# APPENDIX F – EMISSIONS DATA

|                                             | Area IV | N - Preferred | Alternative E | missions (to | ns/yr) |
|---------------------------------------------|---------|---------------|---------------|--------------|--------|
| Emission Source Category                    | PM10    | PM2.5         | NOX           | со           | voc    |
| Overburden Drilling and Blasting            | 1.64    | 0.47          | 2.50          | 9.84         |        |
| Coal Seam Drilling and Blasting             | 2.36    | 0.68          | 30.70         | 121.0        |        |
| Overburden Dragline Stripping               | 30.76   | 2.72          |               |              |        |
| Mine Extraction Operations and Loading      | 77.63   | 8.98          | 73.68         | 34.44        | 8.04   |
| Coal Haul Truck to Stockpiles               | 137.6   | 13.76         | 62.42         | 33.89        | 7.05   |
| Plant Vehicle Travel                        | 49.8    | 4.98          | 16.48         | 4.84         | 1.64   |
| Unloading at Stockpiles and Railcar Loading | 0.35    | 0.11          |               |              |        |
| Reclamation                                 | 58.78   | 11.76         |               |              |        |
| Wind Erosion (Coal and Spoils piles)        | 28.67   | 10.25         |               |              |        |
| TOTALS                                      | 387.6   | 53.7          | 185.8         | 204.0        | 16.7   |

|                                             | Area III - Preferred Alternative Emissions (tons/yr) |       |       |       |      |  |  |  |  |  |  |  |
|---------------------------------------------|------------------------------------------------------|-------|-------|-------|------|--|--|--|--|--|--|--|
| Emission Source Category                    | PM10                                                 | PM2.5 | NOX   | со    | VOC  |  |  |  |  |  |  |  |
|                                             |                                                      |       |       |       |      |  |  |  |  |  |  |  |
| Overburden Drilling and Blasting            | 1.72                                                 | 0.50  | 2.50  | 9.84  |      |  |  |  |  |  |  |  |
| Coal Seam Drilling and Blasting             | 2.47                                                 | 0.72  | 30.70 | 121.0 |      |  |  |  |  |  |  |  |
| Overburden Dragline Stripping               | 32.20                                                | 2.85  |       |       |      |  |  |  |  |  |  |  |
| Mine Extraction Operations and Loading      | 105.96                                               | 11.60 | 68.06 | 31.13 | 7.4( |  |  |  |  |  |  |  |
| Coal Haul Truck to Stockpiles               | 138.8                                                | 13.88 | 62.98 | 34.19 | 7.11 |  |  |  |  |  |  |  |
| Plant Vehicle Travel                        | 130.9                                                | 13.09 | 17.25 | 5.07  | 1.72 |  |  |  |  |  |  |  |
| Unloading at Stockpiles and Railcar Loading | 0.36                                                 | 0.11  |       |       |      |  |  |  |  |  |  |  |
| Reclamation                                 | 65.73                                                | 13.15 |       |       |      |  |  |  |  |  |  |  |
| Coal Preparation Plant (Ex Stockpile)       | 13.89                                                | 4.05  |       |       |      |  |  |  |  |  |  |  |
| Wind Erosion (Coal and Spoils piles)        | 30.15                                                | 10.78 |       |       |      |  |  |  |  |  |  |  |
| TOTALS                                      | 522.3                                                | 70.7  | 181.5 | 201.2 | 16.2 |  |  |  |  |  |  |  |

**Total Preferred Action** 

909.9

124.43 367.3

405.2 33.0

|                                             | A      | II Emissions - | Proposed Ac | tion (tons/yr) |       |
|---------------------------------------------|--------|----------------|-------------|----------------|-------|
| Emission Source Category                    | PM10   | PM2.5          | NOX         | СО             | VOC   |
|                                             |        |                |             |                |       |
| Overburden Drilling and Blasting            | 3.36   | 0.97           | 4.99        | 19.67          |       |
| Coal Seam Drilling and Blasting             | 4.82   | 1.40           | 61.39       | 241.96         |       |
| Overburden Dragline Stripping               | 62.96  | 5.56           |             |                |       |
| Mine Extraction Operations and Loading      | 183.59 | 20.58          | 141.75      | 65.57          | 15.44 |
| Coal Haul Truck to Stockpiles               | 276.47 | 27.65          | 125.40      | 68.08          | 14.16 |
| Plant Vehicle Travel                        | 180.73 | 18.07          | 33.73       | 9.91           | 3.36  |
| Unloading at Stockpiles and Railcar Loading | 0.71   | 0.22           |             |                |       |
| Reclamation                                 | 124.50 | 24.90          |             |                |       |
| Coal Preparation Plant (Ex Stockpile)       | 13.89  | 4.05           |             |                |       |
| Wind Erosion (Coal and Spoils piles)        | 58.82  | 21.03          |             |                |       |
| TOTALS                                      | 909.86 | 124.43         | 367.26      | 405.18         | 32.96 |

#### Table F-1 PARTICULATE MATTER EMISSION ESTIMATION - FUGITIVE EMISSIONS FROM AREA IV NORTH - COAL MINE EQUIPMENT AND OPERATIONS - PREFERRED ALTERNATIVE

|                                                   |             | Tons Coal P | roduced                       |                                                                                                 | 4153000          |                   |        |                  | Cubic Yd          | s Overbur             | den + Inter    | burden      |                  | 6715401           |               |                    |             |                                     |                           |                                   |        |
|---------------------------------------------------|-------------|-------------|-------------------------------|-------------------------------------------------------------------------------------------------|------------------|-------------------|--------|------------------|-------------------|-----------------------|----------------|-------------|------------------|-------------------|---------------|--------------------|-------------|-------------------------------------|---------------------------|-----------------------------------|--------|
| Quarry Operations                                 | Maximum Tra |             | Emission                      | ssion Emission Factor Hourty Emisson Rate (lb/hr) Operating Schedule Controls (ton per year) Ef |                  |                   |        |                  |                   | Control<br>Efficiency | Control        | led Emissic | on Rates (N      | lo Hourly A       | verage for Bl | astin              |             |                                     |                           |                                   |        |
| Quarry Operations                                 | Emissior    | ns Basis    | Factor Units                  | PM                                                                                              | PM <sub>10</sub> | PM <sub>2.5</sub> | РМ     | PM <sub>10</sub> | PM <sub>2.5</sub> | Hours/<br>Week        | Weeks/<br>Year | РМ          | PM <sub>10</sub> | PM <sub>2.5</sub> | %             | PM<br>(Typ. lb/hr) | PM<br>(tpy) | PM <sub>10</sub><br>(Typ.<br>lb/hr) | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(Typ. lb/hr) | F<br>( |
| Drilling - Overburden +<br>Interburden 1          | 9,557       | Holes/yr    |                               | 1.3                                                                                             | 0.676            | 0.195             | 1.958  | 1.018            | 0.294             | 122                   | 52             | 6.21        | 3.23             | 0.93              | 50.0%         | 0.98               | 3.11        | 0.509                               | 1.62                      | 0.147                             | 0      |
| Drilling - Coal <sup>1</sup>                      | 71,566      | Holes/yr    |                               | 0.22                                                                                            | 0.114            | 0.033             | 29.782 | 15.487           | 4.646             | 122                   | 52             | 7.87        | 4.09             | 1.18              | 50.0%         | 14.89              | 3.94        | 7.74                                | 2.05                      | 2.32                              | 0      |
| Overburden Blasting <sup>2</sup>                  | 10          | blast/yr    |                               | 9.7                                                                                             | 5.04             | 1.51              | N/A    | N/A              | N/A               | ٢                     | I/A            | 0.05        | 0.03             | 0.01              | 0.00%         | N/A                | 0.05        | N/A                                 | 0.03                      | N/A                               | 0      |
| Coal Blasting <sup>2</sup>                        | 123         | blast/yr    |                               | 9.7                                                                                             | 5.04             | 1.51              | N/A    | N/A              | N/A               | ١                     | I/A            | 0.60        | 0.31             | 0.09              | 0.00%         | N/A                | 0.60        | N/A                                 | 0.31                      | N/A                               | 0      |
| Overburden Dragline <sup>3</sup>                  | 6.72E+06    | cu.yds/yr   |                               | 0.048                                                                                           | 0.0092           | 8.09E-04          | 54.42  | 10.47            | 0.93              | 113                   | 52             | 159.88      | 30.76            | 2.72              | 0.00%         | 54.42              | 159.88      | 10.47                               | 30.76                     | 0.93                              | 2      |
| Overburden Dozers <sup>4</sup>                    | 1600        | hrs/month   | lb/hr/dozer<br>(12 dozers/hr) | 3.00                                                                                            | 0.54             | 6.60E-02          | 36.02  | 6.43             | 0.79              | 175                   | 52             | 28.82       | 5.14             | 0.63              | 60.00%        | 14.41              | 11.53       | 2.57                                | 2.06                      | 0.32                              | (      |
| Dozers - Maint and<br>Replace <sup>4</sup>        | 2400        | hrs/month   | lb/hr/dozer<br>(12 dozers/hr) | 24.95                                                                                           | 5.94             | 0.55              | 299.39 | 71.26            | 6.59              | 1330                  | 52             | 359.27      | 85.51            | 7.90              | 60.00%        | 119.8              | 143.7       | 28.5                                | 34.2                      | 2.63                              |        |
| Truck Loading Coal<br>with Payloader <sup>5</sup> | 4.15E+06    | tons/yr     | lb/ton<br>(7 Loaders)         | 0.05                                                                                            | 0.0089           | 0.0010            | 5.967  | 0.991            | 0.113             | 715                   | 52             | 110.93      | 18.42            | 2.11              | 50.00%        | 2.98               | 55.47       | 0.50                                | 9.212                     | 0.149                             |        |
| Scrapers <sup>6</sup>                             | 320         | hrs/month   | lb/VMT<br>(3 Scapers)         | 2.26E-01                                                                                        | 1.22E-01         | 7.01E-03          | 0.452  | 0.244            | 0.014             | 74                    | 52             | 0.87        | 0.47             | 0.03              | 50.00%        | 0.23               | 0.43        | 0.12                                | 0.235                     | 0.0070                            | (      |
| Road Graders <sup>6</sup>                         | 1,580       | hrs/month   | lb/VMT<br>(4 Graders)         | 2.26E-01                                                                                        | 1.22E-01         | 7.01E-03          | 2.230  | 1.206            | 0.069             | 74                    | 52             | 4.29        | 2.32             | 0.13              | 50.00%        | 1.11               | 2.15        | 0.60                                | 1.160                     | 0.0346                            | (      |
| Coal Processing Plant 7                           | 4,153,000   | tons/yr     | lb/ton coal                   | 7.40E-01                                                                                        | 3.50E-01         | 5.30E-02          | 9.46   | 4.43             | 1.30              |                       |                | 41.45       | 19.39            | 5.65              | 65.00%        | 3.31               | 14.51       | 1.55                                | 6.79                      | 0.45                              |        |
|                                                   |             |             |                               |                                                                                                 |                  |                   |        |                  |                   |                       | CATE           | GORY SUB    | TOTAL: O         | verburder         | n Drill/Blast |                    | 3.15        |                                     | 1.64                      |                                   |        |
|                                                   |             |             |                               |                                                                                                 |                  |                   |        |                  |                   |                       |                | CATEGOR     | RY SUBTO         | TAL: Coa          | I Drill/Blast |                    | 4.53        |                                     | 2.36                      |                                   |        |
|                                                   |             |             |                               |                                                                                                 |                  |                   |        |                  |                   |                       | CATE           | GORY SUB    | TOTAL: N         | /line Extra       | ction Oper.   |                    | 373.2       |                                     | 77.6                      |                                   |        |
| -                                                 |             |             |                               |                                                                                                 |                  |                   |        |                  |                   |                       |                |             |                  |                   | TOTAL         |                    | 380.9       |                                     | 81.6                      |                                   |        |

NOTES:

1

1 - Emission factor is for uncontrolled drilling for either overburden or coal from AP-42, Western Surface Coal Mining, Table 11.1-4 (7/98). Holes per cu.yd. overburden = 702; holes per ton coal = 58; PM10 = 0.52, PM2.5 = 0.15 x PM (Company data)

2 - The emission factor for overburden/coal seam blasting is in units of lb/blast. Calculation is based on surface area per blast, which is estimated as follows:

Blasted material /yr = 29,449,000 cu. Yds/133 blasts/yr \* 27 cu.ft / 1 cu.yd. = 5,978,000 cu.ft /blast

Area = 5,978,000 cu.ft./blast / 400 ft avg. depth = 149,460 sq.ft./blast

Emission Factor PM (lb/blast) = Area^1.5 x 0.000014 = (5,978,000)^1.5 x 0.000014 = 9.7 lb/blast; AP-42, Table 11.9-1, PM<sub>10</sub> is 52% of the PM Emission Factor

3 - Overburden dragline removal factor (TSP) = 0.0021 \* D ^ 1.1 / M ^ 0.3; (< 15 micron PM ) = 0.0021 \* D ^ 0.7 / M ^ 0.3; Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP)

4 - Coal Bulldozing factor (TSP) = 78.4\* s 1.2 / M 1.3; (< 15 micron PM) = 18.6\* s 1.5 / M 1.4; Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP)

5 - Truck loading of coal with Front-End Loaders (TSP) = 1.16 /M ^ 1.2; (< 15 micron) = 0.119 / M ^ 0.9 Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP)

6 - Emission factor for scrapers and graders from Document AP-42, Western Surface Coal Mining, Section 11.9, Table 11.9-1 (7/98). EF(grading, TSP) = 0.4 S ^ 2.5; EF(PM10) = 0.051 S ^ 2.0 Veh. Avg working speed (S) = 2 mph for emission factor correlation.

