

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

In the Matter of Remedial	)	
Action At:	)	
	)	
LANDSBURG MINE	)	
Sections 24 and 25, T22N,	)	SECOND AMENDMENT OF
R6E	)	AGREED ORDER
	)	
Ravensdale, Washington	)	No. DE 983TC-N273

The parties hereby agree to modify Agreed Order No. DE 983TC-N273 as follows:

A. Section IV (Work to be Performed) is modified to require the PLPs to perform the work described in the proposal from Golder Associates dated June 24, 2005. Ecology hereby finds that the work described in the Golder Associates proposal is necessary for public health and safety. The Golder Associates proposal is Attachment 1 to this Second Amendment, and by this reference is incorporated into the Agreed Order as an integral and enforceable part thereof.

B. Section V.2 (Terms and Conditions of Order) is modified so that the first sentence reads as follows: "WAC 173-340-600(11)(c) requires a 30-day public comment period for agreed orders, or amendments thereto."

C. Section V.11 (Terms and Conditions of Order) is modified by deleting the existing text and replacing it with the following:

1. All actions carried out by the PLPs pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements, including requirements to obtain necessary permits, except as provided in RCW 70.105D.090.

2. Pursuant to RCW 70.105D.090(1), the substantive requirements of Chapters 70.94, 70.95, 70.105, 77.55, 90.48, and 90.58 RCW and of any laws requiring or authorizing local government permits or approvals for the remedial action under this Order and that are known to be applicable at the time this Order becomes effective, have

been included in Attachment 1, and are binding and enforceable requirements of this Order.

PLPs have a continuing obligation to determine whether additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order. In the event either Ecology or the PLPs determine that additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order, the other party or parties shall promptly be notified of this determination. Ecology shall determine whether Ecology or the PLPs shall be responsible to contact the appropriate state and/or local agencies. If Ecology so requires, the PLPs shall promptly consult with the appropriate state and/or local agencies and provide Ecology with written documentation from those agencies of the substantive requirements those agencies believe are applicable to the remedial action. Ecology shall make the final determination on the additional substantive requirements that must be met by the PLPs and on how the PLPs must meet those requirements. Ecology shall inform the PLPs in writing of these requirements. Once established by Ecology, the additional requirements shall be enforceable requirements of this Order. The PLPs shall not begin or continue the remedial action potentially subject to the additional requirements until Ecology makes its final determination.

Ecology shall ensure that notice and opportunity for comment is provided to the public and appropriate agencies prior to establishing the substantive requirements under this section.

3. Pursuant to RCW 70.105D.090(2) in the event Ecology determines that the exemption from complying with the procedural requirements of the laws referenced in RCW 70.105D.090(1) would result in the loss of approval from a federal agency which is necessary for the state to administer any federal law, the exemption shall not apply and the PLPs shall comply with both the procedural and substantive

requirements of the laws referenced in RCW 70.105D.090(1), including any requirements to obtain permits.

D. Except as provided in this Second Amendment, all provisions of Order No. DE 983TC-N273 remain unmodified and in effect.

E. This Second Amendment shall be effective on the date it is signed by the authorized representative of the Department of Ecology.

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

By John M. Shedd

Its Regional Section Manager

Date 10.14.05

TIME OIL COMPANY

By [Signature]

Its General Counsel

Date 9/14/05

BROWNING-FERRIS INDUSTRIES OF ILLINOIS, INC.

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

requirements of the laws referenced in RCW 70.105D.090(1), including any requirements to obtain permits.

D. Except as provided in this Second Amendment, all provisions of Order No. DE 983TC-N273 remain unmodified and in effect.

E. This Second Amendment shall be effective on the date it is signed by the authorized representative of the Department of Ecology.

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

TIME OIL COMPANY

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

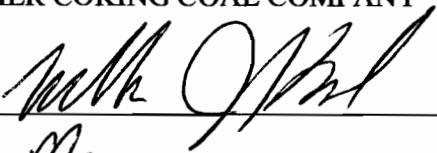
BROWNING-FERRIS INDUSTRIES OF ILLINOIS, INC.

By J. White

Its Corporate Secretary

Date 8-30-05

PALMER COKING COAL COMPANY

By   
Its Manager  
Date August 19, 2005

BNSF RAILWAY COMPANY

By \_\_\_\_\_  
Its \_\_\_\_\_  
Date \_\_\_\_\_

PACCAR INC.

By \_\_\_\_\_  
Its \_\_\_\_\_  
Date \_\_\_\_\_

PLUM CREEK TIMBERLANDS, L.P.  
By Plum Creek Timber I L.L.C., General Partner

By \_\_\_\_\_  
Its \_\_\_\_\_  
Date \_\_\_\_\_

PALMER COKING COAL COMPANY

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

BNSF RAILWAY COMPANY

By Bruce A. Sheppard

Its B. A. Sheppard

Date August 1, 2005

PACCAR INC.

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

PLUM CREEK TIMBERLANDS, L.P.

By Plum Creek Timber I L.L.C., General Partner

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

PALMER COKING COAL COMPANY

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

BNSF RAILWAY COMPANY

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

PACCAR INC.

By  \_\_\_\_\_

Its R.E. Bangert II  
Vice President

Date 7-18-05

PLUM CREEK TIMBERLANDS, L.P.

By Plum Creek Timber I L.L.C., General Partner

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

PALMER COKING COAL COMPANY

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

BNSF RAILWAY COMPANY

By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

PACCAR INC.


By \_\_\_\_\_

Its \_\_\_\_\_

Date \_\_\_\_\_

PLUM CREEK TIMBERLANDS, L.P.

By Plum Creek Timber I L.L.C., General Partner

By 

Its Senior Vice President, General Counsel & Secretary

Date July 25, 2005



**Golder Associates Inc.**

18300 NE Union Hill Road, Suite 200  
Redmond, WA USA 98052-3333  
Telephone (425) 883-0777  
Fax (425) 882-5498  
www.golder.com



June 24, 2005

Our Ref.: 923-1000-002.R200

Palmer Coking Coal Company  
31407 Highway 169  
Black Diamond, Washington 98010

**Attention: Mr. William Kombol / Landsburg PLP Group**

**RE: LANDSBURG COAL MINE – SCOPE OF WORK FOR PHASES 2 AND 3 FOR THE  
CONTINGENT GROUNDWATER TREATMENT SYSTEM (DESIGN AND  
CONSTRUCT INFRASTRUCTURE)**

Dear Bill Kombol:

The Landsburg PLP Group (Group) has requested a proposal for the design and installation of the infrastructure components of the Contingent Groundwater Treatment System and for obtaining the permits (or substantive requirements in the case of MTCA-exempted permits) for this work. The work would be conducted in two phases, described below. The actual treatment system will not be installed, since its design would be dependent on the specific components required for treatment as determined by Ecology.

The Contingent Groundwater Treatment System is likely to be a necessary component of the Cleanup Action Plan for the site. The infrastructure components are believed to represent the longest time-frame for complete system installation. With these components in place, the Group will be able in a short period of time to install and begin operating a groundwater treatment system if Ecology determines that unacceptable levels of contaminants are present at points of compliance identified in the Cleanup Action Plan.

