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3 September, 1991

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Hugh Klein, Reclamation Hydrologist

RE: Sediment Pond Cleaning at UP&L's Deer Creek and Cottonwood Wilberg Mines, PacifiCorp Electric Operations, ACT/015/018 & ACT/015/019, Folder #2, Emery County, Utah

SYNOPSIS

Certain questions and concerns relative to the proposed sediment pond cleaning at the above mentioned mines were raised in this writer's 28 August 1991 to you (PGL). The following analysis is the summary of a 30 August 1991 telephone conversation with Guy Davis of PEO's Huntington field office and should serve to clarify issues raised in the previous memo regarding this matter.

ANALYSIS

In response to this writer's questions, Guy Davis clarified and gave assurance on the following:

1) Bypasses used for rerouting water during pond cleaning will be equipped with valves so that water quality (for NPDES requirements) and water quantity can be closely monitored. If NPDES standards are not being met the valve can be closed. The valve can also be closed in the event that the volume of water entering the temporary basin or alternate pond becomes too large. Any excess volume that could not be contained would be trucked to the Deer Creek Waste Rock Site's sediment pond.

2) Should it be necessary to truck water to the Waste Rock Site, Guy Davis has given the assurance that the loss of this volume from the particular site would not affect any instream needs or local water rights.

3) Sludge removed from the ponds would be trucked to the Waste Rock Site and placed into a temporary basin (in the waste rock material). Although this may present some concerns from the standpoint of putting a semi-liquid material onto coal refuse, this seems to be the best method for two reasons. First, drying at the site of removal would mean that the dried material would eventually have to be moved or transported. Because of the nature of this material after being dried, any transport would almost certainly lead to particles becoming airborne and potentially create air quality problems (this could lead to citizen's complaints). The second reason for the above-mentioned method is that by containing the sludge instead of spreading it over the site, the potential for vehicles leaving the site to track sludge onto county roads is largely eliminated.

4) Trucking sludge is a major concern in this operation. Recent pond cleaning at Skyline resulted in citizen's complaints due to the trucking and spilling of sludge onto county roads. In response to this concern, the Division has been told that water tight trucks will be utilized for transport. The Division has also been given assurance that one of it's representatives (most likely Bill Malencik of the PFO) will be notified prior to the onset of the cleaning so as to be able to observe the operations and assist in overseeing a "clean" procedure.

RECOMMENDATIONS

In light of the assurances and clarifications given by Guy Davis in conjunction with what appears to be a genuine concern for the quality of the sediment pond cleaning operations, the sediment pond cleaning for both the above-mentioned mines should be approved. As a safeguard and in the interest of quality control, the Division should have a representative (probably Bill Malencik or other available person) observe various segments of the operation.