

P.O. Box 68
Point of Rocks, WY 82942
(307) 382-9741 Fax (307) 362-5330



July 31, 2012

Mr. Kirk Billings
Wyoming Department of Environmental Quality
Air Quality Division
510 Meadowview Drive
Lander, Wyoming 82520-2848

SUBJECT: Exceptional Events.

Dear Mr. Billings:

I am writing this letter to notify the DEQ – AQD of one event this past month that we at Bridger Coal feel should be classed as exceptional events under 40CFR 50.14. The date that I am referring to is June 5, 2012 at the JB 4 TEOM site. I have enclosed data concerning this event.

Please see the following information describing the event for the day.

If you have any questions or comments on the data please give me a call at 307-922-7687.

Sincerely,

Jonathan Gross
Environmental Specialist
Bridger Coal Company

Enclosure

Cc: Cara Keslar - DEQ-AQD
Tony Hoyt - DEQ-AQD

4-05-2012

Daily reading: 215.6µg/m³

Work Activities:

Dragline 102 was down for the day.

No Drilling or blasting was taking place that day.

Dragline 103 was working in the Ramp 5 to Ramp 6 area assisted by a dozer. This equipment was working on a large reclamation area reclaiming spoil material.

Two Trucks, a backhoe, and a loader were working in the Ramp 7 area. This equipment was regrading a drainage and backfilling an old pit.

One loader, two trucks, and a dozer were working in the Ramp 1 to 52 area.

Under ground mine was shipping coal via the beltline.

Three Water trucks logged 51 hours of run time for that day applying 1,520,000 gallons of water to control dust around the mine.

Mine Actions due to high readings:

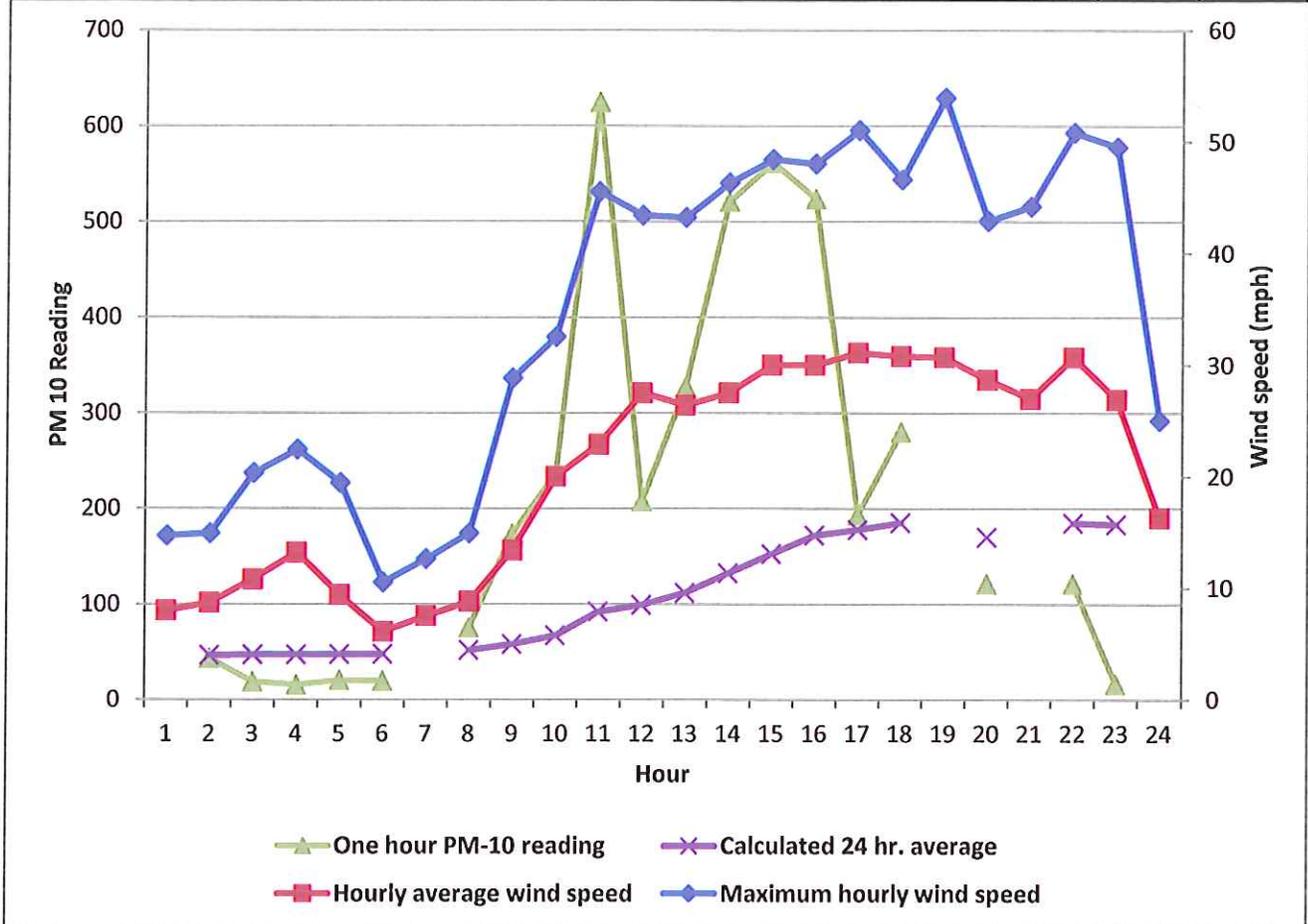
When the first alarm came in for high hourly reading personnel followed our high wind action plan for levels of PM-10 over 300µg/m³. Water trucks were ordered to water all working areas in ramp 5 to 7. A meeting of the environmental personnel and production supervisors took place. During that time it was decided that the mine would stop reclamation efforts for the day in the ramp 7 area. A decision was made to continue to run the dragline and closely monitor the 24 hr. average. Three hours later a decision was made to shut down the dragline this was done when our calculated average 24hr. reading was approximately 130µg/m³. All operations in the ramp 5 to 7 area remained shut down until the next day, except for water trucks.

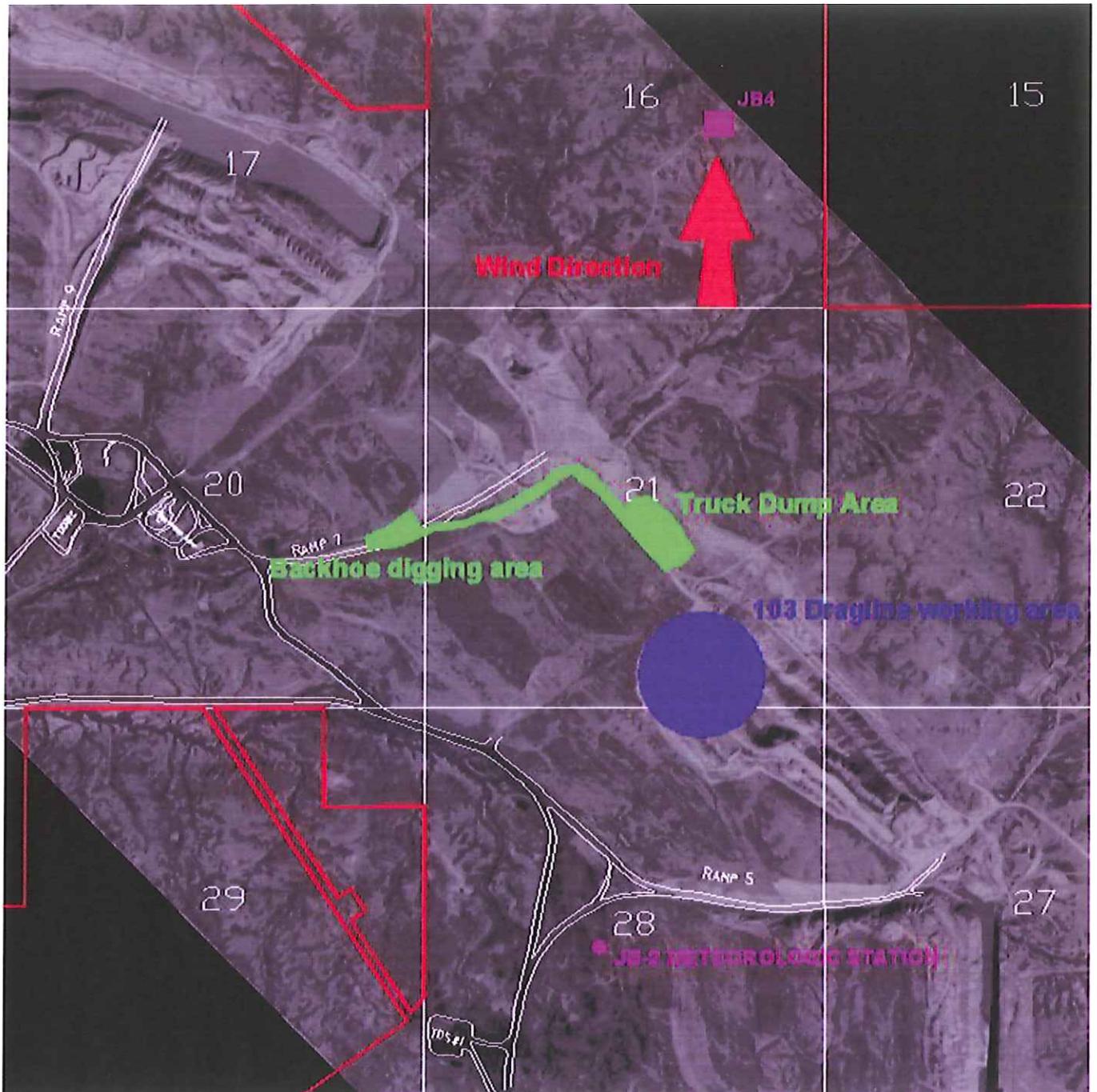
Possible causes:

