

FILE NAME: Powhatan (PHN)

DATE: 1978

DOC#: PHN030

DOCUMENT DESCRIPTION: Govt Inspection Reports

April 6, 1978

In order to control emissions to the outside atmosphere, the company utilizes 4 separate baghouses; two Kelco, one Dixie, and one Wheelabrator. One of the Kelco baghouses is located inside the plant; the remaining 3 units are located outside the plant.

Dixie Baghouse

The Dixie Baghouse is located outside, on the east side of the building. It controls the F-30 process line for the gray asbestos ore. There is one pick-up point for the closed system, which is in the return air duct between the fan and the mill. The exhaust air is discharged horizontally to the atmosphere. Fines collected are recycled to the bagging operation.

Wheelabrator Baghouse

The Wheelabrator Baghouse is located outside the building, on the west side. It controls the bagging hoppers and baggers for both the F-20 and F-30 process lines. Fines collected are waste material. They are periodically emptied from the waste hopper into drums and hand carried to the waste holding building.

The exhaust duct from the baghouse is enclosed by part of the building structure. Several years ago, the company had problems with noise from this unit. A structure was erected around the exhaust, to act as a muffler. Air exhausted into this structure reaches the atmosphere through louvres located in the walls.

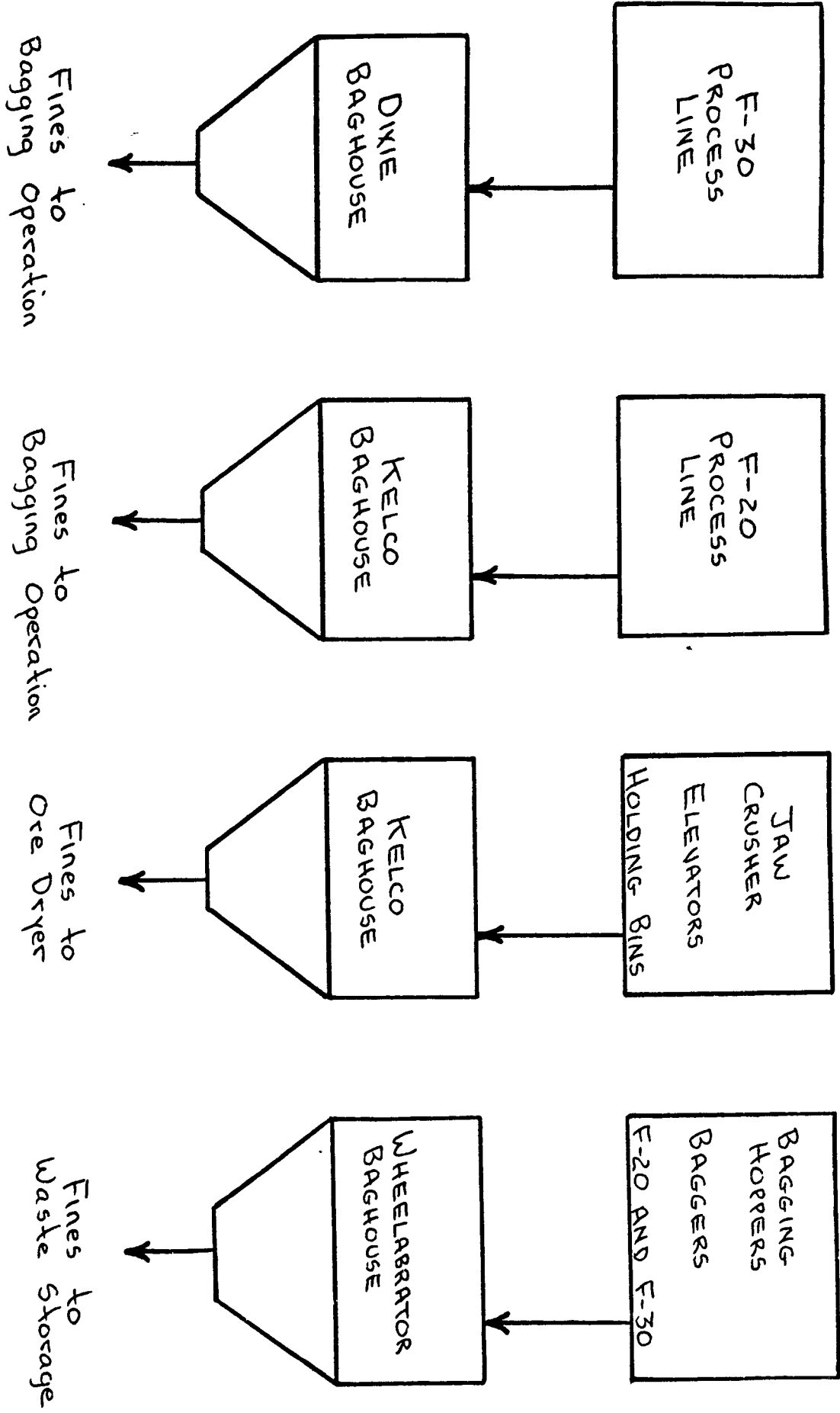
Kelco Baghouse

One Kelco Baghouse is located on the roof of the plant. It controls the primary jaw crusher, elevators, and bins for the 2 mills. The exhaust air flow is directed vertically downward to the roof. Fines from this baghouse are recycled, ~~removed~~, to the open bed dryer.

Kelco Baghouse

One Kelco Baghouse is located inside the building and controls the F-20 process line. One pick-up is located in the return air duct, between the fan and the mill. The baghouse consists of 4 sections, three of which are always on line while one is going through a cleaning cycle. Air is exhausted to the atmosphere through a common horizontal duct, which is located on the west side of the plant. Fines collected are recycled to the bagging operation.

Baghouse Schematic



April 11, 1978

MEMORANDUM

TO: File - Powhattan Mining Company
Baltimore County

FROM: Ronald E. Lipinski
Bureau of Air Quality Control

SUBJECT: Meeting with Dr. Malcolm Ross, U.S. Geological Survey, on April 6, 1978.

Conclusions:

I was referred to Dr. Ross by Dr. Crowley of the Maryland Geological Survey. Dr. Ross is a mineralogist with the U.S. Geological Survey in Reston, Virginia, whose expertise in the past several years has been in asbestos minerals.

