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*Submitted electronically to [DEQColstrip@mt.gov](mailto:DEQColstrip@mt.gov) and [sedinberg@mt.gov](mailto:sedinberg@mt.gov)*

Ms. Edinberg,

On behalf of Northern Plains Resource Council (Northern Plains) and its members, I am submitting the following comments to the Montana Department of Environmental Quality (DEQ) in response to the October 2019 Revised Remedy Evaluation Report (RER) Part 1 for the Units 1&2 ponds at Colstrip, which was submitted to DEQ by Talen Energy.

Northern Plains is a grassroots conservation and family agriculture non-profit organization based in Billings, Montana. Northern Plains organizes Montana citizens to protect our water quality, family farms and ranches, and unique quality of life. Northern Plains is dedicated to providing the information and tools necessary to give citizens an effective voice in decisions that affect their lives.

Northern Plains formed in 1972 over the issue of coal strip mining and its impacts on private surface owners who own the land over federal and state mineral reserves, as well as the environmental and social impacts of mining, burning, and transporting coal. We have many members who live and own ranches in the Colstrip area. Those members' livelihoods depend entirely on clean air and water, native soils and vegetation, and lands that remain intact.

Furthermore, members outside the Colstrip area recognize the negative impacts that legacy groundwater pollution from the leaking coal ash ponds will have on Eastern Montana and adamantly support a thorough and responsible cleanup there. Insofar as the waters of the State of Montana belong to all of the people of our state and insofar as any legacy pollution clean-up costs that remain after plant owners' remediation efforts end could be borne by Montana taxpayers, all of our members have a strong vested interest in ensuring thorough clean-up of Rosebud County's water resources and a bright future for the region.

Attached to these comments, you will find a technical analysis prepared on our behalf on December 4, 2019 by KirK Engineering & Natural Resources, Inc. (KirK). We encourage you to thoroughly review these findings, and while they are not all additionally mentioned or detailed in these comments, we incorporate KirK's findings by reference.

## Background

In January of 1973 at a hearing in Miles City on the proposed coal ash disposal ponds for Colstrip Units 1&2, then-Northern Plains Board of Directors' Chair Ellen Pfister testified that wet disposal of coal ash in scoria soil would result in leakages. In subsequent years, Northern Plains' members in the area continued to raise this issue and to demand that state agencies evaluate how Montana Power Company would control the leaking ash ponds. During hearings prior to the initial construction of Units 3&4, local landowners gave examples of stock reservoirs not holding water due to porous substrate and soils, and recommended that dry storage methods be used to contain the contaminants in the coal ash. These recommendations were dismissed by the Colstrip plant owners and largely ignored by state agencies permitting the ponds.

The current system to control groundwater pollution at all Colstrip coal ash ponds relies on pump-back wells and is a temporary solution that does not address the root cause of the pollution – the leaking coal ash ponds. The pumps pull roughly 750 gallons of groundwater per minute, or 1,080,000 gallons per day, out of the aquifer to prevent the pollution from spreading according to capture-well data contained in Talen Energy's Site Characterization reports. While we appreciate that perpetual pumping may now be a necessary element of pollution control, it is not enough in-and-of-itself. The source of pollution must be eliminated. The owners have been allowed to operate for four decades in direct violation of Montana water quality law and the plant's original Major Facility Siting Act permit. The owners' and state's failure to act has made a bad problem worse.

What is infuriating for adjacent landowners is that during the last four decades this band-aid approach to simply contain pollution with capture wells rather than stop the pollution at its source has created a permanent (and once-avoidable) problem in the form of bedrock aquifer contamination. We believe the state cannot afford a "wait-and-see" approach with this cleanup. It is time to address the problem head-on with aggressive source-control measures that dig out coal ash sitting in the groundwater and move the coal ash to a lined landfill above the water table. *To protect groundwater, DEQ cannot leave unlined or leaking coal ash ponds sitting in the water table.* We believe DEQ will need to exercise the agency's authority as outlined in Article XIII, Section D, of the AOC [Administrative Order of Consent] throughout the RER approval process in order to protect the community's long-term health and safety and to require that Talen Energy execute a responsible cleanup.

Agricultural operations in the Armells Creek watershed have suffered from coal ash pond leakages that have introduced high sulfate and Total Dissolved Solids (TDS) concentrations into the aquifer and from the excessive pumping of uncontaminated groundwater in order to limit the spread of the contamination plume. While pumping may now be situationally necessary, it comes at a meaningful cost. The capture system daily contaminates ever more groundwater, as virgin groundwater is pumped out from the ground via capture wells and piped into storage ponds where it mixes with coal ash. According to DEQ's leakage estimates, 367 gallons of contaminated water leak per minute from the Colstrip coal ash ponds. The capture system, however, pumps an estimated 750 gallons of water per minute out of the aquifer according to Talen Energy's estimates in the Site Characterization Reports. We are then needlessly

contaminating roughly 483 gallons of fresh groundwater per minute just to control the spread of pollution as virgin groundwater is pumped out from the aquifer and transported for storage in the coal ash ponds where it becomes contaminated.

Citizen lawsuits from adjacent landowners to the Units 1&2 ponds in 2008 resulted in a \$25 million settlement for damages caused by pollution from the leaking coal ash ponds. The lawsuits, however, did not result in a permanent fix to eliminate future leakages. The state regulatory agencies, currently DEQ, have never required a permanent fix, only requiring expansion of the capture system to remove more groundwater in an effort to control the spreading pollution. It is encouraging to see the active remediation proposals in the RER, including *in-situ* flushing (which we view as critical), but the Preferred Alternative does not include the single most important strategy needed to remediate pollution at the Units 1&2 ponds – source removal of coal ash. Source removal is the only proven strategy that will keep coal ash at the Stage Two Evaporation Ponds (STEP) out of contact with groundwater in the long term and safeguard the region's water resources.

It is clear from DEQ comments to Talen Energy dated April 22, 2019, that DEQ requested source removal be thoroughly evaluated as a remediation technology for the Stage One Evaporation Ponds (SOEP). However, no alternatives in this RER evaluate source removal for the *other* pond complex associated with Units 1&2 – STEP – despite the fact that the water table also intercepts coal ash at that complex. For the same reasons that SOEP ash will remain a continual, long-term source of contaminants of interest (COIs) if left in place, STEP ash will continue to release COIs for hundreds of years unless it is moved to a new landfill above the water table.

DEQ is not limited to approving only alternatives that are provided by Talen Energy. Indeed, Talen Energy has provided no alternative that guarantees a healthy future for Colstrip and meets clean-up criteria within the AOC boundary for the Units 1&2 site, as defined in the Cleanup Criteria and Risk Assessment report (for example, bringing concentrations of boron and sulfate down below 4 mg/L and 3000 mg/L, respectively, in the alluvium). Even Talen Energy admits that their seemingly preferred alternative, Alternative 5, will result in pollution levels exceeding preliminary clean-up criteria 50 years after they have begun their remediation efforts (see, for instance, page xiii in the RER which states, “As such, Alternative 5 includes MNA [monitored natural attenuation] and institutional controls to address the small isolated Near-Source areas that do not attain the PCC [proposed cleanup criteria], and the Distal Areas within the Plant Property boundary where the boron plume reemerges after the injection/capture system is shut down.”)

To be clear, Northern Plains supports the goals of the AOC and believes the plume remediation technologies outlined in this RER are meaningful steps to help achieve those goals. However, without adequate source controls regarding the coal ash itself, any progress made through plume remediation stands to be reversed in future decades as a long-term source of pollution rebounds.

## Deficiencies in the RER

These comments, and the attached review by KirK Engineering, lay out myriad deficiencies in Talen Energy's draft RER. In the next several pages, we would like to further explore four deficiencies of particular note:

- the RER lacks an alternative where source removal of all coal ash at STEP is evaluated;
- pond liners will not act as a permanent barrier between groundwater and coal ash;
- long-term leaching from STEP is not accurately characterized; and
- the RER lacks a plan for long-term pumping beyond 2070.

### **The RER lacks an alternative where source removal of all coal ash at STEP is evaluated.**

We are heartened by DEQ's April 22, 2019, letter to Gordon Criswell that states that "DEQ will not accept a remedy that leaves a long-term source in place if it is in contact with groundwater." Talen Energy's present failure to evaluate source removal in the RER means they cannot possibly show they will meet this important standard. The water table is elevated above coal ash at the Units 1&2 ponds, and capping any of these ponds in place will leave coal ash in contact with groundwater long-term, making it impossible to meet AOC cleanup goals in the future.

*We believe the final remedy must include source removal of coal ash at STEP and that DEQ should require this be evaluated in Part 2 of the RER.* The alternatives presented by Talen Energy in this report do not allow DEQ to truly evaluate how STEP coal ash continues as a long-term source of COIs if it is capped in place. An alternative where *both* STEP and SOEP coal ash are removed must be evaluated in the Units 1&2 RER Part 2 and weighed against capping any of the coal ash in place. The AOC includes a clear requirement in Article XI that the Remedy Evaluation Reports must contain, among other things, an "Identification and summary of feasible remedial alternatives" (Section C.2.a). Source removal of coal ash is a standard practice for coal ash ponds that sit below the water table. In fact, state legislatures in North Carolina, South Carolina, Virginia, and Illinois have all passed laws mandating this as a requirement. Talen Energy's failure to identify source removal of STEP coal ash as a feasible remedial alternative in this report means they are not meeting this important standard in the AOC.

We also note that none of the alternatives presented in the report achieve the cleanup criteria as identified in the Units 1&2 Cleanup Criteria and Risk Assessment report within all AOC boundaries at the Units 1&2 site. Meeting cleanup criteria is the main point of the AOC process. DEQ issued the AOC as an enforcement action for cleaning up the leaking Unit 1&2 ponds, but the RER as written does not prevent the ponds from leaking into the future as it leaves coal ash sitting below the groundwater table.

The Colstrip owners have had four decades to resolve this issue and have failed to implement a successful strategy. A RER that includes cap-in-place closure for any of the Units 1&2 ponds that are below the water table constitutes a "kick the can down the road" approach and will result in area groundwater contamination continuing into the future. Adjacent

landowners have waited for 40 years for the DEQ, the responsible state agency, to enforce Montana water quality law and require permanent storage of coal ash in a safe, dry landfill. We cannot push the real work of the AOC – digging up coal ash – off into the future and play out a scenario where the state is forced to claw back funding from companies that no longer have active operations in Montana.