The area of ramp 5 to 7 was directly upwind from JB 04 this area is part of a large reclamation project currently taking place. It is our feeling that the high winds caused excessive dust in the air that would have not normally been present for this type of operation. We have been operating a dragline in this same area since April and are still currently operating in this area. This is the only day this year that showed levels above the 150µg/m³ it also had 14 hrs of sustained wind speeds over 20 mph. with measured speeds over 50 mph.

The following Tables and Graph depict the hourly TEOM readings, wind speeds, and direction.

Date	Hour	Wind Speed (mph)	Maximum measured Wind Speed	Wind Direction (°)	Directional Arrow	Sigma Theta (°)	Air Temperature (F)	Hourly Precipitation (in.)	Verified Hourly Reading	Estimated 24 hr. Reading (raw data)
6/5/2012	1	8.0	14.7	135.1	↖	12.8	66.1	0.00		
6/5/2012	2	8.7	14.9	131.2	↖	8.6	63.9	0.00	42.8	46.4
6/5/2012	3	10.8	20.3	141.2	↖	10.4	63.2	0.00	18.5	46.9
6/5/2012	4	13.2	22.4	162.7	↖	11.0	63.7	0.00	15.2	46.9
6/5/2012	5	9.4	19.4	154.4	↖	9.9	61.9	0.00	20.1	47.2
6/5/2012	6	6.1	10.5	158.8	↖	20.2	60.4	0.00	19.2	47.6
6/5/2012	7	7.5	12.6	148.1	↖	12.6	59.8	0.00		
6/5/2012	8	8.8	14.9	162.8	↖	13.5	63.2	0.00	75.2	51.6
6/5/2012	9	13.4	28.8	178.6	↖	13.7	68.3	0.00	173.1	57.8
6/5/2012	10	20.0	32.5	190.6	↖	13.3	71.4	0.00	236.3	67
6/5/2012	11	22.9	45.5	184.5	↖	13.9	73.7	0.00	624.4	92
6/5/2012	12	27.5	43.4	187.0	↖	11.7	75.3	0.00	207.6	99.1
6/5/2012	13	26.4	43.2	183.4	↖	14.2	76.5	0.00	327.2	111.7
6/5/2012	14	27.5	46.3	191.5	↖	11.7	78.0	0.00	520.7	132.3
6/5/2012	15	30.0	48.4	185.9	↖	12.3	79.0	0.00	561.3	152.3
6/5/2012	16	30.0	48	186.1	↖	13.5	79.8	0.00	523.4	171.8
6/5/2012	17	31.1	51	196.0	↖	15.8	79.4	0.00	193.0	177.6
6/5/2012	18	30.8	46.6	203.6	↖	11.4	79.4	0.00	279.7	185
6/5/2012	19	30.7	53.9	219.0	↖	18.5	78.0	0.00		
6/5/2012	20	28.7	42.9	264.4	→	7.8	64.3	0.00	121.1	170
6/5/2012	21	27.0	44.2	276.4	→	11.0	52.9	0.00		
6/5/2012	22	30.7	50.8	277.6	→	10.2	45.6	0.00	121.2	184.9
6/5/2012	23	26.9	49.5	282.1	→	9.6	41.3	0.00	16.3	183.3
6/5/2012	24	16.3	25	268.7	→	12.4	40.5	0.00		







Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's
environment for the benefit of current and future generations.*



Matthew H. Mead, Governor

Todd Parfitt, Director

November 15, 2012

Certified Mail Receipt Number: 7011 1570 0003 4871 6690

Mr. Jonathan Gross
Environmental Specialist
Bridger Coal Company
PO Box 68
Point of Rocks, WY 82942

Re: Request for Flag under the Exceptional Event Rule for PM₁₀ June 5, 2012 Exceedance

Dear Mr. Gross,

The Air Quality Division (AQD) has reviewed the request to flag the June 5, 2012 PM₁₀ ambient monitored data as an Exceptional Event in accordance with the 40 CFR Part 50.14 at the Bridger Coal Mine (Bridger). Although the AQD has placed a temporary "High Wind" flag in AQS on the June 5, 2012 PM₁₀ data, with the description "Possible Exceptional Event – under evaluation by AQD", the team of AQD staff found significant deficiencies in the "weight of evidence" approach presented in the August 3, 2012 submittal. Supplemental information is needed before AQD can determine if all elements were addressed to exclude event-related concentrations from regulatory determinations.

The review team requests the following information/ answers to the following questions to clarify the packet:

- Documentation of water usage and application in response to high hourly or high 24-hour average PM-10 monitor readings is required by Bridger Coal Company's dust action plan. Please provide this documentation.
- Much of BCC's submission is lacking in detail regarding actions taken in response to this exceedance. Please provide more detail regarding the facility's actions in response to the day's high concentration alarms and the facility's actions throughout the day in the area of the exceedance. An hour by hour chart with 1-hour and current 24-hour concentrations that correspond to the facility's actions is typically helpful in these cases.
- It was noted that there was a sharp drop in the monitor's hourly average from the 11:00 to the 12:00 hours, from 624.4 ug/m³ to 207.6 ug/m³, while the hourly average windspeed increased. Please explain what happened to cause this drop in concentration.
- The area of ramp 5 to 7 was identified in the Exceptional Event packet as the source of the PM-10 causing the exceedance. Please be more specific in identifying which operations and areas contributed to the exceedance and the actions taken to control them.
- 40 CFR 50.14 (C) requires the facility submitting the Exceptional Event packet to demonstrate that, "The event is associated with a measured concentration in excess of normal historical fluctuations, including background." Please provide an average windspeed for the month of June for each of the last five years (2012, 2011, 2010, 2009 and 2008). In addition, please provide wind roses for each of the last five Junes (2012, 2011, 2010, 2009 and 2008).

Herschler Building • 122 West 25th Street • Cheyenne, WY 82002 • <http://deq.state.wy.us>

ADMIN/OUTREACH (307) 777-7758 FAX 777-7682	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-5973	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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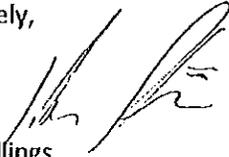


The AQD level of review for Exceptional Event packages is greatly dependent on the level of detail and information provided by the facility in the request to flag exceedances. EPA has also provided examples of exceptional events demonstrations that meet the requirements of the draft high wind guidance. The following link <http://www.epa.gov/ttn/analysis/exevents.htm> is the best place to find examples of information that are needed to have EPA concur with an exceptional event demonstration.

Please keep in mind that while AQD had an extensive staff of monitoring, compliance and permitting personnel available to evaluate the documentation packet, this packet will also be reviewed by the public and EPA.

Please submit the requested supplemental information to Cara Keslar, Monitoring Section Supervisor no later than two (2) weeks from receipt of this letter. The AQD evaluation team will reconvene to determine if all requirements were met under the Exceptional Event Rule. If all requirements of the rule were met, AQD will keep the flags in the AQS database and the documentation package will be made available for public review and submitted to EPA Region 8 for concurrence. If you have questions please contact me at (307) 335-6963 or kirk.billings@wyo.gov.

Sincerely,



Kirk Billings
Air Quality Analyst, Monitoring Section

Cc: Bridger Monitoring File

P.O. Box 68
Point of Rocks, WY 82942
(307) 382-9741 Fax (307) 362-5330



November 29, 2012

Mr. Kirk Billings
Wyoming Department of Environmental Quality
Air Quality Division
510 Meadowview Drive
Lander, Wyoming 82520-2848

SUBJECT: Exceptional Events.