7 - Coal Processing plant located in Area III, emissions are the contribution due to Area IV North production only. Table entry is a composite of all fugitive sources (belts, drop points, transfer points) in the plant. Emission factors primarily from AP-42 13.2.4 (Moisture = 8%, Wind Speed = 9.5) mph

From facitliy data: Drop Height (D) = 30 ft; M = 7.9% moisture

From facitly data: s = 5.5 % Silt; M = 7.9% moisture

From facitliy data: M = 7.9% moisture

#### Table F-2 PARTICULATE MATTER EMISSION ESTIMATION FUGITIVE EMISSIONS FROM AREA III - COAL MINE EQUIPMENT AND OPERATIONS - PREFERRED ALTERNATIVE

|                                                   |           | Tons Coal I  | Produced                      |          | 4347000          |                   |        |                          | Cubic Yd          | s Overbur      | den + Inter    | rburden               |                          | 7029099           |                       |                    |             |                                     |                           |                                   |        |
|---------------------------------------------------|-----------|--------------|-------------------------------|----------|------------------|-------------------|--------|--------------------------|-------------------|----------------|----------------|-----------------------|--------------------------|-------------------|-----------------------|--------------------|-------------|-------------------------------------|---------------------------|-----------------------------------|--------|
|                                                   | Maximum T | ransfer Rate | Emission                      | E        | Emission Fa      | ctor              |        | entative Un<br>Emisson R |                   | Operating      | g Schedule     | Annual En<br>Controls | nission Rat<br>s (ton pe |                   | Control<br>Efficiency | Control            | led Emissic | on Rates (N                         | o Hourly A                | verage for Bl                     | astin  |
| Quarry Operations                                 | or Emiss  | ions Basis   | Factor Units                  | РМ       | PM <sub>10</sub> | PM <sub>2.5</sub> | РМ     | PM <sub>10</sub>         | PM <sub>2.5</sub> | Hours/<br>Week | Weeks/<br>Year | РМ                    | PM <sub>10</sub>         | PM <sub>2.5</sub> | %                     | PM<br>(Typ. lb/hr) | PM<br>(tpy) | PM <sub>10</sub><br>(Typ.<br>lb/hr) | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(Typ. lb/hr) | P<br>( |
| Drilling - Overburden +<br>Interburden 1          | 10,003    | Holes/yr     |                               | 1.3      | 0.676            | 0.195             | 2.050  | 1.066                    | 0.307             | 122            | 52             | 6.50                  | 3.38                     | 0.98              | 50.0%                 | 1.02               | 3.25        | 0.533                               | 1.69                      | 0.154                             | 0      |
| Drilling - Coal <sup>1</sup>                      | 74,910    | Holes/yr     |                               | 0.22     | 0.114            | 0.033             | 31.173 | 16.210                   | 4.863             | 122            | 52             | 8.24                  | 4.28                     | 1.24              | 50.0%                 | 15.59              | 4.12        | 8.10                                | 2.14                      | 2.43                              | 0      |
| Overburden Blasting <sup>2</sup>                  | 10        | blast/yr     |                               | 9.7      | 5.04             | 1.51              | N/A    | N/A                      | N/A               | ٢              | I/A            | 0.05                  | 0.03                     | 0.01              | 0.00%                 | N/A                | 0.05        | N/A                                 | 0.03                      | N/A                               | 0.     |
| Coal Blasting <sup>2</sup>                        | 129       | blast/yr     |                               | 9.7      | 5.04             | 1.51              | N/A    | N/A                      | N/A               | ١              | I/A            | 0.63                  | 0.33                     | 0.10              | 0.00%                 | N/A                | 0.63        | N/A                                 | 0.33                      | N/A                               | 0      |
| Overburden Dragline <sup>3</sup>                  | 7.03E+06  | cu.yds/yr    |                               | 0.048    | 0.0092           | 8.09E-04          | 56.96  | 10.96                    | 0.97              | 113            | 52             | 167.35                | 32.20                    | 2.85              | 0.00%                 | 56.96              | 167.35      | 10.96                               | 32.20                     | 0.97                              | 2      |
| Overburden Dozers <sup>4</sup>                    | 1675      | hrs/month    | lb/hr/dozer<br>(12 dozers/hr) | 3.00     | 0.54             | 6.60E-02          | 36.02  | 6.43                     | 0.79              | 175            | 52             | 30.17                 | 5.38                     | 0.66              | 60.00%                | 14.41              | 12.07       | 2.57                                | 2.15                      | 0.32                              | 0      |
| Dozers - Maint and<br>Replace <sup>4</sup>        | 2530      | hrs/month    | lb/hr/dozer<br>(12 dozers/hr) | 41.29    | 9.96             | 0.91              | 495.47 | 119.57                   | 10.90             | 1330           | 52             | 626.77                | 151.26                   | 13.79             | 60.00%                | 198.2              | 250.7       | 47.8                                | 60.5                      | 4.36                              |        |
| Truck Loading Coal<br>with Payloader <sup>5</sup> | 4.35E+06  | tons/yr      | lb/ton<br>(7 Loaders)         | 0.05     | 0.0089           | 0.0010            | 6.246  | 1.037                    | 0.119             | 715            | 52             | 116.11                | 19.28                    | 2.21              | 50.00%                | 3.12               | 58.06       | 0.52                                | 9.642                     | 0.156                             |        |
| Scrapers <sup>6</sup>                             | 335       | hrs/month    | lb/VMT<br>(3 Scapers)         | 2.26E-01 | 1.22E-01         | 7.01E-03          | 0.473  | 0.256                    | 0.015             | 74             | 52             | 0.91                  | 0.49                     | 0.03              | 50.00%                | 0.24               | 0.45        | 0.13                                | 0.246                     | 0.0073                            | (      |
| Road Graders <sup>6</sup>                         | 1,654     | hrs/month    | lb/VMT<br>(4 Graders)         | 2.26E-01 | 1.22E-01         | 7.01E-03          | 2.334  | 1.263                    | 0.072             | 74             | 52             | 4.49                  | 2.43                     | 0.14              | 50.00%                | 1.17               | 2.25        | 0.63                                | 1.215                     | 0.0362                            | 0      |
| Coal Processing Plant 7                           | 4,347,000 | tons/yr      | lb/ton coal                   | 7.40E-01 | 3.50E-01         | 5.30E-02          | 9.91   | 4.63                     | 1.36              |                |                | 43.38                 | 20.30                    | 5.92              | 65.00%                | 3.47               | 15.18       | 1.62                                | 7.10                      | 0.48                              |        |
|                                                   |           |              |                               |          |                  |                   |        |                          |                   |                | CATE           | GORY SUB              | OTAL: O                  | verburder         | Drill/Blast           |                    | 3.30        |                                     | 1.72                      |                                   |        |
|                                                   |           |              |                               |          |                  |                   |        |                          |                   |                |                | CATEGOR               | Y SUBTO                  | TAL: Coa          | l Drill/Blast         |                    | 4.75        |                                     | 2.47                      |                                   |        |
|                                                   |           |              |                               |          |                  |                   |        |                          |                   |                | CATE           | GORY SUB              | TOTAL: M                 | ine Extra         | ction Oper.           |                    | 490.9       |                                     | 106.0                     |                                   |        |
| •                                                 |           |              |                               |          |                  |                   |        |                          |                   |                |                |                       |                          |                   | TOTAL                 |                    | 514.1       |                                     | 117.2                     |                                   | 1      |

#### NOTES:

1

1 - Emission factor is for uncontrolled drilling for either overburden or coal from AP-42, Western Surface Coal Mining, Table 11.1-4 (7/98). Holes per cu.yd. overburden = 702; holes per ton coal = 58; PM10 = 0.52, PM2.5 = 0.15 x PM (Company data)

2 - The emission factor for overburden/coal seam blasting is in units of lb/blast. Calculation is based on surface area per blast, which is estimated as follows:

Blasted material /yr = 29,449,000 cu. Yds/133 blasts/yr \* 27 cu.ft / 1 cu.yd. = 5,978,000 cu.ft./blast

Area = 5,978,000 cu.ft./blast / 400 ft avg. depth = 149,460 sq.ft./blast

Emission Factor PM (lb/blast) = Area^1.5 x 0.000014 = (5.978.000)^1.5 x 0.000014 = 9.7 lb/blast: AP-42. Table 11.9-1. PM to is 52% of the PM Emission Factor

3 - Overburden dragline removal factor (TSP) = 0.0021 \* D ^ 1.1 / M ^ 0.3; (< 15 micron PM ) = 0.0021 \* D ^ 0.7 / M ^ 0.3; Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP)

4 - Coal Bulldozing factor (TSP) = 78.4\* s ^1.2 / M ^1.3; (< 15 micron PM) = 18.6\* s ^1.5 / M ^1.4; Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP) 5 - Truck loading of coal with Front-End Loaders (TSP) = 1.16 / M ^1.2; (< 15 micron) = 0.119 / M ^0.9</p>

From facitly data: s = 5.5 % Silt; M = 7.9% moisture From facitly data: M = 7.9% moisture

From facitly data: Drop Height (D) = 30 ft; M = 7.9% moisture

6 - Emission factor for scrapers and graders from Document AP-42, Western Surface Coal Mining, Section 11.9, Table 11.9-1 (7/98). EF(grading, TSP) = 0.4 S A 2.5; EF(PM10) = 0.051 S A 2.0 Veh. Avg working speed (S) = 2 mph for emission factor correlation.

7 - Coal Processing plant located in Area III, emissions are the contribution due to Area III production only. Table entry is a composite of all fugitive sources (belts, drop points, transfer points) in the plant. Emission factors primarily from AP-42 13.2.4 (Moisture = 8%, Wind Speed = 9.5) mph

#### PARTICULATE MATTER EMISSION ESTIMATION - FUGITIVE EMISSIONS FROM

#### AREA IV NORTH - COAL MINE AND PLANT VEHICLES - PREFERRED ALTERNATIVE

|                                        | Т                                       | `otal Coal |                         |                   | 4153000       | tons/yr                           |         |         |                          |                   |                                   |        |                          |                           |                            |
|----------------------------------------|-----------------------------------------|------------|-------------------------|-------------------|---------------|-----------------------------------|---------|---------|--------------------------|-------------------|-----------------------------------|--------|--------------------------|---------------------------|----------------------------|
| Mine and Plant Vechicles               | Gross<br>Vehicle<br>Weight <sup>4</sup> | Emissior   | n factor <sup>1</sup> ( | (Ib/VMT)          | Avg.<br>Speed | Oper.<br>Hours/Month <sup>2</sup> |         |         | ncontrolled<br>Rate (tpy | l Emission<br>/)  | Control Measure                   |        | Controlled Emission Rate |                           |                            |
|                                        | tons                                    | PM         | PM <sub>10</sub>        | PM <sub>2.5</sub> | (MPH)         |                                   |         |         | PM <sub>10</sub>         | PM <sub>2.5</sub> |                                   | (%)    | PM<br>(tpy)              | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(tpy) |
| Coal Haulage, Stockpile and Ro         | adway Mai                               | ntenance   | )                       |                   |               |                                   |         |         |                          |                   |                                   |        |                          |                           |                            |
| Coal Haul Trucks (240-ton<br>capacity) | 280                                     | 24.36      | 6.93                    | 0.69              | 35            | 3244                              | 113,537 | 1382.79 | 393.22                   | 39.32             |                                   | 65.00% | 483.98                   | 137.63                    | 13.76                      |
| Water Trucks                           | 62                                      | 12.36      | 3.51                    | 0.35              | 10            | 505                               | 30,300  | 187.25  | 53.25                    | 5.32              |                                   | 65.00% | 65.54                    | 18.64                     | 1.86                       |
| Scrapers (Travel Mode)                 | 62                                      | 12.36      | 3.51                    | 0.35              | 15            | 290                               | 26,100  | 161.29  | 45.87                    | 4.59              | Chem.<br>Suppressant<br>and Water | 65.00% | 56.45                    | 16.05                     | 1.61                       |
| End Dump Trucks                        |                                         |            |                         |                   |               | None Used                         |         |         |                          |                   | Application                       |        |                          |                           |                            |
| LIght/Medium Veh (e.g., Pick-<br>ups)  | 3                                       | 3.16       | 0.90                    | 0.09              | 25            | 640                               | 96,000  | 151.84  | 43.18                    | 4.32              |                                   | 65.00% | 53.14                    | 15.11                     | 1.51                       |
|                                        |                                         |            | Тс                      | tal Plant         | Vehicle tra   | avel                              |         |         |                          |                   |                                   |        | 175.13                   | 49.80                     | 4.98                       |

NOTES:

1 Emission Factors for the coal haul road from AP-42, Section 13.2.2 Equation 1a, with constants from Table 13.2.2-2 - See results below \*Assumed quarry surface silt content = 8.3% (Mean value for stone quarrying and processing, AP-42 Table 13.2.2-1)

\*Assumed days per year with > 0.01 inch moisture = 60, Figure 13.2.2-1

2 Total vehicle category hours per month based on facility estimates for Area IV North development and operations.

3 Total Vehicle Miles Traveled (VMT) estimated by the capacity of coal haul trucks, distance to/from Lowe stockpile (16,600 ft. one way). For other categories, VMT estimated from average speed and hours per month

4 Control efficiency for BNCC control measures estimated from guidance in AP-42, Section 13.2 for unpaved industrial roads

For Unpaved Roads within Area IV North:

 $\begin{array}{ll} \mathsf{AP-42} \ 13.2.2, \ \mathsf{Eqns} \ 1a \ (11/06) & \mathsf{EF} = k \ (s/12)^a \ (W/3) \ ^b \\ \mathsf{EF} = \mathsf{Size} \ \mathsf{specific} \ \mathsf{emission} \ \mathsf{factor} \ (lb/VMT) \\ \mathsf{k} = \mathsf{particle} \ \mathsf{size} \ \mathsf{multiplier} = 4.9 \ \mathsf{for} \ \mathsf{PM} \ \mathsf{and} \ 1.5 \ \mathsf{for} \ \mathsf{PM}_{10}, \ \mathsf{Table} \ 13.2.2-2 \end{array}$ 

S = road surface silt content = 8.3% (obtained from facility data)

