



SURFACE TRANSPORTATION BOARD

Washington, DC 20423

Office of Environmental Analysis

May 20, 2013

David H. Coburn
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington DC 20036

Re: Docket No. FD 30186, Tongue River Railroad Company, Inc. —Rail
Construction and Operation—in Custer, Powder River, and Rosebud Counties,
Mont.; Information Request #3 (Coal Dust)

Dear Mr. Coburn:

Pursuant to 40 C.F.R. § 1506.5(a), we would like to request the information listed below, which is necessary for the Office of Environmental Analysis' Environmental Impact Statement in connection with the above-referenced proceeding.

1. Please provide copies of any studies conducted by BNSF that evaluate or analyze the quantity of coal dust emitted from rail cars using passive dust collectors or other means; the concentration (ug/m^3) of airborne coal dust near rail lines measured using trackside monitoring equipment; the deposition of coal dust along rail lines; or the potential reductions in coal dust emissions resulting from the use of mitigating measures, including the use of chemical suppressors. BNSF's website (<http://www.bnsf.com/customers/what-can-i-ship/coal/coal-dust.html>) mentions "extensive research" and "studies" that it has conducted on coal dust, but provides few references other than the summary of the 2010 "Super Trial" of dust suppressants (<http://www.bnsf.com/customers/pdf/coal-super-trial.pdf>).

We are particularly interested in reviewing any available information on the particle size distribution of coal dust emitted from rail cars; quantitative measurements of coal dust emissions from rail cars and concentrations of airborne coal dust in close proximity to the tracks; the relative quantities of the various types of dust collected and measured (e.g., coal, soil, biological debris, and diesel particulate); and details regarding coal train activity while trackside and passive dust collection measurements were made (e.g., number and dimensions of coal cars, number of trips per day, loaded or unloaded train, suppressants applied or not, distance from point of origin, monitor's distance from the track, and duration of study).

2. Please indicate whether BNSF would require shippers using the Tongue River Railroad to adhere to coal dust mitigation requirements set forth in BNSF Price List 6041-B (BNSF's

Freight Tariff issued in December 2009 establishing the rules and regulations governing coal trains).

3. It is our understanding that coal dust mitigation requirements similar or identical to those in BNSF Price List 6041-B apply only to common carrier or contract traffic moving coal on the Powder River Basin (PRB) Joint Line and BNSF's Black Hills Sub-Division. Please explain why BNSF does not apply the same or similar requirements for shipments of coal that originate from non-PRB locations and move over other BNSF rail lines.
4. Tongue River Railroad's supplemental application dated Dec. 17, 2012 indicates that BNSF would likely be the operator of the new rail line, should the proposal be approved by the Board. Please indicate what voluntary mitigation, if any, TRRC or BNSF would undertake or require shippers to undertake to control coal dust from TRRC trains.
5. Please provide any available information regarding the extent to which the effectiveness of each mitigation measure that BNSF has studied may vary with each of the following factors:
 - a. Distance traveled from the mine;
 - b. Train speed;
 - c. Track gradient;
 - d. Topographic features/cuts/tunnels;
 - e. Weather conditions during the trip (e.g., humidity, precipitation, temperature, cloud cover, wind speed); and
 - f. Time elapsed since car loading.

We look forward to receiving this information at your earliest convenience and in no case, any later than June 4, 2013. Please provide a copy of your response to Mr. Ken Blodgett of my staff at 395 E Street, SW, Washington, DC, 20423, 202-245-0305 (e-mail address: Kenneth.Blodgett@stb.dot.gov) and to Mr. Alan Summerville of ICF International, our independent third-party contractor, at 9300 Lee Highway, Fairfax, Virginia, 22031, 703-934-3616 (e-mail address: Alan.Summerville@icfi.com). Please feel free to contact me or Mr. Blodgett if you have any questions. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Rutson". The signature is fluid and cursive, with the first name "Victoria" and last name "Rutson" clearly distinguishable.

Victoria Rutson
Director
Office of Environmental Analysis