Dear Mr. Billings:

I am writing this letter in response to your request for additional information associated with our request to flag data from June 5, 2012 as an exceptional event. Please note that there is one correction that needs to be addressed in the original submittal. The total gallons of water used, was improperly calculated at 1,520,000 gallons the correct amount used should be 1,220,000 gallons of water used.

Please see the attached material containing Bridger Coals Response to your comments and additional material.

If you have any questions or comments on the data please give me a call at 307-922-7687.

Sincerely,

A handwritten signature in purple ink that reads "Jon Gross".

Jonathan Gross
Environmental Specialist
Bridger Coal Company

Enclosure

Cc: Cara Keslar - DEQ-AQD
Tony Hoyt - DEQ-AQD

Response to November 15, 2012 comments

DEQ Comment: Documentation of water usage and application in response to high hourly or 24-hour average PM-10 monitor readings is required by Bridger Coal Company's dust action plan. Please provide this documentation.

BCC Response: Bridger Coal is required to record when and where watering activities are being done and record total water usage in gallons for the shift. Watering activities in response to high dust alarms were recorded in an email sent to Mr. Kirk Billings on 6/6/12 at 2 am. Please see an attached copy of said email. Also equipment hours are recorded in Bridger Coal Production database which I have provided a copy of water truck hours for the two shifts that were operating at the time of high dust readings, unfortunately the location of where the water was loaded is tracked and not where it is discharged. The water loaded at Ramp 2 water horse and Ramp 9 water horse are in the area of the high dust readings. That would indicate that 41 water loads or approximately 790,000 gallons of water were deposited in that area on roads and work faces. That leaves 35 loads or approximately 430,000 gallons of water for the rest of the mine also experiencing high winds. Also an email sent to me by Mr. Norm Hargis indicates that the 103 Dragline was Shutdown at 4:15 in response to a PM10 reading of 132 ug/m³ at our JB04 Teom in compliance with our action plan.

DEQ Comment: Much of BCC's submission is lacking in detail regarding actions taken in response to this exceedance. Please provide more detail regarding the facility's actions in response to this high concentration alarms and the facility's actions throughout the day in the area of the exceedance. An hour by hour chart with 1 hour and current 24 hour concentrations that correspond to the facility's actions is typically helpful in these cases.

BCC Response: Please see the attached Action Plan Response Chart. Also I have attached associated e-mails depicting when alarms were received. Please note that due to the Teom recording in Standard Time and an error in the down loading program it appears to have a 2 hour discrepancy when there was just 1 hour of actual delay in the download time. This is also seen in the email alarm times.

DEQ Comment: It was noted that there was a sharp drop in the monitor's hourly average from the 12:00 hours, from 624.4 ug/m³ to 207.6 ug/m³, while the hourly average windspeed increased. Please explain what happened to cause this drop in concentration.

BCC Response: Bridger Coal cannot definitively explain the cause of the drop in the dust readings over this 1 hr. period. Many factors may have contributed to this. Please note that even though the hourly average wind speed increased the maximum measured wind speed was less, the average wind direction changed by 2.5 degrees, and the wind direction remained more constant during that 1 hour time. Other possible explanations include; at that time the backhoe and truck run were shut down, and water trucks were directed to that area Bridger Coal believes these two actions likely contributed to the reason in the drop of the dust levels over the one hour period.

DEQ Comment: The area of ramp 5 to 7 was identified in the Exceptional event packet as the source of the PM-10 causing the exceedance. Please be more specific in identifying which operations and areas contributed to the exceedance and actions taken to control them.

BCC Response: Two Trucks, a backhoe, and a loader were working in the Ramp 7 area. This equipment was regrading a drainage and backfilling an old pit. As the backhoe and loader dug down to the proper contour to reestablish a drainage in that area the excess material was placed

In haul trucks. The haul trucks then transported the material to an area of the pit that was being back filled. When the initial hourly average of 624.4 ug/m³ and the 24 hr. average was estimated at 92 ug/m³ at approximately 1:00 this operation was shut down and water trucks were directed to this area. Please see the map in the original submittal for the work area.

Dragline 103 was working in the Ramp 5 to Ramp 6 area assisted by a dozer. To reclaim the mine in the area that the dragline was working in material is picked up from the spoil side of the pit and placed in the old open pit. As the dragline is doing this it needs to reposition itself. A dozer is aiding the dragline by building pads in preparation of these short moves. Each bucket of the dragline moves approximately 80 Cu yds. of material. At approximately 1:00 a water truck was directed to the ramp 5 to 7 area. When the 24 hr. average reached 132 ug/m³ at approximately 4:00 a decision was made to shut down the dragline. Please see the map in the original submittal for the work area.

DEQ Comment: 40 CFR 50.14(C) Requires the facility submitting the Exceptional Event packet to demonstrate that "The event is associated with a measured concentration in excess of normal historical fluctuations, including background." Please provide an average windspeed for the month of June for each of the last five years (2012, 2011, 2010, 2009, and 2008). In addition, please provide wind roses for each of the last five Junes (2012, 2011, 2010, 2009, and 2008).

BCC Response: The data you requested is attached. As you can see in the attached data the monthly average wind speed in June ranged from 9 mph to 11.62 mph. The daily average on 06/05/2012 was 20.5 mph., almost double the highest monthly average with hourly averages over 30 mph. almost triple the highest monthly average.

Gross, Jonathan

From: Gross, Jonathan
Sent: Wednesday, June 06, 2012 2:18 AM
To: 'Kirk.Billings@wyo.gov'
Cc: Hargis, Norman; 'Travis Guthrie'
Subject: TEOM exceedence

Kirk,

I am writing this e-mail to notify you that our raw data for the date of 6/5/12 is showing a daily reading at JB4 of 181.4. This was being tracked and corrective actions were taken at 1pm in the afternoon despite our best efforts. We were not able to reduce the measurements to an acceptable level. I will get more information to you when I return to work next week.

Jonathan Gross

Environmental Specialist
Bridger Coal Company
P.O. Box 68
Point of Rocks, WY 82942
Office:(307) 922-7687
Fax: (307) 362-5330

Table Created from Bridger Coals Production Database

Date	Shift	Equipment	Size	Number of Loads	Fill location	Minutes recorded
6/5/2012	Day	744	10,000 gal.	2	Ramp 2	57
6/5/2012	Day	744	10,000 gal.	5	Ramp 55.5	142
6/5/2013	Day	744	10,000 gal.	11	Ramp 60	311
6/5/2012	Day	747	20,000 gal.	2	Ramp 2	78
6/5/2012	Day	747	20,000 gal.	10	Ramp 9	393
6/5/2013	Day	747	20,000 gal.	1	Power Plant	39
6/5/2012	Day	748	20,000 gal.	11	Ramp2	374
6/5/2012	Day	748	20,000 gal.	3	Ramp 60	102
6/5/2013	Day	748	20,000 gal.	1	Power Plant	34
6/5/2012	Night	744	10,000 gal.	1	Ramp 2	42.5
6/5/2012	Night	744	10,000 gal.	11	Ramp 60	467.5
6/5/2013	Night	747	20,000 gal.	7	Ramp 2	397
6/5/2012	Night	747	20,000 gal.	2	Power Plant	113
6/5/2012	Night	748	20,000 gal.	8	Ramp 2	453
6/5/2013	Night	748	20,000 gal.	1	Power Plant	57

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, June 05, 2012 4:33 PM
To: Gross, Jonathan
Subject: #103 dragline

Jon- the #103 dragline was shut down at 4:15 PM on Tuesday 6/5 after the 4 PM JB-4 update. I told them to leave it down until 24-hr average goes down below 140 and 1-hour average goes below 140.

