

From: Jim Smith
To: Pam Grubaugh-Littig
Date: 7/27/2005 7:23:09 AM
Subject: Re: Rilda Update

No - UPDES permit holders cannot discharge onto FS lands without specific, hard-to-get approval from the USFS.

Dennis is still pursuing the UIC permit, although I don't know on what basis. I don't know if PCorp has MSHA approval for disposal in the mine.

I think the Division can accept the alternative described in the plan (i.e., piping the water through the mine to Deer Creek Canyon and discharging through an existing permitted UPDES outfall there) as meeting the requirements of the Coal Mining Rules. If the water meets UPDES standards when it arrives at Deer Creek it will not need to go through the Deer Creek pond, therefore the size of the pond should not be an issue. I told Dennis to get Water Quality up-to-speed on this alternative plan and if possible get them to provide something in writing acknowledging they are aware of it (or even better, that they have no problems with the current UPDES permit covering this).

For the future, PCorp may eventually amend the plan to simply use the total-containment sedimentation pond at Rilda to treat runoff rather than pumping it through the mine. Dennis also said that if the volumes of gray or equipment washdown water turn out to be small enough, they will consider handling that water in a separate system, trucking it to the Hunter plant, and running it through the treatment plant there.

JIM

>>> Pam Grubaugh-Littig 07/26/2005 5:11 PM >>>

Jim - was there any conclusion to the underground injection situation with Rilda? Can they discharge on FS land (anti-degradation policy)....

CC: Sheila Morrison