I discussed the asbestos problem briefly with Dr. Ross and showed him samples of the ore and material processed by the Powhattan Mining Company. Dr. Ross examined the specimens under an optical microscope and identified the blue fibrous asbestos from Africa as crocidolite, which is an asbestiform variety of reibeckite, a member of the amphibole group. The other samples were identified as a talc-anthophyllite ore definitely containing anthophyllite asbestos, which is also in the amphibole group.

Dr. Ross stated that crocidolite is the only amphibole asbestiform that contains sodium and can therefore be differentiated from the other forms. Dr. Ross feels that the most dangerous of any of the asbestos minerals is crocidolite and feels that all other asbestos minerals are much less dangerous. He stated that crocidolite is now mined in only one place in the world, South Africa.

Dr. Ross was very familiar with the Powhattan Mining Company through newspaper articles that appeared in The Sun on Thursday, September 15, 1977. Dr. Ross was highly opinionated regarding the medical data on health effects of asbestos. He stated that he had studied the health effects data carefully and feels that there is a problem only in certain areas using certain minerals. As an example, he referred to the Quebec, Canada mining industry where he stated there are readings of chrysotile asbestos in the air and in the water at levels many times higher than in U.S. areas. There are years of medical data available and the area has been studied at length. He said that the conclusions indicated that there is no unusual health problems at all in the area. Dr. Ross discussed data which indicated that mesothelioma is mostly very high only among shipyard workers. This data came from a publication in Preventive Medicine Magazine in 1977 by McDonald and McDonald entitled "Epidemiology of Mesothelioma from Estimated Incidence".

REL:bw

cc: Mr. Steve Aust
Baltimore County Health Department

TO: Dr. Donald J. Roop
RE: Powhatan Mining Company
Page Two

August 24, 1978

- 3) The State of Maryland does not currently have the authority to enforce the Federal NESHAPS. However, this authority has recently been delegated to Maryland and will become effective on September 10, 1978.

These reasons, from a legal standpoint, may be valid ones. We feel, however, that the plant, as presently operating, constitutes a significant hazard to public health. We therefore refer this matter to you for whatever action you consider to be appropriate.

