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ARCO Coal Company
Permits and Compliance Group
555 Seventeenth Street
Mailing Address: Box 5300
Denver, Colorado 80217
Telephone 303 575 7500



August 25, 1980

Mr. Donald A. Crane
Regional Director
Office of Surface Mining
Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Mr. Crane:

This letter is in response to the stipulation for air quality monitoring described in your letter of August 18, 1980, to Mr. Brent C. Bradford with the Utah Air Conservation Committee. The stipulation was in regard to the C. V. Spur coal processing and loadout facility owned by Beaver Creek Coal Company, a Subsidiary of Atlantic Richfield Company, located near Price, Utah.

In the spirit of environmental responsibility, it is the intention of Beaver Creek Coal Company to install, maintain, and operate a small air monitoring network for total suspended particulate matter (TSP) for a limited period of time following the completion of new construction. The rationale for the monitoring is to provide the company with data with which to evaluate the effectiveness of the installation of extensions to the truck dump, coal storage and reclaim system in controlling fugitive dust. Beaver Creek Coal Company desires to secure particulate data for its in-house use; however, we are willing to report our findings to the Utah Air Conservation Committee even though they did not require monitoring in their approval of the air permit to construct the proposed facilities.

This commitment to conduct air monitoring in no way should be construed as recognition on our part of any authority on the part of OSM to require air monitoring. On the contrary, it is our understanding in light of the recent suspension of Sections 816.95 and 817.95 of the Permanent Regulatory Program (30 CFR), that OSM does not currently have the authority to require air monitoring.

The proposed monitoring network will consist of two (2) high-volume air samples which will collect 24-hour samples of total suspended particulate matter. Sampling will be conducted every sixth day following the national TSP monitoring schedule for a period of four (4) months following the completion of construction

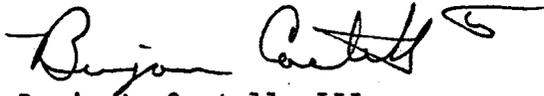
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on the new truck dump, coal storage and reclaim system. The samplers will be positioned so that one will be located upwind and the other downwind of the coal surge pile.

This letter should provide the requested evidence of a commitment to perform air monitoring at the C. V. Spur. Based on discussions held between Mr. John Hardaway of your office and Mr. Jeff Holligan of ARCO Coal Company, it is our understanding that we will be able to commence construction on the proposed facilities upon OSM concurrence with the Beaver Creek Coal Company acceptance of air monitoring.

Should you have any questions regarding this matter, please contact Mr. Jeffery A. Holligan (303-575-7524) or Mr. Jim Ives (303-575-7504).

Sincerely,



Benjamin Costello III
Manager
Permits and Compliance
ARCO Coal Company

on behalf of Beaver Creek Coal Company

BC/egp