We are steadfast in our belief that DEQ must use any means necessary to require Talen Energy to include a source removal alternative in Part 2 of the report. The AOC process is itself an enforcement action, and the RERs are the single largest and most important decision-making part of that process. It is therefore critical that DEQ view enforcement as a central theme of the RER-approval process and ensure that a source removal alternative is included for evaluation in Part 2.

**Pond liners will not act as a permanent barrier between groundwater and coal ash.**

We know that the liners beneath STEP have been leaking for decades and will not act as a permanent barrier between groundwater and coal ash as Talen Energy falsely claims in the RER. The water table at the Units 1&2 ponds is elevated above the bottom of STEP ponds. Therefore, coal ash capped in place ensures coal ash will remain in contact with groundwater and be a long-term source of COIs. Even if the ponds are completely dewatered and all STEP coal ash is temporarily dried out, that situation won't last. Clean groundwater will well up through pathways in the liners where pond water is currently leaking. That groundwater will mix with coal ash again, become contaminated, and finally leak back out, carrying COIs into the aquifer. Talen Energy estimates the high-density polyethylene (HDPE) liners are rated for 400 years in unexposed conditions and 36 years in exposed conditions. No matter how long it takes, when the liners eventually fail, there will be a large mass of coal ash freshly exposed to groundwater.

In comments to Talen Energy dated April 22, 2019, DEQ requested Talen Energy account for horizontal groundwater flows into coal ash when modeling seepage from the Units 1&2 ponds. Talen Energy's response, that "...the presence of the liners in the STEP ponds should eliminate saturated advective flow through the ash," is inadequate. A plastic liner simply will not permanently eliminate groundwater contact with coal ash. When the liners eventually fail, groundwater contact with coal ash will be significant and result in a continual, long-term source of COIs. Talen Energy's failure to accurately account for horizontal groundwater flows in the modeling means DEQ cannot truly evaluate how capping STEP coal ash in place will impact long-term AOC cleanup goals. We reiterate that horizontal flows into the STEP ponds is underestimated in the RER and this prevents DEQ from evaluating the negative impacts of leaving coal ash in place.

**Long-term leaching of COIs from STEP ash is not accurately characterized.**

Long-term leaching of COIs from STEP coal ash is not accurately characterized in the report. This makes it impossible for DEQ to evaluate how capping these ponds in place will impact cleanup goals. Please see KirK Engineering's comments for more explanation on this point. To summarize, Talen Energy argues that the major source of COIs that contribute to future plume reemergence are from SOEP coal ash, and therefore that aggressive source controls

are not needed at STEP. However, this does not make sense as it assumes contamination is only coming from SOEP coal ash but not from STEP coal ash. If two sacks of garbage are sitting in a bathtub, pulling only one of them out does not fully fix the problem of there still being garbage in the bathtub. Leaving SOEP coal ash in place in Talen Energy's models in the RER is a clear attempt to downplay the negative impacts that capping STEP coal ash in place has on long-term cleanup goals.

Northern Plains supports DEQ approving the dewatering of all STEP ponds as a needed first step toward excavation. Along with Cells A and E, dewatering of the Old Clearwell should be included and approved in Part 1 of the report because that cell is currently being filled with coal ash. However, while we support DEQ approving the dewatering in Part 1 of the RER, there should be clear language in the approved RER stating that this approval does not constitute a long-term source control plan for the STEP ponds. Contact between groundwater and coal ash at all Units 1&2 ponds must be addressed in Part 2 of the report and that report must include an alternative that evaluates source removal at all ponds.

### **The RER lacks a plan for long-term pumping beyond 2070.**

The RER should include financial assurance to cover the costs of long-term, likely perpetual, pumping at the Units 1&2 ponds site in order to control the spread of contaminants that *in-situ* flushing does not remove, including, for instance, through the endowment of a trust fund. Talen Energy's preferred alternative is not capable of meeting cleanup standards within all AOC boundaries for the Units 1&2 site. The low-flow nature of the aquifer and decades of contaminant leakage make it difficult to remediate the groundwater. We acknowledge that freshwater flushing is an important tool toward removing much of the contamination, but in reviewing groundwater models in the RER it is clear there will be a need for permanent pumping to control the boron plume from rebounding and spreading beyond AOC boundaries after the capture system shuts down.

Talen Energy states several times in the RER that "...it should be noted that monitoring in perpetuity is not required for waste disposal sites." We ask DEQ for a written response to this claim and to assess its validity. Several references are made in the report to "...small isolated Near-Source areas that do not attain the PCC." If Talen Energy is not required to monitor the Units 1&2 site in perpetuity and DEQ approves a plan that does not attain cleanup criteria in the AOC boundary, we believe DEQ has formally enabled a violation of Montana water quality law in perpetuity.

DEQ must acknowledge the hard fact that this site will require perpetual pumping and monitoring and that the owners must provide financial assurance to cover those costs. New remediation technologies may be available in the future that can remove the less mobile constituents from the plume and prevent the need for perpetual pumping, but DEQ must not approve a plan that is based on that assumption. Perpetual groundwater pumping is a centerpiece of ongoing cleanups at Butte, Zortman-Landusky, and other industrial mining sites in Montana. The Colstrip power plant owners have had plenty of opportunities to prevent a permanent pollution problem from unfolding if they had only voluntarily switched to dry storage. Choosing

to store the coal ash in ponds has resulted in enormous pressure, forcing contamination deep into the aquifers beneath the ponds for decades. There is no proof that removing those contaminants to background concentrations will ever be possible, and while DEQ must require a plan to maximize water quality, minimize degradation, and meet pollution criteria, DEQ must also prepare for the reality of ongoing water pollution by collecting a bond that will cover the cost of long-term pumping at the site. If prepared properly, the MNA study that Talen Energy is completing in the coming year will be helpful in evaluating if MNA is appropriate for the Units 1&2 site, but with the data that is available today, DEQ must have a plan in place to control the pollution long-term.

Things rarely go as planned in industrial remediation projects. For example, the Butte cleanup plan of Silverbow Creek has undergone major revisions since the project began in 1983. We believe there must be several explicit contingency plans to reflect the uncertainty surrounding the effectiveness of the STEP underdrain in fully draining the ponds and limitations on the Hydrologic Evaluation of Landfill Performance (HELP) model used to justify meeting long-term cleanup goals. The models supporting the preferred alternative are not qualified for predictive purposes as stated by Geosyntec in the RER. DEQ must approach remediation at the Units 1&2 site by bonding for the reasonable worst-case scenario – including, though not limited to, perpetual pumping – or accept that the state will be forced to try to collect funding in the future from companies that may no longer exist. We know, and Talen Energy has admitted, that the massive pump-back well system is the only thing keeping the pollution plume from spreading into nearby Armells Creek. This begs the question: what happens when there is no more bonding to keep the pumps running?

### Impacts of Sulfates on Agriculture

High sulfate levels in the coal ash ponds must be controlled to safeguard water quality for downstream livestock producers. Average sulfate concentrations in the STEP ponds range from 20,000-50,000 ppm [parts per million], with a maximum value of 155,000 ppm according to the latest Cleanup Criteria and Risk Assessment report. This is more than concerning to livestock producers in the area, as concentrations of sulfates over 3,000 ppm negatively impact conception rates, result in decrease weight gain and polioencephalomalacia or “brain softening,” and lead to death in cattle. In an attached 2009 field study produced by the Fort Keogh Agriculture Research Center in Miles City, 47% of cattle exposed to water with sulfate levels between 2,900 ppm and 4,600 ppm had symptoms of polio, and 33% died. The Units 1&2 ponds are leaking 31,000 gallons each day of water containing 50,000 ppm!

Livestock producers do not just *rely on* clean water; they *exist solely because* useable water is available. Northern Plains underscores the need for a plan that permanently controls leakages from the coal ash ponds and prevents migration of sulfates into the aquifer.

There is anecdotal evidence from landowners downstream from the Units 1&2 ponds on Armells Creek that water quality has been in a steady state of decline for 40 years. Ranchers have leveled fields in preparation for flood irrigation but then abandoned using that irrigation

strategy on those fields because of poor water quality in Armells Creek and its negative impacts on soil health and crop production, notably from high sulfates. Landowners have also observed steep declines in aquatic life (large fish, turtles, frogs, and other life forms) during the last 40 years in Armells Creek. It is extremely difficult to prove that declines in both water quality and aquatic life in the watershed are a direct result of Colstrip's coal ash ponds leaking, but we note both of these observations to make DEQ aware of on-the-ground, long-term observations from residents in the area.

We also note that while sulfates, like boron, is used as an indicator pollutant in Talen Energy's submission, the list of contaminants ultimately contained in coal ash – lithium, manganese, cobalt, selenium, radium, and more – is long and many of these contaminants pose meaningful threats to water and its uses in southeastern Montana.

### Violations of the Federal Coal Combustion Residuals Rule

As written, the RER does not meet key standards contained in the 2015 Coal Combustion Residuals (CCR) Rule, and DEQ must consider this to ensure that the AOC remedy is executed and that water and its uses are protected. Specifically, the CCR rule requires that free liquids be fully drained from ponds prior to capping (40 CFR § 257.60, 2015) and that the base of existing CCR impoundments be 5 feet above the upper limit of the uppermost aquifer (40 CFR § 257.60, 2015). Groundwater elevations at the Units 1&2 site are above the bottom of STEP ponds, and therefore DEQ approval of a cap-in-place remedy would mean that the agency policy does not comply with both of these key federal standards. Anything short of source removal at these ponds provides uncertainty, risk, and delays addressing the problem to the future – likely a time when owners may not exist or, conceivably, agency leadership may seek to undermine the goals of the AOC and state and federal law.

We respect that DEQ staff, more than anyone, want to approve a permanent remedy that meets federal and state standards and do not want this remediation plan to end up in the courts. Northern Plains agrees and urges the DEQ to carefully evaluate how this RER complies with the CCR rule.