I respectfully request that we may meet with you to discuss the matter in greater detail.

William L. Phillips

William L. Phillips, Chief
Division of Air Pollution
Bureau of Environmental Services

WLP:mgt

April 11, 1978

MEMORANDUM

TO: File - Powhattan Mining Company
Baltimore County

FROM: Ronald E. Lipinski
Bureau of Air Quality Control

SUBJECT: Unannounced Plant and Area Inspection on March 23, 1978

PERSONS IN ATTENDANCE: Mr. Ronald Lipinski
Mr. Ralph Hall
Mr. Dave Filbert

PERSONS CONTACTED: Ms. Frances Matt
Mr. Roland Schisler

Conclusions:

An unannounced plant inspection was made. Ms. Matt was contacted before going into the plant. Mr. Schisler, the plant manager, conducted the tour through the facility and provided a general explanation of the Company's operations. A description of the equipment and operations at the plant are provided in a separate memorandum.

During the inspection, it was observed that parts of the building inside were covered with dusty material and that numerous doors and windows were kept open. Visible emissions of approximately 5% opacity were observed being discharged from the Kelco baghouse vent with some other emissions being barely observed coming from the few holes in the building wall and also through some open windows. Mr. Schisler immediately shut down the process in an attempt to determine the reason for the visible emissions. Subsequently, he contacted the Kelco Corporation for bag replacement and repair.

Outside the plant, a large pile of waste material was observed in a large three-sided storage bin with some material lying outside of the bin. The material inside the bin was mostly covered with a tarp and was very damp. Fibrous material was easily visible in the waste material. A small pile of the same waste material was also observed near an ash pile at the rear of the plant adjacent to some homes. A very small pile was also observed under the Dixie baghouse. All the piles were very wet. The roadways and the grounds around the plant were laced with ore and some waste material all containing, it would appear to be, fibrous asbestos. During the visit, the ground was very wet and the winds were very light so no emissions from these sources were observed.

During the inspection, only the F-20 mill was in operation running brown ore together with the blue asbestos from Africa. Pick-up of particulate matter into the baghouses was judged to be very good during this visit.

We revisited the plant area around 1 p.m. and observed several puffs of emissions of dense opacity being discharged from the horizontal vent of the Kelco baghouse. The Company was apparently in the process of repairing the leaks in the system. No visible emissions were observed after that.

During the inspection, several samples of material around the plant were obtained:

Sample A - Brown asbestos ore brought into the plant (anthophyllite)

Sample B - Gray asbestos ore brought into the plant (anthophyllite)

Sample C - Blue asbestos material brought in bags from Africa (crocidolite)

Sample D - Waste material fines

An area survey around the plant was made for familiarisation purposes and to visit the sampling sites.

REL:bw

cc: Baltimore County Health Department

Powhatan Mining Co. - File

August 25, 1978

David Filbert

National Emission Standards for Hazardous Air Pollutants

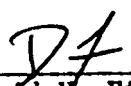
On August 16, 1978, a meeting was held to discuss the Federal NESHAPS in general and their application to Powhatan Mining specifically. Mr. Abraham Ferdas, from EPA Region III was present to answer specific questions and to present EPA's enforcement policies. Others present are listed on the attached roster.

Parker Dean opened the meeting by reporting that the delegation of authority for enforcement of NESHAPS by Maryland Air Quality Programs will become effective on September 10, 1978. There is still a question, however, about the extent of the authority delegation for future adoptions, revisions, etc. The Maryland asbestos control regulations have not yet been acted upon.

Mr. Ferdas then addressed the enforcement policy for asbestos. The regulation forbids any visible emission from an asbestos mill. In evaluating an asbestos mill it is not necessary to use EPA Method 9 for visible emission observation and opacity evaluation. Any emission visible to the human observer is a violation. This is not only from the processing equipment but includes fugitive emissions from windows, doors, etc. Thus, in order to come into compliance, the company would have to completely close up the building and exhaust ventilation air through approved filter devices.

In regard to the spray application of asbestos, the regulations were revised in June 1978. Use of materials containing more than 1% asbestos by weight is prohibited. The EPA enforcement branch in Washington D.C. has a master list of all products with greater than 1% asbestos.

