

**NORWEST**  
CORPORATION

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November 5, 2003

File No. 2893

John Richardson  
Senior Environmental Scientist

Pamela Grubaugh-Littig  
Utah Division of Oil, Gas & Mining  
1594 West North Temple, Suite 1210  
P.O. Box 145801  
Salt Lake City, UT 84114-5801

**Re: Notice of Intent to Modify Approval Order DAQE-117-95  
Consolidation Coal Company – Emery Mine**

Dear Ms. Grubaugh-Littig:

Attached please find a copy of the Notice of Intent (NOI) to modify the above-referenced Approval Order that was hand-delivered to the Utah Division of Air Quality on November 5, 2003.

Please call John Gefferth (618-625-6850) or Jonathan Pachter (412-831-4679) at CONSOL with any questions or concerns.

Sincerely,

**NORWEST CORPORATION**

John Richardson  
Senior Environmental Scientist

VIA First Class Mail

Enclosure

Copy without enclosure to:  
John Gefferth  
Jonathan Pachter

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**RECEIVED****NOV 06 2003**

DIV. OF OIL, GAS &amp; MINING



**CONSOL ENERGY™**

**Consolidation Coal Company**

1800 Washington Road  
Pittsburgh, PA 15241

**phone:** 412/831-4679

**fax:** 412/831-4774

**e-mail:** [Jonathanpachter@consolenergy.com](mailto:Jonathanpachter@consolenergy.com)

**web:** [www.consolenergy.com](http://www.consolenergy.com)

October 31, 2003

Mr. Richard Sprott  
Executive Secretary, Utah Division of Air Quality  
150 North 1950 West  
P.O. Box 144820  
Salt Lake City, UT 84114-4820

Re: Notice of Intent to Modify Approval Order DAQE-117-95  
Consolidation Coal Company – Emery Mine  
Emery County, Utah

Dear Mr. Sprott:

The completed Forms 1 and 15 that are being submitted to the Division at this time constitute Consolidation Coal Company (CONSOL)'s Notice of Intent to modify Approval Order DAQE-117-95 for the Emery Mine. The planned change to the process at the 4<sup>th</sup> East Portal includes replacement of the current NSPS-regulated 500 TPH crusher with a crusher having equivalent throughput capacity. Based on equipment design, air emissions from the replacement unit will not exceed the current emission levels, and will likely be even less. However, to be conservative, the facility is indicating no change in emissions.

For your information, the Emery Mine has made recent changes, as shown on attached Figure 1, to its facility dust control plan that will enhance air quality in the local area. These improvements are indicated below.

**Haul Truck Re-route** CONSOL plans to re-route haul truck traffic from the coal yard at the 4<sup>th</sup> East Portal. The new route will use about 500 feet of the county road east of the coal yard for the new haul truck access to the property. Trucks will turn to the right off the improved (i.e., widened, graveled and treated with dust suppressant) county road, and will continue in an arc path to the new entrance to the truck load out area. The new routing will completely by-pass the present circular path in the coal yard around the coal stockpile, which will reduce onsite traffic and the attendant dusting.

**Water Sprays** The Emery Mine plans to upgrade the water spray distribution systems at the crusher inlet, the crusher outlet and the radial stacker discharge. The upgrade will improve dust control at these transfer points.

**Enclosures** The facility will add panels to the west side of the radial stacker in order to improve enclosure of the conveyor system. The additional enclosure will provide better protection from the prevailing west wind and will improve dust control. The facility will also increase the amount of enclosure of transfer points by installing additional panels where feasible.

**Dust Treatment Program** Main traffic routes within the coal yard and the re-route areas will be treated with dust suppressant (e.g., magnesium chloride) as necessary to improve dust control. Dust suppressant will also be applied locally in hard-to-access areas, such as the stockpile base and around concrete barriers used for pile segregation, as discussed below.

**Water Cannon** One or more high volume (about 100-150 GPM) water cannons will be installed near the stockpile for dust control during windy conditions. The cannons will be wind speed activated, and will be designed for all-weather use. Once activated, the system will blanket the stockpile area with water for a long enough period to adequately wet the pile. The system will shut off after several minutes so that over-wetting of the pile and adjacent area does not occur.

**Concrete Barriers** Concrete barriers will be strategically placed along the perimeter of the coal stockpile to prevent encroachment of coal fines into adjacent plant areas such as truck loading.

**Wind Fences** A wind fence will be installed upwind of the stockpile area at the 4<sup>th</sup> East Portal. The fence will serve as a passive air pollution device that will reduce wind speed in the area of the pile and deflect air movement, thereby reducing the potential for air emissions.