### Conclusion

The Armells Creek drainage supports more than 15 agricultural businesses downstream from the Colstrip Units 1&2 coal ash ponds and is an ancestral waterway of the Northern Cheyenne people. When the ponds were proposed and under construction, landowners raised concerns that the reservoir(s) would not hold water and that storing wet coal ash in a scoria hillside would create an enormous and expensive pollution problem. The Colstrip owners dismissed these concerns with testimony from licensed hydrologists, geologists, and engineers who argued that the ponds would be sealed and leakages minimized. State agencies assured our members and others that if the ponds did leak, extreme measures would be taken to correct the problem. Today, the aquifer continues to receive 500,000 gallons of contaminated water each day from the

Colstrip coal ash ponds. The RER is the latest proposal from the company to address the problem and, in our opinion, does not qualify as an “extreme” approach by any means. Indeed, it fails to meet basic protective standards or comply with the AOC.

We are encouraged by and very much appreciate the dedicated work that DEQ has, in recent years, put into the AOC process leading up to this RER, but we believe that there are outstanding issues that the company is refusing to address – issues that **MUST** be addressed – before DEQ approves this report. These issues include, but are not limited to: Will the aquifer be in contact with coal ash long-term? Has Talen Energy met the AOC requirement to identify and summarize feasible remedial alternatives, as required under Article VI? What happens when the pumps turn off in 2070 and pollution controls are still needed?

DEQ is the responsible state agency that is required to hold the corporate owners of Colstrip accountable for this pollution. These owners have made billions of dollars while operating the power plant through the years even while they have failed to ever propose an effective solution to the leaking coal ash ponds. The AOC assigns clear authority to the DEQ Director under Article XIII, Section D, that, “In the event that the parties are unable to resolve a dispute within this period, the Department’s Director shall issue a final decision.” While Northern Plains hopes that a better plan can be developed that addresses these critical issues, we also realize that DEQ may need to assert this authority in order to protect the permanent health and well-being of the surrounding community members, businesses, and the environment – and we would vigorously defend that decision. The aquifers that are impacted by the Colstrip Units 1&2 ponds support the springs, wells, and creeks that make agricultural livelihoods in this area possible and are irreplaceable. We thank you for the opportunity to comment and are available for further discussion.

Sincerely,

A handwritten signature in black ink that reads "Jeanie Alderson". The signature is written in a cursive, flowing style.

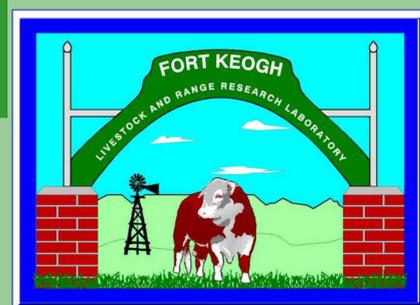
Jeanie Alderson  
Chair, Northern Plains Resource Council

Attachments

KirK Engineering and Natural Resources Comments

KirK Engineering and Natural Resources Comment Attachment

2009 Fort Keogh Livestock Water Quality Study



# LIVESTOCK WATER QUALITY

## STORY IN BRIEF

Water is the most important nutrient for range cattle. It is required for all life processes. A loss of 20 per cent of the body's water will be fatal. Total body water of cattle is 56 to 81 per cent of body weight. Physiologic stage and body composition **affects the body's water content. Lactating cows possess the greatest amount of body water (from 62 to 69%). Fat cows** contain less water than thin lactating cows and younger animals have higher water content than older animals.

Loss of body water occurs through milk production, fecal excretion, urine excretion, sweat and vapor loss. Water losses **through milk production are equal to approximately 33% of the cow's daily consumption. Fecal losses are usually** comparable to milk losses and urinary losses are approximately 50% of fecal losses. Fecal water losses are affected by intake, dry matter content of the diet and digestibility. Urinary losses range from 1 to 9 gallons per day. Urinary water excretion is related to water availability, water absorbed, nitrogen and potassium content of urine and dry matter content of the diet.

Water intake - Cattle can meet their water requirement from 3 sources;

- Drinking free water
- Ingestion of water contained in feed
- **Water produced by the body's metabolism**

It has been estimated that cows;

- require 2.6 to 3.0 lbs of water for every lb of milk produced
- in moist pastures cattle may consume only 40% by drinking
- Salt availability influences consumption
- High salt or protein may stimulate water consumption. For every gram of sodium consumed (28 grams=1 ounce) water intake generally will increase 0.1 lb.

Water is especially important during periods of heat stress.

- Properties for cooling include heat conductivity and vaporization
- As effective temperatures raises from 65 to 86 F consumption increases by 30%
- Losses from urine, sweating & respiration increases 15, 59 and 50% with temperature increases
- No shade during the summer will increase water consumption by 18%

Water quality - Five criteria might be combined to encompass the characteristics of water quality. They are;

- 1.Odor and taste
- 2.Chemical properties ( pH, dissolved solids, total dissolved oxygen and hardness)
- 3.Toxic compounds (heavy metals, toxic minerals, organophosphates and hydrocarbons)
- 4.Presence of excess minerals (nitrates, sodium, sulfate and iron)
- 5.Presence of living organisms (bacteria)

Salinity—total dissolved solids (TDS) expressed as mg/liter or parts per million (ppm). This is a measure of total dissolved salts;

- sodium chloride, carbonates, nitrates, sulfates, calcium, magnesium and potassium.



The primary symptom of high salinity water is diarrhea. If the TDS is high, cattle will be reluctant to drink then, drink a large amount at once. This can cause the animal to become very sick and potentially die. Guidelines are;

- Less than 1000 ppm. Generally safe.

- Greater than 1000 ppm. May cause some diarrhea. May reduce availability of other minerals. May reduce performance.
- 3000 to 5000 ppm. Marginally safe. Maybe reluctant to drink. May reduce performance and affect health. Should also test for sulfates.
- 5000 to 7000 ppm. Poor water. Performance and health slump especially when temperatures are high. Test for sulfates. Use with low value stock
- 7000 plus ppm. Unsuitable. Performance and health effects expected. Limit use with lactating and pregnant stock. Sulfates mostly likely high

Sulfates — commonly high in ground water in South Dakota and Montana. Adult cattle seem to be more resistant to the effects of sulfates than calves. Sulfates can cause secondary deficiencies of;

- copper, zinc, iron and manganese.

The form of the sulfates can vary. All forms are a laxative.

- They will drink less, have diarrhea at a lower sulfate concentration with sodium.
- 2,000+ppm diarrhea may start but cattle will adapt.
- Most common forms are sodium sulfate and magnesium sulfate.
- Iron sulfate may cause the most severe rejection of drinking water. Guidelines for interpretation of sulfate results;



- Less than 500 ppm. Safe.
- 500 to 1500 ppm. Generally safe. Trace mineral availability may be reduced. Decreased performance of confined cattle.
- 1500 to 3000 ppm. Marginal. Poor for confined cattle during hot weather. Sporadic cases of polio may be seen in confined cattle. Performance maybe reduced.
- 3000 to 4000 ppm. Poor water. Sporadic cases of polio are probable, especially in confined cattle. Performance of grazing cattle maybe affected.
- 4000 plus ppm. Dangerous. Health problems expected. Reduction in performance.

Results of studies evaluating water quality on cattle performance – Two South Dakota studies were conducted with yearling cattle in



pens fed a roughage diet. Three groups of cattle received different quality of water

- 1.Good – 400ppm sulfate/1000ppm TDS
- 2.Poor – 3100ppm sulfates/4800ppm TDS
- 3.Poorer- 3900ppm/6200ppm TDS

Steer average daily gain declined from 1.4 lb to 1 lb per day.

The steers drinking the 3100 and 3900ppm sulfate water had;

- reduced water intake, dry matter intake feed efficiency
- 15% of the cattle on the high sulfate water exhibited polio.
- daily sulfur content of diet was 0.27, 0.74 and 0.93%. Requirement is near 0.2%.

In another set of studies steers had access to four sources of water with either;

- 1.400ppm sulfates/1000ppm TDS
- 2.1700ppm sulfates/3000ppm TDS
- 3.2900ppm sulfates/5000ppm TDS
- 4.4600ppm sulfates/7000 TDS.

Steer gains were 1.8, 1.6, 1.5 and 0.6 lbs per day for each sulfate treatment (400, 1700, 2900 and 4600 ppm).

47% of steers on the two highest sulfates levels had symptoms of polio and 33% died.

### Summary

Water quality especially sulfates can affect animal gain and health. If animal performance is disappointing a water analysis may be indicated. Start with a TDS analysis. If the concentration is over 3000ppm TDS, then further analysis of sulfates should follow. Research shows that cattle prefer to drink out of troughs rather than the dirt tanks. Knowledge and management of stock water quality can be an important part of an effective ranch plan.





## **Comments on the Revised Remedy Evaluation Report - Part One Units 1 & 2 Stage I and II Evaporation Ponds**

**December 4, 2019**

This report provides technical comments on the revised Part 1 Remedy Evaluation Report (RER) (Geosyntec Oct. 2019). KirK Engineering & Natural Resources, Inc. prepared these comments as an advisor to Northern Plains Resource Council. The goal of our review is to provide a thorough evaluation of the technical accuracy of the revised RER and if needed provide recommendations for changes or additional analysis.

The RER is required by the Administrative Order on Consent (AOC) between PPL Montana and the Montana Department of Environmental Quality (DEQ), a legal settlement requiring Talen to address environmental impacts from the coal ash ponds and other wastes at the Colstrip Plant (DEQ and PPL Montana, 2012). The AOC is an enforcement action taken by DEQ under the Montana Water Quality Act and the Major Facility Siting Act to address groundwater contamination at the Colstrip Plant. The AOC requires Talen to prepare Site Characterization Reports, Remedy Evaluation Reports, and Facility Closure Plans. Talen's plans for groundwater remedy are contained in the Remedy Evaluation Reports. DEQ approval of the RER constitutes DEQ's approval for Talen's proposed groundwater cleanup plan. The focus of our review and comments in this report is the revised RER Part 1, for Units 1&2 Stage I and II Evaporation Ponds, otherwise known as the SOEP and STEP. Part 1 addresses all components of the remedy for this area with the exception of source control for coal ash, otherwise known as coal combustion residuals (CCR), at the Stage One Evaporation Pond.