 $\mathsf{W}$  = fleet average vehicle weight for given service (tons) as listed for each category in table above

a = empirical constant, 0.7 for PM and 0.9 for  $PM_{10}$ , Table 13.2.2-2

b = empirical constant, 0.45 for PM, PM<sub>10</sub> and PM<sub>2.5</sub>. Table 13.2.2-2

p = ave. days per year with precipitation greater than 0.01 inches, obtained from Figure 13.2.2-1

# PARTICULATE MATTER EMISSION ESTIMATION - FUGITIVE EMISSIONS FROM

#### AREA III -COAL MINE AND PLANT VEHICLES - PREFERRED ALTERNATIVE

Total Coal

4347000 tons/yr

| Mine and Plant Vechicles               | s Gross<br>Vehicle<br>Weight <sup>4</sup> Emission factor <sup>1</sup> (Ib/VMT)<br>tons PM PM <sub>10</sub> PM <sub>2.5</sub> |          | Avg. Oper.<br>Speed<br>(MPH) Hours/Month |                   | Annual VMT <sup>3</sup><br>(miles/yr) | Max. Uncontrolled Emission<br>Rate (tpy) |         |         | Control Measure  | Control<br>Efficiency 4 | Controlled Emission Rate          |        |             |                           |                            |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------|-------------------|---------------------------------------|------------------------------------------|---------|---------|------------------|-------------------------|-----------------------------------|--------|-------------|---------------------------|----------------------------|
|                                        |                                                                                                                               |          | PM <sub>10</sub>                         | PM <sub>2.5</sub> | (MPH)                                 |                                          | (       | PM      | PM <sub>10</sub> | PM <sub>2.5</sub>       |                                   | (%)    | PM<br>(tpy) | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(tpy) |
| Coal Haulage, Stockpile and Ro         | adway Mai                                                                                                                     | ntenance |                                          |                   |                                       |                                          |         |         |                  |                         |                                   |        |             |                           |                            |
| Coal Haul Trucks (240-ton<br>capacity) | 280                                                                                                                           | 24.36    | 6.93                                     | 0.69              | 35                                    | 3273                                     | 114,545 | 1395.07 | 396.71           | 39.67                   |                                   | 65.00% | 488.27      | 138.85                    | 13.88                      |
| Water Trucks                           | 62                                                                                                                            | 12.36    | 3.51                                     | 0.35              | 10                                    | 505                                      | 30,300  | 187.25  | 53.25            | 5.32                    |                                   | 65.00% | 65.54       | 18.64                     | 1.86                       |
| Scrapers (Travel Mode)                 | 62                                                                                                                            | 12.36    | 3.51                                     | 0.35              | 15                                    | 320                                      | 28,800  | 177.98  | 50.61            | 5.06                    | Chem.<br>Suppressant<br>and Water | 65.00% | 62.29       | 17.71                     | 1.77                       |
| End Dump Trucks                        | 175                                                                                                                           | 19.71    | 5.61                                     | 0.56              | 18.5                                  | 730                                      | 81,000  | 798.45  | 227.05           | 22.71                   | Application                       | 65.00% | 279.46      | 79.47                     | 7.95                       |
| Llght/Medium Veh (e.g., Pick-<br>ups)  | 3                                                                                                                             | 3.16     | 0.90                                     | 0.09              | 25                                    | 640                                      | 96,000  | 151.84  | 43.18            | 4.32                    |                                   | 65.00% | 53.14       | 15.11                     | 1.51                       |
|                                        | Total Plant Vehicle travel                                                                                                    |          |                                          |                   |                                       |                                          |         |         |                  |                         |                                   | 460.43 | 130.93      | 13.09                     |                            |

NOTES:

1 Emission Factors for the coal haul road from AP-42, Section 13.2.2 Equation 1a, with constants from Table 13.2.2-2 - See results below

\*Assumed quarry surface silt content = 8.3% (Mean value for stone quarrying and processing, AP-42 Table 13.2.2-1) \*Assumed days per year with > 0.01 inch moisture = 60, Figure 13.2.2-1

2 Total vehicle category hours per month based on facility estimates for Area III continuing operations, concurrent with Area IV North production.

3 Total Vehicle Miles Traveled (VMT) estimated by the capacity of coal haul trucks, distance to/from Lowe stockpile (16,000 ft. one way). For other categories, VMT estimated from average speed and hours per month

4 Control efficiency for BNCC control measures estimated from guidance in AP-42, Section 13.2 for unpaved industrial roads

For Unpaved Roads within Area III North:

AP-42 13.2.2, Eqns 1a (11/06) EF = k (s/12)^a (W/3) ^ b

EF = Size specific emission factor (lb/VMT)

k = particle size multiplier = 4.9 for PM and 1.5 for  $PM_{10}$ , Table 13.2.2-2

S = road surface silt content = 8.3% (obtained from facility data)

W = fleet average vehicle weight for given service (tons) as listed for each category in table above

a = empirical constant, 0.7 for PM and 0.9 for PM<sub>10</sub>, Table 13.2.2-2

b = empirical constant, 0.45 for PM,  $PM_{10}$  and  $PM_{2.5}$ , Table 13.2.2-2

p = ave. days per year with precipitation greater than 0.01 inches, obtained from Figure 13.2.2-1

#### VEHICLE TAILPIPE EMISSION ESTIMATION

#### AREA IV NORTH - COAL MINE AND PLANT VEHICLES -PREFERRED ALTERNATIVE

| Mine Vehicle Emission Sources           | Nominal Size<br>or Capacity <sup>2</sup> | Equipment<br>Hours per<br>Month <sup>3</sup> | NOX Emission<br>Factor <sup>4</sup> | Controlled NOX<br>Emissions <sup>5</sup> | Controlled NOX<br>Emissions | CO Emission<br>Factor <sup>4</sup> | Controlled CO<br>Emissions <sup>5</sup> | Controlled CO<br>Emissions | VOC Emission<br>Factor <sup>4</sup> | Controlled VOC<br>Emissions <sup>5</sup> | Controlled VOC<br>Emissions |
|-----------------------------------------|------------------------------------------|----------------------------------------------|-------------------------------------|------------------------------------------|-----------------------------|------------------------------------|-----------------------------------------|----------------------------|-------------------------------------|------------------------------------------|-----------------------------|
| Description (No. of Units) <sup>1</sup> | hp                                       | h/month                                      | lb/hr/unit                          | Avg. lb/day                              | Ton/yr                      | lb/hr/unit                         | Avg. lb/day                             | Ton/month                  | lb/hr/unit                          | Avg. lb/day                              | Ton/month                   |
|                                         |                                          |                                              | Min                                 | e Operation Ed                           | quipment Emis               | sion Sources                       |                                         | •                          |                                     |                                          |                             |
| Large Front-End Loaders (7)             | 500                                      | 1250                                         | 3.425                               | 164.66                                   | 25.69                       | 1.5182                             | 72.99                                   | 11.39                      | 0.365                               | 17.55                                    | 2.738                       |
| Rubber-Tire Bulldozer (1)               | 330                                      | 1250                                         | 3.425                               | 164.66                                   | 25.69                       | 1.5182                             | 72.99                                   | 11.39                      | 0.365                               | 17.55                                    | 2.738                       |
| Small Front-End Loaders (3)             | 354                                      | 450                                          | 3.2071                              | 55.51                                    | 8.66                        | 1.7411                             | 30.13                                   | 4.70                       | 0.3621                              | 6.27                                     | 0.978                       |
| Large Bulldozers (12)                   | 498                                      | 450                                          | 3.2071                              | 55.51                                    | 8.66                        | 1.7411                             | 30.13                                   | 4.70                       | 0.3621                              | 6.27                                     | 0.978                       |
| Scrapers (3)                            | 265                                      | 350                                          | 1.8284                              | 24.61                                    | 3.84                        | 0.929                              | 12.51                                   | 1.95                       | 0.2391                              | 3.22                                     | 0.502                       |
| Water Trucks (3)                        | 320                                      | 450                                          | 1.5016                              | 25.99                                    | 4.05                        | 0.3676                             | 6.36                                    | 0.99                       | 0.14                                | 2.42                                     | 0.378                       |
| End Dump Trucks (8)                     | 410                                      | 250                                          | 2.0882                              | 20.08                                    | 3.13                        | 0.7785                             | 7.49                                    | 1.17                       | 0.1987                              | 1.91                                     | 0.298                       |
| Graders (4)                             | 275                                      | 125                                          | 1.5357                              | 7.38                                     | 1.15                        | 0.421                              | 2.02                                    | 0.32                       | 0.1493                              | 0.72                                     | 0.112                       |
| Mine E                                  | xtraction Op                             | erations                                     |                                     |                                          | 73.68                       |                                    |                                         | 34.44                      |                                     |                                          | 8.04                        |
|                                         |                                          |                                              |                                     | Other On-                                | Site Mobile So              | urces                              |                                         |                            |                                     |                                          |                             |
| Maintenance Truck (35)                  | 300                                      | 250                                          | 1.615                               | 15.53                                    | 2.42                        | 0.4301                             | 4.14                                    | 0.65                       | 0.1639                              | 1.58                                     | 0.246                       |
| Light Duty Pick-up (60)                 | 230                                      | 350                                          | 1.615                               | 21.74                                    | 3.39                        | 0.4301                             | 5.79                                    | 0.90                       | 0.1639                              | 2.21                                     | 0.344                       |
| Flatbed Truck (10)                      | 385                                      | 250                                          | 2.3188                              | 22.30                                    | 3.48                        | 0.7542                             | 7.25                                    | 1.13                       | 0.2492                              | 2.40                                     | 0.374                       |
| PI                                      | ant Vehicle tr                           | avel                                         |                                     |                                          | 16.48                       |                                    |                                         | 4.84                       |                                     |                                          | 1.64                        |

NOTES:

1 - Number present of each mine operation vehicle obtained from facility projections for Area IV North, some equipment will be from operations displaced from other Navajo Mine areas.

2 - Representative horsepower rating for category. The emission factors are defined by the SCAQMD reference for vehicle categories and broad ranges of engine horsepower.

3 - Estimated average hours per month across the period of the Preferred Alternative (2012 - 2016) obtained from facility projections for Area IV North, some equipment will be from operations displaced from other Navajo Mine areas.

4 - Controlled emission factors for recent model year (2010) for diesel engines to reflect roster of new and existing equipment at Area IV North, SCAQMD 1993 Handbook, Off-road Mobile Source Emission Factors, A9-8 Tables.

5 - Hourly average emission rates estimated from the equipment hours per month, divided equally over scheduled average of 26 operating days per month.

#### VEHICLE TAILPIPE EMISSION ESTIMATION

#### AREA III COAL MINE AND PLANT VEHICLES PER YEAR - PREFERRED ALTERNATIVE

| Coal Production Area III <sup>1</sup> | 4.35E+06 |
|---------------------------------------|----------|
| <b>Coal Production Area IVN</b>       | 4153000  |

| Mine Vehicle Emission Sources           | Nominal Size or<br>Capacity <sup>2</sup> | Equipment<br>Hours per<br>Month <sup>3</sup> | NOX Emission<br>Factor <sup>4</sup> | Controlled NOX<br>Emissions <sup>5</sup> | Controlled NOX<br>Emissions | CO Emission<br>Factor <sup>4</sup> | Controlled CO<br>Emissions <sup>5</sup> | Controlled CO<br>Emissions | VOC Emission<br>Factor <sup>4</sup> | Controlled VOC<br>Emissions <sup>5</sup> | Controlled VOC<br>Emissions |
|-----------------------------------------|------------------------------------------|----------------------------------------------|-------------------------------------|------------------------------------------|-----------------------------|------------------------------------|-----------------------------------------|----------------------------|-------------------------------------|------------------------------------------|-----------------------------|
| Description (No. of Units) <sup>1</sup> | hp                                       | h/month                                      | lb/hr/unit                          | Avg. lb/day                              | Ton/yr                      | lb/hr/unit                         | Avg. lb/day                             | Ton/month                  | lb/hr/unit                          | Avg. lb/day                              | Ton/month                   |
|                                         |                                          |                                              | Mine                                | Operation Equ                            | ipment Emiss                | ion Sources                        |                                         |                            |                                     |                                          | -                           |
| Large Front-End Loaders (7)             | 500                                      | 1308                                         | 3.425                               | 172.36                                   | 26.89                       | 1.5182                             | 76.40                                   | 11.92                      | 0.365                               | 18.37                                    | 2.865                       |
| Rubber-Tire Bulldozer (1)               | 330                                      | 1308                                         | 3.425                               | 172.36                                   | 26.89                       | 1.5182                             | 76.40                                   | 11.92                      | 0.365                               | 18.37                                    | 2.865                       |
| Small Front-End Loaders (3)             | 354                                      | 0                                            | 3.2071                              | 0.00                                     | 0.00                        | 1.7411                             | 0.00                                    | 0.00                       | 0.3621                              | 0.00                                     | 0.000                       |
| Large Bulldozers (12)                   | 498                                      | 471                                          | 3.2071                              | 58.10                                    | 9.06                        | 1.7411                             | 31.54                                   | 4.92                       | 0.3621                              | 6.56                                     | 1.023                       |
| Scrapers (3)                            | 265                                      | 366                                          | 1.8284                              | 25.76                                    | 4.02                        | 0.929                              | 13.09                                   | 2.04                       | 0.2391                              | 3.37                                     | 0.526                       |
| Water Trucks                            | 320                                      | 471                                          | 1.5016                              | 27.20                                    | 4.24                        | 0.3676                             | 6.66                                    | 1.04                       | 0.14                                | 2.54                                     | 0.396                       |
| End Dump Trucks                         | 410                                      | 262                                          | 2.0882                              | 21.02                                    | 3.28                        | 0.7785                             | 7.84                                    | 1.22                       | 0.1987                              | 2.00                                     | 0.312                       |
| Graders                                 | 275                                      | 131                                          | 1.5357                              | 7.73                                     | 1.21                        | 0.421                              | 2.12                                    | 0.33                       | 0.1493                              | 0.75                                     | 0.117                       |
| Mir                                     | e Extraction Oper                        | rations                                      |                                     |                                          | 68.06                       |                                    |                                         | 31.13                      |                                     |                                          | 7.40                        |
|                                         |                                          |                                              |                                     | Other On-S                               | ite Mobile Sou              | rces                               |                                         |                            |                                     |                                          |                             |
| Maintenance Truck                       | 300                                      | 262                                          | 1.615                               | 16.25                                    | 2.54                        | 0.4301                             | 4.33                                    | 0.68                       | 0.1639                              | 1.65                                     | 0.257                       |
| Light Duty Pick-up                      | 230                                      | 366                                          | 1.615                               | 22.76                                    | 3.55                        | 0.4301                             | 6.06                                    | 0.95                       | 0.1639                              | 2.31                                     | 0.360                       |
| Flatbed Truck                           | 385                                      | 262                                          | 2.3188                              | 23.34                                    | 3.64                        | 0.7542                             | 7.59                                    | 1.18                       | 0.2492                              | 2.51                                     | 0.391                       |
|                                         | Plant Vehicle tra                        | vel                                          |                                     |                                          | 17.25                       |                                    |                                         | 5.07                       |                                     |                                          | 1.72                        |

NOTES:

1 - Vehicle operating hours per month for Aree III is scaled from detailed data for each vehicle category in Area IV North, in proportion to annual coal production rates. Some equipment will be from operations displaced from other Navajo Mine areas.