**Water Truck** The facility's water truck is being upgraded from gravity feed to a power spray system. The distribution system will be improved (e.g., multi-point spray bar or fan-tail) for better area coverage. The water truck will be used to supplement the dust treatment program in the coal yard and re-route areas and for wetting untreated areas as needed for dust control.

**Cattle Guard** A cattle guard will be installed near the present entrance/exit to the 4<sup>th</sup> East Portal. Although not usually considered a dust control device, a cattle guard has application at Emery Mine where solids may adhere to truck tires under both overly wet and dry conditions as vehicles travel inside the coal yard. Loaded trucks will run over the cattle guard as they leave the scales. Solids may then become dislodged from tires and collected in a containment structure, where they are less likely to be re-entrained.

**Vacuum Truck** The Emery Mine will use a vacuum truck on a contract and as-needed basis. Vacuuming is anticipated for the sump underlying the cattle guard at the plant entrance/exit and for cleanup of spills in other relatively inaccessible areas, such as beneath conveyors and around the crusher.

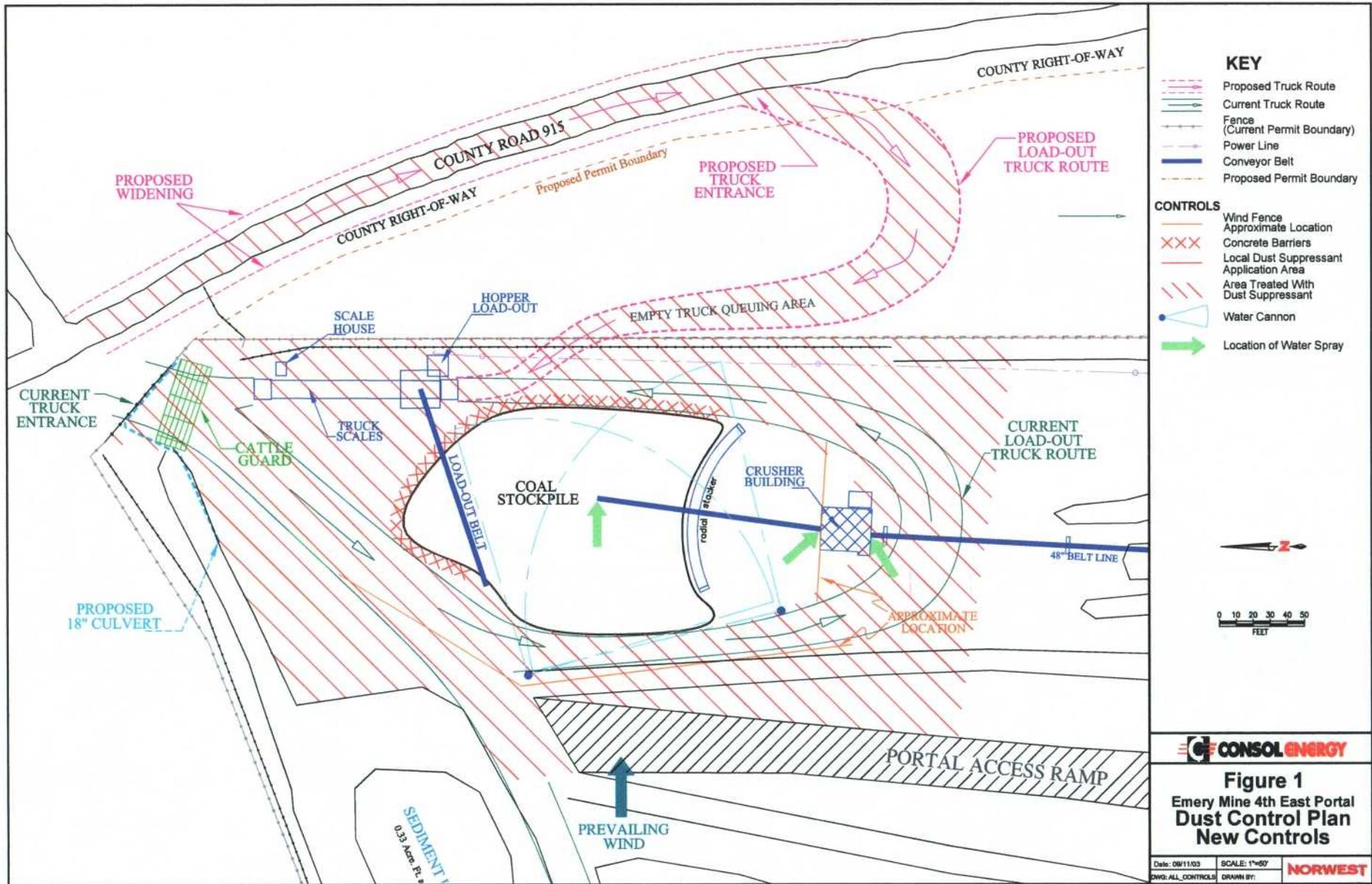
Thank you in advance for your early attention to the matter of processing this Notice of Intent. Please call me with any questions or concerns at (412) 831-4679.