Detailed comments are provided below. The deficiencies we consider most significant are summarized here:

Talen proposes a 'wait and see' approach to leaving CCR in place at the STEP where a single-layer HDPE plastic liner separates the ash from groundwater. Talen provides credible evidence (scientific literature) in the RER that the liners will eventually fail. Talen is also explicitly stating they won't be undertaking the 'see' part of wait and see because they don't believe perpetual monitoring should be required. Any remedy that will fail at some point in the future with no plan for monitoring and contingency kicks the can down the road so that the public would have to assume responsibility for the contamination when liner failure eventually occurs. This is unacceptable. The Montana Water Quality Act does not allow a groundwater remedy which is temporary and guaranteed to be insufficient long-term. Talen either needs to plan for perpetual maintenance of CCR left below the groundwater elevation or needs to provide a remedy which separates CCR from groundwater.

The table of comments for the detailed comments follows.

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## Comments

### **1. General comments**

#### **1-1. The groundwater modeling needs to include removal or control of the SOEP contamination for us to evaluate the remedy performance of the alternatives presented.**

The predictions about remedy performance in the part 1 RER are evaluated and visualized in the figures assuming the SOEP will remain capped in place with CCR remaining in contact with groundwater below the water table. The predictions thereby show a large area of perpetually contaminated groundwater both on Talen property and downstream on private land along East Fork Armells Creek. It's impossible to evaluate remedy performance of the five alternatives because the predicted outcomes are all clouded by the SOEP being a perpetual source of contamination.

The Montana Water Quality Act does not allow the SOEP CCR to be left as a perpetual contaminant source and we know the part 2 remedy will require source controls at the SOEP. The modeling should be run assuming the SOEP source is controlled by eliminating contact between CCR and groundwater. Conceptually this could be done by eliminating the modeled recharge boundary conditions associated with leaving the SOEP in contact with groundwater and running two difference scenarios, one where the SOEP CCR seepage is entirely eliminated and one where only vertical seepage through a type IV cover occurs. This would allow us to compare the actual remedy performance of the part 1 remedy (flush, capture, and dewatering) with two SOEP source control scenarios, one where the CCR is excavated/removed, and the second where hydraulic controls dewater the SOEP CCR which is capped in place with a type IV cover.

Additionally, Geosyntec's statement that contaminant plume reemergence is primarily from the SOEP needs to be evaluated with modeling. This can be done at the same time source control of the SOEP is modeled. When this is done, accurate seepage from the STEP due to perpetual CCR saturation at the A, E, and Old Clearwell cells need to be included in the modeling, as discussed in comment 1-7.

The limitations of the RER in its current form is clear in section 7.5.2.1 which evaluates performance of the preferred alternative. This section evaluates performance of Alternative 5 but for some reason does not discuss the contamination that is shown in the current model results as being transported into the Distal Area Outside Plant Property (i.e. private properties and the East Fork Armells Creek) and remaining above the cleanup criteria long after active remediation measures are complete. Section 7.5.2.1 states "The model simulations for Alternative 5 (Figures 6-45 through 6-54 of Appendix D-6) provide a visualization of the performance of Alternative 5 with respect to boron and sulfate... from the beginning of 2019 to 2150." But they do not. Figure 6.45 to 6.49 now stop at 2050, prior to the plume rebounding and migrating off the property. The animation now includes a note "By 2050, except for a few small areas, the PCC are achieved at the POC. Following cessation of pumping, the only remaining source loading is at SOEP." The model was not used to prove this. This statement also appears to not account for contaminant mass trapped in the unsaturated zone and continued leakage from the groundwater saturated STEP A, E, and Old Clearwell as discussed in comment 1-7. Figures 6.50 to 6.54 have the same deficiency in prediction of sulfate remedy performance. This section should evaluate an actual remedy proposal. As currently written, it doesn't show us the performance of any actual proposed alternative.

## **1-2. Talen should have a plan for perpetual monitoring and maintenance of the STEP if CCR is left in place below the groundwater elevation.**

Synthetic liners such as those used at the STEP ponds will eventually break down; this is why current Federal CCR regulatory criteria requires a 5-foot separation from groundwater. It is difficult to predict with accuracy the current condition of the STEP HDPE liners or the tensile stresses caused by CCR settling against the liner subgrade, both of which may cause liner deterioration. What is clear is that scientific literature shows that HDPE liners will eventually deteriorate.

Talen argues that the HDPE liners eliminate advective flow through ash. This may be true while the liners are relatively intact, but it ignores two serious issues:

- 1) The lined cells will likely continue to leak forever because the cells will never drain completely due to elevated groundwater (see comment 1-7).
- 2) When the liners eventually fail there will be a large mass of CCR freshly exposed to leaching with groundwater.

Talen either needs to plan for perpetual maintenance of CCR left below the water table/potentiometric surface or needs to provide a remedy which separates CCR from groundwater.

## **1-3. Data and modeling used to evaluate contaminants which are trapped in the unsaturated zone need to be described in the RER.**

The RER alludes to contaminants which are trapped in the unsaturated zone and which remobilize after capture system shutoff and contribute to contaminant plume reemergence.

For instance: “In addition, some re-saturation of previously desaturated zones with residual pore water and sorbed mass would occur after the capture system is shut down and contribute to the re-emergence of the plume. Plume re-emergence is primarily due to the re-saturation of ash in the SOEP and is not addressed in Part 1 of this report.” RER Pp x

However, no information is given in the modeling reports as to how the unsaturated zone was modeled. The RER also states that data on the unsaturated zone contaminants was not available for the modeling and remedy performance predictions.

“Although soils beneath the ponds generally have not been assessed, it is possible that there are salts of inorganic solutes, dissolved solutes in residual pore water, sorbed mass in the unsaturated zones beneath the ponds, and remobilization of those materials due to rebounding water tables after the capture system is shut off could be a mechanism for plume re-emergence.” RER Pp xii

Contaminants trapped in the unsaturated zone are critical to understand in evaluating whether the remedy will achieve cleanup criteria. The data and modeling methods used to evaluate this need to be provided. The description should be clear how Geosyntec differentiates between SOEP CCR becoming resaturated and secondary contamination (contaminant salts and other contaminants temporarily attenuated) in the unsaturated zone.

## **1-4. Talen should evaluate whether removal of STEP D cell will lead to further increase in the elevation of groundwater under the STEP.**

The RER states the STEP D Cell will be decommissioned and removed in 2023. No details are provided as to stormwater runoff controls or water management in the pit left with D Cell removal. The groundwater table is already too high beneath the adjacent CCR containing impoundments (A, E, and Old Clearwell cells), which will lead to perpetual saturation of CCR contained in those cells.

Accumulation of precipitation in D Cell will further recharge the groundwater in the area and raise the water table behind the STEP main dam, further exacerbating this problem.

### **1-5. Talen should use the STEP Clearwell and D Cell for contaminated water management and plan for water treatment capacity sooner.**

Talen plans to decommission both the STEP Clearwell and D Cell and move contaminated water storage to the new Captured Groundwater Storage Pond at the Plant Site, to be completed in 2019. The Clearwell and D Cell are the only double-lined impoundments with leachate collection at the STEP and decommissioning them years before adequate storage is available for all groundwater cleanup required by the AOC doesn't make any sense.

The new storage pond should also be targeted for receiving flow from the Unit 3&4 EHP underdrain, which Talen currently does not plan to pump until 2021 due to lack of storage (Geosyntec, 2019b). Unit 1&2 captured groundwater should be management in these existing double-lined cells at STEP as possible. To further reduce water inventory, Talen should be planning for rapid installation of expanded forced evaporation or other water treatment techniques such as Solar Multiple technology described in KirK Engineering (2018).

Until the new treatment system is up and running, Talen should use the current Unit 1&2 VSEP system for STEP dewatering or treatment of flows from the EHP underdrain. If there is an ownership issue between Unit 1&2 and Unit 3&4 water treatment equipment, then the owners of 3&4 should be required to purchase the VSEP system for treatment of EHP underdrain flow.

### **1-6. The SOEP source concentration needs to be accurately modeled.**

The RER states “The results [of the source evaluation of saturated ash at the SOEP] will be used to update the fate and transport modeling if the source strength is less than that assumed in the model” (page xv and 127). Talen needs to accurately model the source concentrations at the SOEP and STEP regardless of whether they are less or more than their current assumptions. Instead of adjusting the source concentration during model calibration, sampled water quality and leach testing results need to be used as the source concentration.

The modeled source concentrations are already based on questionable data. Section 5.2.2 of NewFields (2019) discusses that during model calibration source area concentrations were adjusted even lower than Hydrometrics' (2016) sampled data. We reviewed calibrated source area concentrations and found that Table 8-1 shows the calibrated model assumes an extremely variable source concentration from single CCR impoundments. For instance, the modeled SOEP boron concentrations vary from 6 to 50 mg/L, A Cell from 18 to 100 mg/L, and E Cell from 4 to 65 mg/L. This assumption that seepage concentrations vary by over a magnitude within a single cell are suspect and shows the need for additional focus on sampling and characterizing source area concentrations. It also shows the need for evaluating the uncertainty of other model parameters which may need further calibration instead of source area concentration. For instance, the calibration may have been possible by increasing groundwater flow in the model, such as by increasing the hydraulic conductivity, seepage rate, or adjusting the boron retardation factor within reasonable values.

In addition to the leach testing which Talen is performing, CCR pore water must be adequately characterized in the ponds. Pore water should be sampled for at discrete depths including near the pond bottom to characterize how chemistry changes with depth. Sampling must include the closed ponds (SOEP and A Cell) to characterize the seepage from ponds which are not actively receiving

water from other sources. Sample size must be statistically supportable and not rely on a small number of samples. This is extremely important data for the model which should be supported with good data quality.

We agree with DEQ's 22 April General Comment 4 which states, "this [NewFields reduction of model concentration loading rates during calibration] may underestimate the mass of COIs actually leaching from the ponds and could significantly underestimate the predicted remediation timeframe." We believe this shows that model flow parameters or boron retardation factor should be adjusted during calibration (see comment 1-8).