The Group has already completed Phase 1, which identified the basic infrastructure needed to support the Contingent Groundwater Treatment System facilities and evaluated several discharge alternatives. A Phase 1 letter report was submitted to Ecology on September 27, 2004 (copy attached). Phase 1 also developed conceptual-level layouts and key parameters for the project. Several alternatives for discharge of treated groundwater were evaluated. The preferred approach is to have treatment facilities at the north of the site, and to discharge the effluent to a POTW. The information gathered during Phase 1 provides the basis for proceeding with Phase 2 (detailed design and substantive permitting requirements) and Phase 3 (bidding and construction).



The Group will conduct Phases 2 and 3 to design and install the infrastructure components for the preferred approach identified in the September 27, 2004 Phase I letter report.

- In Phase 2, the Group will prepare a detailed design of the infrastructure components, and obtain permits or identify substantive requirements of MTCA-exempted permits. These include substantive requirements for all local permits associated with grading, site development, buildings, electrical connections, pipeline easements and waste water discharge to a POTW. In addition, during Phase 2 intrusive investigations (using a backhoe) will be conducted of the type of soils that may be encountered during construction.
- In Phase 3, the Group will construct the infrastructure components. The infrastructure components have been identified in the September 27, 2004 Phase I letter report and include the following items:
  - Treatment system pad;
  - Access roadways to the treatment system;
  - Electrical connections that would be adequate for the potential treatment system;
  - Pipeline conveyance system to the nearest sanitary sewer system; and
  - Stormwater control and discharge.

The Group will select a contractor (assumed via bidding) and provide construction oversight to ensure that the project is constructed in the most cost effective manner, and that the actual construction complies with project technical and regulatory requirements. As-built drawings of the completed installation and construction will be made and submitted to the Group and Ecology.

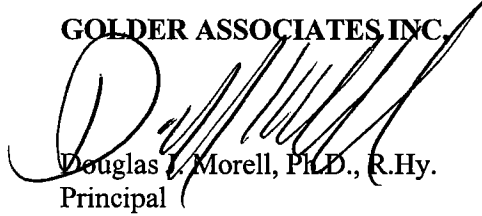
At the end of each phase, the Group will submit a Memorandum or report for Ecology review and approval before beginning the next phase of the work.

The design to send treated water to a POTW requires assistance from Ecology, because the site is located in a rural area that is outside the Urban Growth Area in King County. The preferred discharge alternative requires a connection to Soos Creek Water and Sewer District, which sends their sewage to King County Metro POTW. A new, dedicated effluent pipeline connection is allowed only if necessary for the public health and safety. The Contingent Groundwater Treatment System is necessary for the public health and safety, since its purpose is to be able to take timely actions to address contaminants if required by Ecology. Thus, the tasks described in this Scope of Work are necessary for the public health and safety.

Thank you very much for your consideration and assistance. If you have any questions or require additional information, please contact Douglas Morell.

Sincerely,

**GOLDER ASSOCIATES INC.**



Douglas J. Morell, Ph.D., R.Hy.  
Principal

DJM/se

cc: William Kombol / Palmer Coking Coal Co.  
William Joyce / Salter Joyce Ziker  
Rod Brown / Josh Lipsky / Brown Reavis & Manning  
Pete Haller / Ater Wynne  
Richard Gordon / Time Oil  
Russell Light / Burlington Northern Santa Fe  
Bruce Sheppard / Burlington Northern Santa Fe  
Fred Benz / PACCAR  
Kelly McTigue / Morgan, Lewis & Bockius  
Mark Allendorf / Allied Waste Industries  
Barbara Smith / Harris & Smith  
Jerome Cruz / Washington State, Department of Ecology



# Deliverable Review Record

Project Number:	923-1000-002.R200		
Project Name:	Palmer Coking Coal Company / Landsburg PLP Group		
Document Title:	Landsburg Coal Mine – Scope of Work for Phases 2 and 3 for The Continent Groundwater Treatment system (Design and Construct Infrastructure)		
Version:	<input type="checkbox"/> Draft	<input checked="" type="checkbox"/> Final	<input type="checkbox"/> Revision:
Document Date:	06/24/05		
Author:	Douglas J. Morell		
Reviewer:			

Place a check by reviewed components (Check "NA" if not applicable to this document; leave blank if applicable but not reviewed by this reviewer):

- ☐ Text (including scope, completeness, and interpretation/recommendations)
- ☐ Drawings and Figures (GIS, CAD, Graphics, and other)
- ☐ N/A
- ☐ Hand calculations (including approach/methodology, inputs, and results)
- ☐ N/A
- ☐ Software-based analyses (commercial, proprietary, spreadsheet) – logic
- ☐ N/A
- ☐ Software-based analyses (commercial, proprietary, spreadsheet) – inputs
- ☐ N/A
- ☐ Software-based analyses (commercial, proprietary, spreadsheet) – results
- ☐ N/A
- ☐ Other:

All review comments have been satisfactorily addressed.

The Clients \_\_\_\_\_ Date: \_\_\_\_\_  
 Reviewer  
DJ Morell \_\_\_\_\_ Date: June 24, 2005  
 Author

**Golder Associates Inc.**

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**MEMORANDUM**

**TO:** Landsburg PRP Group *D.S.M.* **DATE:** September 27, 2004  
**FR:** Douglas Morell, Frank Shuri, Golder Associates Inc. **OUR REF:** 923-1000-002.R290  
**RE:** **Landsburg Mine**  
**Phase 1 Infrastructure for Contingent Groundwater Treatment System**  
**And Discharge Alternatives**

**BACKGROUND**

In order to provide a conservative remedy that is fully protective of human health and the environment, the Draft Cleanup Action Plan ("DCAP") for the Landsburg Mine Site includes a contingency for groundwater treatment in the event that concentrations of hazardous substances exceed applicable regulatory thresholds at the points of compliance identified in the DCAP. The contingent groundwater treatment remedy consists of two primary elements: (1) pumping groundwater from each end of subsidence trench segment containing waste materials and (2) treating this water as necessary to reduce the concentrations of constituents of concern to below required levels. The treated water will then be discharged.

These Contingent Groundwater Treatment System (CGTS) facilities will be located at the north end of the site, near the intersection of Summit-Landsburg Road and SE 253 St. If contingent groundwater treatment is required at the south end of the site, it will be pumped northward over the hill to the CGTS facilities, so that all treatment is performed at a single location. The purpose of this Phase 1 Memorandum is to identify the basic infrastructure required to support the CGTS and to evaluate several discharge alternatives. Phase 2 will design the needed infrastructure and the selected discharge alternative.

Four potential discharge alternatives were identified:

1. Discharge to Cedar River.
2. Discharge into a new sewer line connected to a municipal treatment works.
3. Discharge into on-site infiltration trenches.
4. Pump effluent into trucks, which would drive to a discharge manhole in an existing municipal system.