2 - Representative horsepower rating for category. The emission factors are defined by the SCAQMD reference for vehicle categories and broad ranges of engine horsepower.

3 - Estimated average hours per month in Area III across the period of the Preferred Alternative (2012 - 2016) obtained by scaling facility projections for Area IV North, in proportion to annual coal production rates.

4 - Controlled emission factors for recent model year (2010) for diesel engines to reflect roster of new and existing equipment at Area III, SCAQMD 1993 Handbook, Off-road Mobile Source Emission Factors, A9-8 Tables.

5 - Hourly average emission rates estimated from the equipment hours per month, divided equally over scheduled average of 26 operating days per month.

#### TAILPIPE POLLUTANT EMISSION ESTIMATION - COAL HAUL TRUCKS - PREFERRED ALTERNATIVE

|                          | 2013 - 2016 |
|--------------------------|-------------|
| Coal Rate Area IV N(tpy) | 4153000     |
| Coal Rate Area III (tpy) | 4.35E+06    |

| Fraction of Equipment in Operation | 1 |
|------------------------------------|---|
|------------------------------------|---|

| Coal Haul Truck Emissions                                                  | Nominal Size<br>or Capacity <sup>2</sup> | Equipment<br>Hours per<br>Month <sup>3</sup> | NOX Emission<br>Factor <sup>4</sup> |  | Controlled NOX<br>Emissions | CO Emission<br>Factor <sup>4</sup> |  | Controlled CO<br>Emissions | VOC Emission<br>Factor <sup>4</sup> |  | Controlled VOC<br>Emissions |  |  |
|----------------------------------------------------------------------------|------------------------------------------|----------------------------------------------|-------------------------------------|--|-----------------------------|------------------------------------|--|----------------------------|-------------------------------------|--|-----------------------------|--|--|
| Description and (Est. Number of Units) <sup>1</sup>                        | hp                                       | h/month                                      | lb/hr/unit                          |  | Ton/yr                      | lb/hr/unit                         |  | Ton/yr                     | lb/hr/unit                          |  | Ton/yr                      |  |  |
| Coal Haul Truck Tailpipe Emissions - Area IV North - Preferred Alternative |                                          |                                              |                                     |  |                             |                                    |  |                            |                                     |  |                             |  |  |
| Coal Haul Trucks (5) -2014                                                 | 580                                      | 3244                                         | 3.2071                              |  | 62.42                       | 1.7411                             |  | 33.89                      | 0.3621                              |  | 7.048                       |  |  |
| Coal Haul Truck Tailpipe Emissions - Area III - Preferred Alternative      |                                          |                                              |                                     |  |                             |                                    |  |                            |                                     |  |                             |  |  |
| Coal Haul Trucks (5) -2014                                                 | 580                                      | 3273                                         | 3.2071                              |  | 62.98                       | 1.7411                             |  | 34.19                      | 0.3621                              |  | 7.110                       |  |  |

NOTES:

1 - Number of coal haul trucks used from projected Area IV North and Area III information.

2 - Horsepower of trucks from facility information, representative of existing vehicle fleet.

3 - Unit count of equipment hours from the typical operation required for movement of material during the 5 years of the Preferred Action

4 - Controlled emission factors reflect operating year 2010 for diesel engines, SCAQMD 1993 Handbook, Off-road Mobile Source Emission Factors, A9-8 Tables.

5 - Hourly maximum emission rates calculated 100% of all equipment present on site is operating simultaneously.

# Table F-8 CRITERIA POLLUTANT EMISSION ESTIMATION - COAL AND OVERBURDEN BLASTING - PREFERRED ALTERNTATIVE

| SOURCE ID:                                        | BNCC Area 4 North 2        | 012 - 2016                 |                               |                            |                            |                               |
|---------------------------------------------------|----------------------------|----------------------------|-------------------------------|----------------------------|----------------------------|-------------------------------|
|                                                   | Annual use of ANFO =       | = 7,810,650 lbs/yr for 13  | 33 blasts/200 lb/ton = 29     | 9.36 ton ANFO/blast        |                            |                               |
|                                                   | Annual number of blas      | ts = 133 coal and overb    | urden combined (Facili        | ty Estimate) for Area IV   | North 2012 - 16            |                               |
|                                                   | Type of Source: E          | Explosives Detonation -    | ANFO (Mine Usage)             |                            |                            |                               |
|                                                   | Coal                       | Blasting (123 Avg. Blas    | sts/vr)                       | Overbur                    | den Blasting (10 Avg. E    | Blasts/vr)                    |
| Dollutort                                         | Carbon Monoxide            | Nitrogen Oxides            | Sulfur Dioxide                | Carbon Monoxide            | Nitrogen Oxides            | Sulfur Dioxide                |
| Pollutant                                         | (CO)                       | (NO <sub>x</sub> )         | (SO <sub>2</sub> )            | (CO)                       | (NO <sub>x</sub> )         | (SO <sub>2</sub> )            |
| Throughput or Other<br>Emission Basis             | 29.36<br>ton ANFO/blast    | 29.36<br>ton ANFO/blast    | 29.36<br>ton ANFO/blast       | 29.36<br>ton ANFO/blast    | 29.36<br>ton ANFO/blast    | 29.36<br>ton ANFO/blast       |
| Number of Identical<br>Emission Sources           | 1                          | 1                          | 1                             | 1                          | 1                          | 1                             |
|                                                   | 67                         | 17                         | 2                             | 67                         | 17                         | 2                             |
| Emission Factor (Reference)                       | lb/ton ANFO                | lb/ton ANFO                | lb/ton ANFO                   | lb/ton ANFO                | lb/ton ANFO                | lb/ton ANFO                   |
|                                                   | AP-42, Tbl. 13.3-1, 1/95   | AP-42, Tbl. 13.3-1, 1/95   | AP-42, Tbl. 13.3-1, 1/95      | AP-42, Tbl. 13.3-1, 1/95   | AP-42, Tbl. 13.3-1, 1/95   | AP-42, Tbl. 13.3-1, 1/95      |
| Max. Emission Rate                                | 1967.12                    | 499.12                     | 58.72                         | 1967.12                    | 499.12                     | 58.72                         |
| Wax. Emission Rate                                | lb/blast                   | lb/blast                   | lb/blast                      | lb/blast                   | lb/blast                   | lb/blast                      |
| Control Device<br>or System                       | No Add-on Control          | No Add-on Control          | No Add-on Control             | No Add-on Control          | No Add-on Control          | No Add-on Control             |
| Capture and<br>Control Efficiency                 | 0.00                       | 0.00                       | 0.00                          | 0.00                       | 0.00                       | 0.00                          |
| BACT Measure(s)                                   | Limit the number of blasts | Limit the number of blasts | Limit the number of<br>blasts | Limit the number of blasts | Limit the number of blasts | Limit the number<br>of blasts |
| Controlled Max.                                   | 1967.12                    | 499.12                     | 58.72                         | 1967.12                    | 499.12                     | 58.72                         |
| Emission Rate                                     | lb/blast                   | lb/blast                   | lb/blast                      | lb/blast                   | lb/blast                   | lb/blast                      |
| Maximum Daily Blasts                              | 1                          | 1                          | 1                             | 1                          | 1                          | 1                             |
|                                                   | blast/day                  | blast/day                  | blast/day                     | blast/day                  | blast/day                  | blast/day                     |
| Maximum Annual Blasts                             | 123                        | 123                        | 123                           | 10                         | 10                         | 10                            |
| Maximum rimaar Drasts                             | blasts/year                | blasts/year                | blasts/year                   | blasts/year                | blasts/year                | blasts/year                   |
| Man Avena Emissions                               | 81.96                      | 20.80                      | 2.45                          | 81.96                      | 20.80                      | 2.45                          |
| Max. Average Emissions<br>per Blast Event (lb/hr) | 81.90                      | 20.80                      | 2.45                          | 81.90                      | 20.80                      | 2.45                          |
| Max. Daily                                        | 1967.12                    | 499.12                     | 58.72                         | 1967.12                    | 499.12                     | 58.72                         |
| Emissions (lb/day)                                | 1907.12                    | 499.12                     | 30.12                         | 1907.12                    | 499.12                     | 30.12                         |
| Est. Annual                                       | 120.98                     | 30.70                      | 3.61                          | 9.84                       | 2.50                       | 0.29                          |
| Emissions (tpy)                                   | 120.20                     | 50.70                      | 5.01                          | 2.04                       | 2.50                       | 0.29                          |
| Emissions (tpy)                                   |                            |                            |                               |                            |                            |                               |

# Table F-9 CRITERIA POLLUTANT EMISSION ESTIMATION - COAL AND OVERBURDEN BLASTING - PREFERRED ALTERNTATIVE

| SOURCE ID:                              | BNCC Area III 2012 -     |                           |                          |                          |                          |                          |
|-----------------------------------------|--------------------------|---------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
|                                         |                          | = 8,232,240 lbs/yr for 14 |                          |                          |                          |                          |
|                                         | Annual number of blas    | ts = 140 coal and overbu  | urden combined (scaled   | from Area IV North) fo   | r Area IV North 2012 -   | 16                       |
|                                         | Type of Source: E        | xplosives Detonation -    | ANFO (Mine Usage)        |                          |                          |                          |
|                                         | Coal                     | Blasting (128 Avg. Blas   | ts/yr)                   | Overbur                  | den Blasting (12 Avg. B  | lasts/yr)                |
| Pollutant                               | Carbon Monoxide          | Nitrogen Oxides           | Sulfur Dioxide           | Carbon Monoxide          | Nitrogen Oxides          | Sulfur Dioxide           |
| Ponutant                                | (CO)                     | (NO <sub>x</sub> )        | (SO <sub>2</sub> )       | (CO)                     | (NO <sub>x</sub> )       | (SO <sub>2</sub> )       |
| Throughput or Other<br>Emission Basis   | 29.36<br>ton ANFO/blast  | 29.36<br>ton ANFO/blast   | 29.36<br>ton ANFO/blast  | 29.36<br>ton ANFO/blast  | 29.36<br>ton ANFO/blast  | 29.36<br>ton ANFO/blast  |
| Number of Identical<br>Emission Sources | 1                        | 1                         | 1                        | 1                        | 1                        | 1                        |
|                                         | 67                       | 17                        | 2                        | 67                       | 17                       | 2                        |
| Emission Factor (Reference)             | lb/ton ANFO              | lb/ton ANFO               | lb/ton ANFO              | lb/ton ANFO              | lb/ton ANFO              | lb/ton ANFO              |
|                                         | AP-42, Tbl. 13.3-1, 1/95 | AP-42, Tbl. 13.3-1, 1/95  | AP-42, Tbl. 13.3-1, 1/95 | AP-42, Tbl. 13.3-1, 1/95 | AP-42, Tbl. 13.3-1, 1/95 | AP-42, Tbl. 13.3-1, 1/95 |
| Max. Emission Rate                      | 1967.12                  | 499.12                    | 58.72                    | 1967.12                  | 499.12                   | 58.72                    |
| Max. Emission Rate                      | lb/blast                 | lb/blast                  | lb/blast                 | lb/blast                 | lb/blast                 | lb/blast                 |
| Control Device<br>or System             | No Add-on Control        | No Add-on Control         | No Add-on Control        | No Add-on Control        | No Add-on Control        | No Add-on Control        |
| Capture and<br>Control Efficiency       | 0.00                     | 0.00                      | 0.00                     | 0.00                     | 0.00                     | 0.00                     |
| BACT Measure(s)                         | Limit the number of      | Limit the number of       | Limit the number of      | Limit the number of      | Limit the number of      | Limit the number         |
| DACT Measure(3)                         | blasts                   | blasts                    | blasts                   | blasts                   | blasts                   | of blasts                |
| Controlled Max.                         | 1967.12                  | 499.12                    | 58.72                    | 1967.12                  | 499.12                   | 58.72                    |
| Emission Rate                           | lb/blast                 | lb/blast                  | lb/blast                 | lb/blast                 | lb/blast                 | lb/blast                 |
| Maximum Daily Blasts                    | 1                        | 1                         | 1                        | 1                        | 1                        | 1                        |
|                                         | blast/day                | blast/day                 | blast/day                | blast/day                | blast/day                | blast/day                |
| Maximum Annual Blasts                   | 128                      | 128                       | 128                      | 12                       | 12                       | 12                       |
| Maximum / minuar Drasts                 | blasts/year              | blasts/year               | blasts/year              | blasts/year              | blasts/year              | blasts/year              |
|                                         |                          |                           |                          |                          | ·                        |                          |
| Max. Average Emissions                  | 81.96                    | 20.80                     | 2.45                     | 81.96                    | 20.80                    | 2.45                     |
| per Blast Event (lb/hr)                 |                          |                           |                          |                          |                          |                          |
| Max. Daily                              | 1967.12                  | 499.12                    | 58.72                    | 1967.12                  | 499.12                   | 58.72                    |
| Emissions (lb/day)                      |                          |                           |                          |                          |                          |                          |
| Est. Annual                             | 125.90                   | 31.94                     | 3.76                     | 11.80                    | 2.99                     | 0.35                     |
| Emissions (tpy)                         |                          |                           |                          |                          |                          |                          |

