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State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt  
Governor  
Ted Stewart  
Executive Director  
James W. Carter  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340  
801-359-3940 (Fax)  
801-538-5319 (TDD)

ACT/007/034  
#2

July 26, 1995

Jeff Dean  
Utah Division of Air Quality  
150 North 1950 West  
Salt Lake City, Utah 84116

Re: Air Quality Approval Order, Soldier Creek Coal Company, Banning Siding Loadout, ACT/007/034, Folder #2, Carbon County, Utah

Dear Mr. Dean:

On July 12, 1995, I conducted an inspection of Soldier Creek Coal Company's Banning Loadout south of the junction between U. S. Highway 6 and 191 and State Route 123. As I discussed with you by telephone on about July 17, 1995, I was concerned about the lack of a drop chute at the end of the radial stacker. The stacker was in use during the inspection, and there was a breeze of about 10-20 miles per hour. This resulted in a large proportion of coal dropping from the stacker being carried by the wind away from the stack. I did not attempt to estimate the distance from the top of the stacker to the pile during the inspection, but, from my recollection and from the photographs, I believe the distance was about 20 feet. I have enclosed two photographs of the stacker in use.

The Air Quality Approval Order issued July 16, 1980, says, "The free-fall distances of the railcar loadout and radial stackers shall be reduced to a minimum by use of tremies or drop-chutes." Mr. David Spillman of Soldier Creek Coal Company said the company normally tries to minimize free-fall distances by having the stacker drop coal over some of the highest portions of the pile. At the time of my inspection, there was, admittedly, much less stockpiled coal than normal. For this reason, I believe there was a greater than normal free-fall distance. Nevertheless, the approval order has certain requirements that were apparently not being met.

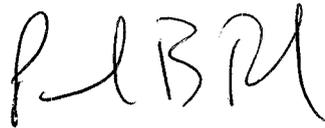
A concern related to this issue is the amount of coal fines on the soil surface outside the disturbed area boundary, particularly to the north and east of the loadout. This has been an ongoing problem for several years and the subject of past enforcement action. However,



the issue has not been fully resolved. If you or someone else from Air Quality visits the site, I would like to be informed in advance so we could discuss this issue on-site.

Please let me know what action you take. I appreciate your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. B. Baker'. The signature is written in a cursive, somewhat stylized font.

Paul B. Baker  
Senior Reclamation Biologist

cc: David Spillman  
Keith Zobell  
BNGDEAN.AQ