In regard to demolition, Section 113 of the 1977 Clean Air Act gives EPA the authority to promulgate work practice standards. In enforcement actions in demolition violations, a sample of the asbestos containing material must be obtained to demonstrate that it is friable.



David H. Filbert, Program Supervisor
Technical Services
Division of Air Pollution Control

DHF/ef
Enclosure
cc: W. L. Phillips

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO Powhatan Mining Co. - File Date August 25, 1978

FROM David Filbert

SUBJECT National Emission Standards for Hazardous Air Pollutants

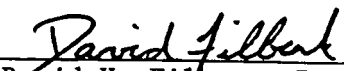
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David H. Filbert, Program Supervisor
Technical Services
Division of Air Pollution Control

DHF/ef
Enclosure
cc: W. L. Phillips

NESHAPS

August 16, 1978

A. Parker Dean	Air Quality Programs
Michael D. Kurman	Air Quality Programs
David E. Filbert	Baltimore County Air Pollution Control
D. Thomas Rees	Air Quality Programs
Ralph H. Hall	Air Quality Programs
Jim Leizear	Division of Solid Wastes, EH
Jim Lewis	Div. of Industrial and Environmental Disease Control
Abraham Ferdas	EPA, Region III, (215) 597-9893
John E. McQuade	Toxic Substances, EHA
Al Ogrinz	Toxic Substances, EHA
Ron Nelson	Community Health Programs

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO Powhatan Mining Company - File

Date September 25, 1978

FROM David Filbert

SUBJECT Recommended Modifications

Based on an evaluation of the Company's operations, it is concluded that some emissions of asbestos fibers do occur from the plant and that substantial building modifications and additional controls are necessary to provide for maximum assurance that these emissions do not escape into the outside atmosphere. Potential sources of asbestos emissions include baghouse malfunctions, poor housekeeping, materials handling procedures, waste disposal practices, and fugitive emissions from all in-plant operations.

Plant modifications necessary to insure the maximum degree of confidence in emission control are recommended as follows:

- 1) A major renovation of the existing buildings would have to be made or an entirely new building would have to be constructed. All openings must be sealed, with all windows and doors kept shut. This would require adequate building ventilation to provide for worker comfort and discharge of all ventilation air through baghouses for emission control. The permanent installation of air curtains may be necessary over loading and unloading doors to prevent emission discharges.
- 2) Additional storage capacity for waste material would have to be built with enclosed inside conveying systems for waste material removal. Closed hoppers or containers inside of the plant would be necessary for the waste material. No asbestos ore or waste material should be stored outside the building.
- 3) The Company should provide for enclosed unloading of trucks bringing in asbestos ore for processing.
- 4) All particulate matter from the plant baghouses should be kept enclosed and conveyed into the building.
- 5) All plant roadways should be paved. The outside plant grounds should be cleaned up and all asbestos fibrous material removed. Occasional spillage must be cleaned up immediately.
- 6) Existing baghouses should be upgraded together with the installation of additional baghouses for building ventilation.

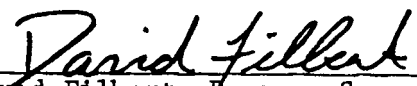
September 25, 1978

Pressure gauges should be installed on existing baghouses and/or sensitive particle sensing devices with alarms to detect bag leakage. A possible alternative would be the use of double baghouses on all systems with a regular maintenance contract for equipment evaluation by a qualified consultant.

- 7) The use of crocidolite should be banned at this plant, or at a minimum, be permitted only under extremely well controlled conditions. It is generally agreed that crocidolite is the most dangerous of the asbestos materials.
- 8) The present drying bed should be enclosed.
- 9) If the "Gooch" fiber process is to be put back into operation, that building which houses the process should be totally enclosed. The acid curing process should be controlled with scrubbers.

