

OGMCOAL - Re: Crandall Canyon- Sludge Disposal Issue

From: Steve Christensen
To: Ralph Bohn
Date: 7/11/2012 7:33 AM
Subject: Re: Crandall Canyon- Sludge Disposal Issue
CC: Ken Hoffman; OGMCOAL

Ralph,

Thanks for looking into this for us. We really appreciate it.

Regards,
Steve

Steve Christensen
Environmental Scientist III
Utah Division of Oil, Gas and Mining
(801) 538-5350

>>> Ralph Bohn <rbohn@utah.gov> 7/11/2012 6:55 AM >>>
I don't see anything in this that would cause it to be a hazardous waste.

Ralph Bohn
Utah Division of Solid and Hazardous Waste
PO Box 144880
Salt Lake City, Utah 84114-4880
Phone 801/536-0212
Fax 801/536-0222
rbohn@utah.gov

Statements made in this e-mail do not constitute the official position of the Director of the Utah Division of Solid and Hazardous Waste. If you desire a statement of the Director's position, please submit a written request to the Director, Utah Solid & Hazardous Waste Control Board, P.O. Box 144880, Salt Lake City, Utah 84114-4880, including copies of documents relevant to your request.

On Mon, Jul 9, 2012 at 5:07 PM, Steve Christensen <stevechristensen@utah.gov> wrote:

Hi Ralph,
Thank you for discussing our Crandall Canyon sludge disposal issue. As we discussed, I've attached the two MSDS sheets for the chemicals currently being utilized at the site to drop the iron out of the mine water (Nalco 7763- polyacrylamide and Nalco 8187- polyaluminum chloride).
Additionally, I've attached the sludge analysis that was performed a year or so ago. Several of the parameters that you mentioned were analyzed (i.e. mercury, lead, arsenic). The question that Ken and I

have is whether or not the testing methods that they utilized were appropriate (i.e. meet the TCLP standard in determining whether the material/sludge is hazardous or toxic). If the testing methods that they used missed the mark in adequately characterizing the material, what testing should we require of them at this point?

Please feel free to contact myself (801) 538-5350 or Ken Hoffman (801) 538-5345 if you have any questions or need more information. We really appreciate your help with this.

Regards,

Steve

Steve Christensen

Environmental Scientist III

Utah Division of Oil, Gas and Mining

(801) 538-5350