Sincerely,

  
Jonathan M. Pachter  
Manager – Environmental Permits

Attach.

Cc DOGM



- KEY**
- - - - - Proposed Truck Route
  - - - - - Current Truck Route
  - - - - - Fence (Current Permit Boundary)
  - - - - - Power Line
  - - - - - Conveyor Belt
  - - - - - Proposed Permit Boundary
- CONTROLS**
- - - - - Wind Fence Approximate Location
  - XXX Concrete Barriers
  - - - - - Local Dust Suppressant Application Area
  - / / / / / Area Treated With Dust Suppressant
  - Water Cannon
  - Location of Water Spray



**CONSOL ENERGY**

**Figure 1**  
**Emery Mine 4th East Portal**  
**Dust Control Plan**  
**New Controls**

Date: 08/11/03 SCALE: 1"=50'  
 DWG: ALL\_CONTROLS DRAWN BY: **NORWEST**



**Utah Division of Air Quality  
New Source Review Section**

Date 10/31/2003

**Form 1  
General Information**

9 Application for:                      9 Initial Approval Order                       Approval Order Modification

AN APPROVAL ORDER MUST BE ISSUED BEFORE ANY CONSTRUCTION OR INSTALLATION CAN BEGIN. This is not a stand alone document. Please refer to the Permit Application Instructions for specific details required to complete the application. Please print or type all information requested. All information requested must be completed and submitted before an engineering review can be initiated. If you have any questions, contact the Division of Air Quality at (801) 536-4000 and ask to speak with a New Source Review Engineer. Written inquiries may be addressed to: Division of Air Quality, New Source Review Section, P.O. Box 144820, Salt Lake City, Utah 84114-4820.

Applicable base fee for engineering review and filing fee must be submitted with the application.

<b>General Owner and Facility Information</b>													
<p>1. Company name and address: Consolidation Coal Company P.O. Box 566, Route 148 North Sesser, IL 62884-0566 Phone No.: (618)625-6850 Fax No.: (618)625-6844</p>	<p>2. Company contact for environmental matters: Jonathan M. Pachter, Manager Environmental Permits  Phone No.: (412)831-4679 Fax No.: (412)831-4774</p>												
<p>3. Facility name and address (if different from above): Emery Mine P.O. Box 527 Emery, UT 84522 Phone no.: (435)286-2301 Fax no.: (435)286-3516</p>	<p>4. Owners name and address: CONSOL Energy Inc. 1800 Washington Road Pittsburgh, PA 15241-1421 Phone no.: (412)831-4000 Fax no.: (412)831-4571</p>												
<p>5. County where the facility is located in: Emery County</p>	<p>6. Latitude &amp; longitude, and/or UTM coordinates of plant: UTM: 4,301.2 km Northing; 478.7 km Easting; Zone 12</p>												
<p>7. Directions to plant or Installation (street address and/or directions to site) (include U.S. Coast and Geodetic Survey map if necessary): 4 miles south of Emery on CONSOL Road, Emery County, Utah</p>													
<p>8. Identify any current Approval Order(s):</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 25%;">AO# DAQE-117-95</td> <td style="width: 25%;">Date 08/05/2002</td> <td style="width: 25%;">AO# _____</td> <td style="width: 25%;">Date _____</td> </tr> <tr> <td>AO# _____</td> <td>Date _____</td> <td>AO# _____</td> <td>Date _____</td> </tr> <tr> <td>AO# _____</td> <td>Date _____</td> <td>AO# _____</td> <td>Date _____</td> </tr> </table>		AO# DAQE-117-95	Date 08/05/2002	AO# _____	Date _____								
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AO# _____	Date _____	AO# _____	Date _____										
<p>9. If request for modification, permit # to be modified: DAQE # DAQE-117-95                      DATED: 08/05/2002</p>													
<p>10. Type of business at this facility: Underground coal mining</p>													
<p>11. Total company employees greater than 100?  9 Yes <input checked="" type="checkbox"/> No</p>	<p>12. Standard Industrial Classification Code 1222</p>												