We have carefully considered reliability, technical implementability and costs of each of the alternatives. The preferred method is on-site pretreatment and discharge to a sanitary sewer line with multiple, redundant treatment steps before ultimate discharge to the accessible environment.

These four alternatives are described in greater detail in the following sections. For evaluation purposes, the flow rate for treated water is assumed to be 50 gpm, the maximum realistically expected without a low permeability cap installed. The flow rate with the proposed low-permeability soil cover in place, as described in the most recent DCAP, is estimated to be less than 10 gpm.



Installation of the infrastructure for a contingent groundwater treatment system is consistent and part of the recommended remedial alternative in the DCAP.

Rough cost estimates are provided for the capital construction of the necessary infrastructure and for each discharge alternative. Certain costs have not been included in these estimates, because they cannot be accurately defined at this time. These include, but are not limited to:

- Treatment plant equipment
- Engineering design
- Permitting
- Engineering oversight during construction.

We have examined the four conceptual designs and have developed estimated costs for the basic infrastructure for the treatment facilities. The basic infrastructure is common to all the alternatives and is included for evaluation purposes. These cost estimates are shown in the attached tables.

### COMMON INFRASTRUCTURE FACILITIES

Those infrastructure facilities common to all discharge alternatives are shown on Drawing 1 and consist of the following:

1. A treatment facility area located in the cleared area adjacent to the north mine portal. This area will consist of a level, structural fill pad approximately 90 feet by 75 feet in dimension, surfaced with several inches of crushed rock. This pad will be the location of the treatment equipment (e.g., skid mounted plant), material storage sheds, pumps and main valves, electrical power supply, and similar components.
2. A parking and laydown area adjacent to the treatment facility area. Approximately 95 feet by 50 feet in plan dimension, this area will be similar in construction to the treatment facility area, and will provide space for vehicle parking and storage of equipment such as piping.
3. A security fence surrounding both the treatment facility and parking areas. For the evaluation, the fence is assumed to consist of 6-foot-high chain link mesh with 3-strand barbed wire around the top.
4. Power service, consisting of a transformer, meter, and connection panel. Power will be obtained from the 3-phase service along Summit-Landsburg Road adjacent to the site at one of the existing power poles shown on Drawing 1. All electrical equipment not mounted on the pole will be located on the treatment facilities pad inside the security fence. To determine the adequacy of the available power service, Puget Sound Energy (PSE) was contacted during this evaluation. Unfortunately, PSE cannot provide any evaluation without a formal application, and the application requires at least an intermediate level of electrical design, which will be developed during Phase 2. However, our electrical design subconsultant indicates that the anticipated loads for the treatment equipment are relatively modest, and there should be no problem obtaining the required power from the existing service line.
5. Lighting for safety and security, consisting of conventional sodium vapor lamps mounted on short poles or structures. The locations of these lights are not shown on Drawing 1,

but will be determined during detailed design. However, at least one light will be located at the site entrance.

6. Site entrance and access road. The entrance is located approximately 250 feet west of the intersection of Summit-Landsburg Road and SE 253 Street, to avoid safety problems with that intersection and provide greater line-of-sight. This is considered particularly important for large trucks, which will likely be entering and leaving the site to deliver supplies and equipment, regardless of which alternative is selected. The access road itself will be a two-lane all-weather road with a crushed rock surface. A lockable steel access gate will be installed at the site entrance.

The estimated cost for constructing these common components is about \$100,000.

### **ALTERNATIVE 1: DISCHARGE TO CEDAR RIVER**

For Alternative 1, a 4-inch-diameter high density polyethylene (HDPE) pipe would be installed below grade from the treatment plant under Summit-Landsburg Road to a discharge point in the existing surface water drainage ditch along the road. Treated water would then flow down the ditch, crossing under SE 253 St in a culvert and discharge into a natural stream channel leading to the Cedar River. These discharge features are shown on Drawing 2. The road crossing would be accomplished using small scale horizontal directional drilling (HDD) methods.

#### Advantages

The advantage of this alternative is that the capital cost is relatively low, adding only about \$15,000 to the cost of the common facility components discussed above.

#### Disadvantages

The disadvantage for this alternative is that there are major uncertainties which will significantly impact implementability, reliability, cost and/or schedule. Additionally, an independent third-party treatment redundancy would not be available and there would be a complete reliance on the CGTS facility. The major uncertainties include:

1. Permitting requirements: It is likely that an NPDES permit or at least the substantive requirements would be required, which is a relatively complex process. Those requirements are as follows:
  - Permit application time
  - Establish mixing zone and discharge limits to Cedar River
  - Determine the frequency of monitoring
  - Public comment period and meetings
2. Treatment levels: There is no other treatment facility between the CGTS facility discharge and the environment; therefore treatment levels will be more critical. Because the level of treatment for direct discharge is likely to be more sensitive than for some of the other alternatives, the reliability, complexity, implementability, and operating

efficiency of the treatment system will be extremely complicated as a long-term alternative. These conditions may result in periodic downtime due to a failure of only a minor system within the CGTS facility. If a system failure occurs, this alternative would be somewhat inflexible and be more susceptible to impacts of ever changing treatment standards.

3. Public Acceptability: Any direct discharge to the Cedar River is not anticipated to be acceptable to the public because of the reliability for unacceptable discharges occurring in the short-term during upset conditions in the treatment system. The Cedar River is a valued surface water body and a discharge to the river would have to be completely reliable.

## **ALTERNATIVE 2: DISCHARGE INTO SEWER LINE**

Under Alternative 2, the effluent from the treatment plant would be discharged through a newly constructed discharge line that would connect to an existing sewer line served by King County treatment facilities. This alternative would incorporate independent third-party treatment redundancy. Independent third-party redundancy means that the CGTS facility would discharge to a downstream sanitary sewer purveyor that then discharges to a publicly Owned Treatment Works (POTW). This allows for the CGTS facility pretreatment, and then Metro treatment which when combined employs primary, secondary, and potentially tertiary and disinfectant treatment methods. This multiple redundancy would be an integral part of the design and there would not be the sole reliance on the CGTS facility. All mine site water that may require discharge to the CGTS facility from the mine site would have multiple levels of treatment and control at all times.

As shown on Drawing 3, the discharge line would generally run along existing site roads, where Palmer Coke and Coal (PCC) has easements, to the Summit-Landsburg Road, then traverse a smaller section of King County property, and finally cross the Summit-Landsburg Road to tie into the existing sewer tightline. Where the discharge line is within PCC property or easements, it would consist of an underground 4-inch-diameter HDPE pipe; in other areas, the discharge line would possibly need to be built to King County standards. It should be noted that the pipeline route shown on Drawing 3 is conceptual; the actual pipeline location would be optimized, based on field investigations and engineering considerations, during the next phase of design, if this alternative is selected.