Norm

Action Plan response Chart

Hour	Day light savings time	Data downloaded to the office - Alarms Sent	Verified Hourly Reading	Estimated 24 hr. Reading (raw data)	Email Received for hourly reading	Email Received for 24 hr. reading	Mine Actions	Action plan required response
1	1 to 2	3:00 AM	42.8	no	no	no	General use of water truck and blades	none
2	2 to 3	4:00 AM	48.8	46.4	no	no	General use of water truck and blades	none
3	3 to 4	5:00 AM	18.5	46.9	no	no	General use of water truck and blades	none
4	4 to 5	6:00 AM	15.2	46.9	no	no	General use of water truck and blades	none
5	5 to 6	7:00 AM	20.1	47.2	no	no	General use of water truck and blades	none
6	6 to 7	8:00 AM	19.2	47.6	no	no	General use of water truck and blades	none
7	7 to 8	9:00 AM		Data not Valid			General use of water truck and blades	none
8	8 to 9	10:00 AM	75.2	51.6	no	no	General use of water truck and blades	none
9	9 to 10	11:00 AM	173.1	57.8	no	no	General use of water truck and blades	none
10	10 to 11	12:00 PM	236.3	67	no	no	General use of water truck and blades	none
11	11 to 12	1:00 PM	624.4	92	yes	no	At this time the mine foreman made sure that three water trucks were running and that someone was dedicated to the ramp 5 to ramp 7 reclamation areas. At this time a brief meeting also took place between the environmental department and the mine production department to ensure that Bridger Coal was at minimum following if not exceeding its dust control plan. During this meeting it was also decided that the truck loader operation in ramp 7 would be shut down for the day this action exceeded our action plan.	Ensure water trucks are operating in dust producing areas.
12	12 to 13	2:00 PM	207.6	99.1	no	no	Mine personnel were closely monitoring air readings. Watering continued	none
13	13 to 14	3:00 PM	327.2	111.7	yes	yes	Mine personnel were closely monitoring air readings. Watering continued	Ensure water trucks are operating in dust producing areas.
14	14 to 15	4:00 PM	520.7	132.3	yes	yes	At this time the it was recommended to shut down the 103 dragline operating in the ramp 5 area until the dust levels are below 140 ug/m ³ for the hourly and 24 hr readings. This action was carried out by the production department.	Modify or shutdown operations that are major dust contributors
15	15 to 16	5:00 PM	561.3	152.3	yes	yes	All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
16	16 to 17	6:00 PM	523.4	171.8	yes	yes	All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
17	17 to 18	7:00 PM	193.0	177.6	no	yes	All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
18	18 to 19	8:00 PM	279.7	185	no	yes	All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
19	19 to 20	9:00 PM		Data not Valid			All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
20	20 to 21	10:00 PM	121.1	170	no	yes	All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
21	21 to 22	11:00 PM		Data not Valid			All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
22	22 to 23	12:00 AM	121.2	184.9	no	yes	All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
23	23 to 24	1:00 AM	16.3	183.3	no	yes	All equipment in the ramp 5 to 7 area remains shut down except for watering trucks.	Shutdown all pit operators.
24	24 to 1	2:00 AM		Data not Valid			Email sent to DEC notifying them of a possible exceedance.	Shutdown all pit operators.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:05 AM
To: Gross, Jonathan
Subject: FW: High 1-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 1:08 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 1-Hour Concentration at JB4

The 1-Hour Concentration on the Air Monitor Across From Ramp 7 (JB4 TEOM) on 6/5/2012 11:00:05 AM was 624.4190.

Which is over the 300 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:06 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 3:10 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schoffeld, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 1:00:05 PM was 111.6610.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:06 AM
To: Gross, Jonathan
Subject: FW: High 1-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 3:10 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 1-Hour Concentration at JB4

The 1-Hour Concentration on the Air Monitor Across From Ramp 7 (JB4 TEOM) on 6/5/2012 1:00:05 PM was 327.2320.

Which is over the 300 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:07 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 5:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Ketterling, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 2:00:05 PM was 132.2840.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:07 AM
To: Gross, Jonathan
Subject: FW: High 1-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 5:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 1-Hour Concentration at JB4

The 1-Hour Concentration on the Air Monitor Across From Ramp 7 (JB4 TEOM) on 6/5/2012 2:00:05 PM was 520.6500.

Which is over the 300 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:07 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 5:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 3:00:05 PM was 152.3020.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:07 AM
To: Gross, Jonathan
Subject: FW: High 1-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 5:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 1-Hour Concentration at JB4

The 1-Hour Concentration on the Air Monitor Across From Ramp 7 (JB4 TEOM) on 6/5/2012 3:00:05 PM was 561.3480.

Which is over the 300 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:07 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 6:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovlch, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 4:00:05 PM was 171.7650.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:08 AM
To: Gross, Jonathan
Subject: FW: High 1-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 6:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovlch, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 1-Hour Concentration at JB4

The 1-Hour Concentration on the Air Monitor Across From Ramp 7 (JB4 TEOM) on 6/5/2012 4:00:05 PM was 523.3600.

Which is over the 300 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:08 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 7:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 5:00:05 PM was 177.5890.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:08 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 9:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 6:00:05 PM was 185.0440.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:09 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Tuesday, June 05, 2012 11:07 PM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 8:00:05 PM was 170.0310.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:09 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Wednesday, June 06, 2012 1:06 AM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 10:00:05 PM was 184.9370.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:10 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Wednesday, June 06, 2012 1:06 AM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schoffeld, Marvin; Madrid, Daniel; Lmb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/5/2012 11:00:05 PM was 183.3310.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Gross, Jonathan

From: Hargis, Norman
Sent: Tuesday, November 20, 2012 11:10 AM
To: Gross, Jonathan
Subject: FW: High 24-Hour Concentration at JB4

From: alert@imlinc.com [<mailto:alert@imlinc.com>]

Sent: Wednesday, June 06, 2012 2:06 AM

To: Gross, Jonathan; Wales, Donald; Hargis, Norman; Patrick.Akers@PacifiCorp.com; Seely, James; Palmer, Scott; Keller, Richard; Knezovich, Paul; Lancaster, Thomas (BCC); Kettering, Harvey; Schofield, Marvin; Madrid, Daniel; Limb, Charles; Poulsen, Darryl

Subject: High 24-Hour Concentration at JB4

The 24-Hour Concentration on the air monitor across from Ramp 7 (JB4 TEOM) on 6/6/2012 12:00:05 AM was 181.3620.

Which is over the 100 $\mu\text{g}/\text{m}^3$ limit.

This is an automated email.

Bridger Mine

Wind Data Summary

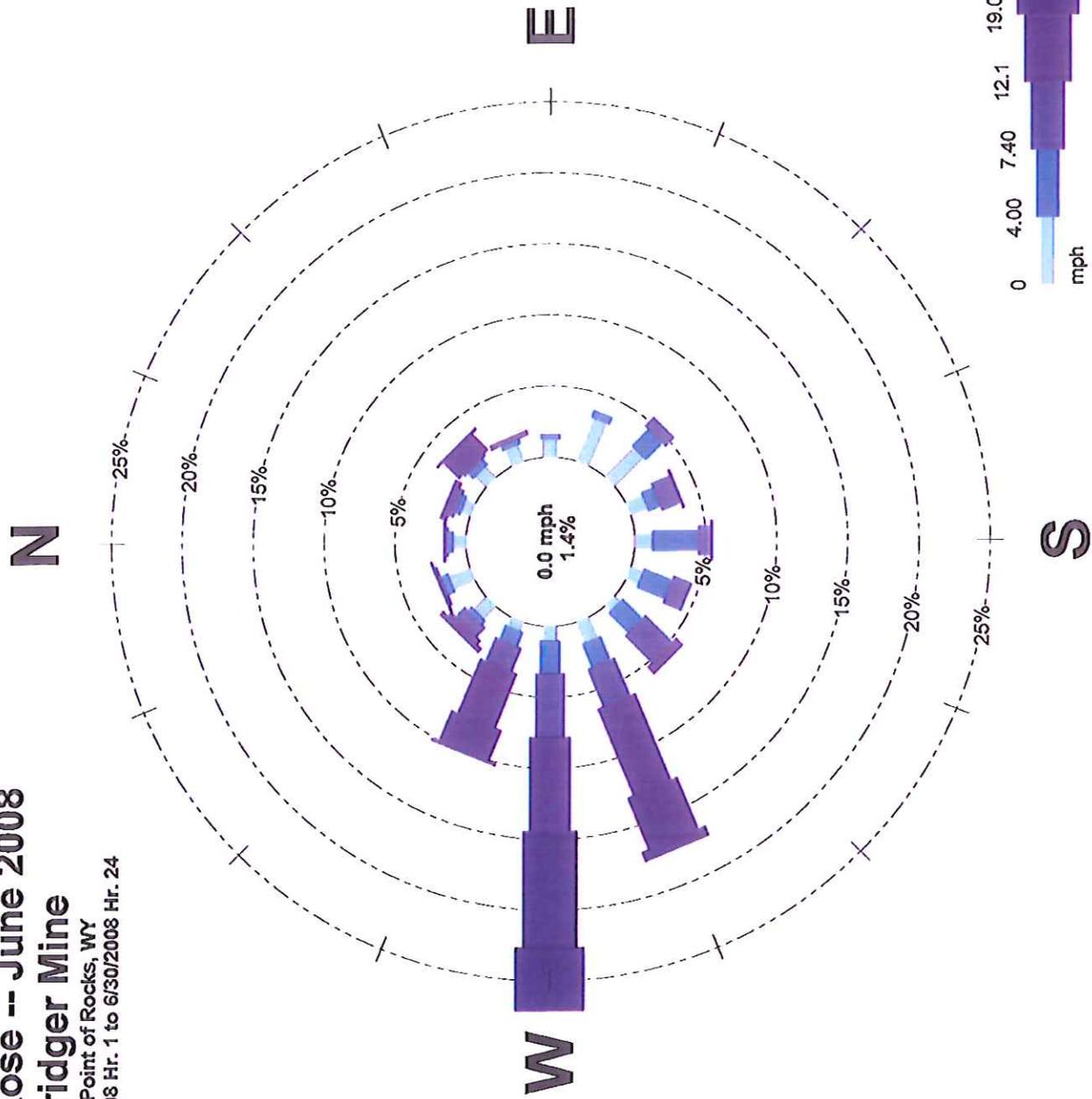
5 Years Month of June

Monthly Averages (mph)