**Approval Order Application  
Form 1 Instructions**

1. Identify the name, address, phone number, and fax number of the legal entity that operates the equipment.
2. Identify the person who is to be contacted regarding this application; also include the phone number and fax number of this person.
3. Identify the address where the equipment will be located.
4. If you are not the owner of the equipment under this application, enter the name, address, phone number, and fax number of the owner.
5. Identify in what county the facility is located. If this is portable equipment, state in what county the first location is.
6. Indicate the technical location of the facility so that it can be located on a map for modeling and inventory purposes. The location can be read from a 7.5" map.
7. Indicate the geographical location or address of facility and directions to site if needed for remote locations. For example, "Go five miles south on highway 1, turn left at farmhouse, go 1.5 miles."
8. List any valid Approval Orders (AO) which are for equipment at this site.
9. Indicate previous AO number (if any) and date for AO modification.
10. State the type of business you conduct at this facility.
11. Indicate if the total number of people employed by your company is over 100 people.
12. Using the provided list of business codes (page 8), enter the code which best describes your business activity at this facility.
13. Check all applicable boxes
  - New Construction:* new equipment which has not yet been constructed and requires a permit to construct.
  - Existing Equipment Operating Without Permit:* equipment which has been in operation without a prior permit issued by the state.
  - Change of permit condition:* permitted equipment which will be operated contrary to permit conditions.
  - Modification:* existing equipment which is physically altered by the removal, addition, or non-identical replacement of parts.
  - Permanent site:* equipment will be located continuously at one site for more than 180 days.
  - Change of location:* permitted equipment which will be transferred from one property to another.
14. Enter the start date and the completion date of any new installation, construction, or modification.
15. For cases in this category, enter the future date when the change is anticipated.
16. For this category of equipment, enter the date when this equipment was first operated.
17. This is for equipment that was operated before November 29, 1969. Indicate whether the facility has been modified or increased capacity since that date.
18. Attach as Appendix A to the application a site plan in sufficient detail to identify: general location of site, buildings, roads, process equipment, emission points, and site characteristics that may effect plume dispersion.
19. Attach as Appendix B to the application a flow diagram which illustrates the entire process from introduction of raw materials to the emission of exhaust to the atmosphere and includes at least the following: generating equipment, process equipment, control equipment, monitoring devices, duct work, hoods, fans, stacks, flow rates/direction, gauges, etc.
20. Attach as Appendix C to the application a narrative description of the process and equipment to be permitted. Essentially include a narrative of the flow chart above. **The description must include equipment or process specific forms as appropriate.** The attached general supplemental process form (Form 2) must be filled out by all sources. Please mark which forms below apply to this project. Forms available upon request are as follows:
  - Form 11 Internal Combustion Engines
  - Form 12 Incinerators
  - Form 13 Spray Booths
  - Form 14 Concrete Batch Plants
  - Form 15 Rock Crushing and Screening
  - Form 16 Soil/groundwater Remediation
  - Form 17 Diesel Powered Standby Generator
  - Form 18 Portable Hot Mix Drum Asphalt Plants
  - Form 19 Fuel Burning Equipment (Boilers, Heaters, Steam Generators)
  - Form 20 Organic Liquid Storage Tank
  - Form 21 Solvent Metal Cleaning (degreasers)
  - Form 22 Combustion Turbines
21. To claim confidentiality on information submitted with this application, check "yes". Be sure that all submitted information which you wish kept confidential is clearly marked as such. Also state the reason(s) for claiming confidentiality per 40CFR2.208. Examples of acceptable reasons are trade secrets and production data. Note that information on emissions and permits cannot be confidential.

**New Source Review Application  
Form 1 Instructions (Continued)**

- 22. Attach a completed Form 1d, Emissions Information. Provide all MSD Sheets for all chemicals used.
- 23. List emission points and parameters on the site plan (#14 above).
- 24. Attach as Appendix D to the application a list of all air pollution control equipment. **Must include form(s) as appropriate.** Please mark which forms apply to this project. Forms available upon request are as follows:

- \_\_\_ Form 3 Afterburners
- \_\_\_ Form 4 Flares
- \_\_\_ Form 5 Adsorption Unit
- \_\_\_ Form 6 Cyclone
- \_\_\_ Form 7 Condenser
- \_\_\_ Form 8 Electrical Precipitators
- \_\_\_ Form 9 Scrubber
- \_\_\_ Form 10 Fabric Filter

- 25. Attach as Appendix E to the application a list with description of all compliance monitoring devices and/or activities. Include such things as make, model, type, size, capability, accuracy, calibration frequency, etc. for the devices and monitoring frequency, outline of training program, level of certification required of inspectors, etc. for monitoring activities.
- 26. Dispersion modeling will be required under two circumstances:
  - 1. if the Executive Secretary determines that modeling is to be performed.
  - 2. if the proposed emissions are in the range of values given in given in Table 1.