### Advantages

The primary advantage of this alternative is that independent third-party treatment redundancy of the CGTS facility and the King County Metro treatment facilities would exist at all times. A potential failure at the CGTS facility would not result in a loss of control and treatment and the ability to discharge. The level of treatment would be more dependable and flexible in the long term. The treatment system would employ more traditional process equipment than expected for alternatives involving direct discharge of treated water to the accessible environment. Review of King County pretreatment guidelines indicates that a modest range of expected compounds could be tolerated. Consequently, pre-treatment prior to discharge will mirror traditional requirements of the sanitary sewer purveyor, and ongoing treatment methods would be more reliable, implementable, redundant and predictable.



Disadvantages

The potential disadvantages associated with this alternative include:

1. **Permitting.** The proposed discharge line is entirely outside of the Urban Growth Management boundary, and consequently no new sewer construction is technically allowed. However, because the Landsburg Mine is a Model Toxics Control Act (MTCA) site, connection to the existing sewer system could be accomplished under an Interim Action approved by the Washington State Department of Ecology.
2. **Costs.** The cost for this alternative would add about \$180,000 to the capital cost of the common facility components, which is significantly higher than for the other alternatives. In addition, this estimate contains a relatively high level of uncertainty. That portion of the discharge line that is outside of PCC property and easements may need to be constructed to King County standards. Discussions with personnel from the Soos Creek Water and Sewer District indicated that the total cost of the tightline serving the general area was over \$200 per linear foot. Because the discharge line from the Landsburg Mine treatment facility will likely be smaller diameter than King County's tightline, a cost of \$100 per linear foot was used for this evaluation. However, the actual requirements and hence costs are not known at this time.

**ALTERNATIVE 3: DISCHARGE TO ON-SITE INFILTRATION TRENCHES**

In this alternative, the effluent from the treatment facility would be discharged into a series of underground infiltration trenches, to return to the groundwater regime. The layout for this alternative is shown on Drawing 4.

Advantages

The advantage of this alternative is that the capital cost is relatively low, adding only about \$20,000 to the cost of the common facility components discussed above.

Disadvantages

1. **Treatment levels.** Similar to Alternative 1, an independent third-party treatment redundancy would not be available and there would be a complete reliance on the CGTS facility. There is no other treatment facility between the CGTS facility discharge and the environment. Because the level of treatment for discharge to groundwater is likely to be more sensitive than for discharge to a POTW, the reliability, complexity, implementability, and operating efficiency of the treatment system will be extremely complicated as a long-term alternative. If a system failure occurs, this alternative would be somewhat inflexible and be less reliable than discharge to a POTW.
2. **Technical uncertainties.** The subgrade soils near the treatment facilities are believed to be glacial outwash deposits and are expected to have permeabilities on the order of  $10^{-3}$  cm/sec or higher. In this case, adequate infiltration rates can be achieved with a reasonably sized series of trenches. However, if the permeability were lower, then the required length of trenches would increase significantly.

## MEMORANDUM

Landsburg PRP Group

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3. Permitting requirements. Although the overall permitting process could be easier than that for Alternative 1, because all effluent remains on site, "full scale" infiltration tests are now typically required prior to issuing a permit, which could make achieving the desired schedule for this project difficult.
4. This alternative is not anticipated to be preferred by the public because of the reliability for unacceptable discharges occurring in the short-term during upset conditions in the treatment system.

### ALTERNATIVE 4: TRUCKING

This alternative involves pumping the treated effluent into tanker trucks, driving to an approved manhole, and discharging the effluent into the existing sewer system served by King County treatment facilities. The facilities layout for this alternative is shown on Drawing 5 and includes the addition of holding tanks and a loop road for the tanker trucks. In addition, it has been assumed that the roadways would be paved with asphalt concrete to withstand the constant truck traffic under all weather conditions. The capital costs for this alternative would add about \$40,000 to the common facilities cost.

#### Advantages

1. Permitting: This alternative would probably be the easiest to permit.
2. Treatment levels: As for Alternative 2, this alternative incorporates independent third-party treatment redundancy. All mine site water that may require discharge to the CGTS facility from the mine site would have multiple levels of treatment and control at all times

#### Disadvantages

1. This option has more environmental concerns due to the reliance on fossil-fuel burning truck haulage and truck traffic with associated air and noise impacts.
2. There is a potential for spills and leaks during loading and off-loading.
3. There is a potential for traffic accidents, injuries, and fatalities on roadways,
4. This alternative has "disproportionate cost for no incremental benefit" compared to other alternatives as defined under MTCA,
5. Operating cost: Based on the assumed maximum flow rate of 50 gpm, two trucks would need to be operated 24 hours per day, 365 days per year to dispose of the effluent. The costs for this portion of the alternative are estimated at nearly \$1,000,000 per year.

## MEMORANDUM

Landsburg PRP Group

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### SUMMARY

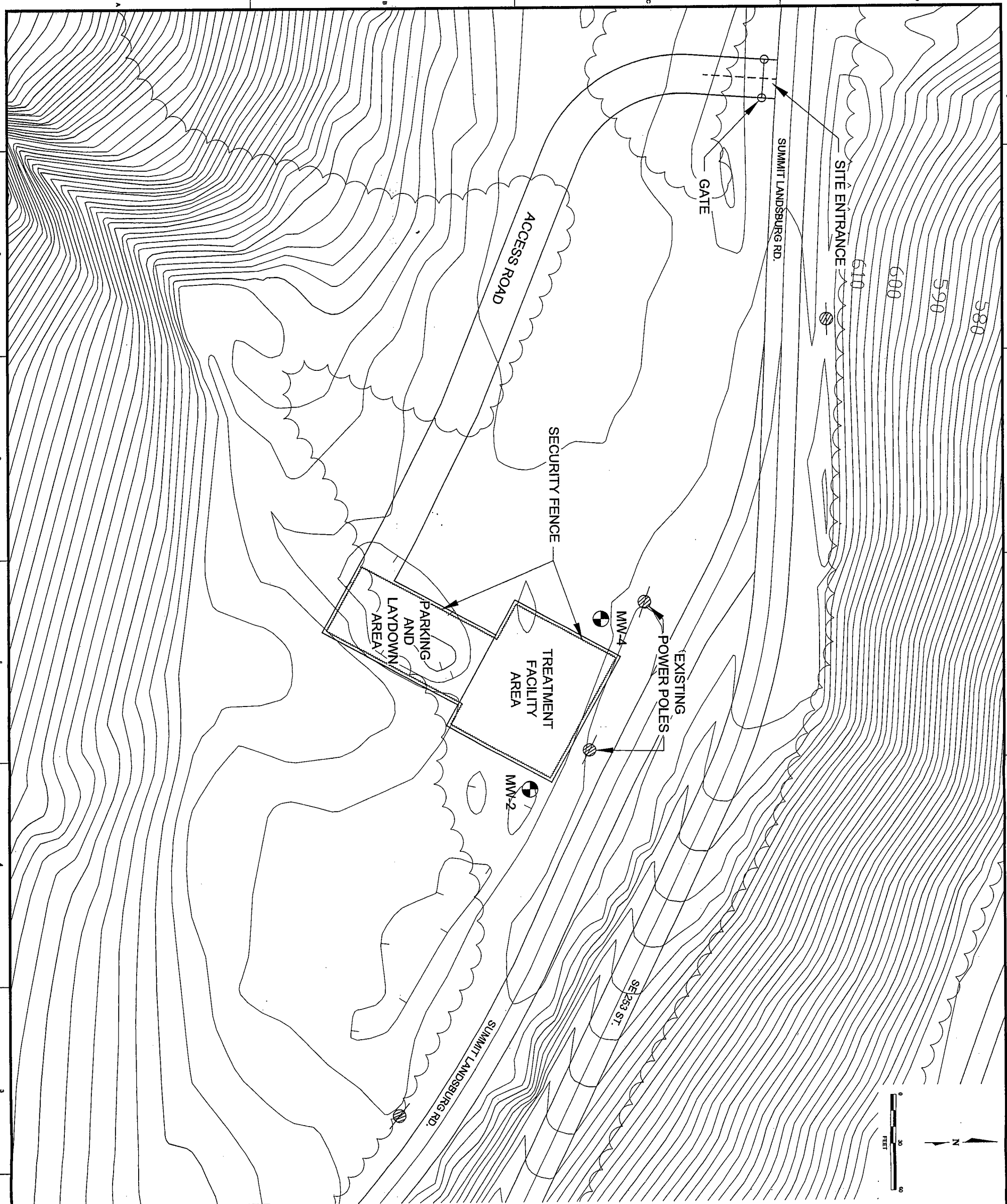
Effluent discharges directly to surface or ground water does not allow for independent third-party treatment redundancy. Even the most elaborate system will have periodic failures and this will not meet the goal of total containment, capture, and effective treatment sought by the Landsburg Mine site PLP Group.