#### Table F-10 PARTICULATE MATTER EMISSION ESTIMATION - FUGITIVE EMISSIONS FROM COAL ADDITION TO STOCKPILES AND RAILCAR LOADING OPERATIONS - PREFERRED ALTERNATIVE

|                         |                                              |       | Tons                     | Coal/Yr Area | III                          | 4153000           | 4347000  |                  |                   |       |                               |                   |                                    |                       |             |                                     |                           |                                   |                            |
|-------------------------|----------------------------------------------|-------|--------------------------|--------------|------------------------------|-------------------|----------|------------------|-------------------|-------|-------------------------------|-------------------|------------------------------------|-----------------------|-------------|-------------------------------------|---------------------------|-----------------------------------|----------------------------|
|                         |                                              |       | <u> </u>                 |              |                              | 4155000           | 434/000  |                  |                   |       |                               |                   |                                    |                       |             |                                     |                           |                                   |                            |
| Fugitive<br>Emission ID | Quarry Operations                            |       | Transfer Rate or         | Emis         | sion Factor <sup>1</sup> (Ib | o/ton)            | Max. Hou | rly Emisson      | Rate (lb/hr)      |       | nnual Emissi<br>(ton per year |                   | Control<br>Efficiency <sup>3</sup> |                       | с           | ontrolled Er                        | nission Ra                | tes                               |                            |
| Number                  | quality opportunions                         | Emis  | sions Basis              | PM           | PM <sub>10</sub>             | PM <sub>2.5</sub> | PM       | PM <sub>10</sub> | PM <sub>2.5</sub> | PM    | PM <sub>10</sub>              | PM <sub>2.5</sub> | %                                  | PM<br>(max.<br>lb/hr) | PM<br>(tpy) | PM <sub>10</sub><br>(max.<br>lb/hr) | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(max. lb/hr) | PM <sub>2.5</sub><br>(tpy) |
| Area IVN                | Coal Addition to<br>Stockpile <sup>4</sup>   | 8,500 | Max.tons/hr <sup>2</sup> | 3.54E-04     | 1.67E-04                     | 5.26E-05          | 3.01     | 1.42             | 0.447             | 0.735 | 0.348                         | 0.109             | 0.50                               | 1.50                  | 0.368       | 0.712                               | 0.17                      | 0.224                             | 0.055                      |
|                         | Train Loading from<br>Stockpile <sup>5</sup> | 8,500 | Max.tons/hr <sup>2</sup> | 3.54E-04     | 1.67E-04                     | 5.26E-05          | 3.01     | 1.42             | 0.447             | 0.735 | 0.348                         | 0.109             | 0.50                               | 1.50                  | 0.368       | 0.712                               | 0.17                      | 0.224                             | 0.055                      |
|                         | Coal Addition to<br>Stockpile <sup>4</sup>   | 8,500 | Max.tons/hr <sup>2</sup> | 3.54E-04     | 1.67E-04                     | 5.26E-05          | 3.01     | 1.42             | 0.447             | 0.769 | 0.364                         | 0.114             | 0.50                               | 1.50                  | 0.385       | 0.712                               | 0.18                      | 0.224                             | 0.057                      |
|                         | Train Loading from Stockpile <sup>5</sup>    | 8,500 | Max.tons/hr <sup>2</sup> | 3.54E-04     | 1.67E-04                     | 5.26E-05          | 3.01     | 1.42             | 0.447             | 0.769 | 0.364                         | 0.114             | 0.50                               | 1.50                  | 0.385       | 0.712                               | 0.18                      | 0.224                             | 0.057                      |

NOTES:

1

Emission factors for excavation from AP-42, from batch drop equation AP-42, Aggregate Handling and Storage Piles (Sect. 13.2), Equation 13.2-4 (11/06), as calculated below with parameters estimated from samples at mine site.
 The mine haul and load operations are estimated to be capable of 8,500 tons per hour, and this value used to set maximum hourly emission rate.

3 - Control efficiency based on water sprays at transfer points, as required, due to high moisture in mined coal.

4 - Coal haul to Lowe Stockpile will be accomplished by 240 ton capacity, end-dump coal haul trucks. The addition to Stockpile emissions are based on Batch Drop equation for unloading of the end dump truck. Emission factor from AP-42 Equation 13.2-4 is

Area IVN Area III

5 - Railcar loading from the Lowe Stockpile assumed to match the coal addition rate (8,500 tons/hr). Emission factros from batch drop correlation used for addition to stockpiles.

Tons Coal/Yr Area III

| Coal Addition to Stockpile and Railcar Coal Loading                                                               | E (PM <sub>10</sub> ) =  | 1.67E-04 |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|----------|
|                                                                                                                   | E (PM) =                 | 3.54E-04 |
|                                                                                                                   | E (PM <sub>2.5</sub> ) = | 5.26E-05 |
| U for coal railcar load and exposed stockpile loading areas = 8.7 mph, facility data for 1-hour averages per day. |                          |          |
| Moisture (M) is taken as as-mined average of 13% based on sampling at the mine site                               |                          |          |

#### PARTICULATE MATTER EMISSION ESTIMATION - WIND EROSION OF STOCKPILES AND UNRECLAIMED OPEN AREAS - PREFERRED ALTERNATIVE

|          | Total Stockpile Areas (Acres) | Area IV N           | Area III     |                        | Coal Prod. | Area IV N       | Area III                        | Total Unrecl Area                             | Area IV N | Area III         | ]                     |
|----------|-------------------------------|---------------------|--------------|------------------------|------------|-----------------|---------------------------------|-----------------------------------------------|-----------|------------------|-----------------------|
|          | Overburden                    | 120                 | 126          |                        | TPY        | 4153000         | 4347000                         | (Acres/yr)                                    | 108       | 114              |                       |
|          | Coal                          | 50                  | 53           |                        |            |                 |                                 |                                               |           |                  |                       |
| Constr   | ruction Emission Sources      | Particulate Control | Nominal Surf | ace Areas <sup>2</sup> | Controlled | Emission Factor | <sup>3</sup> (ton/yr/Area Unit) | Additional Control<br>Efficiency <sup>4</sup> | Controlle | d Emission Rates | (ton/yr) <sup>5</sup> |
|          | Description <sup>1</sup>      |                     | Value        | Units                  | РМ         | PM10            | PM2.5                           | %                                             | PM        | PM10             | PM2.5                 |
|          | Soil/Overburden Stockpiles    | Contour and Compact | 490.44       | 10 <sup>3</sup> m2     | 0.059      | 0.0296          | 0.0119                          | Incl in Emiss. Fct                            | 28.9      | 14.5             | 5.8                   |
|          | Coal Stockpiles               | Contour and Compact | 204.35       | 10 <sup>3</sup> m2     | 0.0438     | 0.022           | 0.0088                          | Incl in Emiss. Fct                            | 9.0       | 4.5              | 1.8                   |
| Area IVN | Coal Prep Plant Stockpiles    | Contour and Compact | 28.34        | 10 <sup>3</sup> m2     | 0.356      | 0.177           | 0.0266                          | Incl in Emiss. Fct                            | 10.1      | 5.0              | 0.75                  |
|          | Unreclaimed Open Area         | Water/Stabilize     | 108          | acres                  | 0.1718     | 0.0859          | 0.0344                          | 50%                                           | 9.3       | 4.6              | 1.9                   |
|          |                               |                     |              |                        |            |                 |                                 | Total Wind Erosion                            | 57.3      | 28.7             | 10.2                  |
|          | Soil/Overburden Stockpiles    | Contour and Compact | 514.962      | 10 <sup>3</sup> m2     | 0.059      | 0.0296          | 0.0119                          | Incl in Emiss. Fct                            | 30.4      | 15.2             | 6.1                   |
|          | Coal Stockpiles               | Contour and Compact | 216.611      | 10 <sup>3</sup> m2     | 0.0438     | 0.022           | 0.0088                          | Incl in Emiss. Fct                            | 9.5       | 4.8              | 1.9                   |
| Area III | Coal Prep Plant Stockpiles    | Contour and Compact | 29.66        | 10 <sup>3</sup> m2     | 0.356      | 0.177           | 0.0266                          | Incl in Emiss. Fct                            | 10.6      | 5.3              | 0.79                  |
|          | Unreclaimed Open Area         | Water/Stabilize     | 114          | acres                  | 0.1718     | 0.0859          | 0.0344                          | 50%                                           | 9.8       | 4.9              | 2.0                   |
|          |                               |                     |              |                        |            |                 |                                 | Total Wind Erosion                            | 60.2      | 30.2             | 10.8                  |

1 - Sources are for windblown dust from idle areas of stockpiles and from disturbed mine areas prior to reclaim activities

2 - Areas estimated for stockpiles and unreclaimed areas are only for Area IV North operations. Some of these areas will offset reductions in stockpile and disturbed areas in other Navajo Mine areas. Stockpiles converted to square meters by convertion 4

3 - Controlled emission factor reflect windblown emissions model from AP-42 as determined by facility emissions for existing Navajo Mine stockpiles of known surface areas. Emissions factors for stockpiles include indicated control measure - no additional 4 - Controls for the Area IV North stockpiles that represent additional measures for those areas.

5 - Controlled emissions from assumed annual areas for total stockpile and unreclaimed areas during each operating year. Ratio of PM2.5 to PM10 obtained from AP-42 model for windblown friction velocity correlation.

6 - Coal Processing plant located in Area III, emissions are the contribution due to separate area production levels. Table entry is a composite 10 stockpiles, erosion from AP-42 model, Albuquerque fasted mile of wind (Moisture = 8%, Wind Speed = 9.5) mp

# Table F-12 PARTICULATE MATTER EMISSION ESTIMATION - CONSTRUCTION VEHICLES AND EARTHMOVING FOR RECLAMATION OF MINED AREAS - PREFERRED ALTERNATIVE

| Co       | nstruction Emission Sources       | Particulate Control      | Nominal /<br>Materi |       | 10       | trolled Emission<br>actor <sup>3</sup> | PM Control Efficiency<br>4 | Controlled PM10<br>Emission Rates <sup>5</sup> | Ratio: PM2.5 to<br>PM10 <sup>6</sup> | Controlled PM2.5<br>Emission Rates |
|----------|-----------------------------------|--------------------------|---------------------|-------|----------|----------------------------------------|----------------------------|------------------------------------------------|--------------------------------------|------------------------------------|
|          | Description <sup>1</sup>          |                          | Value               | Units | Value    | Units                                  | %                          | PM10 (ton/yr)                                  | Frac of PM10                         | PM2.5 (ton/yr)                     |
|          | General Construction - Contouring | Watering, Veh.<br>Speeds | 145                 | acres | 0.19     | ton PM10/acre-<br>month                | 50%                        | 13.8                                           | 0.2                                  | 2.8                                |
| Area IVN | Overburden Replacement            | Watering, Veh.<br>Speeds | 1.50E+07 Tons       |       | 0.012    | lb PM/ton                              | 50%                        | 45.0                                           | 0.2                                  | 9.00                               |
|          |                                   |                          |                     |       | Total Re | clamation Emi                          | issions - Area IV N        | 58.8                                           |                                      | 11.76                              |
|          | General Construction - Contouring | Watering, Veh.<br>Speeds | 155                 | acres | 0.19     | ton PM10/acre-<br>month                | 50%                        | 14.7                                           | 0.2                                  | 2.9                                |
| Area III | Overburden Replacement            | Watering, Veh.<br>Speeds | 1.70E+07            | Tons  | 0.012    | lb PM/ton                              | 50%                        | 51.0                                           | 0.2                                  | 10.20                              |
|          |                                   |                          |                     |       | Total    | Reclamation E                          | missions - Area III        | 65.7                                           |                                      | 13.15                              |

NOTES:

1 - Sources are for construction operations involved in reclaim of mined areas in Area IV N and Area III during representative year of Preferred Action. These emission source categories include earthmoving, surface shaping, soil handling and vehicle operation.

2 - Areas and overburden quantity estimated for unreclaimed areas for Area IV North operations and scaled for Area III.

Stockpiles converted to square meters by convertion 4,088 m2 = 1 acre

3 - Controlled emission factors from various studies. General Construction factor more recent than latest AP-42 section on Heavy Construction (MRI 1996, EPA 2001, EPA 2006.) Overburden replacement from factor given in Western Surface Coal Mining, AP-42 Section 11.9.

4 - Controls for the Area IV North and Area III reclaim activities represent range of control measures utilized for current Mining Permit in other Navajo Mine areas.

5 - Controlled emissions from assumed annual reclaim areas and overburden replacement for each operating year of the Preferred Action.

6 - Ratio of PM2.5 to PM10 conservatively set for the range of construction operations. For geologic dusts, typical raio in AP-42 is 20% of PM10 is PM2.5.

