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Scott M. Matheson
Governor

STATE OF UTAH
DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL HEALTH
150 West North Temple, P.O. Box 2500, Salt Lake City, Utah 84110

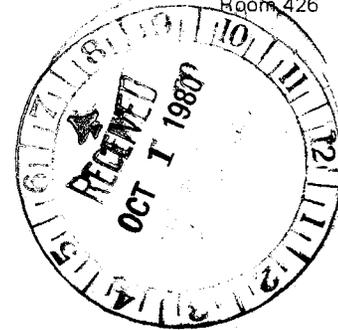
Route 3 file
CV Spur
ACT/007/022
JWS
Apr 10/7



Alvin E. Rickers, Director
Room 426 801-533-6121

533-6108

September 26, 1980



James O. Mason, M.D., Dr.P.H.
Executive Director
801-533-6111

DIVISIONS

Community Health Services
Environmental Health
Family Health Services
Health Care Financing
and Standards

OFFICES

Administrative Services
Health Planning and
Policy Development
Medical Examiner
State Health Laboratory

Donald A. Crane
Office of Surface Mining
Reclamation and Enforcement
Brooks Towers
1020 - 15th Street
Denver, CO 80202

Re: Air Monitoring Requirement for
ARCO Coal Company CV Spur (Your
Letter Dated 8/16/80 and ARCO's
Letter to You Dated 8/25/80)

Dear Mr. Crane:

We do not understand and seriously question your stipulation basing your approval of ARCO Coal Company's modification of their CV Spur operation upon a company acceptance of an air monitoring requirement. As far as we are concerned, the requirement is not justified. We cite as our reason for questioning, the following:

1. The proposed modification of facilities will result in an estimated 80 tons of particulate per year decrease.
2. Our engineering/air quality impact review considered the need for monitoring, as we do in each review. Monitoring was not deemed necessary because of the reduction of emissions, the size of the modification proposal (classed as a minor source), and the availability of meteorological and ambient air data considered representative of the area.
3. Computer modeling results of proposed emissions showed no exceedance of any particulate ambient concentration standard.
4. The rationale for the requirement is unclear, i.e., "...to indicate whether additional controls are required to protect environmental values." If monitoring is necessary, it normally is conducted prior to construction/modification to assess the current situation. With that information, the amount of control to be required to meet ambient air standards is then planned for. To wait until after modifications are made results in retrofit controls which are usually costly.
5. The required monitoring is inconsistent with the requirements of the Clean Air Act and Federal Regulations dealing with Prevention of Significant Deterioration of Air Quality.

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Donald A. Crane
9/26/80

We would appreciate knowing why you did require the monitoring in the ARCO case. What air quality agency was contacted? This is important since it appears we will be working with your office on future, similar type projects, at least until the local Oil, Gas and Mining Division has primacy in these type matters.

Since ARCO (Beaver Creek Coal Company) has agreed to do the monitoring, you have evidence of acceptance of your stipulation. Concerning the special purpose monitoring effort, we will address several desirable monitoring plan conditions directly to ARCO, which if followed will help to insure the acceptability and useability of the gathered data.

Sincerely,

Brent C. Bradford
Executive Secretary
Utah Air Conservation Committee

MRK:il

cc: Utah Division of Oil, Gas & Mining (J. Smith)
ARCO Coal Company (J. A. Holligan)
Southeastern District Health Dept.
EPA/Region VIII (N. Huey)

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*Why require at all? If not needed, does
ARCO know this? If you wish for me
to look into it, I will
see 11/80*