Trucking the effluent, while favorable from a containment, capture, and effective treatment perspective, has a major disadvantage over any of the other alternatives. In addition to being an environmentally unfriendly solution, this alternative does not appear to be a long term solution.

Discharge into an existing sewer line has a relatively low level of technical uncertainty, and the associated pre-treatment technologies are reliable and mirror existing sanitary sewer treatment methods employed downstream. The ability of the CGTS facility pretreatment to discharge to Soos Creek treatment, and then Metro treatment which combined with the CGTS facility, employs primary, secondary, and potentially tertiary and disinfectant treatment methods. All mine site water that may potentially require discharge to the CGTS facility from the mine site would have multiple levels of treatment and control at all times.

We have carefully considered technical implementability, reliability, and costs of each of the alternatives. The preferred method is on-site pretreatment and discharge to a sanitary sewer line with multiple, redundant treatment steps downstream.

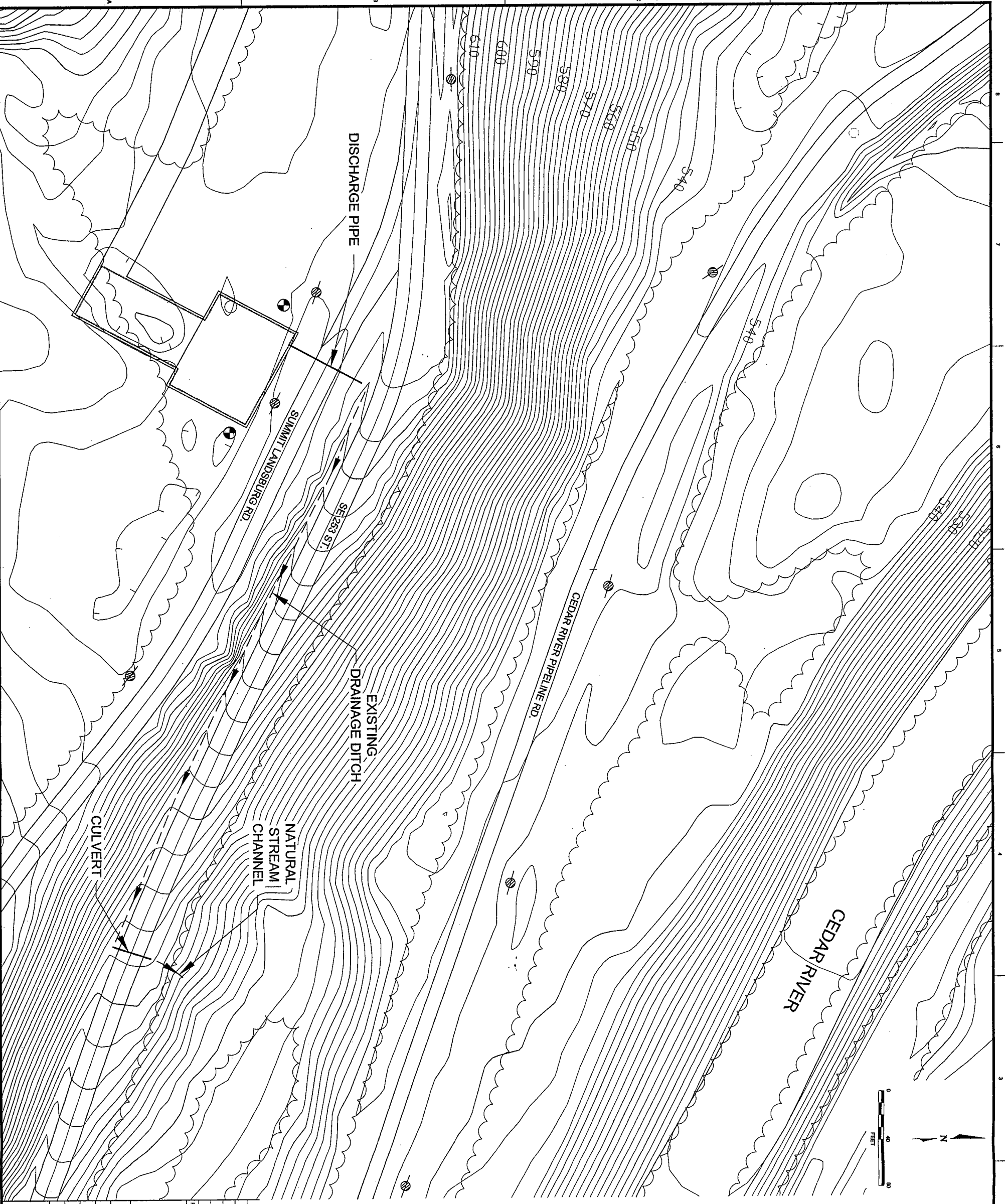
## **DRAWINGS**



REV.	DATE	DESCRIPTION	DR BY	CHK BY

SCALE:	AS SHOWN	PROJECT NO.:	825-100-002	PHASE NO.:	0200
DES BY:	FSS	PROJECT: LANDSBURG MINE - GW TREATMENT SYSTEM			
DR BY:	FSS	SHEET TITLE: COMMON FACILITIES LAYOUT			
CHK BY:	-	SHEET: 1 OF 3			
REV BY:	DM	DRAWING NO. 1			
		REV. A			