	Average
June 2008	11.62
June 2009	9.00
June 2010	11.29
June 2011	10.53
June 2012	11.15

Wind Rose -- June 2008 Bridger Mine

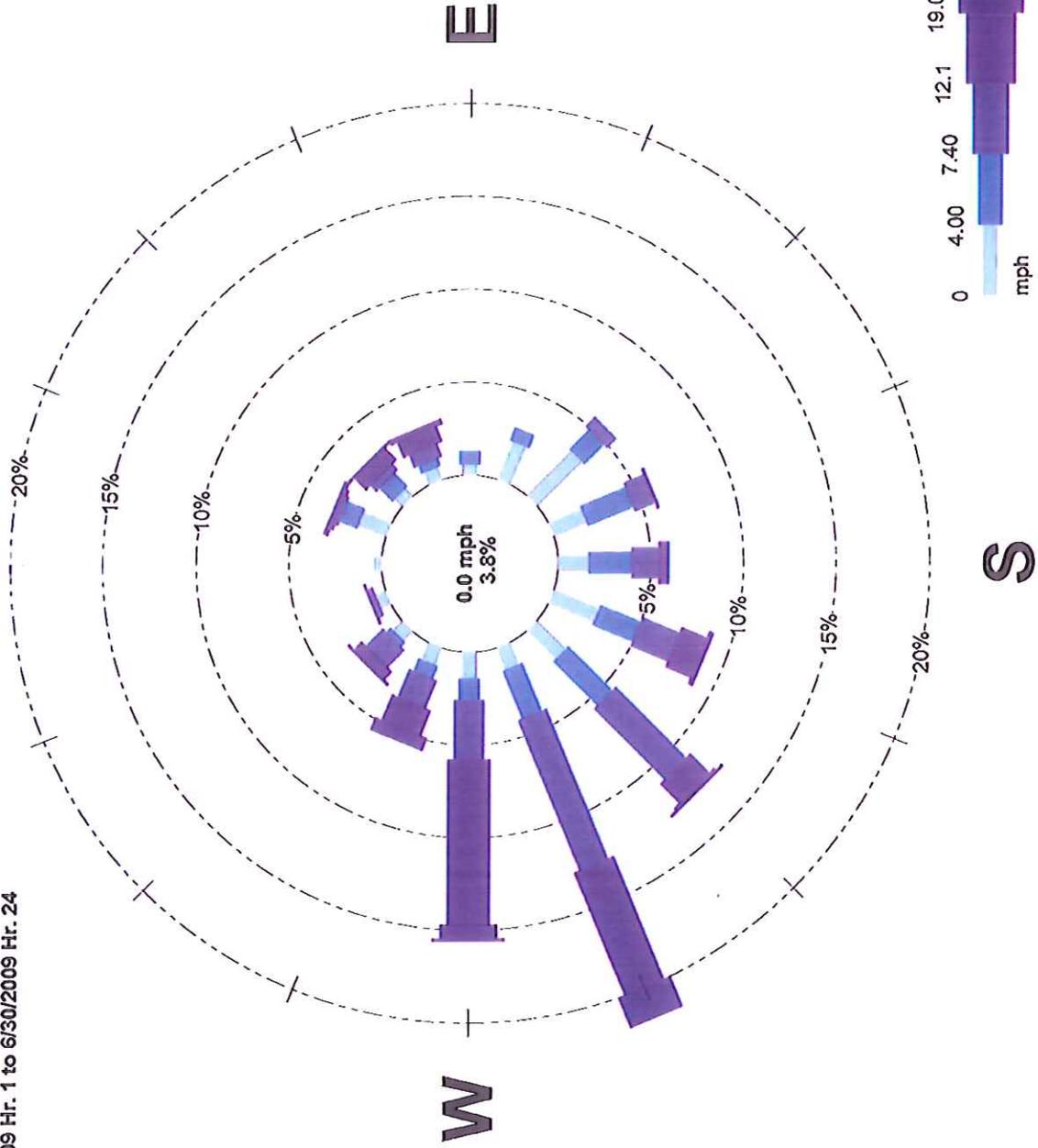
Point of Rocks, WY
6/1/2008 Hr. 1 to 6/30/2008 Hr. 24



Wind Rose -- June 2009

Bridger Mine

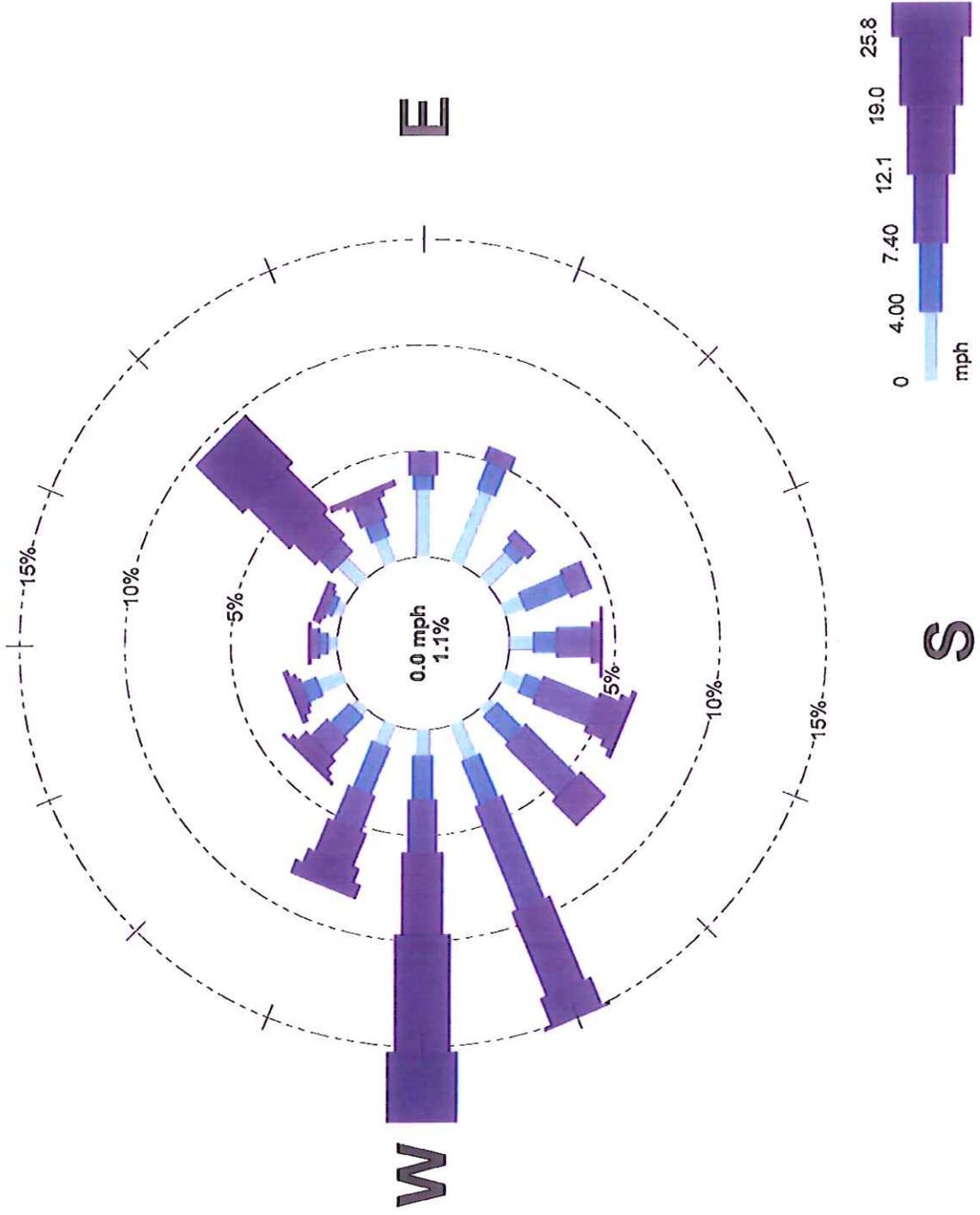
Point of Rocks, WY
6/1/2009 Hr. 1 to 6/30/2009 Hr. 24