It is recognized that these modifications are quite extensive and will therefore require a significant amount of time to complete. In order to provide some degree of emission control immediately however, the following actions should be taken:

- a) Application of oil or other suitable dust suppressant on the plant roadways.
- b) A thorough clean-up of the grounds.
- c) Sealing of all building openings. Replacement of broken windows, etc.
- d) Use of enclosed containers such as tote bins or dumpsters for waste storage.
- e) Elimination of the excessive handling and transport of waste material.
- f) Installation of water sprays on the conveyor from the screens to the waste storage building behind the plant.
- g) Wetting of raw ore before transferring it from the delivery truck to the plant.


David Filbert, Program Supervisor
Technical Services Section
Division of Air Pollution
Bureau of Environmental Services

DF:mrg

cc: Dr. D. J. Roop
Mr. Ron Lipinski

Dr. Donald J. Roop

September 25, 1978

David Filbert

Powhatan Mining Company

Attached for your information are the following:

- 1) Recommended plant modifications for emission control
- 2) EPA analysis of original asbestos samples

The EPA found mass concentrations of amphibole asbestos on the filters to be considerably lower than the levels found by the State Lab.

We still have no written report from the Bureau of Mines on their analysis, however they have reported by phone that they are finding "little or no" amphibole asbestos on the filters.



David Filbert, Program Supervisor
Technical Services Section
Division of Air Pollution
Bureau of Environmental Services

DF:mrg

Attachments

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO Powhatan Mining Company - File Date September 29, 1978
FROM David Filbert
SUBJECT Meeting with Dr. Roop - September 27, 1978

A meeting was held with Ms. Frances Mett, President of Powhatan, in the office of Dr. Roop to discuss the emission of asbestos fibers from the company. Those present were:

Dr. Roop - Balto. County Health Officer
Ms. Mett - President, Powhatan Mining
Mr. Phillips - Balto. Co. Air Pollution
Dave. Filbert - Balto. Co. Air Pollution
John Hobner - Balto. Co. Solid and Hazardous Wastes
Ralph Hall - State Air Quality Programs
Jim Leizear - State Solid Waste

Dr. Roop opened the meeting by explaining to Ms. Mett the current situation at her company. Inspections and air monitoring studies have made it evident that there are emissions of asbestos fibers escaping from the plant into the atmosphere. Considering the nature of asbestos and the health effects related to it, this situation represents an imminent health hazard. It is therefore imperative that major modifications be made to the plant itself and to the current operating procedures so that the company can operate in a safe manner. The purpose of the meeting was to inform Ms. Mett of this dangerous situation and to find out her feelings on the matter.

Ms. Mett asked where the asbestos emissions have been found, in what quantities, and where they are coming from.

Dr. Roop replied that the general condition of the building and the overall material handling practices permit the emission of asbestos throughout the entire area surrounding the company property.

Ms. Mett said she realized the building was very old and could not offer any apologies for the problem. She then asked exactly what had to be done.

Dr. Roop and Mr. Phillips then went through the list of recommended modifications necessary to control the emissions. Each item was explained in detail so that Ms. Mett understood exactly what had to be done. It was pointed out that while most of the modifications were major and would require considerable time, there were interim measures that could be implemented immediately which would minimize emissions.

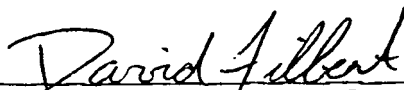
September 29, 1978

Jim Leizear then discussed the solid waste handling procedures. The State Environmental Health Administration will issue an Order to the company requiring that they be permitted as a generator of a Class II hazardous substance. The Order will call for submittal of plans for the upgrading of the present disposal methods. It also forbids the disposal of any more waste material until the company receives its permit. Jim added that the proposals outlined by the County for improved waste handling practices would be satisfactory with his office.

Dr. Roop closed the meeting by expressing his desire that this matter be resolved through a cooperative effort by all parties concerned. He has no desire to close the company at this time but must insist on prompt implementation of all possible improvements.

If the company fails to cooperate, it will then be necessary to take legal action and he will not hesitate to do so.

Ms. Mett did not make a commitment one way or the other. She appeared to understand the seriousness of the situation and accepted all the recommendations without argument. She did not, however, commit the company to any of them.


David Filbert, Program Supervisor
Technical Services Section
Division of Air Pollution
Bureau of Environmental Services

DF:mrg

Mail Stop 3404 CS

October 2, 1978

Ms. Frances E. Matt, President
Powhatan Mining Company
6721 Windsor Mill Road
Baltimore, Maryland 21207

Dear Ms. Matt:

I am writing to confirm the discussion held in my office on September 27, 1978 concerning the operation of the Powhatan Mining Company.

