the Patrick Coal Corporation Export Terminal

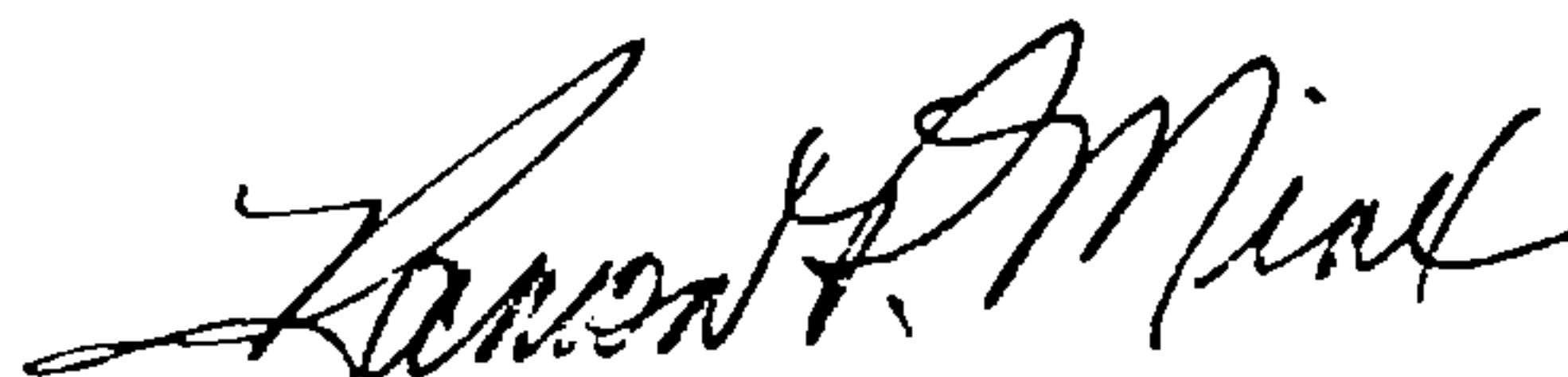
Enclosures : (1) Draft Letter to Massey Terminal
(2) Draft Letter to Dominion Terminal
(3) Draft Letter to Patrick Terminal

Date : August 11, 1983

Serial No. : 0419-83

Experience during the last 3 months has shown that fugitive emissions from open coal storage piles can cause a severe air pollution problem even though the permits we have issued have directed each terminal "to institute coal pile spraying operations as soon as the piles become a source of fugitive dust". Unfortunately, once the piles become a visible source of dust it is usually too late to prevent an unacceptable concentration of coal dust downwind. In order to prevent such occurrences it is necessary to keep the surface moisture level of the pile high enough to preclude the formation of fugitive emissions once the wind comes up. Experience also has shown that portable systems to wet down the pile are inadequate for the task at hand, especially if time becomes a factor. In view of the above it is suggested that the State Air Pollution Control Board modify the three (3) coal terminal permits currently in effect in order to institute a more positive approach to controlling coal pile emissions. The status of these terminals is as follows: Massey Coal Terminal is in operation and now has a permanent "rain-bird" system installed, Dominion Coal Terminal is in the final stages of completion with plans to install a "rain-bird" system, and Patrick Coal Terminal has yet to break ground.

It is recommended that the subject permits be revised as indicated in enclosures (1), (2) and (3).



Ramon P. Minx
Director, Region VI

RPM/LWH/cf

Enclosures

File
Dominion
8/12/83
(18)

DRAFT

Mr. Frank J. Mancuso
Project Manager
Utah International, Inc.
Dominion Terminal Associates
550 California Street
San Francisco, California 94104

Dear Mr. Mancuso:

The staff of the Air Pollution Control Board has re-evaluated the requirements necessary to prevent fugitive coal dust being emitted from coal storage piles. As a result of this re-evaluation, the Permit issued to Dominion Terminal Associates on October 14, 1981 is hereby amended under the authority delegated to the Executive Director by the Board in the following way:

- A. Delete paragraph 5 c
- B. Add a new 5 c as follows:

"5. c. Dominion Terminal Associates shall construct and operate a permanent installation to spray the entire coal storage area with water and/or other suitable dust suppressants. Such system to be activated whenever conditions indicate that fugitive emissions are likely".

All other conditions of the permit remain unchanged.

Sincerely,

W. R. Meyer
Executive Director

WRM/

ENCLOSURE (1)

DRAFT

Mr. J. M. Baylor, President
Massey Coal Terminal Corporation
Post Office Box 26755
Richmond, Virginia 23261

Dear Mr. Baylor:

The staff of the State Air Pollution Control Board has re-evaluated the requirements necessary to prevent fugitive coal dust being emitted from coal storage piles. As a result of this re-evaluation, the Permit issued to Massey Coal Terminal Corporation on December 2, 1980 is hereby amended under the authority delegated to the Executive Director by the Board in the following way:

- A. Delete paragraph 7
- B. Add a new paragraph 7 as follows:

"7. Massey Coal Terminal Corporation shall construct and operate a permanent installation to spray the entire coal storage area with water and/or other suitable dust suppressants. Such system to be activated whenever conditions indicate that fugitive emissions are likely".

All other conditions of the permit remain unchanged.

Sincerely,

W. R. Meyer
Executive Director

WRM/

ENCLOSURE (2)

DRAFT

Mr. Charles D. Robinson
Patrick Coal Corporation
Post Office Box 875
Grundy, Virginia 24614

Dear Mr. Robinson:

The staff of the Air Pollution Control Board has re-evaluated the requirements necessary to prevent fugitive coal dust being emitted from coal storage piles. As a result of this re-evaluation, the Permit issued to Patrick Coal Corporation on February 8, 1983 is hereby amended under the authority delegated to the Executive Director by the Board in the following way:

- A. Delete paragraph 5 c
- B. Add a new 5 c as follows:

"5. c. Patrick Coal Corporation shall construct and operate a permanent installation to spray the entire coal storage area with water and/or other suitable dust suppressants. Such system to be activated whenever conditions indicate that fugitive emissions are likely".

