From: Buteyn, Douglas J (DEC)
To: Lyons, Ellen H CIV USARMY CEPOA (US)
Cc: Rypkema, James (DEC)
Subject: [Non-DoD Source] RE: Northside Business Park, Himebauch
Date: Monday, July 10, 2017 11:46:42 AM

Speaking for the Solid Waste program, because analytical testing of Alaskan coal ash shows that the material does not readily leach contaminants, our primary concern is avoiding physical changes to surface water (e.g. discoloration). To that end, we require that all coal ash used as fill must be completely covered by some other material to minimize the potential that it is washed out into surface water. But, since metals are the primary compounds of concern in coal ash, my suggestion for assessing possible contamination would be to test the water for metals. Comparison of the water in the constructed pond to the water in the natural pond should provide some measure of what impact the coal ash has had.

For what it's worth, under the new federal regulations for coal ash landfills and surface impoundments (40 CFR 257, subpart D), metals are the focus for groundwater monitoring programs associated with those landfills. The required compounds are listed in Appendices III and IV to those regulations (copied below).

Doug Buteyn

APPENDIX III TO PART 257—CONSTITUENTS FOR DETECTION MONITORING
Boron
Calcium
Chloride
Fluoride
pH
Sulfate
Total Dissolved Solids (TDS)

APPENDIX IV TO PART 257—CONSTITUENTS FOR ASSESSMENT MONITORING
Antimony
Arsenic
Barium
Beryllium
Cadmium
Chromium
Cobalt
Fluoride
Lead
Lithium
Mercury
Molybdenum
Selenium
Thallium
Radium 226 and 228 combined

-----Original Message-----
From: Lyons, Ellen H CIV USARMY CEPOA (US) [mailto:Ellen.H.Lyons@usace.army.mil]
Sent: Monday, July 10, 2017 10:29 AM
To: Buteyn, Douglas J (DEC) <doug.buteyn@alaska.gov>
Cc: Rypkema, James (DEC) <james.rypkema@alaska.gov>
Subject: RE: Northside Business Park, Himebauch

Also, when you discover solid waste in water, how do you determine if it has contaminated the water, or if it has the potential to contaminate the water? Do you perform specific tests? Since coal ash has been eroded into the stormwater pond, and it is being proposed as mitigation, I would like to be able to accurately assess the quality of the aquatic habitat and wildlife habitat and ensure the site does not pose a risk to wildlife that use it due to poor water quality.

Thanks,

Ellen Lyons
907-474-2166

-----Original Message-----
From: Buteyn, Douglas J (DEC) [mailto:doug.buteyn@alaska.gov]
Sent: Monday, July 10, 2017 10:01 AM
To: Lyons, Ellen H CIV USARMY CEPOA (US) <Ellen.H.Lyons@usace.army.mil>
Subject: [Non-DoD Source] RE: Northside Business Park, Himebauch

Ellen:

Thank you for the notice about this; I would like to talk to you about this and get a better understanding of how the enlarged pond might impact or otherwise affect the approved fill projects. As for correspondence on the project, I did a quick search and found the attached two documents. The pdf file is a letter on which you were a cc recipient; the other is a copy of an email I sent to you describing how DEC currently regulates coal ash. The attached letter is the only one I can find on which you were specifically copied so I'm not sure what other correspondence you had. If you think it will be helpful, I can send you copies of the various project authorizations. Let me know if you would like those.

Thanks again!

Doug Buteyn
ADEC Solid Waste Program
Phone: 907-451-2135
Email: doug.buteyn@alaska.gov

-----Original Message-----
From: Lyons, Ellen H CIV USARMY CEPOA (US) [mailto:Ellen.H.Lyons@usace.army.mil]
Sent: Sunday, July 09, 2017 11:15 AM
To: Buteyn, Douglas J (DEC) <doug.buteyn@alaska.gov>

Cc: Rypkema, James (DEC) <james.rypkema@alaska.gov>
Subject: Northside Business Park, Himebauch

Doug, Northside Business Park (NW corner of the Johanson and the Steese) is proposing a change to the pond that has been preserved under the Corps permit (POA-2004-1127-M5). They are proposing to enlarge and enhance the storm water pond they have created in the northwest corner of the property to replace the natural pond that already exists on the east side of the property. I did a site visit out there in September of 2016 (I can't remember if you accompanied me that time?) and observed the piles of coal ash that were not stabilized or capped and were being eroded in to the storm water pond.

I would like to discuss this issue with you at some point, but first I was wondering if you would share your correspondence with Northside Business Park regarding the coal ash with me. You have provided it to me in the past but it was lost when my computer crashed earlier this year.

I would also be interested in the regulations that govern the disposal of coal ash so I am situationally aware. I have a meeting with them on Tuesday at 3 so it would be very helpful to receive any information you can provide to me before then.

I will also be holding at least one agency meeting regarding this project in the future and will let you both know when that will occur. Let me know if you have any comments or concerns regarding this information.

Thank you for your assistance!

Ellen Lyons
Project Manager, Regulatory Division
Alaska District, North Central Section, Fairbanks
(907) 474-2166