Inspection and evaluation of the Company's operations have made it evident that emissions of asbestos fibers from the plant to the atmosphere do occur. Considering the hazardous nature of asbestos and the documented health effects related to it, this situation represents an imminent health hazard in Baltimore County. It is, therefore, imperative that major modifications to the plant and the operations be made in order to eliminate the escape of asbestos into the atmosphere. Sources of asbestos emissions include baghouse malfunctions, poor housekeeping, materials handling procedures, waste disposal practices, and fugitive emissions from all in-plant operations.

Plant modifications necessary to insure the maximum degree of confidence in emission control are as follows:

- (1) A major renovation of the existing building must be made or an entirely new building constructed. All openings must be sealed, with all windows and doors kept shut. This would require adequate building ventilation to provide for worker comfort and discharge of all ventilation air through baghouses for emission control. The permanent installation of air curtains over loading and unloading doors may be necessary to prevent emission discharges.
- (2) Additional storage capacity for waste material must be built with enclosed inside conveying systems for waste material removal. Closed hoppers or containers inside of the plant would be necessary for the waste material. No asbestos ore or waste material may be stored outside the building.
- (3) The Company must provide for enclosed unloading of the trucks bringing in asbestos ore for processing.

Mr. Frances F. Mett, President
Powhatan Mining Company

- 2 -

October 2, 1978

- (4) All particulate matter from the plant baghouses must be transported in enclosed conveyors directly into the plant.
- (5) All plant roadways must be paved.
- (6) Existing baghouses must be upgraded, together with the installation of additional baghouses for building ventilation. Pressure gauges must be installed on existing baghouses and/or sensitive particle sensing devices with alarms to detect bag leakage. A possible alternative would be the use of double baghouses on all systems with a regular contract for equipment evaluation by a qualified consultant.
- (7) The use of crocidolite must be banned at this plant, or at a minimum, be permitted only under extremely well controlled conditions. Experts agree that crocidolite is the most dangerous of all asbestos materials.
- (8) The building which houses the Cooch fiber process must be totally enclosed and sealed, with ventilation air exhausted through baghouses. The acid curing process must be controlled with scrubbers.

It is recognized that these modifications are quite extensive and will, therefore, require a significant amount of time to complete. In order to provide a reasonable degree of emission control immediately, however, the following actions must be taken as soon as possible:

- (9) Application of oil or suitable dust suppressant on the plant roadways.
- (10) A thorough clean-up of the grounds.
- (11) Sealing of all building openings. Replacement of broken windows, cracked doors, etc.
- (12) Use of enclosed containers such as tote bins or dumpsters for waste material.
- (13) Elimination of excessive handling and transport of waste material.
- (14) Installation of water sprays on the conveyor from the screens to the waste storage building behind the plant.
- (15) Wetting of ore before transferring it from the delivery truck to the plant or unloading the ore inside the plant.

It is my firm desire that the matter of this health hazard may be resolved through a cooperative effort by all parties concerned. We are prepared to offer you any assistance that you may need. The seriousness of this problem, however, would compel me to take appropriate legal actions against your company if it becomes necessary.

Ms. Frances K. Mett, President
Powhatan Mining Company

- 3 -

October 2, 1978

Please submit to me by October 13, 1978 a letter of confirmation stating your intent to give immediate attention to items 9 through 15 above while long-range plans for the major modifications can be made. By November 13, 1978 please submit a notice of your intention regarding items 1 through 8.

Thank you for your cooperation in this matter and for sharing my concern for the health and welfare of the people of Baltimore County.

If you have any questions or desire any assistance at all, please feel free to contact this office. We are more than willing to help in any way we can.

