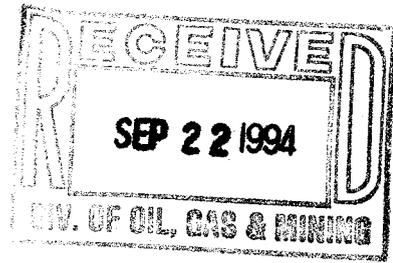
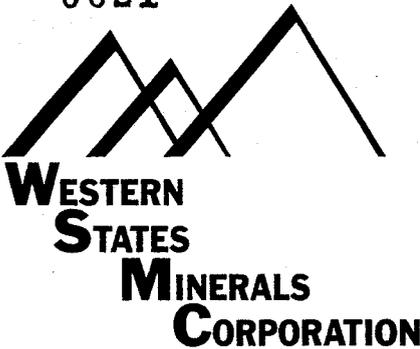


0021



September 19, 1994

Ms. Lisa Rogers  
State of Utah  
Department of Environmental Quality  
Division of Water Quality  
288 North 1460 West  
Salt Lake City, UT 84114-4870

RE: APPLICATION FOR PERMISSION TO USE SEWAGE SLUDGE FROM THE PRICE RIVER WATER IMPROVEMENT DISTRICT (PRWID) WASTEWATER TREATMENT PLANT FOR RECLAMATION PURPOSES AT THE J.B. KING RECLAIMED MINESITE.

*ACT/015/002 #2 Copy Henry*

Dear Ms. Rogers:

Please consider this submittal as application, by Western States Minerals Corporation (WSMC) for permission to use sewage sludge from the Price River Water Improvement District (PRWID) Wastewater Treatment Plant for reclamation purposes at the J.B. King reclaimed minesite.

As you may be aware, the J.B. King reclaimed minesite, Permit No. ACT/015/002, is located in Emery County, Utah. The reclaimed site is located approximately 5 miles east of the intersection of State Highway 10 and Interstate 70. This project is under the jurisdiction of the Utah Division of Oil, Gas and Mining (Coal Regulatory Program). Your contact at the DOGM will be:

Mr. Daron R. Haddock, Permit Supervisor  
or  
Ms. Pamela Grubaugh-Littig, Permit Supervisor  
c/o Utah Division of Oil, Gas & Mining (UDOGM)  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203  
(801) 538-5340

The following is a summary of our proposal and analyses of the sewage sludge to be used from the PRWID Wastewater Treatment Plant; and provided to you for your review and approval:

Our Proposal

We are presently working with the staff at DOGM to amend our existing reclamation plan to include the use of sewage sludge as a soil conditioner to enhance vegetative growth at the J.B. King reclaimed minesite.

The sewage sludge would be trucked from the PRWID Wastewater Treatment Plant directly to the J.B. King site. At the site, the sludge would be thoroughly mixed with the top layer of soil at the rate of approximately 15 to 20 tons of sludge per acre requiring enhancement.

Analyses for your review:

1. Metals content of sludge: (attachments)
  - a) sludge sample collected 12/30/93 and analyzed by Ford Analytical Laboratories
  - b) sludge sample collected 3/31/94 and analyzed by Ford Analytical Laboratories
  - c) sludge sampled collected 5/31/94 and analyzed by Richard Laboratories Inc.
  - d) sludge sample collected 8/23/94 and analyzed by Ford Analytical Laboratories
2. Nitrate, Nitrite, Phosphorus, and total KN or organic Nitrogen (attachment)
  - a) sludge sample collected 8/23/94 and analyzed by Ford Analytical Laboratories
3. Classification of sludge as Class B with respect to pathogens  

See attached letter from Mr. Jeffrey R. Richens, Superintendent for PRWID Wastewater Treatment Plant for an explanation of how this classification was met.
4. Vector Attraction Reduction  

Again, see attached letters from Mr. Jeffrey R. Richens, Superintendent of PRWID Wastewater Treatment Plant for an explanation of how this was accomplished.

### Site Controls

1. Anti-erosion - Erosion protection will be provided by thorough mixing of the sewage sludge with the top layer of soil where application is made. In addition, the site is equipped with a sediment pond to capture all suspended solids prior to release off-site.  
NOTE: To date, since reclamation was performed in 1985, no surface water from the site has been released off-site.
2. Protection from public access - The site is equipped with a barbed-wire fence around the entire perimeter to prevent domestic livestock grazing and to discourage general public access.

In addition, the site is inspected on a monthly basis by DOGM personnel and quarterly by a contracted WSMC caretaker (or more often as required).

### Monitoring

Per your request an initial (prior to sludge application) soil analysis of 4 locations on site will be performed for total nitrogen. Each location will be sampled to a total depth of 5 ft., taken at one (1) ft. intervals. Each interval will be analyzed by an independent, certified laboratory for total nitrogen. The results will be submitted to you upon receipt.

Annually, following the application of sludge, this same sampling and analysis procedure will be accomplished. I assume that you will designate how many years this will be required for.

I believe that this application would be in full compliance with the 503 regulations.

As I discussed with you previously, I'm under a critical timeline to receive your approval. I anticipate shipping sludge to the site the week of October 10, 1994 and begin the application thereafter. Your help to expedite this approval is greatly appreciated!

Ms. Lisa Rogers  
September 19, 1994  
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If you need any additional information, please call me at your convenience.

I look forward to working with you and the PRWID on this very beneficial use of sewage sludge.

Sincerely,



E.M. (Buzz) Gerick  
V.P. Operations

cc: J. Richens, PRWID  
P. Grubaugh-Littig, DOGM  
D. Haddock, DOGM  
G. Cropper, WSMC