All other conditions of the permit remain unchanged.

Sincerely,

W. R. Meyer
Executive Director

WRM/

ENCLOSURE (3)

OCR

The following pages contain the Optical Character Recognition text of the preceding scanned images.

W, morandum To Dicector, Division of Coiiip'liarice

Froin Director, Region VI

@ubject Proposed chaiige to the Perinits issued to the l4assey Coal Teriiiiinal Corporation, the Dominion Terminal Associates and the Patt-ick Cnal Corl, oration Export Tc-riiiinal

EncLOSUres (1) Draft Lettei- Lo @-, CisseY Terminal

(2) Di-aft Letter to Pominion Tpt-fninal

(3) Draft I-etter to Patrick Teriiiiinal

Date August 11, 1983

Serial No. 0419-83

Experience during tiie last 3 months has sliown that fugitive eiiiissioiis ft-om open coal storage piles can cause a severe aii- pollution problem even though the permits we have iSSLed liave directed each tet-illinal "to institut e coal pile spraying operations as soon as the piles beconie a -jource of fugiti ve dust". Utifoi-tunately, once the piles hecome a visible sout-ce of dust it is USUally too late to pi-event an unacceptable concentration of coal dust downkq ird. In order to prevent such occui-rciices it is necessary to keep the sul-face moisture level of the pile Iiigh enoLiah to precltide 'Lllie floni.ation of fLigitive e iiiissions once the wind coiiies lip. E., :perience also has shc%-@n that pot-table systel lis to wet down the pile are inadequate for the task at hand, c-@@pecially if tiwe becoii ies a factor. In vievi of the above it is suggested 'L hat the Statc, Ait- Polluti on Control Board modify the three (3) coal tet-initial pc-r-iiiits currently in e ffect in order to itistitute a more positive appi-oacli to conti-olling coal pile em issions. The status of these teriiiiinals is as follows: Massey Coal Teci,.iinal is in o pera- tion and now has a permanent "rain-bird" syste-di iistalled, Doi-,iinion Coal Te-r--i-iinal is in the final stages of coiiipletion with plans to install a "i-ain-bit-d" s ysteifl, and Pati-ick Coal Tet-iiiiiiial lias yet to bt-eak ground.

It is recor-,, -iiended 'Lliat the subject periiiits be i-evised as indicated i n encLOSUres (1), (2) and (3).

it n P. Minx
Dii-ector, Regioti VI

RPM/LI, JH/cf

Enclosures

D-R-A F T.

Mr. Frank J. Mancuso
Project Manager
Utah International, Inc.
Domestic Terminal Associates
550 California Street
San Francisco, California 94104

Dear Mr. Mancuso:

The staff of the Air Pollution Control Board has re-evaluated the requirements necessary to prevent fugitive coal dust being emitted from coal storage piles. As a result of this re-evaluation, the Permit issued to Domestic Terminal Associates on October 14, 1981 is hereby amended under the authority delegated to the Executive Director by the Board in the following

way:

A. Delete paragraph 5 c

B. Add a new 5 c as follows:

"5. c. Dominion Terminal Associates shall construct and operate a permanent installation to spray the entire coal storage area with water and/or other suitable dust suppressants. Such system is to be activated whenever conditions indicate that fugitive emissions are likely".

All other conditions of the permit remain unchanged.

Sincerely,

W. R. Meyer
Executive Director

WRIA/

ENCLOSURE (1)

D-R A-F T

Mr. J. M. Baylor, President
Massey Coal 'lei-niinal Cot-poration
Post Office Box 26755
Richmond, Virginia 21J261

Dear Mr. Baylor:

The staff of the State Air Pollution Control Board has re-evaluated the requirements necessary to prevent fugitive coal dust being eiflitted froin coal

storage piles. As a result of this re-evalua'Lion, the Permit issued to Masse y

Coal Teri-ninal Corporation on December 2, 1980 is hereby amended under the autliority delegated to the Exectitive Dit-ector by the Board iti the followin g

,...;ay:

A. Delete pat-agraph 7

B. Add a new paragi-aph 7 as follo,vis:

`7. Hassey Coal Tet-iiiiiiial Corpoi-ation shall construct and operate a perriianent installation to spray tiie entire coal s-IL-loi-age area with vi ater

and/or other suitable di-ist SUp Suppressants. Such system to be activated whenever conditions itidicate that fugitive emiissions are likely".

All other conditions of the pet'init reiiiain uiichanged.

Siticet-ely,

W. R. 'Meyer
Executive Director

WRM/

EIICLOSURE (2)

DRAFT

Mr. Charles D. Robinson
Patrick Coal Corporation
Post Office Box 875
Gt-uridy, Virginia 24614

Dear Mr. Robinson:

The staff of the Air Pollution Control Board has re-evaluated the requirements necessary to prevent fugitive coal dust being emitted from coal storage piles. As a result of this re-evaluation, the Permit issued to Patrick Coal Corporation on February 8, 1983 is hereby amended under the authority delegated to the Executive Director by the Board in the following way:

A. Delete paragraph 5 c

B. Add a new 5 c as follows:

"5. c. Patrick Coal Corporation shall construct and operate a permanent installation to spray the entire coal storage area with water and/or other suitable dust suppressants. Such system to be activated whenever conditions indicate that fugitive emissions are likely".

All other conditions of the permit remain unchanged.

Sincerely,

W. R. Meyer
Executive Director

WRM/

ENCLOSURE (3)