Wind Rose -- June 2010

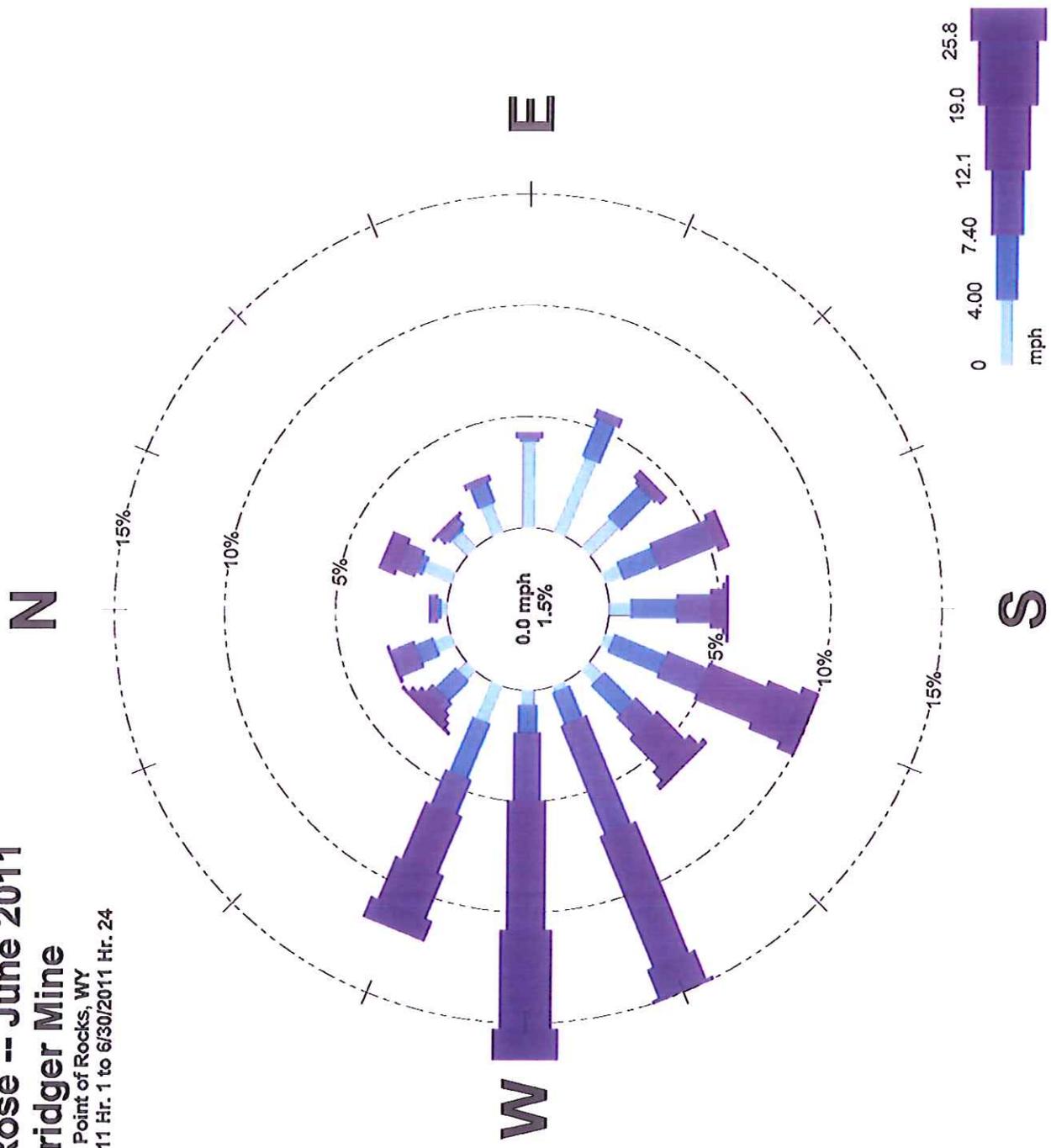
Bridger Mine

Point of Rocks, WY
6/1/2010 Hr. 1 to 6/30/2010 Hr. 24



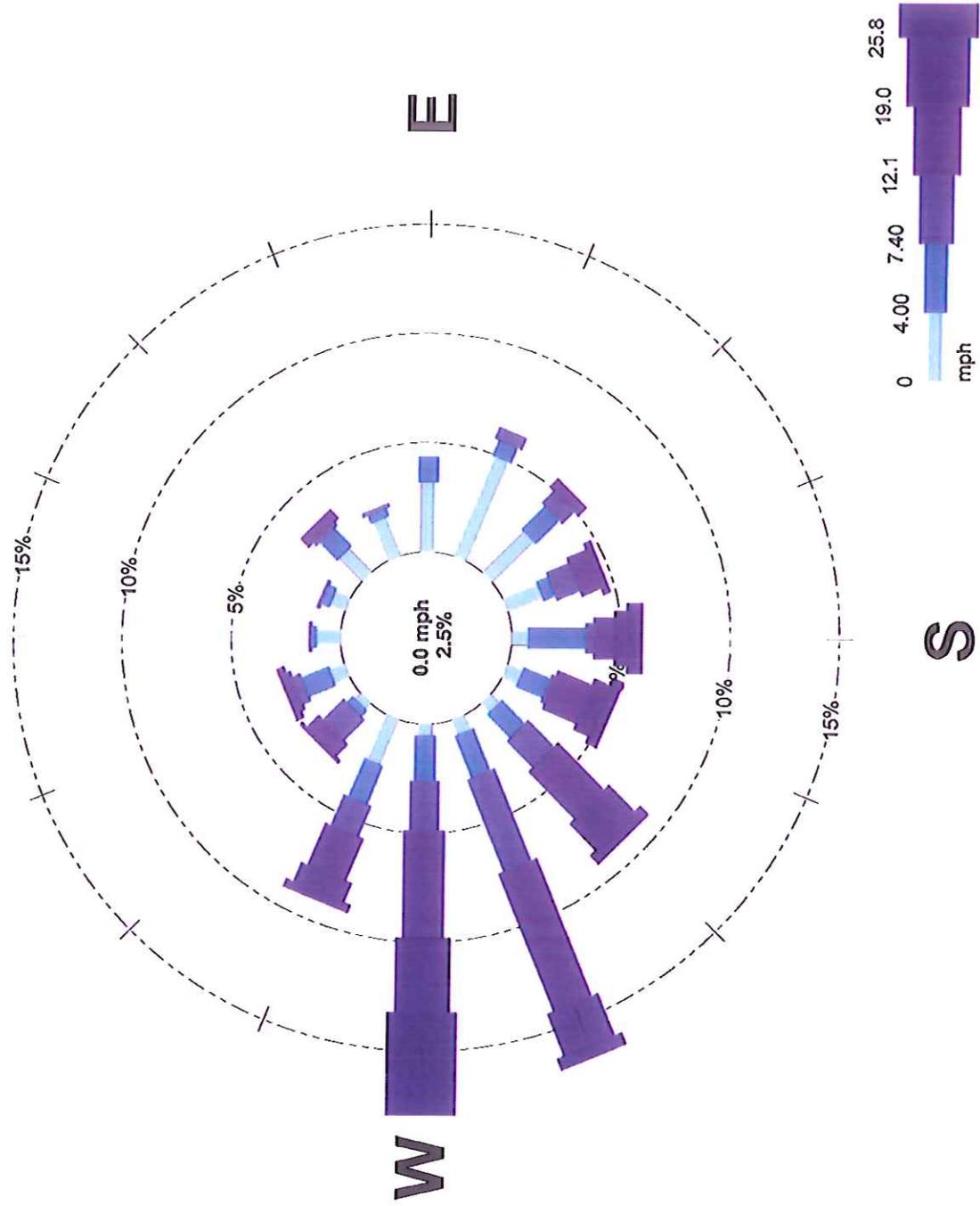
Wind Rose -- June 2011 Bridger Mine

Point of Rocks, WY
6/1/2011 Hr. 1 to 6/30/2011 Hr. 24



Wind Rose -- June 2012 Bridger Mine

Point of Rocks, WY
6/1/2012 Hr. 1 to 6/30/2012 Hr. 24





Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matt H. Mead, Governor

Todd Parfitt, Director

December 6, 2012

Certified Mail Receipt Number: 7011 1570 0003 4871 6737

Mr. Jonathan Gross
Environmental Specialist
Bridger Coal Company
PO Box 68
Point of Rocks, WY 82942

Re: Request for Flag under the Exceptional Event Rule for PM₁₀ June 5, 2012 Exceedance

Dear Mr. Gross,

The Air Quality Division (AQD) has reviewed the request to flag the June 5, 2012 PM₁₀ ambient monitored data as an Exceptional Event in accordance with the 40 CFR Part 50.14 at the Bridger Coal Mine (Bridger). Although the AQD has placed a temporary "High Wind" flag in AQS on the June 5, 2012 PM₁₀ data, with the description "Possible Exceptional Event – under evaluation by AQD", the team of AQD staff has additional questions regarding the additional information presented in the November 29, 2012 submittal. Supplemental information is needed before AQD can determine if all elements were addressed in the request to exclude event-related concentrations from regulatory determinations.