### **1-7. The pond seepage calculations are in error.**

The HELP model that Geosyntec uses is intended to be used for lined municipal landfills which are above the water table, not unlined CCR ponds sitting in groundwater. Appendix J-1 through J-3 uses EPA's HELP model to estimate current and future seepage from the SOEP and STEP ponds. The HELP simulations assume that the SOEP and STEP are free draining ponds (i.e. are not in contact with groundwater) and that flow is entirely vertical through the landfill. Both of these assumptions are incorrect because the SOEP is currently saturated with groundwater and the STEP pond bottoms are in contact with groundwater.

Although HELP has a groundwater component it is not intended to be a dynamic head-dependent part of a model simulation. Rather subsurface inflow (groundwater source) in HELP is a simple fixed parameter to be used if it is known that groundwater infiltrates a landfill at a specific rate. The HELP User Guide for Version 3, EPA (1994) states "If subsurface inflow is specified for the bottom layer, the program will assume no leakage through the bottom of the landfill." This specifically shows that HELP is not intended to model seepage when the bottom of the landfill is in contact with groundwater.

Under the actual field conditions, it is likely that seepage from the STEP cells would be lower than if the ponds were free draining because the vertical gradient is lower and seepage may last much longer because the ponds will take longer to drain or may never completely drain. The length of time that the ponds leak has major implications for how long active groundwater capture and remediation should last and perpetual maintenance needs.

Seepage from STEP A, E, and Old Clearwell Cells should be modeled in a head dependent manner with a platform that allows for modeling of unsaturated/saturated flow through a waste repository in contact with groundwater.

### **1-8. Model calibration needs to include the boron retardation factor.**

Section 8.4 of NewFields (2019) modeling report states "Empirical data presented in Appendix D show retardation factors in the Stage I and II areas that range from 4.1 to 1.96, with an average retardation factor of 3. Because the range of retardation factors was based on limited data from three wells..". Retardation factor is the critical modeling parameter controlling boron and other less mobile contaminant transport and predictions of remedy performance. This factor is the most poorly supported data used in the model. A static retardation factor is used to model the very complex hydrogeology in this setting which does not make conceptual sense.

Retardation is a parameter that needs to be calibrated. NewFields has currently calibrated the model by only adjusting the seepage source concentration. Seepage concentration should be fairly well constrained by the sampling and leach testing discussed in comment 1-6.

**1-9. Groundwater elevation at the STEP should be compared to the CCR elevation at the STEP.**

Newfields figure 6-57 shows the depth of saturated CCR at the SOEP. A similar figure should be prepared for the STEP which compares the elevation of the potentiometric surface to the elevation of the bottom of the STEP. This is needed to evaluate the volume of CCR in the STEP which may stay permanently saturated and to evaluate groundwater contact when the STEP liners eventually fail.

**1-10. Talen should include the STEP Old Clearwell in plans for dewatering and source control.**

Talen's current preferred alternative includes only dewatering STEP A and E cells. Our analysis shows that water elevation in well 923A which is adjacent to the Old Clearwell is 12-14 feet above the Old Clearwell bottom elevation, shown in drawings in Geosyntec (2016). This water elevation comparison is shown in Table 2.1-3 of KirK Engineering (2018) which is attached. The Old Clearwell is currently being filled with CCR and should be treated the same as A and E cells. These CCR impoundments should be actively dewatered and the remedy should plan for providing source control in perpetuity.

**1-11. Talen's ISS evaluation needs to consider that groundwater may be further backed up with ISS treatment.**

Talen plans to evaluate in-situ solidification and stabilization for the SOEP. Treatment of the CCR in the SOEP will likely further slow groundwater flow through the area and back up groundwater higher. The ISS plan should include fully encapsulating the CCR and not simply treating the CCR that is saturated today. Complete encapsulation can sometimes be accomplished by treating the pond perimeter with ISS, creating a bathtub. However, the 3-D shape of the SOEP will make this difficult to accomplish and ISS treatment plans are needed to account for this.

**1-12. Talen's contaminant mass flux calculation from the SOEP is in error.**

Talen provides a mass flux in their response to DEQ's 22 April 2019 General Comment 8 to show that the saturated CCR in the SOEP is a relatively small source of contamination. Their calculations neglect that groundwater is flowing at higher rates in the alluvium which is located at the bottom of the SOEP. The flow along the base of the CCR will leach contaminants from the ash.

As an estimate we calculate the groundwater discharge in the alluvium using the same methods as Talen but with the following data:

Alluvium  $K = 7.2$  ft/d (page 9 of NewFields, 2016 Appendix A to the Units 1&2 Site Report)

Alluvium width = 800 ft (figure 2-2 of NewFields, 2016)

Alluvium thickness = 15 ft (figure 2-4 of NewFields, 2016)

Hydraulic gradient = 0.0071 (assumed equal to Talen's value for SOEP transect B-B)

Given these values, the Darcy flux through the alluvium is 3.2 gpm or 68 times the flux Talen calculates through the ash itself.

This is a textbook preferential flowpath and one which likely greatly factors into leaching of CCR from the SOEP. This preferential flowpath for CCR leaching will not be removed by simply capping the SOEP.

Talen should use zonebudget in MODFLOW for the SOEP alluvium to arrive at a better estimate of the flow through the alluvium and include this in any their analysis of source control requirements for the SOEP.

### **1-13. STEP underdrain performance needs to be described in the RER.**

The section from the January 2019 version of the RER (Geosyntec 2019a) “Water was not present in the underdrain collection systems for STEP B Cell in 2017, and a minimal amount of water was pumped from the underdrain collection systems for STEP D Cell, indicating that the upper (primary) liners for both cells are intact (Hydrometrics, 2017)” was removed from the RER. Underdrain performance data needs to be described in the RER and whether it indicates there is a problem with the liners in those cells.

### **1-14. The RER should indicate if MNA will be required outside of the Plant Property boundary.**

The RER pp xiii states “As such, Alternative 5 includes MNA and institutional controls to address the small isolated Near-Source areas that do not attain the PCC, and the Distal Areas within the Plant Property boundary where the boron plume reemerges after the injection/capture system is shut down.” (underline added). The modeling provided in the RER clearly shows distal areas including private property outside the Plant Property will be impacted by perpetual boron contamination. This statement needs to be updated to reflect this fact unless the remedy and modeling has been updated to eliminate the boron contaminant plume from areas outside of the Plant Property.

### **1-15. All contaminants of potential concern and constituents of interest should continue to be monitored during active remediation.**

Talen will likely seek to use flushing, capture, and treatment for the groundwater remedy. Although current data supports that radium, cobalt, lithium, and manganese appear are attenuating close to the CCR cells, this may change with flushing and associated changes in chemical conditions and groundwater flow. All of the contaminants of potential concern and constituents of interest should continue to be monitored for the duration of the active remedial measures.

## **2. Specific comments**

2-1. Page ix of the part 1 RER states, “This Revised Remedy Evaluation Report – Part 1 incorporates the following: New data collected under the Federal Coal Combustion Residuals (CCR) Rule” but the list omits radium. DEQ indicated in their conditional approval letter of the CCRA Report (Canty December 2018) “Please add text that specifies radium will be sampled under the AOC in addition to CCR Rule requirements, and that radium will be retained as a COPC until an appropriate number of samples (including background samples) have been analyzed.”

2-2. Section 2.6.5 states: “The Revised CCRA Report did not identify radium as a groundwater COI/COPC because radium concentrations in groundwater at the SOEP/STEP area are not due to a release from the cells.” This should be updated to reflect that radium is a COPC which is still being monitored and evaluated.

2-3. Section 6.6 states: “It is estimated that the ash in those two cells would be substantially dewatered by 2050 after which it is assumed that little or no water would drain to the dewatering pipes (discussed in Appendix J-3).” The groundwater data is clear that the ash in these cells is below the groundwater elevation unless groundwater hydraulic controls are included in the remedy. This

statement should be updated to discuss if the leaky HDPE liner will allow groundwater to keep the CCR saturated in perpetuity.

2-4. Section 7.5.1 states: “The STEP cells do not contribute to this plume in Alternative 5 because of the dewatering of STEP A Cell and E Cell.” This is not accurate; the model is based on flawed HELP seepage modeling. In reality, without continued dewatering the STEP cells will continue to leak because they are not able to be permanently dewatered because groundwater will leak through the liner into A, E, and Old Clearwell. This statement should be updated to reflect this unless groundwater hydraulic controls are included in the remedy.

2-5. Section 7.5.1.3 states: “The seepage rate from the STEP cells combined would be reduced from ~14 gpm in 2020 to ~1 gpm in 2050. Therefore, STEP cells are not a long-term source and do not contribute to plume re-emergence.” The seepage calculations are incorrect due to a misapplication of the HELP model. This statement should be updated to reflect results of head dependent seepage modeling for the STEP cells.

2-6. Newfields figure 6-57 shows the depth of saturated CCR at the SOEP is 5 ft greater in alternatives 4 & 5 vs 2 & 3 (30 vs 35 ft contour at deepest part of SOEP). Figure 6-58 shows the saturated volume being the same in all of these alternatives. This needs to be reconciled. If the depth of saturation is thicker than the volume is greater.

## References

Geosyntec Consultants 2016, October. History of Construction Report per Requirement on 40 CFR §257.73. Report prepared for Talen Montana, LLC.

Geosyntec, 2019a. Revised Remedy Evaluation Report Units 1 & 2 Stage I and II Evaporation Ponds. January 2019. Prepared for Talen Montana.

Geosyntec, 2019b. Response to General Comments Units 3 & 4 EHP Remedy Evaluation. 13 May 2019.

Hydrometrics, Inc. 2016, March revision. Colstrip Steam Electric Station: Administrative Order on Consent: Units 1 & 2 Stage I and II Evaporation Ponds Site Report. Report prepared for Talen Energy, LLC.

Kirk Engineering & Natural Resources, 2018. POWER Cleanup Jobs Study Remediation Alternatives Analysis. Prepared for Northern Plains Resource Council. December 2018.

NewFields 2016. Appendix A. Stage I&II Evaporation Ponds Area Groundwater Conceptual Model and Expanded Numerical Model. March 2016.

NewFields 2019. Appendix D. Units 1 & 2 Stage I and II Evaporation Ponds Fate and Transport Model Development and Remedial Alternative Analysis Revised-Part One. October 2019.