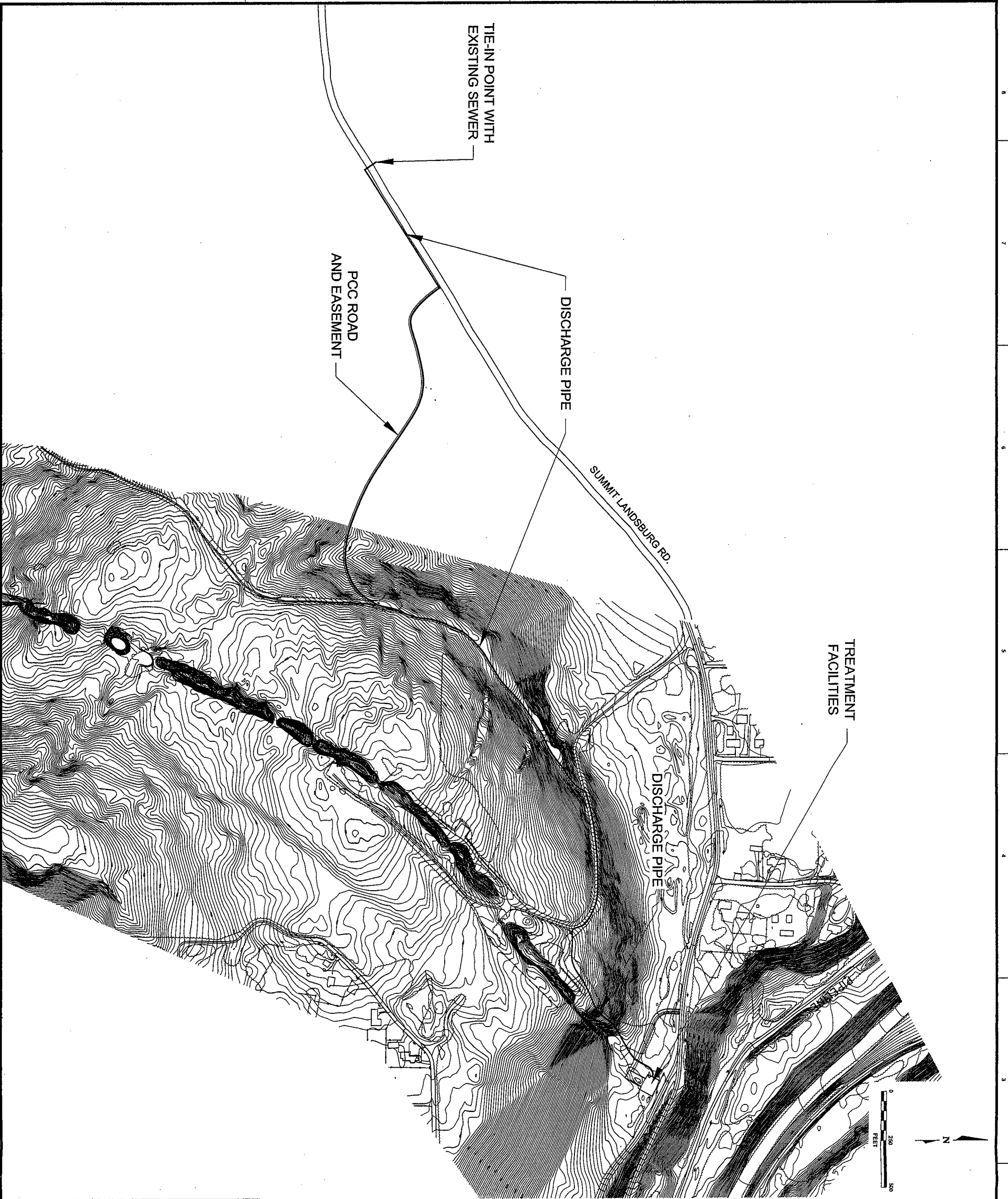


REV	DATE	DESCRIPTION	DR BY	CHK BY

SCALE:	AS SHOWN	PROJECT NO.:	823-1000-002	PHASE NO.:	0200
DES BY	FSS	PROJECT:	LANDSBURG MINE - GW TREATMENT SYSTEM		
DR BY	FSS	SHEET TITLE:	CEDAR RIVER DISCHARGE ALTERNATIVE		
CHK BY	-				
RMV BY	DAM				

SHEET:	1	OF	1
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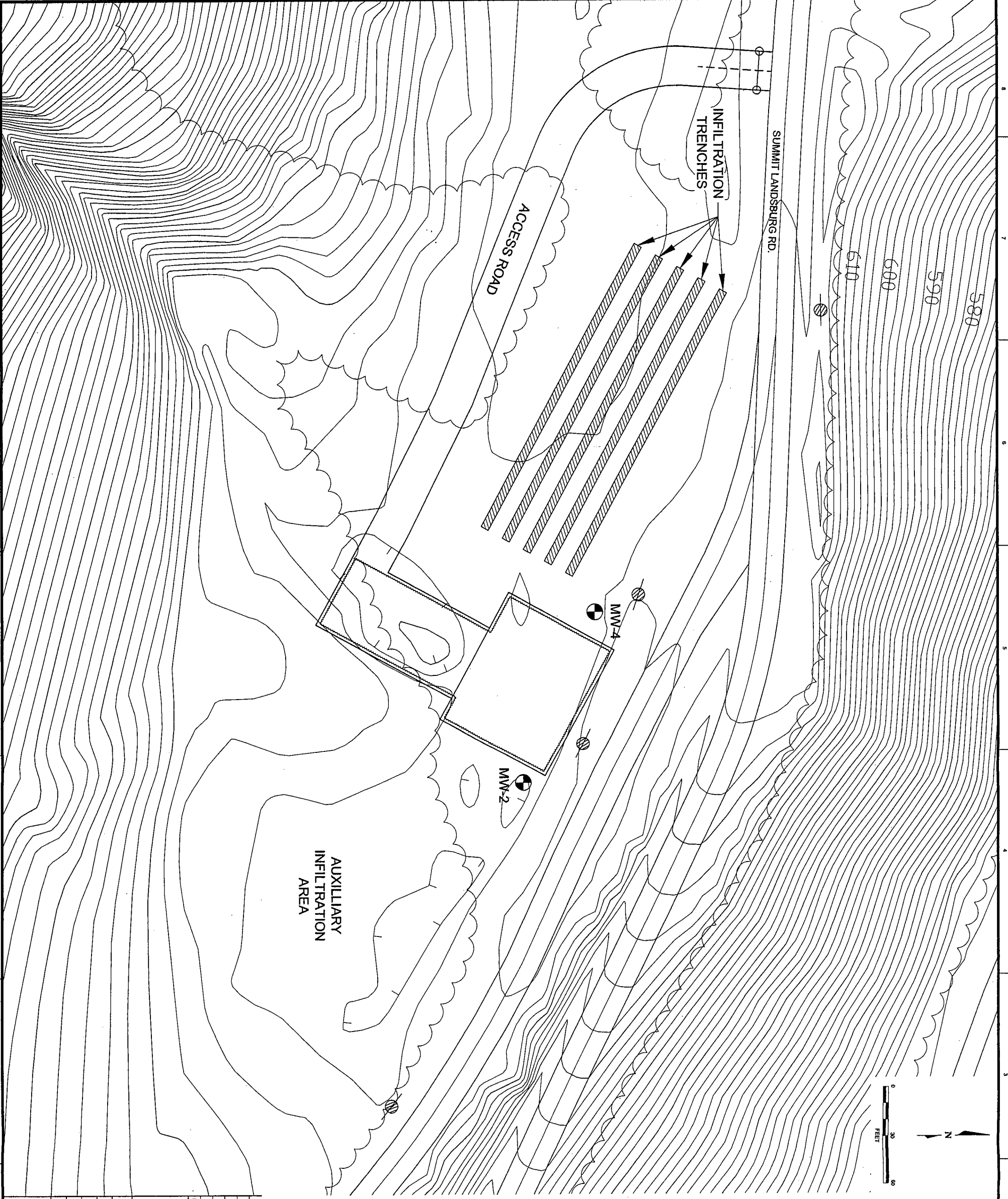