The review team requests the following information/ answers to the following questions to clarify the packet:

- Documentation of water usage and application in response to high hourly or high 24-hour average PM-10 monitor readings is required by Bridger Coal Company's dust action plan. Although a table listing water usage was submitted, the AQD prefers to use primary sources when possible. Primary sources in this case would include written water truck logs or dispatch records rather than the summary table provided. Please provide this documentation.
- Was water applied in greater concentration in the Ramp 5 through Ramp 7 area than in other parts of the mine that day? A comparison of the disturbed area treated between Ramps 5 and 7 versus the total disturbed area treated that day would be helpful.
- BCC's response to Item #1 in the AQD's first request for additional information indicates that BCC tracks the location of where water is loaded, not where water is discharged, but the response to item number three indicates that the facility has a system to direct water trucks to a specific area. These two statements would appear to be at odds with each other. Please elaborate on the facility's water distribution system. How does BCC direct water application? How does BCC track water usage? How does data find its way into the facility database that was cited in the November 29, 2012 submission to the AQD from BCC?

The AQD level of review for Exceptional Event packages is greatly dependent on the level of detail and information provided by the facility in the request to flag exceedances. EPA has also provided examples of exceptional events demonstrations that meet the requirements of the draft high wind guidance. The

Lander Field Office • 510 Meadowview Drive • Lander, WY 82520 • <http://deq.state.wy.us>

ABANDONED MINES
(307) 332-5085
FAX 332-7726

AIR QUALITY
(307) 332-6755
FAX 332-7726

LAND QUALITY
(307) 332-3047
FAX 332-7726

SOLID & HAZARDOUS WASTE
(307) 332-6924
FAX 332-7726

WATER QUALITY
(307) 332-3144
FAX 332-7726



following link <http://www.epa.gov/ttn/analysis/exeevents.htm> is the best place to find examples of information that are needed to have EPA concur with an exceptional event demonstration.

Please keep in mind that while AQD had an extensive staff of monitoring, compliance and permitting personnel available to evaluate the documentation packet, this packet will also be reviewed by the public and EPA.

Please submit the requested supplemental information to Cara Keslar, Monitoring Section Supervisor no later than two (2) weeks from receipt of this letter. The AQD evaluation team will reconvene to determine if all requirements were met under the Exceptional Event Rule. If all requirements of the rule were met, AQD will keep the flags in the AQS database and the documentation package will be made available for public review and submitted to EPA Region 8 for concurrence. If you have questions please contact me at (307) 335-6963 or kirk.billings@wyo.gov.

Sincerely,



Kirk Billings
Air Quality Analyst, Monitoring Section

Cc: Bridger Monitoring File

P.O. Box 68
Point of Rocks, WY 82942
(307) 382-9741 Fax (307) 362-5330



December 19, 2012

Mr. Kirk Billings
Wyoming Department of Environmental Quality
Air Quality Division
510 Meadowview Drive
Lander, Wyoming 82520-2848

SUBJECT: Exceptional Events.

Dear Mr. Billings:

I am writing this letter in response to your request for additional information associated with our request to flag data from June 5, 2012 as an exceptional event.

Please see the attached material containing Bridger Coals Response to your comments and additional material.

If you have any questions or comments on the data please give me a call at 307-922-7687.

Sincerely,

A handwritten signature in cursive script that reads "Jonathan Gross".

Jonathan Gross
Environmental Specialist
Bridger Coal Company

Enclosure

Cc: Cara Keslar - DEQ-AQD
Tony Hoyt - DEQ-AQD

Response to December 6, 2012 comments

DEQ Comment: Documentation of water usage and application in response to high hourly or high 24-hour average PM-10 monitor readings is required by Bridger Coal Company's dust action plan. Although a table listing water usage was submitted, the AQD prefers to use primary sources when possible. Primary sources in this case would include written water truck logs or dispatch records rather than the summary table provided. Please provide this documentation.

BCC Response: Bridger Coal is providing a copy of the shift report filled out by the operators of each water truck.

DEQ Comment: Was water applied in greater concentration in the Ramp 5 through 7 area than in other parts of the mine that day? A comparison of disturbed area treated between ramp 5 and 7 versus the total disturbed area treated that day would be helpful.

BCC Response: Yes more water was applied to the Ramp 5 to 7 disturbance than to other areas of the mine that day. To make this determination we need to calculate the total mine disturbance, the disturbance from 5 to 7 and the water used per acre. We know that the water hoses used in ramps 2 and 9 are the closest to the area so we will calculate the water used per acre from ramp 2 to 9 the remaining amount of water and disturbance acreage we can calculate the water used per acre on the rest of the mine.

Mine wide disturbance not reclaimed = 6110 ac.

Ramp 2 to 9 disturbance not reclaimed = 1650 ac.

Water used mine wide = 1,220,000 gal.

Water used from Ramp 2 to 9 = 790,000 gal.

Mine wide water per acre including Ramp 2 to 9 = 199.7 gal per acre of disturbed ground

Mine wide water per acre not including Ramp 2 to 9 = 96.4 gal. per acre of disturbed ground

Ramp 2 to 9 water per acre = 478.8 gal per acre of disturbed ground

Because the ramp 2 to 9 area encompasses the ramp 5 to 7 work areas we would assume that the ramp 5 to 7 work areas were watered at a rate greater than 478.8 gallons per acre and the remaining mine wide disturbance at a rate less than 96.4 gal. per acre.

DEQ Comment: BCC's response to item #1 in the AQD's first request for additional information indicates that BCC tracks the location of where water is loaded, not where water is discharged, but the response to item number three indicates that the facility has a system to direct water trucks to a specific area. These two statements would appear to be at odds with each other. Please elaborate on the facility's water distribution system. How does BCC direct water application? How does BCC track water usage? How does data find its way into the facility database that was cited in the November 29, 2012 submission to the AQD from BCC?

BCC Response: The shift foreman will direct water truck to an area of the mine by using his radio if the water is needed at that particular area. The shift foreman was given directions to concentrate his water spraying into the Ramp 5 to 7 equipment operations areas on June 5, 2012. If a water truck driver is not being directed to work in a specific area they generally concentrate on watering high traffic areas such as haul road. Water

loads are written on a shift report by the water truck operators they are then input in to the database by office clerks.

BRIDGER COAL COMPANY
PINE CREEK STATION INSPECTION CHECKLIST FOR WATER TRUCK OPERATION SHIFT REPORT

OPERATOR: [REDACTED] UNIT NO.: 1118
DATE: 6/5/12 SHIFT: 6:30 APT NIGHT

LOAD NO. DESCRIPTION	LOAD COUNT	WATER SYSTEMS CHECKLIST	OPERATIONAL	
			YES	NO
1. FILLER VALVE OPERATIONAL				
2. WATER VALVES WORKING				
3. FUEL TRUCK OPERATIONAL (FUEL, AIR, & WATER)				
4. OPERATOR'S CONTROLS FUNCTIONAL				
5. FRESH WATER SYSTEM FILLING				
6. FRESH WATER SYSTEM FILLING				
7. SPENDING AND BUCKET CAPACITY				

UTL CANTON SUPERVISOR

DAY	APT	NIGHT
6:00	400	1200
8:00	500	100
10:00	600	200
11:00	200	200
12:00	400	400
1:00	600	600
2:00	1000	800
2:00	1100	700

EO UTILTY COST	COST CENTER	INS
WORKING INS.	81	9
WORKING INS.	81	
WORKING INS.	81	
DELAY INS.	82	1
MAINT. INS.	84	N/A
STANDARD INS.	82	N/A
TOTAL INS.	87	10