Table 2.1-3 Pond groundwater level worksheet

SOEP-STEP Site																				
Pond cell & approximate bottom elevation of cell proximal to well (in feet)	SOEP 3300 3250 3250 3240				STEP A cell 3218 3218		STEP E cell 3210		STEP Old Clearwell 3200		STEP D cell 3232 3242									
Well	371D		966A		2002A		920A		921A		922A		923A		2018D		953D			
Water level (earliest available measurement)	12/8/94	3298.34	Date not reported	3279.3	7/2/09	3272.25	8/23/00	3229.33	8/22/00	3226.52	8/17/00	3226.38	8/23/00	3214.33	8/23/00	3214.33	7/21/11	3221.66	8/12/04	3207.13
Water level (May 2017)	5/2/17	3283.41	Converted to pumping well		5/2/17	3269.45	5/3/17	3240.42	5/3/17	3219.17	Converted to pumping well		5/3/17	3212.22	5/3/17	3212.22	5/3/17	3217.65	5/3/17	3207.06
Saturated CCR thickness (earliest available measurement)	12/8/94	0	Date not reported	29.3	7/2/09	22.25	8/23/00	0	8/22/00	8.52	8/16/04	8.38	8/23/00	4.33	8/23/00	14.33	7/21/11	0	8/12/04	0
Cell bottom separation from groundwater (earliest available measurement)	12/8/94	1.66	Date not reported	0	7/2/09	0	8/23/00	10.67	8/22/00	0	8/16/04	0	8/23/00	0	8/23/00	0	7/21/11	10.34	8/12/04	34.87
Saturated CCR thickness (May 2017)	5/2/17	0		NA	5/2/17	19.45	5/3/17	0.42	5/3/17	1.17	NA		5/3/17	2.22	5/3/17	12.22	5/3/17	0	5/3/17	0
Cell bottom separation from groundwater (May 2017)	5/2/17	16.59		NA	5/2/17	0	5/3/17	0	5/3/17	0	NA		5/3/17	0	5/3/17	0	5/3/17	14.35	5/3/17	34.94
Date nearest capture well began	9/27/01	EAP-208	9/29/05	966A	9/29/05	966A	9/29/05	966A	2/4/10	958D	2/4/10	958D	9/27/01	924A	9/27/01	924A	3/2/12	2019D	3/2/12	2019D

: yellow indicates impoundment < 5 ft from upper most aquifer or tailings are saturated.

Pond bottom elevation from drawings in History of Construction Report Per Requirements of 40 CFR §257.73, Appendix C.2 (Geosyntec 2016)

Water levels earliest available measurement from well log, Unit 1&2 Stage I and II Evaporation Pond Site Report (Hydrometrics, 2016), Stage I&II Evaporation Ponds Area Groundwater Conceptual Model and Expanded Numerical Model Appendix E (Newfields 2016), or MBMG GWIC.

Water levels May 2017 from Evaluation of 2017 Hydrologic Monitoring Data from Colstrip Units 1 through 4 Process Pond system, Appendix B (Hydrometrics, 2018).

EHP Site																												
Pond cell & approximate bottom elevation of cell proximal to well (in feet)	A cell (south portion) 3260 3260			A cell (new clearwell) 3265		B cell 3200		C cell 3180		D/E cell 3235 3235		F cell 3240 3240		G cell 3200		H cell 3220		J cell 3160 3160 3160										
Well	640P		641P		MD-12-17SP		641P		MD-12-16SP		674R		1005R		1011R		1003R		1164R		674R		MD-12-16SP		1060C		1116D (deep aquifer)	
Water level (earliest available measurement)	6/21/01	3233.46	6/22/01	3232.02	5/8/13	3231.89	6/22/01	3232.02	5/8/13	3233.4	11/2/04	3238.49	1/18/05	3249.56	5/3/05	3245.73	1/17/05	3261.73	5/9/14	3238.5	11/2/04	3238.49	5/8/13	3233.4	6/2/01	<3235.35	10/6/10	3182.18
Water level (May 2017)	5/9/17	3230.82	5/9/17	3233.39	5/17/17	3231.88	5/9/17	3233.39	5/14/17	3233.32	5/9/17	3255.56	5/9/17	3243.63	5/9/17	3240.28	5/9/17	3254.21	5/10/17	3238.49	5/9/17	3255.56	5/14/17	3233.32	5/8/17	<3235.35	5/8/17	3174.39
Saturated CCR thickness (earliest available measurement)	6/21/01	0	6/22/01	0	5/8/13	0	6/22/01	32.02	5/8/13	53.4	11/2/04	3.49	1/18/05	14.56	5/3/05	5.73	1/17/05	21.73	5/9/14	38.5	11/2/04	18.49	5/8/13	73.4	?		10/6/10	22.18
Cell bottom separation from groundwater (earliest available measurement)	6/21/01	26.54	6/22/01	27.98	5/8/13	33.11	6/22/01	0	5/8/13	0	11/2/04	0	1/18/05	0	5/3/05	0	1/17/05	0	5/9/14	0	11/2/04	0	5/8/13	0	?		10/6/10	0
Saturated CCR thickness (May 2017)	5/9/17	0	5/9/17	0	5/17/17	0	5/9/17	33.39	5/14/17	53.32	5/9/17	20.56	5/9/17	8.63	5/9/17	0.28	5/9/17	14.21	5/10/17	38.49	5/9/17	35.56	5/14/17	73.32	?		5/8/17	14.39
Cell bottom separation from groundwater (May 2017)	5/9/17	29.18	5/9/17	26.61	5/17/17	33.12	5/9/17	0	5/14/17	0	5/9/17	0	5/9/17	0	5/9/17	0	5/9/17	0	5/10/17	0	5/9/17	0	5/14/17	0	?		5/8/17	0
Date nearest capture well began	7/11/06	656R	7/11/06	656R	1/1/04	645D	7/11/06	656R	1/1/04	644D	10/12/05	1007R	9/1/05	1002R	9/1/05	1002R	9/1/05	1002R	12/12/05	1001R	10/12/05	1007R	1/1/04	644D	1/1/04	644D	1/1/04	644D

: yellow indicates impoundment < 5 ft from upper most aquifer or tailings are saturated.

Pond bottom elevation from History of Construction Report Per Requirements of 40 CFR §257.73, Appendix C.3 (Geosyntec 2016) or Units 3&4 Effluent Holding Pond (EHP) Site Report, Figures 3-1, 3-2, 3-3 (Hydrometrics 2016).

Water levels earliest available measurement from well log obtained from MBMG GWIC or Units 3&4 Effluent Holding Pond (EHP) Site Report Appendix D (Hydrometrics 2016), Units 3&4 EHP Area Groundwater Conceptual Model and Updated Numerical Model Appendix E (Newfields 2016)

Water levels May 2017 from Evaluation of 2017 Hydrologic Monitoring Data from Colstrip Units 1 through 4 Process Pond system, Appendix C (Hydrometrics, 2018).

Table 2.1-3 Pond groundwater level worksheet

Plant Site																
Pond cell & approximate bottom elevation of cell proximal to well (in feet)	Units 1&2 A Pond 3240 3240 3240			Units 1&2 B Pond 3230		Units 1&2 Bottom Ash Pond Not reported		Units 3&4 Bottom Ash Pond 3285 3285 3285								
Well	AB1-S		AB-3S		AB29-S		AB19SM			20S		20SP		21SP-2		
Water level (earliest available measurement)	9/5/96	3239.62	9/5/96	3235.7	10/1/96	3254.02	9/5/96	3246.35			8/1/83	3232.81	8/1/83	3258.09	9/8/93	3244.35
Water level (May 2014)	5/1/14	3241.9	5/1/14	3231.4	5/1/14	3243.8	5/1/14	3248.7			5/1/14	3264.8	5/1/14	3264.4	5/1/14	3257.7
Water level (Apr 2017)											4/6/17	3266.52	4/6/17	3266.15	4/6/17	3259.49
Saturated CCR thickness (earliest available measurement)	9/5/96	0	9/5/96	0	10/1/96	14.02	9/5/96	16.35		?	8/1/83	0	8/1/83	0	9/8/93	0
Cell bottom separation from groundwater (earliest available measurement)	9/5/96	0.38	9/5/96	4.3	10/1/96	0	(see note 1) NA capture system			?	8/1/83	52.19	8/1/83	26.91	9/8/93	40.65
Saturated CCR thickness (May 2014)	5/1/14	1.9	5/1/14	0	5/1/14	3.8	5/1/14	18.7		?	5/1/14	0	5/1/14	0	5/1/14	0
Cell bottom separation from groundwater (May 2014)	5/1/14	0	5/1/14	8.6	5/1/14	0	(see note 1) NA capture system			?	5/1/14	20.2	5/1/14	20.6	5/1/14	27.3
Date nearest capture well began	10/7/97	SRP-8	10/7/97	SRP-8	B Pond underdrain	2004	B Pond underdrain	2004			6/14/02	51SP	6/14/02	51SP	6/14/02	54SP

     : yellow indicates impoundment < 5 ft from upper most aquifer or tailings are saturated.  
 Note 1- B Pond underdrain is currently preventing CCR saturation with groundwater, value is height of water table above pond bottom.  
 Pond bottom elevation from drawings in History of Construction Report Per Requirements of 40 CFR §257.73, Appendix C.2 (Geosyntec 2016)  
 Water levels earliest available measurement from well logs obtained from MBMG GWIC or from Plant Site Groundwater Conceptual Model and Numerical Model Update Appendix E (Newfields 2015)  
 Water levels April 2014 from Plant Site Characterization Report Figure 3-15.  
 Water levels May 2017 from Evaluation of 2017 Hydrologic Monitoring Data from Colstrip Units 1 through 4 Process Pond system, Appendix A (Hydrometrics, 2018).