REVISIONS		DESCRIPTION		DR BY	CHK BY
REV	DATE				

<b>Goldier Associates</b>		PROJECT NO.: 923-1000-002	PHASE NO.: R290
SCALE: AS SHOWN		PROJECT: LANDSBURG MINE - GW TREATMENT SYSTEM	
DES BY	FSS	-	
DR BY	FSS	-	
CHK BY	-	-	
RW BY	DM	-	
SHEET TITLE: DISCHARGE TO SEWER ALTERNATIVE		SHEET: 3	OF: 3
DRAWING NO.		3	REV. B

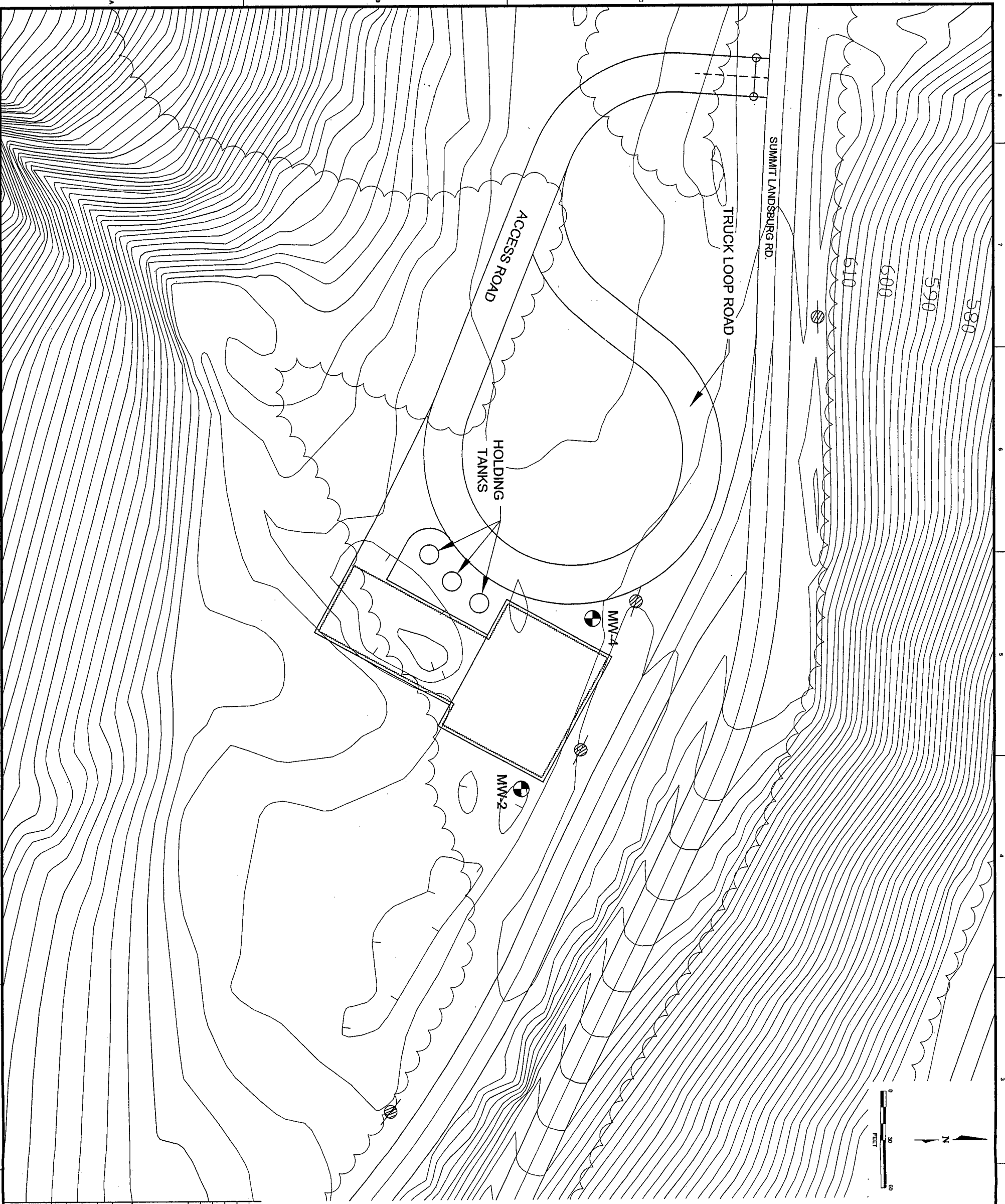




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REV.	DATE	DESCRIPTION	DR BY	CHK BY

SCALE: AS SHOWN		PROJECT NO.: 923-1000-002		PHASE NO.: R290	
DES BY	FSS	-	PROJECT: LANDSBURG MINE - GW TREATMENT SYSTEM		
DR BY	FSS	-			
CHK BY	-	-			
ROW BY	DAM	-			
SHEET TITLE:			TRUCKING ALTERNATIVE		



SHEET TITLE:

TRUCKING ALTERNATIVE

SHEET: 2	OF 3
DRAWING NO.	REV.
5	A

## **ATTACHMENT A**

Costs Common to All Alternatives				
Component	Units	Unit Cost	Quantity	Component Cost
Mob / Demob	ls	\$5,000.00	1	\$5,000
Erosion and Sediment Control	ls	\$5,000.00	1	\$5,000
Clear and Grub	acre	\$4,900.00	0.92	\$4,524
Fill for Pad	cy	\$5.00	2,037	\$10,185
Gate	ea	\$1,500.00	1	\$1,500
Security Fence	lf	\$25.00	500	\$12,500
Access Road Subbase	cy	\$15.00	650	\$9,756
Pad Surface	cy	\$15.00	125	\$1,875
Subtotal:				\$50,339
Water Service	ls	\$4,000.00	1	\$4,000
Fire Hydrant	ls	\$5,000.00	1	\$5,000
Light Poles and Fixtures	ea	\$2,500.00	5	\$12,500
UG Conduit	lf	\$28.00	300	\$8,400
Transformer	ea	\$10,000.00	1	\$10,000
Meter, Control Panel, etc.	ls	\$3,500.00	1	\$3,500
Other Electrical Equipment	ls	\$5,000.00	1	\$5,000
Subtotal:				\$48,400
<b>Total:</b>				<b>\$98,739</b>