*NOTE: THIS IS A SOLE SOURCE
ECONOMIC REPORT
PREPARED BY UTL

SUPERVISOR SIGNATURE

BRIDGER COAL COMPANY
PINE CREEK STATION INSPECTION CHECKLIST FOR WATER TRUCK OPERATION SHIFT REPORT

OPERATOR: [REDACTED] UNIT NO.: 1117
DATE: 6/5/12 SHIFT: 6:30 APT NIGHT

LOAD NO. DESCRIPTION	LOAD COUNT	WATER SYSTEMS CHECKLIST	OPERATIONAL	
			YES	NO
1. FILLER VALVE OPERATIONAL				
2. WATER VALVES WORKING				
3. FUEL TRUCK OPERATIONAL (FUEL, AIR, & WATER)				
4. OPERATOR'S CONTROLS FUNCTIONAL				
5. FRESH WATER SYSTEM FILLING				
6. FRESH WATER SYSTEM FILLING				
7. SPENDING AND BUCKET CAPACITY				

UTL CANTON SUPERVISOR

DAY	APT	NIGHT
6:00	400	1200
8:00	600	100
10:00	600	200
11:00	200	200
12:00	400	400
1:00	600	600
2:00	1000	800
2:00	1100	700

EO UTILTY COST	COST CENTER	INS
WORKING INS.	81	4
WORKING INS.	81	
WORKING INS.	81	
DELAY INS.	82	1
MAINT. INS.	84	N/A
STANDARD INS.	82	N/A
TOTAL INS.	87	5

*NOTE: THIS IS A SOLE SOURCE
ECONOMIC REPORT
PREPARED BY UTL

SUPERVISOR SIGNATURE

BRIDGIER COAL COMPANY
PRE OPERATION INSPECTION CHECKLIST FOR WATER WAGON OPERATOR SHIFT REPORT

OPERATOR: [REDACTED] UNIT NO.: 744
DATE: 6-5-12 SHIFT: DAY AFT NIGHT

LOADING INFORMATION	LOAD COUNT	WATER SYSTEMS CHECKLIST	OPERATIONAL		ACTION TAKEN
			YES	NO	
UNIT: <u>276</u>	LOCATION: <u>111</u>	1. FILLER HOLE SCREEN (in pipe and tank)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>60</u>	<u>111</u>	2. DRIVE WAGON WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>60</u>	<u>111</u>	3. FILL TRUCK CONNECTIONS CLEAN, FLUSHED, & COVERED	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>60</u>	<u>111</u>	4. OPERATOR'S CONTROLS WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>60</u>	<u>111</u>	5. PUMP DRIVE MOTOR FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>60</u>	<u>111</u>	6. TANK SPRAYING FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>60</u>	<u>111</u>	7. SPRAYERS AND WATER CHANGES WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

UTILIZATION SUMMARY

DAY	AFT	NIGHT
7	400	1200
8	500	1500
9	600	200
10	700	300
11	600	400
12	500	500
13	1900	600
14	1100	700

EQ. UTILIZ. DIST.	COST CENTER	HRS
WORK HRS. 01		
WORK HRS. 01		
WORK HRS. 01		
DELAY HRS. 03	N/A	
MAINT. HRS. 04	N/A	
STANDBY HRS. 02	N/A	
TOTAL HRS. *	07	

*NOTE: TOTAL HRS. SHOULD EQUAL SCHEDULED SHIFT TIME (MINUS 8 OR 12 HRS.)

EXPLANATION OF ABNORMAL DELAYS

SUPERVISOR SIGNATURE: _____

BRIDGIER COAL COMPANY
PRE OPERATION INSPECTION CHECKLIST FOR WATER TRUCK OPERATOR SHIFT REPORT

OPERATOR: [REDACTED] UNIT NO.: 747
DATE: 6-5-12 SHIFT: DAY AFT NIGHT

LOADING INFORMATION	LOAD COUNT	WATER SYSTEMS CHECKLIST	OPERATIONAL		ACTION TAKEN
			YES	NO	
UNIT: [REDACTED]	LOCATION: [REDACTED]	1. FILLER HOLE SCREEN (in pipe and tank)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
[REDACTED]	[REDACTED]	2. DRIVE WAGON WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
[REDACTED]	[REDACTED]	3. FILL TRUCK CONNECTIONS CLEAN, FLUSHED, & COVERED	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
[REDACTED]	[REDACTED]	4. OPERATOR'S CONTROLS WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
[REDACTED]	[REDACTED]	5. PUMP DRIVE MOTOR FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
[REDACTED]	[REDACTED]	6. TANK SPRAYING FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
[REDACTED]	[REDACTED]	7. SPRAYERS AND WATER CHANGES WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

UTILIZATION SUMMARY

7-R-2
2-Plant 9

DAY	AFT	NIGHT
6	400	1200
7	500	1500
8	600	200
9	700	300
10	600	400
11	500	500
12	1900	600
13	1100	700

EQ. UTILIZ. DIST.	COST CENTER	HRS
WORK HRS. 01		
WORK HRS. 01		
WORK HRS. 01		
DELAY HRS. 03	N/A	
MAINT. HRS. 04	N/A	
STANDBY HRS. 02	N/A	
TOTAL HRS. *	07	

*NOTE: TOTAL HRS. SHOULD EQUAL SCHEDULED SHIFT TIME (MINUS 8 OR 12 HRS.)

EXPLANATION OF ABNORMAL DELAYS

SUPERVISOR SIGNATURE: _____

BRIDGEMOUNT COAL COMPANY
PRE OPERATION INSPECTION CHECKLIST FOR WATER TRUCK OPERATOR SHIFT REPORT

OPERATOR: [REDACTED] UNIT NO.: 744
 DATE: 6/4/12 SHIFT: DAY ~~AFT~~ NIGHT

LOADING INFORMATION	LOAD COUNT	WATER SYSTEMS CHECKLIST	OPERATIONAL		ACTION TAKEN
			YES	NO	
UNIT: <u>744</u>	LOCATION: <u>1</u>	1. FILLER HOSE SECURED (in room and draw)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>708</u>	<u>R2</u>	2. COAL VALVES W/SLANG	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		3. FIRE TRUCK CONNECTIONS CLEAN, FLUSHED & COVERED	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		4. OPERATOR'S CONNECTIONS WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		5. PUMP OIL/LUB ACTION FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		6. TANK STRUTS FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		7. SPRINKLERS AND WATER CANNON'S WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

9

UTILIZATION SUPERVISOR

DAY	AFT	SHIFT
6:00	4:00	12:00
8:00	5:00	1:00
10:00	5:00	2:00
11:00	2:00	3:00
12:00	5:00	4:00
1:00	5:00	5:00
2:00	10:00	6:00
3:00	11:00	7:00

EQ. UTILIZ. DIST.	COST CENTER	HRS
WORK HRS.	01	
WORK HRS.	01	
WORK HRS.	01	
DELAY HRS.	03	N/A
MAINT. HRS.	04	N/A
STANDBY HRS.	02	N/A
TOTAL HRS.*	07	

*NOTE: TOTAL HRS. SHOULD EQUAL SCHEDULED SHIFT TIME MINUS 8 OR 12 HRS.

EXPLANATION OF ABNORMAL DELAYS

SUPERVISOR SIGNATURE

BRIDGEMOUNT COAL COMPANY
PRE OPERATION INSPECTION CHECKLIST FOR WATER WAGON OPERATOR SHIFT REPORT

OPERATOR: [REDACTED] UNIT NO.: 744
 DATE: 6-5-12 SHIFT: DAY ~~AFT~~ NIGHT

LOADING INFORMATION	LOAD COUNT	WATER SYSTEMS CHECKLIST	OPERATIONAL		ACTION TAKEN
			YES	NO	
UNIT: <u>744</u>	LOCATION: <u>1</u>	1. FILLER HOSE SECURED (in room and draw)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>60</u>	<u>11</u>	2. COAL VALVES W/SLANG	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		3. FIRE TRUCK CONNECTIONS CLEAN, FLUSHED & COVERED	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		4. OPERATOR'S CONNECTIONS WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		5. PUMP OIL/LUB ACTION FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		6. TANK STRUTS FOR LEAKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		7. SPRINKLERS AND WATER CANNON'S WORKING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

UTILIZATION SUPERVISOR

DAY	AFT	SHIFT
6:00	4:00	12:00
8:00	5:00	1:00
10:00	6:00	2:00
11:00	7:00	3:00
12:00	6:00	4:00
1:00	5:00	5:00
2:00	10:00	6:00
3:00	11:00	7:00

EQ. UTILIZ. DIST.	COST CENTER	HRS
WORK HRS.	01	
WORK HRS.	01	
WORK HRS.	01	
DELAY HRS.	03	N/A
MAINT. HRS.	04	N/A
STANDBY HRS.	02	N/A
TOTAL HRS.*	07	<u>10</u>

*NOTE: TOTAL HRS. SHOULD EQUAL SCHEDULED SHIFT TIME MINUS 8 OR 12 HRS.

EXPLANATION OF ABNORMAL DELAYS

SUPERVISOR SIGNATURE