

0004



ONE UTAH CENTER

201 SOUTH MAIN • SUITE 2100 • SALT LAKE CITY, UTAH 84140-0021 • (801) 220-2000

*Copy Henry, Jesse,
Tom, Hugh, Ken, Pam
File Act/015/017 #2*

October 16, 1991

Original is coming through the mail

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2
To <i>Pam Grubaugh-Littig</i>	From <i>Guy Davis</i>	
Co. <i>DOGMA</i>	Co. <i>PACIFICORP</i>	
Dept.	Phone #	
Fax #	Fax #	

Ms. Pamela Grubaugh-Littig
Permit Supervisor
DIVISION OF OIL, GAS AND MINING
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Re Sediment Pond Sludge Incorporation Details, Des-Bee-Dove Sediment Pond Clean, PacifiCorp, Des-Bee-Dove Mine, ACT/015/017

Dear Pamela:

In response to your conditioned approval letter of October 9, 1991 and phone conversation of the same day I submit the following detailed incorporation of the Des-Bee-Dove sediment pond sludge at the waste rock facility. In addition to the details, other incorporation methods suggested by the Division are discussed as to their practicability.

SLUDGE INCORPORATION DETAILS:

The temporary idling of the Des-Bee-Dove Mine has minimized the water flow into the sediment pond. Flow into the pond is exclusively from precipitation events. Because of this unique situation the sediment pond has been decanted, while staying in compliance with the current UPDES permit, and is now naturally evaporating to an even lower elevation, leaving the sludge in a drier condition than could normally be attained. The sludge in the inlet delta area in particular will be dry enough to immediately incorporate it into the refuse of the waste rock facility. Other sludge that is still quite firm in texture will also be incorporated into the refuse as long as handling of such material can be contained. The materials will be allowed to dry and compacted with the other refuse piles into 2-foot lifts. (This incorporation procedure is one recommended by the Division.)

The sludge which contains more moisture than can be properly handled on the refuse pile location will be dumped into a containment area to allow drying of the sludge and maintain adequate working room for normal operation. This material will be excavated when dry and distributed throughout the refuse area for incorporation and compaction, which will help maintain the proper coal to rock ratio throughout the site and ensure uniform stability.

Ms. Pamela Grubaugh-Littig
October 16, 1991
Page Two

OTHER INCORPORATION METHODS:

PacifiCorp reviewed other incorporation methods including dumping the sludge in current refuse pile voids, dumping the sludge in trenches across the refuse, and incorporating the sludge into the refuse by windrowing without any containment area.

The refuse pile void method is impractical due to the fluctuation of refuse piles available during the time of cleaning. The consistency of the sludge could also cause difficulties. The first sludge is usually more firm, which would restrict sludge with more moisture from going into the voids. Costs of making ramps on top of the piles would also be more expensive than the proposed incorporation method.

The other two methods are impractical because of the access restriction which would be created. Normal operation of the facility would be restricted to small areas that are difficult for large hauling equipment to maneuver into. Another major concern created is the collection of the sludge on vehicles and transportation off the site.

PacifiCorp believes that the proposed sludge incorporation method is the most economical as well as being environmentally safe. Incorporation of drier sludge directly into the refuse should greatly reduce the containment area size, exposing all deposited sludge for greater evaporation potential.

We would appreciate your help in this cleaning operation by your response to Guy Davis at 653-2312 or me at 220-4584 prior to the October 21, 1991 scheduled cleaning date.

Sincerely,

Guy Davis (for)

J. Blake Webster
Permitting Administrator

DGD/sh

cc: Larry LaFrentz
File