ENVIRONMENTAL ASSESSMENT FOR MINOR REVISION
COAL AND URANIUM PROGRAM
MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY

COMPANY NAME: Decker Coal Company DATE: August 12, 2014

PERMIT# : C1983007 REVISION NO: MR55

LOCATION: East Decker Coal Mine

Type and Purpose of Action:

This minor revision moves the location of the land treatment unit (LTU). The LTU is used to treat fuel and oil contaminated soils which are generated by on-site spills. The current location of the LTU is scheduled to be reclaimed therefor an alternate location is needed. The new location proposed for the LTU is also closer to the mine facilities, which will improve operational efficiency. Treatment of the contaminated soils involves spreading the soils in a thin layer (<12") to allow natural aeration and biodegradation to reduce contaminant levels. The contaminated materials are periodically tilled to enhance the remediation process.

Potential Impacts and Mitigation Measures:

The potential impacts from the LTU are migration of hydrocarbons from the treatment area to either surface water or groundwater. Migration of contaminants to surface water is prevented by the installation of berms surrounding the LTU designed to contain the 10-year 24-hour rainfall event. Migration of contaminants to groundwater is prevented by the substrate under the LTU. The substrate was tested in four locations within the proposed LTU, and found to be a silty clay loam spoil material, with approximately 30% clay content. Because this fine grained substrate material will allow only limited, slow infiltration of water, the potential for migration of contaminants to the water table is minimized. Additionally, following treatment, the substrate below the treatment zone is sampled to confirm no contaminants are migrating below the treatment zone.

Because of the mitigations described above, no impacts to surface water or groundwater are expected as a result of the operations of the LTU in the new proposed location.

Alternative Actions:

The alternatives would be to keep the LTU in its current location, or to select a different location for a new LTU. Keeping the LTU in its current location would delay reclamation, resulting in a negative environmental impact as regrading, soil laydown, and

planting of vegetation would not be able to occur. At any alternate location the potential impacts and mitigation would be the same as the new proposed location, and the location would likely be farther from the facilities area, thus there is no advantage to this alternative.

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