Alternative 1: Discharge to Cedar River				
Component	Units	Unit Cost	Quantity	Component Cost
Common Costs	ls	\$98,739.47	1	\$98,739
Pipeline - Trenching and Backfill	lf	\$22.50	100	\$2,250
Pipeline - Pipe	lf	\$8.30	100	\$830
Manholes	ea	\$1,200.00	1	\$1,200
Road Crossings	ea	\$10,000.00	1	\$10,000
<b>Total:</b>				<b>\$113,019</b>

Alternative 2: Sewer to POTW				
Component	Units	Unit Cost	Quantity	Component Cost
Common Costs	ls	\$98,739.47	1	\$98,739
Sewer Line to King Co. Potential Standards	lf	\$100.00	800	\$80,000
Clearing and Grubbing	acre	\$4,900.00	1.79	\$8,774
Pipeline - Trenching and Backfill (PCC Prop.)	lf	\$5.00	5,200	\$26,000
Pipeline - Pipe (PCC Prop.)	lf	\$8.30	5,200	\$43,160
Lift Station Pump	ea	\$10,000.00	1	\$10,000
Manholes	ea	\$1,200.00	2	\$2,400
Road Crossings	ea	\$10,000.00	1	\$10,000
<b>Total:</b>				<b>\$279,074</b>

Alternative 3: Infiltration Trenches				
				Component
Component	Units	Unit Cost	Quantity	Cost
Common Costs	ls	\$98,739.47	1	\$98,739
Trench Excavation	cy	\$5.00	370	\$1,852
Perforated PVC Pipe	lf	\$5.00	1,250	\$6,250
Geotextile Wrap	sf	\$0.25	15,000	\$3,750
Gravel Backfill	cy	\$25.00	370	\$9,259
<b>Total:</b>				<b>\$119,851</b>

Alternative 4: Trucking				
Component	Units	Unit Cost	Quantity	Component Cost
Common Costs	ls	\$98,739.47	1	\$98,739
Loop Road Subbase	cy	\$15.00	320	\$4,800
Asphalt Paving	sf	\$2.00	19,200	\$38,400
Subtotal Capital Cost:				\$141,939
Truck Equipment Cost	shift	\$450.00	1,095	\$492,750
Operator Cost	hr	\$25.00	8,760	\$219,000
Disposal Cost	gal	\$0.01	26,280,000	\$262,800
Subtotal Annual Operating Cost:				\$974,550
<b>Total First Year Cost:</b>				<b>\$1,116,489</b>

Quantities		
Feature	Unit	Quantity
<b>Input Quantities:</b>		
Treatment Facility Area	sf	6,750
Parking and Laydown Area	sf	7,000
Average Pad Thickness	ft	4
Access Road Length	ft	440
Loop Road Length	ft	360
Road Width	ft	24
Infiltration Area	sf	2,500
Infiltration Trench Width	ft	2
Infiltration Trench Depth	ft	4
Roadway Subbase Thickness	ft	1
Pad Surface Thickness	ft	0.5
Treatment Facility Output	gpm	50
Length of Discharge Pipe to Existing Ditch	ft	100
Width of Pipeline Clearing Zone	ft	15
Length of King Co. Sewer	ft	800
Length of Sewer on PCC Property	ft	5,200
RT Distance to Truck Discharge Point	mi	10
Average Truck Speed	mph	15
Load Time	hr	0.5
Discharge Time	hr	0.5
Truck Capacity	gal	5,000
<b>Derived Quantities:</b>		
Pad and Parking Fill Volume	cy	2,037
Subbase Volume - Common	cy	650
Subbase Volume - Trucking	cy	320
Treatment Facility Area Surface	cy	125
Infiltration Trench Length	ft	1,250
Clear and Grub Area	acre	0.92
Asphalt Area	sf	19,200
Disposal Time	hr/truckld	1.67
Truckloads per Day	1/day	14
Trucking Time per Day	hr	24
Number of Shifts per Day Trucking	-	3



		Unit Costs				
Item	Unit	Unit Cost				
Mob/Demob	ls	\$5,000.00				
Erosion and Sediment Control	ls	\$5,000.00				
Clearing and Grubbing	acre	\$4,900.00	Means 2004 02230 100 0160			
Trench Excavation	cy	\$5.00	Means 2004 02315 610 0090			
Trenching and Soil Backfill, 2-ft x 4-ft deep	lf	\$4.50	Means 2004 G1030 805 1330 *3 for work on steep slopes			
Cost Factor for Trenching on Steep Slopes	-	5				
General Soil Fill	cy	\$5.00	Placed			
Topsoil	cy	\$10.00	Placed			
Drain Gravel	cy	\$25.00				
Subgrade Crushed Rock / Gravel	cy	\$15.00				
Asphalt Pavement, 4-inch	sf	\$2.00				
Security Fencing	lf	\$25.00	Means 2004 028200 130 0500			
Gate	ea	\$1,500.00				
Geotextile - 8 oz/yd <sup>2</sup> nonwoven polypro	sf	\$0.25	Installed			
4-inch PVC Pipe, Perforated	lf	\$5.00	Means 2004 02530 780 2000			
4-inch HDPE Pipe	lf	\$8.30	Means 2004 02510 760 0100			
Manholes	ea	\$1,200.00	Means 2004 02630 400 1120			
Road Crossing, Small Diameter HDD	ea	\$10,000.00	Trenchless Tech, * 2			
Lift Station Pump	ea	\$10,000.00	Means 2004 15230 500 8140			
Sewer Line, Complete, King Co. Standards	lf	\$100.00	King County Potential Requirements			
Hydroseeding	acre	\$2,000.00				
Wetland Restoration	acre	\$25,000.00				
Transformer	ea	\$10,000.00	Means 2004 16270 600 0100			
Meter, Control Panel, etc.	ea	\$3,500.00	Means 2004 16210 600 2300			
4-inch Electrical Conduit in Trench	lf	\$28.00	Means 2004 16132 240 1000; not incl excav and backfill			
Other Electrical Equipment	ea	\$5,000.00	Allowance			
Potable Water Line	ea	\$4,000.00	Means 2004 Assembly G3010 120 2200 * 4 for 80-ft length			
Light Poles and Fixtures	ea	\$2,500.00	Means 2004 Assembly G4020 110 3120			
Fire Hydrant	ea	\$5,000.00	Means 2004 Assembly G3010 410 2100			
Water Truck, 5,000 gallon	day	\$450.00	8-hr day, Means 2004 Crew B-59			
Truck Driver	hr	\$25.00				
POTW Fee	gal	\$0.01				