#### Table F-13 GREENHOUSE GAS EMISSION ESTIMATION - AVERAGE ANNUAL BASIS, AREA IV NORTH and AREA III OPERATIONS - PREFERRED ALTERNATIVE

|                                       | Avg. Operation<br>Sched <sup>2</sup> | Fuel Consump | CO2 Emission<br>Factor <sup>4</sup> | CO2<br>Emissions <sup>5</sup> | CO2 Emissions <sup>6</sup> | CH4 Emission<br>Factor <sup>4</sup> | CH4 Emissions <sup>5</sup> | CO2e Emissions<br>6 | N2O Emission<br>Factor <sup>4</sup> | N2O<br>Emissions <sup>5</sup> | CO2e Emissions |
|---------------------------------------|--------------------------------------|--------------|-------------------------------------|-------------------------------|----------------------------|-------------------------------------|----------------------------|---------------------|-------------------------------------|-------------------------------|----------------|
| Description (and Number) <sup>1</sup> | Hours/Month                          | Gal/hr       | kg CO2/gal                          | Avg. MT/Yr                    | MT CO2e/year               | g CH4/gal                           | Avg. MT/Yr                 | MT CO2e/year        | g N2O/gal                           | Avg. MT/Yr                    | MT CO2e/year   |
|                                       |                                      |              |                                     | Non-Ro                        | ad Mine Vehicles (         | Diesel Engines)                     | •                          |                     |                                     |                               | •              |
| Large Bulldozers (18)                 | 3275                                 | 4            | 10.15                               | 1595.58                       | 1595.58                    | 0.58                                | 0.0912                     | 1.91                | 0.26                                | 0.0409                        | 12.67          |
| Rubber-Tire Bulldozer (3)             | 8190                                 | 2            | 10.15                               | 1995.08                       | 1995.08                    | 0.58                                | 0.1140                     | 2.39                | 0.26                                | 0.0511                        | 15.84          |
| Large Front-End Loaders (12)          | 3244                                 | 4            | 10.15                               | 1580.48                       | 1580.48                    | 0.58                                | 0.0903                     | 1.90                | 0.26                                | 0.0405                        | 12.55          |
| Small Front-End Loaders (6)           | 532                                  | 3            | 10.15                               | 194.39                        | 194.39                     | 0.58                                | 0.0111                     | 0.23                | 0.26                                | 0.0050                        | 1.54           |
| Graders (7)                           | 3234                                 | 4            | 10.15                               | 1575.60                       | 1575.60                    | 0.58                                | 0.0900                     | 1.89                | 0.26                                | 0.0404                        | 12.51          |
| Scrapers (6)                          | 1265                                 | 4            | 10.15                               | 616.31                        | 616.31                     | 0.58                                | 0.0352                     | 0.74                | 0.26                                | 0.0158                        | 4.89           |
| TOTAL EMISSIONS: Mine Extr            | action /Loading E                    | quipment     |                                     | 7557.45                       | 7557.45                    |                                     | 5.18                       | 108.83              |                                     | 2.32                          | 720.15         |
|                                       |                                      | Coal H       | laul Trucks - Ba                    | sed on averag                 | e monthly operati          | na hours durina F                   | Preferred Alternativ       | ve vears            |                                     |                               |                |
| Coal Haul Trucks (10)                 | 3300                                 | 5            | 10.15                               | 2009.70                       | 2009.70                    | 0.58                                | 0.1148                     | 2.41                | 0.26                                | 0.0515                        | 15.96          |
| Diesel Engine                         | Vehicles                             |              | Plant Vehic                         | les - Based o                 | n average monthly          | / operating hours                   | on plant roads             |                     |                                     |                               |                |
| End Dump Trucks (8)                   | 532                                  | 4            | 10.15                               | 259.19                        | 259.19                     | 0.58                                | 0.0148                     | 0.31                | 0.26                                | 0.0066                        | 2.06           |
| Water Trucks (3)                      | 1010                                 | 4            | 10.15                               | 492.07                        | 492.07                     | 0.58                                | 0.0281                     | 0.59                | 0.26                                | 0.0126                        | 3.91           |
| Gasoline Engin                        | e Vehicles                           | ••           |                                     |                               |                            |                                     | Assume                     | 12                  | MPG                                 |                               | •              |
| Emission Fac                          | tor Units                            |              | kg CO2/gal                          |                               |                            | g/mile                              |                            |                     | g/mile                              |                               |                |
| Light Duty Pick-up (60)               | 1280                                 | 1            | 8.81                                | 135.32                        | 135.32                     | 0.033                               | 0.0061                     | 0.13                | 0.0134                              | 0.0025                        | 0.77           |
| Flatbed Truck (10)                    | 2400                                 | 2            | 8.81                                | 507.46                        | 507.46                     | 0.033                               | 0.0228                     | 0.48                | 0.0134                              | 0.0093                        | 2.87           |
| Maintenance Truck (35)                | 3500                                 | 2            | 8.81                                | 740.04                        | 740.04                     | 0.033                               | 0.0333                     | 0.70                | 0.0134                              | 0.0135                        | 4.19           |
| TOTAL EMISSIONS:                      | Plant Vehicles                       |              |                                     | 2134.08                       | 2134.08                    |                                     | 0.11                       | 2.21                |                                     | 0.044                         | 13.79          |
|                                       |                                      | Coa          | I Mine Methane                      | Based on GH                   | G Reporting Rule           | Emission Factor                     | for Surface Coal N         | lining              |                                     |                               |                |
|                                       | Ton Coal/yr                          |              |                                     |                               |                            | lb CH4/ton coal 7                   | MT/yr CH4                  | CO2e Emissions<br>6 |                                     |                               |                |
| Preferred Alt Representative Annual   | 8,500,000                            |              |                                     |                               |                            | 0.711                               | 2747.0                     | 57688               |                                     |                               |                |

1 - Categories of large, non-road plant maintenance equipment and maintenance personnel vehicles. Numbers of vehicles estimated by facility for projected Area IV North plus Area III operations.

2 - Average monthly hours of operation per each vehicle category, as estimated by facility for typical operation dueing Preferred Alternative years in Area IV North and Area III . In actuality, units will operate on varying monthly and annual schedules.

3 - Estimated fuel consumption rate for category of vehicles, actual consumption will vary for all vehicles in a category.

4 - Default U.S. EPA Emission factors for diesel and gasoline fueled construction vehicles, compiled in Climate Registry, 2008. Tables 13.1, 13.3, and 13.6

5 - Annual metric tons (MT = 2,200 lbs) emissions based on assumed hours per month average operation, for all combined units in vehicle category

6 - Carbon equivalent emissions calculated with relative global warming potential: CO2 = 1, CH4 = 21, N2O = 310

7 - Emission factors for San Juan Basin surface coal mine methane (Support Documents - GHG Mandatory Reporting Rule 2010): Coal Extraction = 14.6 ft3 CH4/short ton of coal; Post-mining preparation = 2.4 ft3 CH4/short ton of coal. Converted to mass basis emission factor by density of methane at standard conditions: (14.6 + 2.4 ft3 CH4/ton) x 0.418 lb CH4/ft3 = 0.711 lb CH4/ton coal

#### Table F-14 PARTICULATE MATTER EMISSION ESTIMATION FUGITIVE EMISSIONS FROM COAL MINE EQUIPMENT AND OPERATIONS -Baseline Year 2009

|                                                |           | Tons Coal I  | Produced                      |          | 8500000          |                   |        |                           | Cubic Yd          | s Overbur      | den + Inter    | burden                |                          | 13744500          |                       |                    |             |                                     |                           |                                   |                            |
|------------------------------------------------|-----------|--------------|-------------------------------|----------|------------------|-------------------|--------|---------------------------|-------------------|----------------|----------------|-----------------------|--------------------------|-------------------|-----------------------|--------------------|-------------|-------------------------------------|---------------------------|-----------------------------------|----------------------------|
|                                                | Maximum T | ransfer Rate | Emission                      | E        | mission Fa       | ctor              |        | entative Un<br>Emisson Ra |                   | Operating      | g Schedule     | Annual En<br>Controls | nission Rat<br>s (ton pe |                   | Control<br>Efficiency | Controlle          | ed Emissio  | n Rates (No                         | Hourly Av                 | verage for Bla                    | asting)                    |
| Quarry Operations                              | or Emiss  | ions Basis   | Factor Units                  | PM       | PM <sub>10</sub> | PM <sub>2.5</sub> | PM     | PM <sub>10</sub>          | PM <sub>2.5</sub> | Hours/<br>Week | Weeks/<br>Year | РМ                    | PM <sub>10</sub>         | PM <sub>2.5</sub> | %                     | PM<br>(Typ. lb/hr) | PM<br>(tpy) | PM <sub>10</sub><br>(Typ.<br>lb/hr) | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(Typ. lb/hr) | PM <sub>2.5</sub><br>(tpy) |
| Drilling - Overburden +<br>Interburden 1       | 19,560    | Holes/yr     |                               | 1.3      | 0.676            | 0.195             | 4.008  | 2.084                     | 0.601             | 122            | 52             | 12.71                 | 6.61                     | 1.91              | 50.0%                 | 2.00               | 6.36        | 1.042                               | 3.31                      | 0.301                             | 0.954                      |
| Drilling - Coal <sup>1</sup>                   | 146,476   | Holes/yr     |                               | 0.22     | 0.114            | 0.033             | 60.955 | 31.696                    | 9.509             | 122            | 52             | 16.11                 | 8.38                     | 2.42              | 50.0%                 | 30.48              | 8.06        | 15.85                               | 4.19                      | 4.75                              | 1.208                      |
| Overburden Blasting <sup>2</sup>               | 10        | blast/yr     |                               | 9.7      | 5.04             | 1.51              | N/A    | N/A                       | N/A               | ١              | I/A            | 0.05                  | 0.03                     | 0.01              | 0.00%                 | N/A                | 0.05        | N/A                                 | 0.03                      | N/A                               | 0.008                      |
| Coal Blasting <sup>2</sup>                     | 252       | blast/yr     |                               | 9.7      | 5.04             | 1.51              | N/A    | N/A                       | N/A               | ١              | I/A            | 1.22                  | 0.64                     | 0.19              | 0.00%                 | N/A                | 1.22        | N/A                                 | 0.64                      | N/A                               | 0.191                      |
| Overburden Dragline <sup>3</sup>               | 1.37E+07  | cu.yds/yr    |                               | 0.048    | 0.0092           | 8.09E-04          | 111.38 | 21.43                     | 1.89              | 113            | 52             | 327.24                | 62.96                    | 5.56              | 0.00%                 | 111.38             | 327.24      | 21.43                               | 62.96                     | 1.89                              | 5.563                      |
| Overburden Dozers <sup>4</sup>                 | 3275      | hrs/month    | lb/hr/dozer<br>(12 dozers/hr) | 3.00     | 0.54             | 6.60E-02          | 36.02  | 6.43                      | 0.79              | 175            | 52             | 58.99                 | 10.53                    | 1.30              | 60.00%                | 14.41              | 23.59       | 2.57                                | 4.21                      | 0.32                              | 0.519                      |
| Dozers - Maint and<br>Replace <sup>4</sup>     | 8187      | hrs/month    | lb/hr/dozer<br>(12 dozers/hr) | 24.95    | 5.94             | 0.55              | 299.39 | 71.26                     | 6.59              | 1330           | 52             | 1225.56               | 291.69                   | 26.96             | 60.00%                | 119.8              | 490.2       | 28.5                                | 116.7                     | 2.63                              | 10.78                      |
| Truck Loading Coal with Payloader <sup>5</sup> | 8.50E+06  | tons/yr      | lb/ton<br>(7 Loaders)         | 0.05     | 0.0089           | 0.0010            | 12.213 | 2.028                     | 0.232             | 715            | 52             | 227.05                | 37.71                    | 4.31              | 50.00%                | 6.11               | 113.52      | 1.01                                | 18.855                    | 0.304                             | 5.66                       |
| Scrapers <sup>6</sup>                          | 655       | hrs/month    | lb/VMT<br>(3 Scapers)         | 2.26E-01 | 1.22E-01         | 7.01E-03          | 0.924  | 0.500                     | 0.029             | 74             | 52             | 1.78                  | 0.96                     | 0.06              | 50.00%                | 0.46               | 0.89        | 0.25                                | 0.481                     | 0.0143                            | 0.028                      |
| Road Graders <sup>6</sup>                      | 3,234     | hrs/month    | lb/VMT<br>(4 Graders)         | 2.26E-01 | 1.22E-01         | 7.01E-03          | 4.564  | 2.469                     | 0.141             | 74             | 52             | 8.78                  | 4.75                     | 0.27              | 50.00%                | 2.28               | 4.39        | 1.23                                | 2.375                     | 0.0707                            | 0.136                      |
| Coal Processing Plant 7                        | 8,500,000 | tons/yr      | lb/ton coal                   | 7.40E-01 | 3.50E-01         | 5.30E-02          | 19.37  | 9.06                      | 2.66              |                |                | 84.83                 | 39.69                    | 11.57             | 65.00%                | 6.78               | 29.69       | 3.17                                | 13.89                     | 0.93                              | 4.05                       |
|                                                |           |              | •                             | •        |                  |                   |        |                           |                   |                | CATEO          | ORY SUBT              | OTAL: O                  | verburden         | Drill/Blast           |                    | 6.41        |                                     | 3.33                      |                                   | 0.96                       |
|                                                |           |              |                               |          |                  |                   |        |                           |                   |                |                | CATEGOR               | Y SUBTO                  | FAL: Coal         | Drill/Blast           |                    | 9.28        |                                     | 4.82                      |                                   | 1.40                       |
|                                                |           |              |                               |          |                  |                   |        |                           |                   |                | CATE           | GORY SUB              | TOTAL: N                 | line Extrac       | tion Oper.            |                    | 989.6       |                                     | 219.4                     |                                   | 26.7                       |
| 1                                              |           |              |                               |          |                  |                   |        |                           |                   |                |                |                       |                          |                   | TOTAL                 |                    | 1005.2      |                                     | 227.6                     |                                   | 29.1                       |

NOTES:

1 - Emission factor is for uncontrolled drilling for either overburden or coal from AP-42, Western Surface Coal Mining, Table 11.1-4 (7/98). Holes per cu.yd. overburden = 702; holes per ton coal = 58; PM10 = 0.52, PM2.5 = 0.15 x PM (Company data)

2 - The emission factor for overburden/coal seam blasting is in units of lb/blast. Calculation is based on surface area per blast, which is estimated as follows:

Blasted material /yr = 29,449,000 cu. Yds/133 blasts/yr \* 27 cu.ft / 1 cu.yd. = 5,978,000 cu.ft./blast

Area = 5,978,000 cu.ft./blast / 400 ft avg. depth = 149,460 sq.ft./blast

Emission Factor PM (lb/blast) = Area^1.5 x 0.000014 = (5,978,000)^1.5 x 0.000014 = 9.7 lb/blast; AP-42, Table 11.9-1, PM<sub>10</sub> is 52% of the PM Emission Factor

3 - Overburden dragline removal factor (TSP) = 0.0021 \* D ^ 1.1 / M ^ 0.3 ; (< 15 micron PM ) = 0.0021 \* D ^ 0.7 / M ^ 0.3 ; Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP)

4 - Coal Bulldozing factor (TSP) = 78.4 \* s ^ 1.2 / M ^ 1.3 ; (< 15 micron PM ) = 18.6 \* s ^ 1.5 / M ^ 1.4; Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP) 5 - Truck loading of coal with Front-End Loaders (TSP) = 1.16 / M ^ 1.2; (< 15 micron) = 0.119 / M ^ 0.9 Scaling factors: PM10 = 0.75 x EF (< 15 micron); PM2.5 = 0.017 x EF (TSP) From facitly data: Drop Height (D) = 30 ft; M = 7.9% moisture From facitly data: s = 5.5 % Silt; M = 7.9% moisture From facitly data: M = 7.9% moisture

6 - Emission factor for scrapers and graders from Document AP-42, Western Surface Coal Mining, Section 11.9, Table 11.9-1 (7/98). EF(grading, TSP) = 0.4 S ^ 2.5; EF(PM10) = 0.051 S ^ 2.0 Veh. Avg working speed (S) = 2 mph for emission factor correlation.

