



STATE OF  
COLORADO

Musick - DNR, Jason <jason.musick@state.co.us>

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## Comments on Proposed Gasification Plant

1 message

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**Gerber - CDPHE, Miquette** <miquette.gerber@state.co.us>

Tue, Dec 6, 2016 at 9:55 AM

To: Jason Musick - DNR <jason.musick@state.co.us>

Cc: Daniel Hernandez - DNR <daniel.hernandez@state.co.us>, "Henderson - CDPHE, Jerry" <jerry.henderson@state.co.us>

Jason,

Thank you for soliciting our input regarding the installation of a gasification plant at the Bowie No. 2 Coal Mine in Delta County, Colorado. Unfortunately, the information provided is not enough for me to determine which, if any, solid waste regulations would apply. After additional information is obtained, please don't hesitate to contact me for additional review and comment.

Thank you also for contacting other Divisions within CDPHE (Air Pollution Control and Water Quality Control) for their input as well.

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**Miquette Gerber, P.G.**

Solid Waste Permitting Unit

Solid Waste and Materials Management Program

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**DLT Bowie Letter\_120616.pdf**

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**COLORADO**  
Department of Public  
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

Electronic document submittal

December 6, 2016

Mr. Jason Musick  
Environmental Protection Specialist  
Division of Reclamation, Mining and Safety  
1313 Sherman Street, Room 215  
Denver, CO 80203

RE: Solid Waste Regulations Applicability  
Bowie No.2 Mine (Permit No. C-1996-083), Technical Revision No. 110 (TR-110)  
Installation of Gasification Plant  
SW/DLT DEL/GEN/1.4

Dear Mr. Musick:

The Solid Waste Permitting Unit of the Hazardous Materials and Waste Management Division (the Division) reviewed the following documents provided by Division of Reclamation, Mining, and Safety:

- *Bowie No. 2 Mine (Permit No. C-1996-083), Technical Revision No. 110 (TR-110), Installation of Gasification Plant within the Permit*, dated November 23, 2016; and
- *Bowie Resources, LLC, Bowie No. 2 Mine, Technical Revision #110, Install a Daxiom Plant*, dated November 10, 2016 and prepared by J.S. Stover on behalf of Bowie Resources LLC.

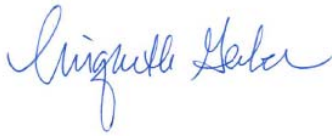
A technical review was conducted to determine the applicable requirements set forth in the Solid Wastes Disposal Sites and Facilities Act, Title 30, Article 20, Part 1 of the Colorado Revised Statutes, as amended; and with the regulations promulgated under 6 CCR 1007-2 (the Regulations). The proposed permit revision TR-110 includes installation of a gasification plant that will use coal processing waste to produce gas for use as energy. Unfortunately, very few details were provided pertaining to the nature and disposition of waste generated by the proposed Daxiom Plant. Exhibit 25 (page 4 dated 11/16) indicates that a solid residue would result from the gasification process. However, no information is provided as to where this solid residue will be stored and/or disposed of.

Additional information is necessary in order for the Division determine the applicable requirements under the Solid Waste Regulations, if any. It is possible that Regulation Sections 1, 2, 3, and 6 may apply to this operation. Also, the U.S. Environmental Protection Agency recently promulgated regulations pertaining to Coal Combustion Residues (CCR) that may also apply to this facility.

Please contact me by phone at 970-248-7168 or email at [miquette.gerber@gmail.com](mailto:miquette.gerber@gmail.com) should you have questions regarding this correspondence.

Sincerely,





Miquette Gerber  
Environmental Protection Specialist  
Solid Waste Permitting Unit  
Hazardous Materials and Waste Management Division

ec: J. Henderson, CDPHE  
cc: GJ file