Susan Vogt  
269 Bias Dr., B  
Fairbanks, AK 99712

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Susan Vogt

Georgia Braithwaite  
2145 S Hogan Ln  
Cottonwood, AZ 86326

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Georgia Braithwaite

kathy grieves  
7709 w. via del sol  
peoria, AZ 85383

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

kathy grieves

Bob Leppo  
310 Cuyama Ave  
Pismo Beach, CA 93449-1806

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Bob Leppo

Carol Gold  
2901a Sir Francis Drake Blvd.  
Fairfax, CA 94930

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Carol Gold

Deborah St Julien  
4570 Kingspark Dr  
San Jose, CA 95136

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Deborah St Julien

Frances Goff  
37 S Sierra Madre Blvd  
Pasadena, CA 91107

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Frances Goff

jim hite  
34 13th St Apt 3  
RICHMOND, CA 94801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

jim hite

JL Angell  
2391 Ponderosa Road  
Rescue, CA 95672

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

JL Angell

Karen Kirschling  
633 Oak  
SF, CA 94117

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Karen Kirschling

Laura Keating  
7846 Winding Way  
Fair Oaks, CA 95628

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Laura Keating

Mary Masters  
23 Peter Coutts Circle  
Stanford, CA 94305

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

As a retired professional environmental engineer, and a former EPA Region 9 Superfund manager, I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Mary Masters  
Stanford, CA

Mary Masters

Nicolette Froehlich  
25902 n fuhrman rd  
Acampo, CA 95220

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Nicolette Froehlich

Rosemary Graham-Gardner  
P.O.Box 3335  
Manhattan Beach, CA 90266

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Rosemary Graham-Gardner

Rosemary Graham-Gardner  
PO Box 3335  
Manhattan Beach, CA 90266-1335

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Rosemary Graham-Gardner

Steve Sugarman  
PO BOX 923  
Malibu, CA 90265

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Steve Sugarman

Therese Ryan  
37310 36th. st. east  
Palmdale, CA 93550

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Therese Ryan

Dr. David Inouye  
38213 Highway 133  
Hotchkiss, CO 81419

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

One of Montana's greatest resources (and tourist attractions) is its water. That resource contributes significantly to the state's economy. Unfortunately that resource can be damaged, as could its contribution to the state's economy. Pollution from coal ash has the potential to do long-term significant damage to the state's water resources.

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Dr. David Inouye

Kathy Tolman  
4735 Reed St.  
Wheat Ridge, CO 80033

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Kathy Tolman

Colonel Meyer  
3701 eagle pass street, 30  
North Port, FL 34286-2009

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Colonel Meyer

David Leithauser  
821 Snapdragon Drive  
New Smyrna Beach, FL 32168

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to strongly urge the DEQ to approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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David Leithauser

Elizabeth Garratt  
400 Plantation Grove Ln  
St Augustine, FL 32086

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Sincerely,

Elizabeth Garratt

Gregory Esteve  
3655 North Scenic Highway  
Lake Wales, FL 33898

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Gregory Esteve

Patricia Wynn  
11781 SW 91 Terrace  
Miami, FL 33186

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Patricia Wynn

Susie Cassens  
PO Box 593  
Fort Pierce, FL 34954

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Susie Cassens

Barbara Doucet  
403 Tucker Dr  
NEWNAN, GA 30263

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Barbara Doucet

Mark Koritz  
12104 Ashford Gables Drive  
Alanta, GA 30338

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Sincerely,

Mark Koritz

Matthew Tarpley  
P.O. Box 818  
McDonough, GA 30253

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Matthew Tarpley

carolyn massey  
632 1/2 N 6th St  
quincy, IL 62301

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

carolyn massey

Jeff Green  
102 S. Maple street  
Frankfort, IL 60423

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jeff Green

Susan Rumburg  
8 Linnview, POBox 1221  
Mt. Vernon, IL 62864

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
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Sincerely,

Susan Rumburg

Mark Grassman  
726 Negley Avenue  
Evansville, IN 47711-3430

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Mark Grassman

Bonnie Murphy  
712 Cole Rd. Coralville, Ia  
Coralville, IA 52241

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
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Sincerely,

Bonnie Murphy

Jody Gibson  
317 E Wall Ave  
Des Moines, IA 50315-5259

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jody Gibson

Agnieszka Beletsky  
26 Academy Street  
EAST NEW MARKET, MD 21631

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Agnieszka Beletsky

Douglas Sedon  
2815 Fry Road  
Jefferson, MD 21755

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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I may not live in Montana, but the last time I checked, it is on the same planet I live on.

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Douglas Sedon

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Douglas Sedon  
2815 Fry Rd  
Jefferson, MD 21755-7424

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Douglas Sedon

Meya Law  
7100 Mount Forest Terrace  
Forestville, MD 20747

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Sincerely,

Meya Law

Michele Shipp  
22 Anna Court  
Gaithersburg, MD 20877

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Waste Management and Remediation Division  
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Sincerely,

Michele Shipp

Brenda Troup  
21 Meadow Road  
Bolton, MA 1740

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
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Sincerely,

Brenda Troup

Judith Glixon  
2 Aerial St.  
Lexington, MA 2421

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Thank you!

Sincerely,

Judith Glixon

Matthew Genaze  
334 Harvard S  
Cambridge, MA 2139

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
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We have scientific data and long standing evidence of the damage that will be caused by allowing such an action to occur. One of the key roles of government is to preserve public safety. Willfully ignoring clear evidence of an impending catastrophe is a dereliction of duty. Scientists have worked for decades to assemble an incontrovertible body of evidence related to our changing climate, and ignoring that information is insidious. Future generations' resources, health and prosperity is dependent on us acting immediately, significantly and broadly.

Sincerely,

Matthew Genaze

Peter Kahigian  
PO Box 6259  
Haverhill, MA 1831

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
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Sincerely,

Peter Kahigian

Diana Cumming  
3210 Cleveland St NE  
Minneapolis, MN 55418

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Removing coal ash and building a landfill to store it would create hundreds of jobs in the Colstrip area that could be sustained for decades. Responsible cleanup would also prevent another Superfund story from playing out in Montana.

Please require a "high and dry" cleanup strategy solution that moves all coal ash to a lined landfill above the water table.

Sincerely,

Diana Cumming

Mark Fraser  
343 S. Kirkwood Road  
Kirkwood, MO 63122

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Sincerely,

Mark Fraser

Alan Hilden  
720 Judicial Ave.  
Billings, MT 59105

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
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Alan Hilden

Alex Cunha  
322 S 29th St  
Laramie, MT 82072

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Sincerely,

Alex Cunha

Amanda Niles  
P.O. Box 7995  
Kalispell, MT 59904

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Waste Management and Remediation Division  
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Sincerely,

Amanda Niles

Ann Baker  
2300 14th AVE S #4  
Great Falls, MT 59405

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Sincerely,

Ann Baker

Anne Banks  
7 Hill St  
Bozeman, MT 59715

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Anne Banks

Anthony Sammartano  
1126 Alderson Ave  
Billings, MT 59101

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- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,  
Anthony Sammartano

Anthony Sammartano

Ariel Hawthorne  
510 N Custer Ave  
Hardin, MT 59034

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Ariel Hawthorne

Ariel Hawthorne

Barbara Aas  
1219 S. Tracy Ave  
Bozeman, MT 59715-5655

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear. Save Eastern Montana from becoming another Superfund site. Coal is dying and we need to clean this up!

sincerely,  
Barbara Aas

Barbara Aas

Barbara Charlton  
5448 head lane  
Helena, MT 59602

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Barbara Charlton

Barry Stockdale  
715 N. 32nd Street  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Barry Stockdale

Becky Mitchell  
119 Wyoming Ave  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,  
Becky Mitchell

Becky Mitchell

Becky Piske  
303 State Street  
Helena, MT 59601

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Becky J Piske

Yes, I am using the words of NPR, but they are saying what needs to be said. Please, please, please take care of this awful mess, NOW.

Becky Piske

Betty Stroock  
1350 Story Mill Road  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to support the requirement in the Remedy Evaluation Report to excavate all coal ash in the Units 1& 2 ponds and move the ash to a secure, lined landfill sited above the water table. Montana has a long history of pollution from the mining industry. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
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Sincerely,

Betty Stroock

Bobette Bertsch  
35679 Memory Lane  
Polson, MT 59860

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of pollution from mining. The companies that profited from these plants need to do the responsible thing and do the cleanup that was expected of them. Do not shift the cost of this the cleanup to the taxpayers.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
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Sincerely,

Bobette Bertsch

Brian Harrington  
501 Chancery Lane  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Brian Harrington (Billings)

Brian Harrington

CARL CLARK  
604 34 AVE NE  
Great Falls, MT 59404

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

CARL CLARK

Carol Mick  
78 27th St. W., #311  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Carol Mick

P.S. Also we have a great wealth of technology and possibilities that can recycle, reuse, re-purpose or chemically alter substrate to be non toxic and not a problem. Are you smart enough to take on the challenge?

Carol Mick

Catie DeMets  
8 Creek Crossing Court  
Missoula, MT 59802

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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As someone who worked closely over the last three years with Montana farmers and ranchers, let me assure you that these producers do not need any more challenges to their operations. They face enormous burdens and the ruination of their water sources--the nearly inevitable endpoint of a lax approach--would likely be their end. I urge you not to contribute to the hollowing out of rural Montana in this way.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
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Sincerely,

Catie DeMets  
Missoula, MT

Catie DeMets

Charlaine Wilkerson  
2402 Riverview Dr  
Chesterton, MT 46304

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Charlaine Wilkerson

Chris Carrieri  
231 S 2nd St  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

We just spent time exploring Rosebud Co as part time SW MT residents. Please consider the advantages of doing this clean up properly now and not waiting-don't kick it down the road! ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Chris Carrieri

Chris Siegler  
19475 Conifer Dr  
Huson, MT 59846

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

Utility companies make billions of dollars every year and are protected monopolies. That status should require that companies protect their customers by fully remediating the toxic remains of their production facilities.

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Chris Siegler

Clinton Nagel  
1385 Golden Gate Ave  
Bozeman, MT 59718

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I strongly urge DEQ to approve the Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. My prior years working as a hydrographer for the Federal Government guides me to recognize a problem when I see one and there is a problem here. It needs to be dealt with. Why would you not want to prevent a major disaster from happening? We expect our federal and state agencies to look out for the public's resources. It is your job. Do it.

Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Clinton Nagel

Corine lindhorst  
103 Golden Valley Loop  
Great Falls, MT 59404

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Corine lindhorst

Corine Llundhorst  
103 Golden Valley Loop  
Great Falls, MT 59404

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Corine Llundhorst

Daniel Seifert  
PO Box 1131  
Red Lodge, MT 59068

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

+Includes long term monitoring to ensure design integrity and that construction is properly completed.

