



State of Utah

Department of  
Natural Resources

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December 1, 2004

Mr. Maung Maung, Environmental Scientist  
Utah Division of Air Quality  
150 North 1950 West  
P.O. Box 144820  
Salt Lake City, Utah 84114-4820

Dear Mr. Maung:

Re: Air Quality Approval Order DAQE-005-00, Andalex Resources, Inc. Wildcat Loadout, C/007/0033. Task ID #2031, Outgoing File

The Division of Oil, Gas, and Mining would like to work with you on the coal fine deposition issue at the Wildcat Loadout. We have recently requested Andalex Resources, Inc. to include more specific information in their Mining and Reclamation Plan (MRP) to address this issue through Division Order DO-04, Task ID #2031

The MRP refers to the January 5, 2000, AO DAQE-005-00. Upon review of the MRP, the following equipment was approved for use at the Wildcat Loadout by that Air Quality Approval Order:

- Three below ground hoppers equipped with water sprays for truck unloading;
- Two coal crushers rated at 250 Tons/hr and enclosed as per condition #9;
- Three sets of screens, each set rated at 500 Tons/hr;
- Three radial stackers;
- One under-pile reclaim system (conveyor);
- Railcar loadout consisting of a tower and an extendable chute for loading railcars;
- Associated stockpiles;
- Associated conveyors, covered as per condition #9;
- Associated mobile equipment;
- 0.21 miles of haul road, posted speed limit 5 mph, as per General Condition #11.

Some requirements of the AO are as follows:

- Control of disturbed or stripped areas through treatment (condition #12);

- Maintenance of 4.0% moisture content of the fines (by weight) (condition #14);
- Total combined area of all stockpiles not to exceed 16.5 acres (condition #15);
- Watering storage piles, as conditions warrant (condition #15);
- Visible emissions limits (20% opacity);
- Application of water sprays or chemical treatment to areas used by mobile equipment and haul roads (condition #10);
- Maintenance of the surface of unpaved roads and pad areas in a damp/moist condition (condition #10);
- A production limit of 5,000,000 tons of coal per rolling 12-month period (condition #7).

The fugitive dust control plan outlined in the AO relies upon the application of moisture to stockpiles and open disturbed areas as well as a limited haul road length and vehicle speed to control fugitive dust. The AO requires that fugitive dust control be applied when monitoring indicates greater than 20% opacity. Monitoring is the responsibility of the Permittee.

The Wildcat Loadout has the throughput capacity of approximately 5,000,000 tons of coal per year. Plate 1, Wildcat Loadout Surface Facilities As Constructed, of the Mining and Reclamation Plan (MRP) indicates that there may be more than 0.21 miles of haul road (General Condition #11) and that there may be greater than 16.5 acres of coal stockpiles (General Condition #15).

In 1994, the Division of Oil Gas and Mining (DOGM) issued a notice of violation (N94-34-1-3) for accumulations of coal fines on the ground surface east of the disturbed area. In 1999, DOGM received a letter from the Division of Wildlife Resources (DWR) concerning the effects of coal fines on vegetation and wildlife habitat in adjacent areas. An effect on vegetation was confirmed within the coal affected area by DOGM and DWR Biologists (June 18, 1999 Memo to File from Paul Baker). Recently, coal fines or fugitive dust have accumulated to depths greater than three inches on undisturbed soils east of the coal stockpiles between sediment ponds A and B (Patrick Collins report March 2003, Division Incoming record 0001).

The MRP indicates in Section R645-301-212, page 2-4 that coal fines will be vacuumed if deemed necessary. Vacuuming has been found to be very disruptive to undisturbed soils and is in itself a disturbance. The Division would like to encourage Andalex Resources Inc. Tower Division to closely monitor the wind blown coal fine deposition on adjacent undisturbed soils, and employ the measures such as those outlined in the AO: moisture on the stockpile(s) to reduce fugitive dust as well as water sprays or chemical treatment on areas used by mobile equipment and haul roads as required by the January 5, 2000 Approval Order (DAQE-005-00) General

Conditions #10 and #15. DOGM does not have the authority to enforce the provisions of the AO, however.

DOGM would like to work through DAQ to develop an effective strategy for improved dust control measures at the Wildcat Loadout that we believe will assist in lowering the coal fine deposition, such as:

- Requirements for ongoing monitoring and maintenance of the components of the dust control plan.
- Lower opacity limits to set a lower threshold for implementation of dust control strategies at the transfer points and storage pile to limit movement of coal fines onto the haulroad and adjacent property.

Thank you for this opportunity to comment on the AO. The Memorandum of Understanding (MOU) between DOGM and DEQ, signed September 1, 1999, envisioned such cooperation. Please contact Priscilla Burton at (801) 538-5288, or Pamela Grubaugh-Littig (801) 538-5265 for further discussion.

Sincerely,



Mark Mesch  
Acting Associate Director, Mining