# Table F-15 PARTICULATE MATTER EMISSION ESTIMATION - FUGITIVE EMISSIONS FROM

**COAL MINE AND PLANT VEHICLES – Baseline Year 2009** 

|                                        | Т                                          | otal Coal |                       |                   |                       | 8500                       | 000           | tons/yr                           |                                       |                                       |                          | Overburden | 5862204                           | tons/yr     |                           |                            |        |
|----------------------------------------|--------------------------------------------|-----------|-----------------------|-------------------|-----------------------|----------------------------|---------------|-----------------------------------|---------------------------------------|---------------------------------------|--------------------------|------------|-----------------------------------|-------------|---------------------------|----------------------------|--------|
| Mine and Plant Vechicles               | Gross<br>Vehicle<br>Weight <sup>4</sup>    | Emissio   | n factor <sup>1</sup> | (Ib/VMT)          | Max. Daily<br>Vehicle | Per Trip                   | Avg.<br>Speed | Oper.<br>Hours/Month <sup>2</sup> | Annual VMT <sup>3</sup><br>(miles/yr) | Max. Ur                               | ncontrolled<br>Rate (tpy |            | Control Measure                   |             | Cont                      | trolled Emissic            | n Rate |
|                                        | tons                                       | PM        | PM <sub>10</sub>      | PM <sub>2.5</sub> | Trips                 | (miles) (MPH) <sup>Π</sup> |               |                                   |                                       | PM PM <sub>10</sub> PM <sub>2.5</sub> |                          |            | (%)                               | PM<br>(tpy) | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(tpy) |        |
| Coal Haulage, Stockpile and Ro         | Haulage, Stockpile and Roadway Maintenance |           |                       |                   |                       |                            |               |                                   |                                       |                                       |                          |            |                                   |             |                           |                            |        |
| Coal Haul Trucks (240-ton<br>capacity) | 280                                        | 24.36     | 6.93                  | 0.69              | 2.0                   | 1                          | 35            | 6524                              | 218,819                               | 2665.03                               | 757.84                   | 75.78      |                                   | 65.00%      | 932.76                    | 265.24                     | 26.52  |
| Water Trucks                           | 62                                         | 12.36     | 3.51                  | 0.35              |                       |                            | 10            | 987                               | 59,220                                | 365.97                                | 104.07                   | 10.41      |                                   | 65.00%      | 128.09                    | 36.42                      | 3.64   |
| Scrapers (Travel Mode)                 | 62                                         | 12.36     | 3.51                  | 0.35              |                       |                            | 15            | 626                               | 56,340                                | 348.17                                | 99.01                    | 9.90       | Chem.<br>Suppressant<br>and Water | 65.00%      | 121.86                    | 34.65                      | 3.47   |
| End Dump Trucks                        | 175                                        | 19.71     | 5.61                  | 0.56              |                       |                            | 18.5          | 1040                              | 115,468                               | 1138.21                               | 323.67                   | 32.37      | Application                       | 65.00%      | 398.37                    | 113.28                     | 11.33  |
| Llght/Medium Veh (e.g., Pick-<br>ups)  | 3                                          | 3.16      | 0.90                  | 0.09              | 5.0                   | 1                          | 25            | 1280                              | 192,000                               | 303.67                                | 86.35                    | 8.64       |                                   | 65.00%      | 106.28                    | 30.22                      | 3.02   |
|                                        |                                            |           |                       |                   | Total Pla             | nt Vehicle tr              | avel          |                                   |                                       |                                       |                          |            |                                   |             | 754.61                    | 214.58                     | 21.46  |

NOTES:

1 Emission Factors for the coal haul road from AP-42, Section 13.2.2 Equation 1a, with constants from Table 13.2.2-2 - See results below

\*Assumed guarry surface silt content = 8.3% (Mean value for stone guarrying and processing, AP-42 Table 13.2.2-1) 2 Total vehicle category hours per month based on current facility estimates for 2009 operations, with no Area IV North production. \*Assumed days per year with > 0.01 inch moisture = 60, Figure 13.2.2-1

3 Total Vehicle Miles Traveled (VMT) estimated by the capacity of coal haul trucks and End Dump trucks, distance to/from Lowe stockpile (16,311 ft. one way), or End Dump travel (7,800 ft. one way).

Total trips based on total 2009 coal production (coal and overburden) and 240 ton haul truck load, and 150 ton end dump load. For other categories, VMT estimated from average speed and hours per month

4 Control efficiency for BNCC control measures estimated from guidance in AP-42, Section 13.2 for unpaved industrial roads

For Unpaved Roads within 2009 Operating Areas:

| For Unpaved Roads within 2009 Operating Areas         |                                     |                                    |
|-------------------------------------------------------|-------------------------------------|------------------------------------|
| AP-42 13.2.2, Eqns 1a (11/06)                         | EF = k (s/12)^a (W/3) ^ b           | E=(k(S/12)^a)x(W/3)^b)x(365-p)/365 |
| WHERE:                                                |                                     |                                    |
|                                                       |                                     | -                                  |
| AP-42 13.2.2, Eqns 1a (11/06)                         | EF = k (s/12)^a (W/3) ^ b           |                                    |
| EF = Size specific emission factor (lb/VMT)           |                                     |                                    |
| k = particle size multiplier = 4.9 for PM and 1.5 for | r PM <sub>10</sub> , Table 13.2.2-2 |                                    |
| S = road surface silt content = 8.3% (obtained fro    | m facility data)                    |                                    |

W = fleet average vehicle weight for given service (tons) as listed for each category in table above

a = empirical constant, 0.7 for PM and 0.9 for PM<sub>10</sub>, Table 13.2.2-2

b = empirical constant, 0.45 for PM,  $PM_{10}$  and  $PM_{2.5}$ . Table 13.2.2-2

p = ave. days per year with precipitation greater than 0.01 inches, obtained from Figure 13.2.2-1

#### VEHICLE TAILPIPE EMISSION ESTIMATION

#### COAL MINE AND PLANT VEHICLES PER YEAR -Baseline Year 2009

Coal Production 2009 tons 8.50E+06

| Mine Vehicle Emission Sources           | Nominal Size or<br>Capacity <sup>2</sup> | Equipment<br>Hours per<br>Month <sup>3</sup> | NOX Emission<br>Factor <sup>4</sup> | Controlled NOX<br>Emissions <sup>5</sup> | Controlled NOX<br>Emissions | CO Emission<br>Factor <sup>4</sup> | Controlled CO<br>Emissions <sup>5</sup> | Controlled CO<br>Emissions | VOC Emission<br>Factor <sup>4</sup> | Controlled VOC<br>Emissions <sup>5</sup> | Controlled VOC<br>Emissions |
|-----------------------------------------|------------------------------------------|----------------------------------------------|-------------------------------------|------------------------------------------|-----------------------------|------------------------------------|-----------------------------------------|----------------------------|-------------------------------------|------------------------------------------|-----------------------------|
| Description (No. of Units) <sup>1</sup> | hp                                       | h/month                                      | lb/hr/unit                          | Avg. Ib/day                              | Ton/yr                      | lb/hr/unit                         | Avg. lb/day                             | Ton/month                  | lb/hr/unit                          | Avg. lb/day                              | Ton/month                   |
|                                         |                                          |                                              | Min                                 | e Operation E                            | quipment Emis               | ssion Sources                      | 6                                       |                            |                                     |                                          | -                           |
| Large Front-End Loaders (7)             | 500                                      | 2558                                         | 3.425                               | 336.97                                   | 52.57                       | 1.5182                             | 149.37                                  | 23.30                      | 0.365                               | 35.91                                    | 5.602                       |
| Rubber-Tire Bulldozer (1)               | 330                                      | 2558                                         | 3.425                               | 336.97                                   | 52.57                       | 1.5182                             | 149.37                                  | 23.30                      | 0.365                               | 35.91                                    | 5.602                       |
| Small Front-End Loaders (3)             | 354                                      | 0                                            | 3.2071                              | 0.00                                     | 0.00                        | 1.7411                             | 0.00                                    | 0.00                       | 0.3621                              | 0.00                                     | 0.000                       |
| Large Bulldozers (12)                   | 498                                      | 921                                          | 3.2071                              | 113.61                                   | 17.72                       | 1.7411                             | 61.68                                   | 9.62                       | 0.3621                              | 12.83                                    | 2.001                       |
| Scrapers (3)                            | 265                                      | 716                                          | 1.8284                              | 50.35                                    | 7.85                        | 0.929                              | 25.58                                   | 3.99                       | 0.2391                              | 6.58                                     | 1.027                       |
| Water Trucks                            | 320                                      | 921                                          | 1.5016                              | 53.19                                    | 8.30                        | 0.3676                             | 13.02                                   | 2.03                       | 0.14                                | 4.96                                     | 0.774                       |
| End Dump Trucks                         | 410                                      | 512                                          | 2.0882                              | 41.12                                    | 6.41                        | 0.7785                             | 15.33                                   | 2.39                       | 0.1987                              | 3.91                                     | 0.610                       |
| Graders                                 | 275                                      | 256                                          | 1.5357                              | 15.12                                    | 2.36                        | 0.421                              | 4.15                                    | 0.65                       | 0.1493                              | 1.47                                     | 0.229                       |
| Ν                                       | line Extraction Op                       | erations                                     |                                     | •                                        | 133.07                      |                                    |                                         | 60.86                      |                                     |                                          | 14.46                       |
|                                         |                                          |                                              |                                     | Other On-                                | Site Mobile Sc              | ources                             |                                         |                            |                                     |                                          |                             |
| Maintenance Truck                       | 300                                      | 512                                          | 1.615                               | 31.80                                    | 4.96                        | 0.4301                             | 8.47                                    | 1.32                       | 0.1639                              | 3.23                                     | 0.504                       |
| Light Duty Pick-up                      | 230                                      | 921                                          | 1.615                               | 57.21                                    | 8.92                        | 0.4301                             | 15.24                                   | 2.38                       | 0.1639                              | 5.81                                     | 0.906                       |
| Flatbed Truck                           | 385                                      | 512                                          | 2.3188                              | 45.66                                    | 7.12                        | 0.7542                             | 14.85                                   | 2.32                       | 0.2492                              | 4.91                                     | 0.766                       |
|                                         | Plant Vehicle t                          | ravel                                        |                                     |                                          | 35.72                       |                                    |                                         | 10.44                      |                                     |                                          | 3.56                        |

NOTES:

1 - Vehicle operating hours per month scaled from detailed data for each vehicle category in Area IV North, to represent equivalant production for 2009 Baseline year, in proportion to annual coal production rates.

2 - Representative horsepower rating for category. The emission factors are defined by the SCAQMD reference for vehicle categories and broad ranges of engine horsepower.

3 - Estimated average hours per month in operating BNCC areas across the 2009 Baseline year at 8,500,000 coal production level obtained by scaling facility projections for Area IV North, in proportion to annual coal production rates.

4 - Controlled emission factors for recent model year (2010) for diesel engines to reflect roster of new and existing equipment at Area III, SCAQMD 1993 Handbook, Off-road Mobile Source Emission Factors, A9-8 Tables.

5 - Hourly average emission rates estimated from the equipment hours per month, divided equally over scheduled average of 26 operating days per month.

# **TAILPIPE POLLUTANT EMISSION ESTIMATION - COAL HAUL TRUCKS - Baseline Year 2009**

|                       | 2009    |
|-----------------------|---------|
| Coal Rate 2009 (tons) | 8500000 |

Fraction of Equipment in Operation

1

|                                                                              | Coal Haul Truck Emissions                           | Nominal Size or Capacity <sup>2</sup> | Equipment<br>Hours per<br>Month <sup>3</sup> | NOX Emission<br>Factor <sup>4</sup> |  | Controlled NOX<br>Emissions | CO Emission<br>Factor <sup>4</sup> | Controlled CO<br>Emissions | VOC Emission<br>Factor <sup>4</sup> |  | Controlled VOC<br>Emissions |
|------------------------------------------------------------------------------|-----------------------------------------------------|---------------------------------------|----------------------------------------------|-------------------------------------|--|-----------------------------|------------------------------------|----------------------------|-------------------------------------|--|-----------------------------|
|                                                                              | Description and (Est. Number of Units) <sup>1</sup> | hp                                    | h/month                                      | lb/hr/unit                          |  | Ton/yr                      | lb/hr/unit                         | Ton/yr                     | lb/hr/unit                          |  | Ton/yr                      |
| Coal Haul Truck Tailpipe Emissions - BNCC Operaitng Areas 2009 Baseline year |                                                     |                                       |                                              |                                     |  |                             |                                    |                            |                                     |  |                             |
|                                                                              | Coal Haul Trucks (5)                                | 580                                   | 6524                                         | 3.2071                              |  | 125.54                      | 1.7411                             | 68.15                      | 0.3621                              |  | 14.174                      |

#### NOTES:

1 - Number of coal haul trucks used from representative 2009 Baseline year operation and 8,500,000 ton/yr total coal production.

