

Linc Energy, question on process waste from UCG

2 Messages in thread

Mon May 20 2013 10:54:19 GMT-0600 (MDT)
ID: 13ec2dcf7054cf5c
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To: John Passehl <john.passehl@wyo.gov>
CC: Kevin Frederick <kevin.frederick@wyo.gov>

John, fyi

I've been talking with Linc Energy about whether or not they can inject their waste water from their upcoming UCG burn into a Class I well. I believe it comes down to the question on whether the water meets the definition of "process water" under the Bevill amendment exclusion (CFR 261.4 (b)(7)). The CFR does state that "process water" from coal gasification is exempt, but it is not clear whether the water from the burn that Linc wants to dispose of meets the definition of "process water".

It's likely that the water will exceed the haz waste threshold of 500 ppb for benzene. I left a voice mail with Bob Breuer, SHWD (RCRA) to discuss. Just wanted to let you guys know that I'm looking into the question in case Linc is shopping for answers in Cheyenne. Thanks.Don

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Mon May 20 2013 12:15:49 GMT-0600 (MDT)
ID: 13ec32790eb2d1e8
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John, The question is whether the water is exempt under RCRA as a Bevill amendment waste. RCRA exemptions can be pretty confusing. I'll let Haz Waste make the call since we are a RCRA primacy state. If it is Bevill amendment exempted, Kissack can take it under their permit.