This requirement holds for new as well as modified sources. For modified sources, the values in Table 1. denote emission increases. If the emission values are greater than values in Table 1, higher level modeling will be required. Call the Planning Section at (801) 536-4000 for additional information. The meteorological data to be used in the modeling must be submitted to the Executive Secretary for review and approval *before* they are used in the dispersion modeling exercise.

Table 1. Criteria For Screen Modeling (tons/year)

SO <sub>2</sub>	40
NO <sub>x</sub>	40
PM <sub>10</sub> fugitive	5
PM <sub>10</sub> non-fugitive	15
CO*	100/250
HAP**	varies
lead	0.6

- \* 100 tons if one of the 28 source categories in UAC R307-1-3.6.5.B; 250 tons if not
- \*\* Contact the Division of Air Quality Modeling Section.

- 27. For a description of a proper BACT proposal, see Form 1b.
- 28. Signature of authorized company agent.
- 29. Name of signing party.
- 30. Telephone number of signing party.
- 31. Date of application.

ADDITIONAL INFORMATION MAY BE REQUIRED FOR SOME APPLICATIONS. If so, the reviewing engineer will contact the individual listed in question number 2.

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Revised 1/23/03

## UTAH DIVISION OF AIR QUALITY - FORM 1 APPENDICES

Appendix A Site plan of facility. See section 3.1 and figures submitted as part of the NOI to modify Approval Order DAQE-117-95 in April 2002. No changes proposed except as noted in Appendix C below.

Appendix B Process flow diagram. See section 3.1 and figures submitted as part of the NOI to modify Approval Order DAQE-117-95 in April 2002. No changes proposed except as noted in Appendix C below.

Appendix C Process description. Following are planned changes to the process since submittal of the NOI to modify Approval Order DAQE-117-95 in April 2002 (see section 3.0 Process Information).

**Crushing Process** – CONSOL, by submitting this NOI to modify Approval Order DAQE-117-95 dated 08/05/2002, proposes to replace the current 500 TPH Cedar Rapids hammer mill crusher with a 500 TPH Gundlach double-roll crusher (or equivalent). All other aspects of the process description submitted earlier to DAQ describing the crushing process remain unchanged.

**Haul Roads** – In addition to the information previously provided to DAQ regarding haul roads, CONSOL plans to reroute haul truck traffic from the coal yard at the 4<sup>th</sup> East Portal. The new route will use about 500 feet of the county road east of the coal yard for the haul truck access to the property. The trucks will turn to the right off the county road, and will travel in an arc path to the new entrance to the truck load out area. The new route will completely by-pass the present circular path in the coal yard around the coal stockpile.

Appendix D Pollution Control Equipment. See section 5.0 Air Pollution Control Equipment Information in the NOI to modify Approval Order DAQE-117-95 dated April 2002. None of the controls and the accompanying BACT analysis are proposed for change with the following exceptions:

**Water Sprays** – CONSOL plans to upgrade the water spray distribution systems at the crusher inlet, the crusher outlet and the radial stacker discharge. This will improve dust control at these transfer points.

**Enclosures** – CONSOL will add panels to the west side of the radial stacker in order to improve enclosure of the conveyor system. The additional enclosure will provide better protection from the prevailing west wind and will improve dust control. The company will also improve enclosure of transfer points by installing additional panels where feasible.

Appendix E Compliance Monitoring Devices/Activities. See section 6.2 Compliance Monitoring and Demonstration in the NOI to modify Approval Order DAQE-117-95

dated April 2002. Once the existing crusher is replaced, CONSOL will follow the procedures previously provided in section 6.2.

Modeling – N/A. Emissions ( $PM_{10}$ ) are less than Table 1 values.

Appendix F Best Available Control Technology. See section 5.1 BACT Analysis in the NOI to modify Approval Order DAQE-117-95 dated April 2002. With the exception of the improvements to the water sprays and the conveyor and transfer point enclosures mentioned above, no changes are proposed that would alter the previous BACT analysis.



