

OGMCOAL - Crandall Canyon: Alternate sludge disposal plan

From: Steve Christensen
To: OGMCOAL
Date: 3/14/2011 10:39 AM
Subject: Crandall Canyon: Alternate sludge disposal plan

>>> "Shaver, Dave" <dshaver@coalsource.com> 3/11/2011 2:24 PM >>>
Daron, Dana.....In your letter of February 3, 2011 (Denial of Sediment Pond A Storage, Task #3713), you instructed that we submit a new disposal plan for the Crandall water treatment sludge material. In response to that letter, we have identified a site near the power plant in Huntington Canyon on which we propose to construct several shallow evaporation ponds for the purpose of storing and ultimately burying the material on-site under the SMCRA regulations. This site is located in a highly-industrial area on SITLA land, and is well suited for such a facility. We intend to permit the facility under the existing Crandall Canyon permit 015/032. We have discussed the matter with SITLA and are now in the process of applying to lease the site. We have scheduled contractors to do the pre-requisite topographic mapping, archeological survey, soils survey, and vegetation survey. We have inspected the site with Steve Christensen and Kevin Lundmark to assess the permitting requirements from a hydrologic standpoint. We have also reviewed the area with an earthwork contractor regarding the possible time-frame for construction. Based on this preliminary work, we anticipate submitting an amendment to the Crandall MRP for this site within the next several months. Realistically, by the time the baseline studies are completed, the permitting process is approved, and the construction is finished and ready for use, we could be five to six months in the future. We recently cleaned the Crandall sludge pond, but based on past experience the pond will need to be cleaned again in about two months in order to stay in compliance. As part of the evaporation pond permitting process, we will most likely seek permission from the Division to utilize the Crandall sediment pond for temporary storage of the sludge material for several months in the interim until the evaporation ponds can be completed. As you know, the Division has previously allowed such temporary and limited usage of the sediment pond in connection with the operational development of the current water treatment facilities. If you have any questions regarding our plans for developing this new sludge disposal facility, please contact me. Thanks

Dave