2 - Horsepower of trucks from facility information, based on existing vehicle fleet.

3 - Unit count of equipment hours from the typical operation required for movement of material during the 2009 Baseline year, at 8,500,000 ton/year production.

4 - Controlled emission factors reflect operating year 2010 for diesel engines, SCAQMD 1993 Handbook, Off-road Mobile Source Emission Factors, A9-8 Tables.

5 - Hourly maximum emission rates calculated 100% of all equipment present on site is operating simultaneously.

# CRITERIA POLLUTANT EMISSION ESTIMATION - COAL AND OVERBURDEN BLASTING – Baseline Year 2009

| SOURCE ID:                                        | Baseline Year 2009         |                                       |                                      |                                         |                                       |                                      |  |  |
|---------------------------------------------------|----------------------------|---------------------------------------|--------------------------------------|-----------------------------------------|---------------------------------------|--------------------------------------|--|--|
|                                                   |                            | •                                     | 40 blasts/2000 lb/ton = 2            | 9.36 ton ANFO/blast                     |                                       |                                      |  |  |
|                                                   | Annual number of blas      | sts = 140 coal and overb              | urden combined                       |                                         |                                       |                                      |  |  |
|                                                   | Type of Source: H          | Explosives Detonation -               | ANFO (Mine Usage)                    |                                         |                                       |                                      |  |  |
|                                                   |                            | •                                     |                                      |                                         |                                       |                                      |  |  |
|                                                   |                            | Blasting (128 Avg. Blas               |                                      | Overburden Blasting (12 Avg. Blasts/yr) |                                       |                                      |  |  |
| Pollutant                                         | Carbon Monoxide<br>(CO)    | Nitrogen Oxides<br>(NO <sub>x</sub> ) | Sulfur Dioxide<br>(SO <sub>2</sub> ) | Carbon Monoxide<br>(CO)                 | Nitrogen Oxides<br>(NO <sub>x</sub> ) | Sulfur Dioxide<br>(SO <sub>2</sub> ) |  |  |
| Throughput or Other<br>Emission Basis             | 29.36<br>ton ANFO/blast    | 29.36<br>ton ANFO/blast               | 29.36<br>ton ANFO/blast              | 29.36<br>ton ANFO/blast                 | 29.36<br>ton ANFO/blast               | 29.36<br>ton ANFO/blast              |  |  |
| Number of Identical<br>Emission Sources           | 1                          | 1                                     | 1                                    | 1                                       | 1                                     | 1                                    |  |  |
|                                                   | 67                         | 17                                    | 2                                    | 67                                      | 17                                    | 2                                    |  |  |
| Emission Factor (Reference)                       | lb/ton ANFO                | lb/ton ANFO                           | lb/ton ANFO                          | lb/ton ANFO                             | lb/ton ANFO                           | lb/ton ANFO                          |  |  |
|                                                   | AP-42, Tbl. 13.3-1, 1/95   | AP-42, Tbl. 13.3-1, 1/95              | AP-42, Tbl. 13.3-1, 1/95             | AP-42, Tbl. 13.3-1, 1/95                | AP-42, Tbl. 13.3-1, 1/95              | AP-42, Tbl. 13.3-1, 1/9              |  |  |
| Max. Emission Rate                                | 1967.12                    | 499.12                                | 58.72                                | 1967.12                                 | 499.12                                | 58.72                                |  |  |
| Max. Emission Rate                                | lb/blast                   | lb/blast                              | lb/blast                             | lb/blast                                | lb/blast                              | lb/blast                             |  |  |
| Control Device<br>or System                       | No Add-on Control          | No Add-on Control                     | No Add-on Control                    | No Add-on Control                       | No Add-on Control                     | No Add-on Contro                     |  |  |
| Capture and<br>Control Efficiency                 | 0.00                       | 0.00                                  | 0.00                                 | 0.00                                    | 0.00                                  | 0.00                                 |  |  |
| BACT Measure(s)                                   | Limit the number of blasts | Limit the number of blasts            | Limit the number<br>of blasts        | Limit the number<br>of blasts           | Limit the number of blasts            | Limit the number of blasts           |  |  |
| Controlled Max.                                   | 1967.12                    | 499.12                                | 58.72                                | 1967.12                                 | 499.12                                | 58.72                                |  |  |
| Emission Rate                                     | lb/blast                   | lb/blast                              | lb/blast                             | lb/blast                                | lb/blast                              | lb/blast                             |  |  |
| Maximum Daily Blasts                              | 1                          | 1                                     | 1                                    | 1                                       | 1                                     | 1                                    |  |  |
| Maximum Dairy Blasts                              | blast/day                  | blast/day                             | blast/day                            | blast/day                               | blast/day                             | blast/day                            |  |  |
| Maximum Annual Blasts                             | 251                        | 251                                   | 251                                  | 22                                      | 22                                    | 22                                   |  |  |
| Maximum Annual Blasts                             | blasts/year                | blasts/year                           | blasts/year                          | blasts/year                             | blasts/year                           | blasts/year                          |  |  |
|                                                   | 01.06                      | 20.00                                 | 0.45                                 | 01.04                                   | 20.00                                 | 2.45                                 |  |  |
| Max. Average Emissions<br>per Blast Event (lb/hr) | 81.96                      | 20.80                                 | 2.45                                 | 81.96                                   | 20.80                                 | 2.45                                 |  |  |
| Max. Daily<br>Emissions (lb/day)                  | 1967.12                    | 499.12                                | 58.72                                | 1967.12                                 | 499.12                                | 58.72                                |  |  |
| Est. Annual<br>Emissions (tpy)                    | 246.87                     | 62.64                                 | 7.37                                 | 21.64                                   | 5.49                                  | 0.65                                 |  |  |

#### PARTICULATE MATTER EMISSION ESTIMATION - WIND EROSION OF STOCKPILES AND UNRECLAIMED OPEN AREAS -Baseline Year 2009

|      | Total Stockpile Areas (Acres)                        | 2009                   |                                                                                            |                    |        |        |                                               |                                        |       |      |       |
|------|------------------------------------------------------|------------------------|--------------------------------------------------------------------------------------------|--------------------|--------|--------|-----------------------------------------------|----------------------------------------|-------|------|-------|
|      | Overburden                                           | 308                    |                                                                                            |                    |        |        |                                               |                                        |       |      |       |
|      | Coal                                                 | 103                    |                                                                                            |                    |        |        |                                               |                                        |       |      |       |
| Cons | Construction Emission Sources<br>Particulate Control |                        | Nominal Surface Areas <sup>2</sup> Controlled Emission Factor <sup>3</sup> (ton/Area Unit) |                    |        |        | Additional Control<br>Efficiency <sup>4</sup> | Controlled Emission Rates $(ton/yr)^5$ |       |      |       |
|      | Description <sup>1</sup>                             |                        | Value                                                                                      | Units              | PM     | PM10   | PM2.5                                         | %                                      | PM    | PM10 | PM2.5 |
|      | Soil/Overburden Stockpiles                           | Contour<br>and Compact | 1258.796                                                                                   | 10 <sup>3</sup> m2 | 0.059  | 0.0296 | 0.0119                                        | Incl in Emiss. Fct                     | 74.3  | 37.3 | 15.0  |
|      | Coal Stockpiles                                      | Contour<br>and Compact | 420.961                                                                                    | 10 <sup>3</sup> m2 | 0.0438 | 0.022  | 0.0088                                        | Incl in Emiss. Fct                     | 18.4  | 9.3  | 3.7   |
| 2009 | Coal Prep Plant Stockpiles                           | Contour and<br>Compact | 58.00                                                                                      | 10 <sup>3</sup> m2 | 0.356  | 0.177  | 0.0266                                        | Incl in Emiss. Fct                     | 20.6  | 10.3 | 1.54  |
|      | Unreclaimed Open Area                                | Water/Stabilize        | 300                                                                                        | acres              | 0.1718 | 0.0859 | 0.0344                                        | 50%                                    | 25.8  | 12.9 | 5.2   |
|      |                                                      |                        |                                                                                            |                    |        |        |                                               | Total Wind Erosion                     | 139.1 | 69.7 | 25.4  |

1 - Sources are for windblown dust from idle areas of stockpiles and from disturbed mine areas prior to reclaim activities

2 - Areas estimated for stockpiles and unreclaimed areas are only for Area IV North operations. Some of these areas will offset reductions in stockpile and disturbed areas in other Navajo Mine areas.

Stockpiles converted to square meters by convertion 4,088 m2 = 1 acre

3 - Controlled emission factor reflect windblown emissions model from AP-42 as determined by facility emissions for existing Navajo Mine stockpiles of known surface areas.

Emissions factors for stockpiles include indicated control measure - no additional controls.

 ${\bf 4}$  - Controls for the Area IV North stockpiles that represent additional measures for those areas.

5 - Controlled emissions from assumed annual areas for total stockpile and unreclaimed areas during each operating year. Ratio of PM2.5 to PM10 obtained from AP-42 model for windblown friction velocity correlation.

# PARTICULATE MATTER EMISSION ESTIMATION - CONSTRUCTION VEHICLES AND EARTHMOVING FOR RECLAMATION OF MINED AREAS – Baseline Year 2009

| Co                    | nstruction Emission Sources       | Particulate Control      | Nominal /<br>Materi |       |       | trolled Emission<br>actor <sup>3</sup> | PM Control Efficiency<br>4 | Controlled PM10<br>Emission Rates <sup>5</sup> | Ratio: PM2.5 to<br>PM10 <sup>6</sup> | Controlled PM2.5<br>Emission Rates |
|-----------------------|-----------------------------------|--------------------------|---------------------|-------|-------|----------------------------------------|----------------------------|------------------------------------------------|--------------------------------------|------------------------------------|
|                       | Description <sup>1</sup>          |                          | Value               | Units | Value | Units                                  | %                          | PM10 (ton/yr)                                  | Frac of PM10                         | PM2.5 (ton/yr)                     |
|                       | General Construction - Contouring | Watering, Veh.<br>Speeds | 303                 | acres | 0.19  | ton PM10/acre-<br>month                | 50%                        | 28.8                                           | 0.2                                  | 5.8                                |
| Baseline<br>Year 2009 | Overburden Penlacement            | Watering, Veh.<br>Speeds | 3.32E+07            | Tons  | 0.012 | lb PM/ton                              | 50%                        | 99.7                                           | 0.2                                  | 19.94                              |
|                       | Total Reclamation Emissions – 200 |                          |                     |       |       |                                        |                            | 128.5                                          |                                      | 25.70                              |

#### NOTES:

1 - Sources are for construction operations involved in reclaim of mined areas. These emission source categories include earthmoving, surface shaping, soil handling and vehicle operation.

2 - Areas and overburden quantity estimated for unreclaimed areas in ongoing operations in current Navajo Mine active ares during 2009 Baseline year.

Stockpiles converted to square meters by convertion 4,088 m2 = 1 acre

- 3 Controlled emission factors from various studies. General Construction factor more recent than latest AP-42 section on Heavy Construction (MRI 1996, EPA 2001, EPA 2006.) Overburden replacement from factor given in Western Surface Coal Mining, AP-42 Section 11.9.
- 4 Controls for the reclaim operations in Baseline 2009 year represent range of control measures utilized for current Mining Permit in other Navajo Mine areas
- 5 Controlled emissions from reclaim areas and overburden replacement representative of the 2009 Baseline year, scaled to coal production rate of 8,500,000 tons/yr

6 - Ratio of PM2.5 to PM10 conservatively set for the range of construction operations. For geologic dusts, typical raio in AP-42 is 20% of PM10 is PM2.5.

| Summary | - 2009 |
|---------|--------|
|---------|--------|

|                                             |        | Baseline Y |        |  |
|---------------------------------------------|--------|------------|--------|--|
| Emission Source Category                    | PM10   | PM2.5      | NOX    |  |
| Overburden Drilling and Blasting            | 3.33   | 0.96       | 5.49   |  |
| Coal Seam Drilling and Blasting             | 4.82   | 1.40       | 62.64  |  |
| Overburden Dragline Stripping               | 62.96  | 5.56       |        |  |
| Mine Extraction Operations and Loading      | 142.60 | 17.12      | 133.07 |  |
| Coal Haul Truck to Stockpiles               | 265.2  | 26.52      | 125.54 |  |
| Plant Vehicle Travel                        | 214.6  | 21.46      | 35.72  |  |
| Unloading at Stockpiles and Railcar Loading | 0.71   | 0.11       |        |  |
| Reclamation                                 | 128.5  | 25.70      |        |  |
| Coal Prep Plant (Ex. Stockpiles)            | 13.89  | 4.05       |        |  |
| Wind Erosion (Coal and Spoils piles)        | 69.67  | 25.39      |        |  |
| TOTALS                                      | 906.3  | 128.3      | 362.5  |  |

# Summary - 2009

| 09    |       |
|-------|-------|
| со    | voc   |
|       |       |
| 21.64 |       |
| 246.9 |       |
|       |       |
| 60.86 | 14.46 |
| 68.15 | 14.17 |
| 10.44 | 3.56  |
|       |       |
|       |       |
|       |       |
|       |       |
| 408.0 | 32.2  |