**Utah Division of Air Quality  
New Source Review Section**

Date: 10/31/2003

Company: Consolidation Coal Company  
Site: Emery, UT Facility

**Form 15  
Rock Crushing and Screening**

Equipment Information																																							
<p>1. Check the appropriate crushing operations used in your process:</p> <p>Type of Unit      Coal Crusher            Manufacturer    Gundlach or equivalent            Model             Not determined            Date Manufactured    N/A  <input checked="" type="checkbox"/> Primary Crushing type    Not determined  <input type="checkbox"/> Secondary Crushing type    9 Cone    9 Jaw    9 Ball  <input type="checkbox"/> Tertiary Crushing type      9 Cone    9 Jaw    9 Ball            Screen Manufacturer _____            Model and Date Manufactured _____            Screen type and size (triple, double, or single deck)            _____</p>		<p>2. Dust sources will be controlled as follows:</p> <table border="0"> <tr> <td></td> <td>No Control</td> <td>Pre Soaked</td> <td>Water Spray</td> <td>Bag house</td> <td>Other (explain)</td> </tr> <tr> <td>G Feed hopper</td> <td>G</td> <td>G</td> <td>G</td> <td>G</td> <td>G</td> </tr> <tr> <td>G All belt transfer points</td> <td>GG</td> <td><input checked="" type="checkbox"/></td> <td>G</td> <td><input checked="" type="checkbox"/></td> <td></td> </tr> <tr> <td>G Inlet to all crushers</td> <td>G</td> <td>G</td> <td><input checked="" type="checkbox"/></td> <td>G</td> <td>G</td> </tr> <tr> <td>G Exit of all crushers</td> <td>G</td> <td>G</td> <td><input checked="" type="checkbox"/></td> <td>G</td> <td>G</td> </tr> <tr> <td>G All shaker screens</td> <td>G</td> <td>G</td> <td>G</td> <td>G</td> <td>G</td> </tr> </table> <p>Water sprays at stacker tail and head pulleys Enclosures at transfer points</p>			No Control	Pre Soaked	Water Spray	Bag house	Other (explain)	G Feed hopper	G	G	G	G	G	G All belt transfer points	GG	<input checked="" type="checkbox"/>	G	<input checked="" type="checkbox"/>		G Inlet to all crushers	G	G	<input checked="" type="checkbox"/>	G	G	G Exit of all crushers	G	G	<input checked="" type="checkbox"/>	G	G	G All shaker screens	G	G	G	G	G
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<table border="1"> <tr> <td>Total Water Rate to nozzles (gal/min): Approx. 30</td> <td>Nozzle pressure (psi): Approx. 100</td> <td>Quantity of nozzles at each spray bar location: Four</td> </tr> </table>	Total Water Rate to nozzles (gal/min): Approx. 30	Nozzle pressure (psi): Approx. 100	Quantity of nozzles at each spray bar location: Four	<p>4. Maximum Plant Production Rate and Operating Hours:</p> <p>1,300,000 tons/yr      500 tons/hr 8,760 hrs/yr            24 hrs/day</p>																																			
Total Water Rate to nozzles (gal/min): Approx. 30	Nozzle pressure (psi): Approx. 100	Quantity of nozzles at each spray bar location: Four																																					
<p>5. Water sprays used on stockpiles? G Yes    <input checked="" type="checkbox"/> No</p> <p>Stockpile size: 1-10,000 tons</p>		<p>6. Number of conveyor belt transfer and drop points: Six</p>																																					

- NOTE:**
- Submit this form in conjunction with Form 1 and Form 2.
  - To relocate a Aggregate Plant submit Form 15b.
  - Call the Division of Air Quality (DAQ) at (801) 536-4000 if you have problems or questions in filling out this form. Ask to speak with a New Source Review engineer. We will be glad to help!
  - This project may be subject to New Source Performance Standards. If so, additional information may be requested for the engineering review.

**Instructions**

- Indicate the type, manufacturer, and model of the equipment. Mark the appropriate box for the kind of crushing at the facility and indicate the type (cone, ball, jaw) of crushing being done.
- Mark the appropriate box for the control device for the emission points.
- List the specifications of the water sprays. Check vendor literature or call sales agent.
- Indicate the maximum amount of product that will be processed by the facility in tons per hour, the number of hours the facility will be run per day and number of days/year.
- Are water sprinklers used on stockpiles? Indicate the size of the stockpile(s).
- The number of belt drop points.