Very truly yours,

Donald J. Roop, M.D., M.P.H.
Deputy State and County Health Officer

DFP:DF:mg

cc: Thomas Devlin, Envir. Services
George Ferreri, AQP
Jim Laizear, State Solid Waste

POWHATAN MINING COMPANYACID PROOF ★ *Powminco Asbestos* ★ DIELECTRIC

6721 WINDSOR MILL ROAD - BALTIMORE, MARYLAND 21207 U. S. A.

October 12, 1978

RECEIVED

OCT 11 1978

HEALTH
OFFICER

Dr. Donald J. Roop
Deputy State and County Health Officer
Baltimore County, Department of Health
Towson, Maryland, 21204

Dear Sir:

Your letter of October 2, 1978.

We have given considerable thought to this and have taken your directives under advisement. We find the following:

Items 9, 10, 11, these we are willing to do. Items 12, 13, 14, and 15, we are willing to do, but we must ascertain what it is going to cost before we can do these. For example item 12, the supplier needs to know what kind of discharge outlets would be necessary on these dumpsters; where will we be permitted to dump them, what kind of conditions exist at the dumping site? We are going to need more space for the waste materials and more space for the containers; which as you can appreciate involves a new and larger building structure. It takes time for the suppliers to come up with the answers. Item 14 would require designing and engineering.

As soon as we get some of the answers as to cost, then we would be in a position to know if we want to go out to the bank to get a loan.

Thank you.

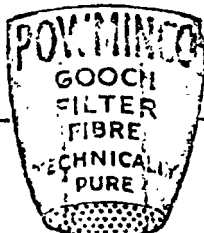
Yours very truly,

POWHATAN MINING COMPANY

Frances E. Mett
Frances E. Mett, President

FEM
cc**RECEIVED**

OCT 13 1978

ENVIRONMENTAL
SERVICES

Powhatan
Compliance
RECEIVED

OCT 27 1978

HEALTH
DIVISION

CERTIFIED MAIL

OCT 28 1978

Miss Frances Mett
Powhatan Mining Company
6721 Windsor Mill Road
Baltimore, Maryland 21207

Dear Miss Mett:

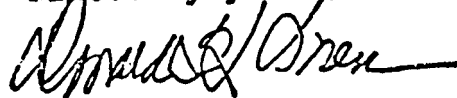
Representatives of the Environmental Health Administration's Community Health Programs, following an investigation, have probable cause to believe that a health hazard prejudicial to the public interest may result due to continued uncontrolled disposal and storage of industrial and manufacturing wastes at the Powhatan Mining Company.

Enclosed you will find an Order pursuant to Article 43, Section 397 of the Annotated Code of Maryland requiring:

- 1) Submission of engineering plans and specifications stipulating methods of disposal to be employed;
- 2) Immediate cessation of uncontrolled disposal and storage of manufacturing and industrial wastes on site;
- 3) Storage of all wastes in an acceptable manner.

If you have any further questions, please do not hesitate to communicate with this office.

Sincerely yours,



Donald H. Noren, Director
Environmental Health Administration

attachment

cc: Dr. Benjamin D. White
Dr. Donald J. Roop
Mr. Ronald Nelson
Mr. Arthur N. Caple

★ SECRETARY OF HEALTH AND MENTAL HYGIENE

IN THE MATTER OF: ★

POWHATAN MINING COMPANY ★

SERVE ON: ★

Miss Frances Mett, President ★ ENVIRONMENTAL HEALTH ADMINISTRATION

★ 201 WEST PRESTON STREET

★ BALTIMORE, MARYLAND 21201

★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★ ★

ORDER

POWHATAN MINING COMPANY

WHEREAS, the State of Maryland, Department of Health and Mental Hygiene, pursuant to the powers, duties and responsibilities vested in and imposed upon, the Secretary of Health and Mental Hygiene by the provisions of Article 43, Annotated Code of Maryland, as delegated to the Director, Environmental Health Administration, has conducted an investigation and has probable cause to believe that a health hazard prejudicial to the public interest will result due to the following existing conditions at the Powhatan Mining Company:

- 1) Industrial and manufacturing wastes are being disposed in an uncontrolled manner;
- 2) No engineering plans or specifications exist which would serve to describe how the above deficiency is to be corrected.

