



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

July 12, 2018

Certified Mail: 9171 9690 0935 0132 2075 58

Mr. Mike Conaboy
John Henry No. 1 Mine
30700 Black Diamond-Ravensdale Road
P.O. Box 450
Black Diamond, WA 98010

Re: Supplemental information needed to support the NPDES permit application submitted by Pacific Coast Coal Company, WA0030830

Dear Mr. Conaboy,

Department of Ecology is in the process of developing an NPDES permit for John Henry No. 1 Mine. Please provide following information to support your application:

- 1) Please provide a vicinity map (in electronic format) showing
 - a) Property boundaries
 - b) Outfall locations
 - c) Coal processing area
 - d) Coal Wash water collection and treatment area
 - e) Wheel wash water collection and treatment area
 - f) Vehicle wash water collection and treatment areaPlease provide a map that has good resolution at 8.5"X11" size.
- 2) Please provide a Mine Plan map (in electronic format), clearly indicating
 - a) Areas that have been mined in the past and have been reclaimed
 - b) Areas that have been mined in the past and have not been reclaimed
 - c) Areas that PCCC is planning to mine (indicate proposed mining schedule)
 - d) Areas that PCCC is planning to reclaim
 - e) Stockpiles and pits that are created due to mining operationPlease provide a map that has good resolution at 8.5"X11" size. You may choose to submit the updated version of the map that was submitted to OSMRE.
- 3) Please provide a flow chart/schematic (in electronic format) clearly indicating generation point, treatment and discharge location for all different wastewater streams including



process water (coal wash water, wheel wash water, and vehicle wash water), mine dewatering water and stormwater. Please make sure that the resolution is good at 8.5"X11" size. If needed, you may choose to use separate sheets for process water, mine dewatering water and stormwater.

- 4) Please provide following information about all the onsite sedimentation ponds:
 - a) Pond is lined or unlined
 - b) Type of wastewater discharged to the pond, for example stormwater, mine dewatering water, process water etc.
- 5) Briefly describe the wastewater treatment processes including the following:
 - a) Name and type of wastewater treatment
 - b) Hours/day operation and when staffed
 - c) Water use and reuse
 - d) Best management practices employed
 - e) Other site-specific issues
- 6) Original EIS said that the John Henry Mine No. 1 would be reclaimed by the year 2000. It is our understanding that the facility has not started reclaiming the mine yet. What is the timeline for reclaiming this facility?

Continued mining and reclamation both involves exposing soils. Ecology needs clear information about reclamation timeline to assess project impacts.

- 7) What is your proposal to upgrade the existing wheel wash? Please provide appropriate information to confirm that the wheel wash meets the latest design, installation and maintenance requirements set forth in Ecology's latest Stormwater Management Manual for Western Washington or equivalent.
- 8) As per the information we have, PCCC has been accepting fill material from various sites like sand and gravel facilities, Ashgrove Cement, Tolt river reservoir, Sound Transit light rail construction sites etc. Fill material from different sites may impact the quality of stormwater and leachate generated at the facility.

PCCC needs to provide reasonable assurance that only clean soil or inert waste was accepted as fill material. We are looking for a **recent comprehensive** wastewater characterization data and other records to confirm that only clean soil or inert waste were used to fill the site.

- a) Did PCCC maintain records to confirm that only clean soils and inert waste was disposed of at this facility?

- b) Did PCCC conduct any recent comprehensive wastewater/stormwater characterization to evaluate the quality of water discharged from the facility?
 - c) Is PCCC still accepting fill material from various locations?
- 9) In past 20 years the treatment technologies for treating wastewater have significantly improved. As an NPDES permit requirement PCCC will be required to meet the AKART with the proposed permit.

AKART is all known, available and reasonable methods of prevention, control and treatment. AKART shall represent the most current methodology that can be reasonably required for preventing, controlling, or abating the pollutants associated with a discharge. The concept of AKART applies to both point and nonpoint sources of pollution.

Addition of polymers to the sediment ponds at this facility is not considered AKART. Please provide Ecology an updated engineering report that meets the AKART requirements.

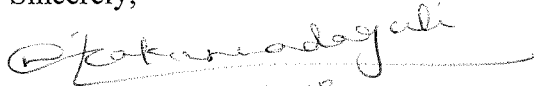
Following facility information is not required for developing effluent limits. However, this information is routinely provided in the factsheet for the benefit of general public.

- 10) Information about industrial process
- a) What are the new proposed coal production rates?
 - b) Are you proposing any increase or decrease in the production rates?
 - c) Are you anticipating any seasonal variation in coal production? If yes, please provide appropriate information.
- 11) Please provide facility information about
- a) Facility address provided in the application is not the same as the facility location shown on the map. Please look into this and provide necessary information
 - b) Proposed days of operation/wk and number of shifts,
 - c) Approximate number of people employed
- 12) Does PCCC own the facility or is it leased? Please briefly provide facility ownership information.

I appreciate if you could submit this information to Ecology by July 23rd 2018. If you need additional time to provide the information, please suggest another reasonable timeline.

As we progress, we may need additional information for permit development. We will contact you if the need arises. If you have any follow-up questions, please feel free to e-mail me at mkan461@ecy.wa.gov.

Sincerely,



July 12, 2018

Monika Kannadaguli, PE, CPESC
Facility Manager
Northwest Regional Office

By Certified Mail

CC: Dave Morris, via e-mail: djmorris@aol.com
David Costain, via e-mail: dcostain@osmre.gov
Central Files, Pacific Coast Coal Company; WA003083-0; WQ 1.3