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July 23, 2018

Ms. Monika Kannadaguli, PE, CPESC  
Facility Manager – Northwest Regional Office  
Department of Ecology  
3190 160<sup>th</sup> AVE SE  
Bellevue, WA 98008-5452

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

Dear Ms. Kannadaguli:

We are submitting this response to your request for additional information requested in your letter of July 12, 2018. This is a partial response as we are not able to attempt to provide the graphics you've requested. We intend to provide additional information by August 24, 2018.

1. For the information you requested it is difficult to provide a map that has good resolution at 8.5" x 11" size. Nothing has changed since the previous permit so what you had then should be adequate. We provided a map with most of this information with our March 19<sup>th</sup> submittal. I'm attaching it again for your reference. Nonetheless we'll work on improving this vicinity map for the August submittal.
2. The information you've requested in on several maps contained in our OSMRE permit application package (PAP). Trying to provide all this information on one map will be difficult to understand. Nonetheless we'll see what we can do and submit something in August that will attempt to provide all that information on one map. Much of this information is also shown on maps contained within OSMRE's Environmental Assessment (EA). Perhaps you can use some of those maps/figures?
3. This information about our sediment control system is contained in ESM Consulting Engineers, LLC's technical information report (TIR) that we provided DOE in our March submittal. Let us know if you require more than what is contained in ESM's extensive report. Please note that our coal processing plant

is closed circuit and there is no discharge. The wheel wash is also closed circuit. The vehicle wash is unlikely to be used with our relatively low production rates.

4. All sediment control ponds are unlined. All ponds take stormwater. Ponds I and B also receive mine dewatering water. None of the sediment ponds receive process water.
5. We do not plan to treat stormwater as we anticipate that untreated stormwater will meet quality specifications as demonstrated in our DMR's.
6. Your understanding that we have not reclaimed any of the mine site is incorrect as clearly explained in the recent EA published by OSMRE. Under Federal regulations we are required to contemporaneously reclaim as we mine. Most of Pit 1 has been backfilled and graded. As noted on page 5 of the EA, we've backfilled 8,563,000 cubic yards of material in Pits 1 and 2. Once we resume mining, over 2 million cubic yards of overburden from Pit 2 will be hauled to Pit 1 to establish a riparian border around the final cut lake. Pit 2 will be reclaimed as it advances to the west and when mining is completed, will be fully backfilled. Final reclamation will take place within two years of coal depletion. As mining advances in Pit 2 it will expose soil. However, most stormwater that falls on that exposed soil will remain in the pit and will be pumped as necessary into either Pond I or B before leaving the site. This is a Federal requirement.
7. We don't have plans to upgrade the wheel wash. The wheel wash was not used when we were just hauling clean coal. It was required by King County when we started hauling in external clean soils. We do plan to operate the wheel wash for coal haulage as necessary to meet King County requirements.
8. Your information is completely out of date. We did haul clean soil from a few sites from 1999 – 2006 but have not received any material since 2005. We have no plans to accept clean soil moving forward. OSMRE required us to revise our permit for each new source of clean fill. That process provided reasonable assurance that only clean soil or inert waste was accepted. Given the process that OSMRE imposed, most of the soil we received was dewatered fine material from two sand and gravel washing operations and a small amount of waste limestone and gypsum from Ash Grove Cement. We did maintain records and will provide more information in August. We did not conduct a recent comprehensive wastewater/stormwater characterization to evaluate quality of water discharged from the facility other than the submittal of quarterly DMR's to DOE. OSMRE did complete a Cumulative Hydrologic Impact Assessment (CHIA) that characterized water quality discharges. Disposal of clean soil is fully described in the EA on pages 5-6.

9. Did you not review the ESM Consulting Engineers, LLC's Technical Information Report that we submitted to you in March? It is on the flash drive that we provided DOE. Based on this question it is apparent that you did not. Let me know if it was misplaced and I provide another copy of ESM's report. It is too large to email.
10. This information is all provided in OSMRE's EA which DOE reviewed. For your convenience I'll repeat.
- a) Proposed production rate is 84,000 tons per year
  - b) This is a decrease from previously approved production rate of 250,000 tons per year (we were over 300,000 in 1992)
  - c) Yes, we will likely increase mining during dry months from May through October although we cannot provide any details. It will depend on markets.
11. Facility Information.
- a) The physical address provided in the application is 30700 Black Diamond – Ravensdale Road. This is the correct address. We're not sure what map you are referring to or what that address references
  - b) We will operate five days per week with one operational shift each operating day
  - c) As noted on p 11 of the EA, we'll engage 30 people during mining operations and 20 during final reclamation
12. PCCC owns the facility but leases the coal from Palmer Coking Coal Company.

Hopefully this allows you to move forward with your efforts. I think that if you spend some time with the EA and with the TIR most of your questions will be answered. I suggest that once you go through this process please submit a revised supplemental request so we can get everything back to you by August 24<sup>th</sup>.

Respectfully submitted,



David J. Morris, PE  
General Manager