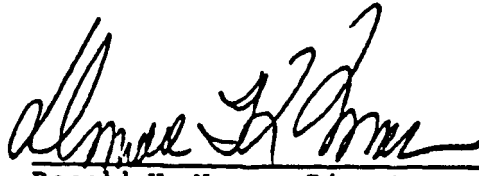
It is this 29th day of September, 1978, therefore ORDERED by the Director, Environmental Health Administration, that:

- 1) Within 45 days of receipt of this Order, Powhatan Mining Company shall submit to the Environmental Health Administration such engineering plans and specifications as are necessary to determine if the proposed methods employed by Powhatan Mining Company can be permitted under Article 43, Section 397 of the Annotated Code of Maryland. The Powhatan Mining Company is directed to make alterations in the methods of disposal upon approval by the Department of Health and Mental Hygiene; and

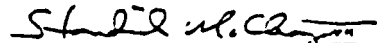
POWHATAN MINING COMPANY - ORDER

- 2) Powhatan Mining Company shall immediately discontinue disposing of manufacturing and industrial wastes and shall store such wastes in an acceptable manner until a permit is issued by the Secretary of Health and Mental Hygiene in accordance with the provisions of Article 43, Section 397 of the Annotated Code of Maryland.

September 29, 1978
Dated


Donald H. Noren, Director
Environmental Health Administration

Approved as to form and legal sufficiency
this 22nd day of September, 1978.


Standish McCleary, III
Assistant Attorney General

POWHATAN MINING COMPANY

ACID PROOF ★ *Powminco Asbestos* ★ DIELECTRIC

6721 WINDSOR MILL ROAD - BALTIMORE, MARYLAND 21207 U. S. A.

November 10, 1978

RECEIVED

NOV 13 1978

HEALTH
OFFICER

Donald J. Roop, M.D., M.P.H.
Deputy State and County Health Officer
Baltimore County Department of Health
Towson, Maryland, 21204

Dear Sir:

As requested in your letter of October 2, we are replying by November 13 items 1 thru 8.

We have submitted your requests for plant modifications to the Kelco Corporation, but drafting of such extensive modifications will require considerable time. This Company is unable at present to give plans as to what changes can be made to comply with your letter.

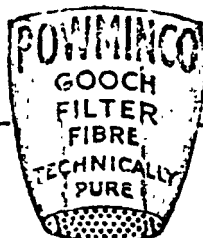
If you will refer to my letter of October 12, which was in answer to your letter of October 2. To date I have not received a reply. You indicated you were prepared to offer this company assistance. A reply from you would be appreciated.

Yours very truly,

POWHATAN MINING COMPANY

Frances E. Mett
(Miss) Frances E. Mett, President

FEM



BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO Powhatan Mining Co. - File

Date December 5, 1978

FROM David Filbert

SUBJECT Plant Visit - December 4, 1978

Ms. Mett - Powhatan
Mr. Schlisler - Powhatan

Mr. Lipinski - AQP
Mr. Leizear - State Solid Waste
D. Filbert - Balto. County

The purpose of the visit was to evaluate the company's progress in complying with the modifications outlined in the letter from Dr. Roop dated, October 2, 1978 and with the Order issued by the Environmental Health Administration dated September 29, 1978.

Ms. Mett stated that the company is not operating at the present time. First priority has been given to plant and grounds clean-up, equipment maintenance, and building modification. She does not know when they will begin operation again. To date, the company has completed the following:

- 1) patched and replaced broken and missing windows in the main plant
- 2) cleaned up the grounds of asbestos spillage
- 3) cleaned up the inside of the plant
- 4) arranged to have the driveway area paved
- 5) contacted Kelco Corporation to perform major equipment and building modifications.

Ms. Mett said that bad weather has prevented the paving of the driveway. It will be completed as soon as weather permits. Mr. Douglas Sauter, a friend of Ms. Mett, has agreed to do the work for her. This is the same gentleman who has previously hauled waste material for Ms. Mett.

In regards to the major building and equipment modifications, Ms. Mett said that Mr. Kelly, Sr., of Kelco, would like to meet with representatives of the Health Department to discuss exactly what will be required. A meeting will be scheduled.

Mr. Leizear told Ms. Mett that she should go ahead and make arrangements for the disposal of the accumulated waste presently in storage in the waste bins. Ms. Mett said that additional time would be required to comply with the provisions of the EHA Order. Mr. Leizear responded that a written request for additional time should be submitted to Mr. Noren, EHA Director.