+includes provisions for long-term maintenance of the liner and cap.

Sincerely,

Daniel Seifert

David Wieland  
518 Broadwater Ave  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

David Wieland

Debbie Tauscher  
818 S. Main  
Butte, MT 59701

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Debbie Tauscher

Deborah Hanson  
1002 Pleasant  
Miles City, MT MT

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. Talen Energy is lobbying to "cap" the ponds in place and walk away from the job.

We demand a "high and dry" solution where the company is directed to excavate all coal ash at the Units 1&2 ponds for storage in a new, lined landfill and DEQ will secure bonding from Colstrip's owners to pump water beyond the year 2070 in order to protect future taxpayers from footing the bill.

Montana has seen enough taxpayer-funded cleanups where the companies walk away; we don't need another Butte, Libby, or Zortman-Landusky.

Sincerely,

Deborah Hanson

Deborah Hanson

Dee Anna  
21 Red Fox lane  
Boulder, MT 59632

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Dee Anna

Donna Onstott  
P. O. Box 830  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to request that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. As a Montana taxpayer I do not want to be burdened with future cleanup costs. I want the industry to be required to do the cleanup right in the first place. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades. Finally, compared to the industry's cap-in-place cleanup proposal, proper cleanup would provide more than twice as many well-paying jobs during the first ten years of cleanup for workers, who, through no fault of their own, will losing their jobs when the units shut down.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
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Sincerely,

Donna Onstott

Doug Brugger  
305 N Warren St  
Helena, MT 59601

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Doug Brugger

Douglas Rhodes  
P.O. Box 1646  
Whitefish, MT 59937

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely, Doug Rhodes

Douglas Rhodes

Dr. Lynn Hilten  
P.O. Box 1107  
Columbus, MT 59019

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Dr. Lynn Hilten

Duane Claypool  
911 S Sutton Ave  
Miles City, MT 59301

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Duane Claypool

Eileen Carney  
P.O. Box 1193  
Libby, MT 59923-1193

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

Montana has a sad history of letting corporations do what they wish and making the tax payers clean up their mess. We must hold these polluters responsible for what they do to send a message that the future will be different from the past. I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Eileen Carney

Eileen Carney

Elizabeth R Vanderhorst  
1003 Victory Ave  
Billings, MT 59105

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Elizabeth R Vanderhorst

Elizabeth Madden  
408 Overbrook Drive  
Bozeman, MT 59715-7131

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

Please accept my comments on cleanup plan for Colstrip Units 1&2. I ask that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the under drain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table.
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Elizabeth Madden

Evan Fritz  
724 1st ST E, Apt. 3  
Roundup, MT 59072

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

In regards to the clean-up plan for the coal ash ponds in Colstrip, I insist that whatever action is taken is thorough enough to ensure the long-term health of the local environment, and the continuing cleanliness of the area's groundwater. From what I have read, the best way to ensure that is to remove ALL the coal ash, and place it in a landfill far above the water table, so as to ensure against future contamination. I am no expert on these matters, however, and if there is a simpler way to accomplish the aforementioned objective, I would be agreeable to it. It is imperative, however, that unnecessary risks be avoided. Too many environmental disasters have occurred because nobody asked what would happen if things went wrong. When choosing a clean-up plan to approve, assume that everything that can go wrong WILL go wrong, and choose the plan which would have the least impact in such a scenario.

Thanks,

Evan Fritz

Evan Fritz

Fred Brewer  
416 Eldora Dr  
Butte, MT 59701

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Fred Brewer

Gail Richardson  
5263 Cimmeron Drive  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Gail Richardson

Grant Barnard  
Box 1658/422 W. 15th St.  
Red Lodge, MT 59068

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Grant Barnard

Hank McClain  
6200 Pine Cone Drive  
Clinton, MT 59825

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Hank McClain

Heather Sheffield  
PO Box 202  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Heather Sheffield

Heidi Anderson  
PO box 568  
Gardiner, MT 59030

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We also have a long legacy of clean water and residents who value the recreational opportunities that come with clean water. The stay relies heavily on the tourism industry. For these reasons, we cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
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Sincerely,

Heidi Anderson

Ita Killeen  
1504 south 3rd Ave  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Ita Killeen

Jane Van Dyk  
3130 Gregory Drive  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jane Van Dyk

Janice Munzke-Deal  
3114 Augusta Dr  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Janice Munzke-Deal

Jay Raines  
1800 Cooper st #8  
Missoula, MT 59802

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jay Raines

Jeanie Alderson  
29 Bones LN  
Birney, MT 59012

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

My family ranches and pays taxes in Rosebud County. I am writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades. We need clean up done right so those of who pay taxes do not shoulder the on going burden of in adequate clean up.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Jeanie Alderson

Jeanne Thomas  
6 Upper Luther Road  
Red Lodge, MT 59068

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Jeanne Thomas

Jeffrey Kreidler  
807 North 31st Street  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Jeffrey Kreidler

Jena Nash Reno  
5262 W. Durston Rd  
Bozeman, MT 59718

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear. We are tired of Montana being sold down the river for the sake of industry. Our water, our wildlife, and subsequently our health are negatively impacted. Stop the damage. We cant afford any more devastation.

Sincerely,

Jena Nash Reno

Jennifer Ferguson  
518 S 4th St W  
MISSOULA, MT 59801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director  
Montana Department of Environmental Quality

I'm writing to urge the DEQ to approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so water resources in the region do not continue to be contaminated. Montanans should not foot the bill for future clean-up costs that can be prevented now.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
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Sincerely,

Jennifer Ferguson

Jessica Walton  
244 Yellowstone Ave  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jessica Walton

Jim Barrett  
231 S H Street  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jim Barrett

Jim Davis  
2004 Phoebe Dr  
Billings, MT 59105

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
  - Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- And please don't stick Montana with yet another industrial nightmare...!!!
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Jim Davis

joan daniels  
192 Grey Eagle Rd  
Stevensville, MT 59870

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

joan daniels

Joel Harris  
1101 E. 6th Ave  
Helena, MT 59601

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to strongly encourage you / the DEQ to approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,  
Joel Harris

Joel Harris

Joe Loos  
7245 New Castle Dr  
Missoula, MT 59802

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Joe Loos

John AND Jean Fleming  
21364 Hytrail Circle  
Lakeville, MT 55044

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,  
John AND Jean Fleming

John AND Jean Fleming

John Boschert  
643 Yellowstone Ave  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,  
John Boschert

John Boschert

John bradley  
PO Box 1894  
Colstrip, MT 59323-1894

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

Shaun McGrath, Director,  
Montana Department of Environmental Quality  
Dear Director McGrath,

I write to encourage your support of a stringent and thorough clean-up of Colstrip's ash ponds.

Having literally seen our groundwater when it was exposed near Castle Rock outside Colstrip at the start of a mining project, I was struck by how vulnerable this precious source of life is.

You will hear some probabilistic statements that make "shoot, shovel and shut-up" seem like a reasonable operating procedure.

Ash pond contaminants were removed from air pollution, mixed with water and are now concentrated in structure more like a mud puddle than a containment structure. Neurotoxins, mutagens and carcinogens are a foolish legacy to abandon in half-measures.

Don't set an unnatural standard that encourages enterprises to foul the nest in which they hatch their golden eggs.

I urge you to issue DEQ a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and isolating the ash in a manner which minimizes any ordinary or disaster-caused release of these concentrated contaminant/ poisons into the the water, land or air.

Sincerely,  
John Ross Bradley

John bradley

John Woodland  
580 River Bend Rd  
Superior, MT 59872

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Our State Constitution entitles us to a clean and healthful environment. Our Supreme Court has ruled that this requirement is preventative and that it is a fundamental right. You, as an officer of the State of Montana have a duty to protect our rights and you will be breaching that duty unless you require a full, comprehensive cleanup.

Sincerely,

John Woodland

Joy LaClaire  
W. Villard & N. 25th  
Bozeman, MT 59718

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Joy LaClaire

Judith G. Hunt  
98 Shorey Road  
Roberts, MT 59070

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Judith G. Hunt

Judy Gobert  
36326 Moss Creek Lane  
Polson, MT 59860

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Judy Gobert

Julia M Saylor  
554 3rd St  
Helena, MT 59601

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Montana has long generated massive, destructive Superfund sites; let's change that pattern now.

Sincerely,

Julia M Saylor

Julia M Saylor

Karen Schweitzer  
504 Fieldstone Dr.  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Karen Schweitzer

Karen Tibbs  
742 Moon Beam Lane  
Billings, MT 59105

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Karen Tibbs

Karl Schmiedeskamp  
4215 Mt. Sapphire Drive #313  
Billings, MT 59106

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Small children are taught to clean up after themselves. Corporations ought to be at least as responsible as children.

Karl Schmiedeskamp

Kathie Daviau  
216 Lexington Dr  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Kathie Daviau

Kathryn Kern  
PO Box 2306 Great Blue way  
Red Lodge, MT 59068

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Kathryn Kern

Katie Scherfig  
PO Box 1973  
Bozeman, MT 59771

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Katie Scherfig

Ken Clark  
3365 Hoffman Rd  
East Helena, MT 59635

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Ken Clark

Kerry Krebill  
8 Park Pl  
Clancy, MT 59634

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Kerry Krebill

Kristin Freeman  
1346 River Street  
Missoula, MT 59801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Kristin Freeman

Kristin Vance  
1603 s church ave  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Kristin Vance

LARRY BEAN  
2905 HARROW DR  
BILLINGS, MT 591020717

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

This comment is for the purpose of requesting that DEQ provide the best solution for the final remediation of the Colstrip waste.

I fully understand that it is the primary duty of the owners to avoid as many costs as possible in order to maximize profits. They have done an excellent job of this, even at the detriment of the very customers they serve. Now that the units are reaching their life expectancy it is time that a tiny part of the profits be used to properly clean up the mess they made.

Please protect the interests of Montana citizens both now and in the future by assuring that coal ash waste is cleaned up properly now. Make the owners dewater all the ponds and pump out toxic ground water as long as it is needed. Also make the owners move all the coal ash to a location where it can never contaminate groundwater again.

Sincerely,  
Larry Bean

LARRY BEAN

Laulette HANSEN  
127 S. