

Section 17.24.311

AIR POLLUTION CONTROL PLAN

(l)(a) Air Quality Monitoring Program

SCM operates an ambient air monitoring network around the mining operation. The network consists of three PM₁₀ monitoring sites and a meteorological station per Permit #1120-05, issued May 11, 1979 as Air Quality Permit No. 1120. The network is operated in accordance with EPA and the Montana Air and Waste Management Bureau (AWMB) quality assurance requirements. The existing network required modification due to the CAA expansion. As approved by the MDEQ in correspondence dated January 18, 2002 and March 1, 2002, the Company relocated Hivol Site #3 as described below. The monitoring data is submitted quarterly and annually. Monitor site descriptions are as follows:

Meteorological Station

UTM coordinates: 4997590 mN, 352180 mE.
Decker-Holmes : Northing 418,880, Easting 2,676,200

Height of probes above ground:

Wind speed, wind direction and temperature are measured at the top of a 10 meter tower. Precipitation is measured at the ground surface.

Distance from and height of obstructions:

Instruments are essentially clear in all directions. A small bluff located 850 meters to the northeast rises 50 meters above the level of the site.

Hivol Site #1

UTM coordinates: 4997590 mN, 352180 mE.
Decker-Holmes : Northing 418,880, Easting 2,676,200

Height of probes above ground:

Samplers sit on a platform roughly 2 meters high. Collocated samplers are approximately 2 1/2 meters apart and are oriented N-S (for the prevalent NW wind).

Section 17.24.311

Distance from and height of obstructions:

The bluff mentioned in the preceding meteorological site description is basically the only major obstruction. The meteorological equipment shelter is roughly 2 1/2 meters high and 2 meters square. It stands 12 meters from the sampler platform.

Distance from other sources:

Coal crushing, storage, and rail loading facilities lie roughly 880 meters to the west and 300 meters to the south of the sampling station. The rail line travels NW/SE and is 210 meters to the southwest at its closest proximity. The closest major access road is 620 meters to the southeast and travels in a northwest to southeast direction.

Hivol Site #2

UTM coordinates: 4995500 mN, 350430 mE.

Decker-Holmes : Northing 411,720, Easting 2,671,050

Height of probes above ground:

The sampler sits on a platform roughly 2 meters high and is oriented north-south.

Distance from and height of obstructions:

Due south about 790 meters is a low ridge running east-west and rising roughly 90 meters above the site. There are no other obstructions.

Distance from other sources:

The closest mine pit lies roughly 330 meters to the north and runs WNW-ESE. The closest access road is located approximately 150 meters to the north and runs east-west.

Hivol Site #3 (relocated in 2002)

UTM coordinates: 4999562 mN, 348937 mE.

Decker-Holmes : Northing 424,659, Easting 2,665,407

Revised 4/02; Reference - Minor Revision 2-12-2

Section 17.24.311

Height of probes above ground:

The sampler sits on a platform 1 meter high and oriented in a north-south direction.

Distance from and height of obstructions:

A low hill 30.5 meters above the site lies 500 meters to the north. Another low hill 7.6 meters above the site lies 325 meters to the northeast. Trees, approximately 10 meters in height, are growing near and on the low hills.

Distance from other sources:

The closest mine pit will be to the southwest approximately 146 meters away. A haul road lies 580 meters to the south of the site.

A discussion of the baseline monitoring program and results is contained in Vol. 1, EBS, Air Resources Text.

(l)(b) Fugitive Dust Control Practices

SCM's fugitive dust control plan is discussed in Air Quality Permit No. 1120-05. Following is a non-inclusive summary of emission control technologies utilized by SCM as described in the air quality permit:

1. The above ground conveyor sides and roof are enclosed by metal siding. The conveyor floor is partially enclosed by stairs or walkways and the remaining space is covered by expanded metal.
2. The truck dump pit is enclosed on two sides and the top. Openings face the prevailing wind direction. A dust suppression system has been installed at top and bottom of the truck dump hopper to suppress dust as trucks are unloaded. Sprays provide a curtain across the top of the hopper to contain dust generated by falling coal. Overhead sprays are used to control dust near the bed level of the trucks as they dump. Such systems are designed for year round use.
3. An Agglomeration Dust Suppression System (ADS) is used to control dust during the primary crusher's operations. The ADS system is used at strategic points in the primary crusher.

Section 17.24.311

4. An ADS system is used to control dust during the secondary crusher's operations. The ADS system is used at strategic points in the secondary crusher.
5. An ADS system is used to collect dust during the loading of the 200-ton silo loadout bin. Telescoping chutes are used during railcar loadout.
6. The 40,000 ton coal storage pile is completely enclosed in a storage barn. The coal storage barn stacker is designed to minimize the free fall distance of coal, thus helping to minimize creation of coal dust. An open coal stockpile is maintained adjacent to the truck dump for blending purposes.
7. Best Management Practice is defined as the minimization of fall distance of coal and overburden into trucks.
8. Blasting is conducted in such a manner as to prevent overshooting and to minimize the area to be blasted.
9. Wind erosion is controlled by use of temporary vegetative cover.
10. Fugitive dust from haul roads is controlled by a combination of chemical dust suppressants and road watering.
11. Haul roads are graded as required. Loose debris is removed from haul roads. Chemical dust suppressants are reapplied as required.
12. Reclamation of reclaimed surface will begin within one growing season.
13. The paved mine access road is approximately 13,300 feet long. The road is maintained by SCM.
14. The emissions from the coal quality analytical laboratory are controlled by a Johnson March Fabric Filter Collector, Model #PCTB 6-10, 3400 ACFM. Approximately 80 tons of coal per year are crushed and analyzed at the laboratory.
15. The lump operation, located at the truck dump, has a reject conveyor placing the incorrectly sized product back in the truck dump. This operation processes, over a three-year average, approximately 13,800 tons per year, with a 60% reject tonnage. The remaining 40% is transported via trucks to the predefined customer. Emissions from the reject product are controlled by the

Revised 4/02; Reference - Minor Revision 2-12-2

Section 17.24.311

truck dump suppression system.

Based on the effectiveness of control to date, and of similar controls at other mines, these measures adequately control air pollutant emissions. The control technologies have been deemed to represent "Best Available Control Technology" through issuance of the air quality permit.