

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

July 7, 2006

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor
J.D. Smith, Reclamation Hydrologist, Team Lead

FROM: Peter Hess, Engineering / Air Quality Review

RE: Loadout Expansion, Task No. 2469, C.W. Mining Company, Bear Canyon Mine, C0150025

SUMMARY:

The Permittee submitted an application to the Division on March 23, 2006 to increase the loading capability of the Bear Canyon tippie truck loading area. The Permittee is proposing to modify several conveyors in the loading area in order to establish two loading lanes for parallel loading. One loading conveyor, and one blending / cross-over conveyor will be dismantled. There will not be any modifications to the coal drop points or the dust controls on them.

The Division has identified this project as Task ID # 2469.

This technical memo will address the adequacy of the submittal as it relates to the requirements of **R645-301-420, Air Quality**.

TECHNICAL ANALYSIS:

OPERATION PLAN

AIR POLLUTION CONTROL PLAN

Regulatory Reference: 30 CFR 784.26, 817.95; R645-301-244, -301-420.

Analysis:

The Permittee submitted an application to the Division on March 23, 2006 to make modifications to the truck loading area such that two loading lanes could be established. The necessary modifications include the following;

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- 1) one loadout belt and one blending / cross-over conveyor will be dismantled;
- 2) the outslope of the coal stockpile pad will be removed, and a Hilfiker retaining wall will be constructed in order to establish a flat area for the construction of the second truck loading lane.

The Permittee's first submittal did not contain sufficient information such that the Division could properly review the application. The missing information included that which the Division would need to properly address the requirements of R645-301-400, Air Quality.

On July 6, 2006, the Division discussed the missing air quality information with Mr. Mark Reynolds, Permitting Co-ordinator with C.W. Mining Company. Mr. Reynolds forwarded the following information via an E-mail submittal on that day:

- 1) the current Air Quality approval order (DAQE-145-02) was approved by the Utah Division of Air Quality on February 22, 2002.
- 2) DAQE-145-02 is included as **Appendix 7-P** in the currently approved mining and reclamation plan for the Bear Canyon operation.
- 3) DAQE-145-02 approved an increase in throughput (annual coal production) from 1.2 MTPY to 1.95 MTPY for a twelve month rolling period. At the time of the 2001 application to DAQ, the Permittee was anticipating the installation of longwall mining. 1.95 MTPY was the maximum amount of throughput which DAQ would permit without the Permittee doing screen modeling (less than 15% increase in total tons of pollution created).
- 4) The Permittee stated on July 6, 2006 that as part of the loadout expansion project, "there will be no modifications to the drop points or to the dust controls on them". The drop points will be relocated; however, the generation points will still be in compliance with the current Air Quality Approval Order.

Thus, the Permittee does not intend to increase the loading capacity of the associated conveyors for the expansion.

- 5) According to the Mine's Resource Recovery and Protection Plan, as reviewed and approved by the USDOJ / Bureau of Land Management, the annual tonnage is projected to be 1.6 million tons for 2007 and 2008.
- 6) The Permittee anticipates applying for another increase in throughput to 3.5 MTPY in February 2007, which correlates with the projected tonnage for that year in the currently approved R2P2.

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Findings:

The submitted information, as approved by the Utah Division of Air quality is adequate to meet the requirements of R645-301-400.

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