

November 20, 2003

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

Re: Notice of Intent to Modify Approval Order DAQE-117-95. Consolidation Coal Co. (Consol), Emery Deep Mine, C/015/0015, Task ID #1762, Outgoing File

Dear Mr. Maung:

As listed in the Air Quality Approval Order dated August 5, 2002, the Emery Mine 4<sup>th</sup> East Portal facility includes a screening/crusher building, and a 10,000 ton processed coal stockpile along with associated conveyors. The 4<sup>th</sup> East Portal has the throughput capacity of approximately 1,300,000 tons of coal per year. In Consol's first year of operation, three to four inches of wind blown coal fines were deposited outside the permit area.

The Division has required that Consol reduce coal fine deposition on undisturbed areas adjacent to the 4<sup>th</sup> East Portal of the Emery Mine. With that goal in mind, the Division has:

- Increased the 4<sup>th</sup> East Portal disturbed area by 1.5 acres to allow construction of a new haul route.
- Requested site-specific weather information including wind speed and direction. (Consol installed a weather station at the main Emery Mine facilities in January 2003 and began collecting data in May 2003.)
- Requested a detailed dust control plan for the loadout. (The Notice of Intent to Modify Approval Order DAQE-117-95, dated October 31, 2003 outlines the key components of that plan.)

Consol has committed to implementing a second phase of dust control, if the strategies outlined in the dust control plan do not eliminate the off-site deposition of the coal dust. Thus, an objective measurement of coal fine accumulations off-site is required. To date, the Division has discussed with Consol the possibility of direct measurement of coal fine accumulation on adjacent areas; recorded measurements of opacity by a certified person; or the use of PM10 monitors (assuming that there is a correlation between PM10 measurement and the larger particles that settle out on the ground).

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Could you recommend any other monitoring alternatives? What, in your opinion, would be the most effective methods for data collection to measure off site deposition? Would this sort of monitoring fall under the Division of Air Quality's regulatory authority? What is your analysis of the components of the dust control plan and details of its implementation?

We look forward to having a dialogue on this issue. Please contact Priscilla Burton at (801) 538-5288 or myself (801) 538-5268 with your comments or to arrange a meeting for discussion of the dust control plan and monitoring methods.

Sincerely,

Pamela Grubaugh-Littig  
Permit Supervisor

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