

File
Div. 6
8/12/83

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

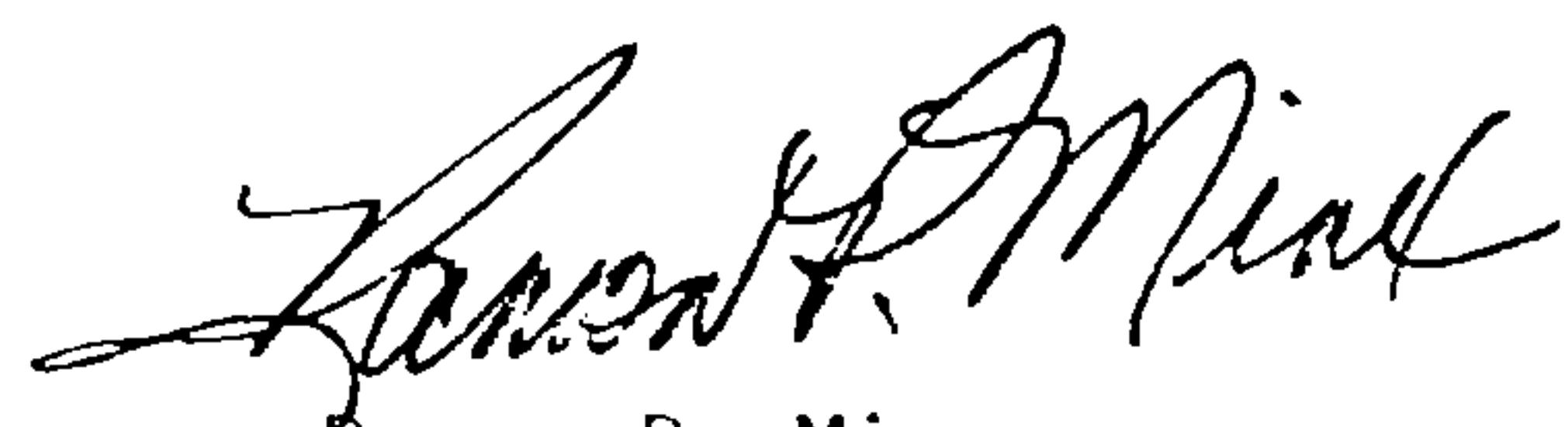
Enclosures : (1) Draft Letter to Massey Terminal
(2) Draft Letter to Dominion Terminal
(3) Draft Letter to Patrick Terminal

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

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/

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/

OCR

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

Memorandum To Director, Division of Coal and Mineral Resources

From Director, Region VI

Subject Proposed change to the permits issued to the Massey Coal Terminal Corporation, the Dominion Terminal Associates and the Peat-ick Coal Corporation Export Terminal

Enclosures (1) Draft Letter to Massey Terminal

(2) Draft Letter to Dominion Terminal

(3) Draft Letter to Peat-ick 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 prevent the formation of fugitive emissions once the wind carries it 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 terminals 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-bit-d" system, and Peat-ick Coal Terminal has yet to break ground.

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

cc: P. Minx
Director, Region VI

RPM/LI, JH/cf

Enclosures

D-R-A F T.

Mr. Frank J. Mancuso
Project Manager
Utah International, Inc.
Dow Union 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
Dow Union 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

WRRA/

ENCLOSURE (1)

D-R A-F T

Mr. J. M. Baylor, President
Massey Coal Terminal Corporation
Post Office Box 26755
Richmond, Virginia 21261

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

, . . . ; say:

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

tlr. 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 control 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.

Since, -el y

W. R. Meyer
Executive Director

WRM/

ENCLOSURE (3)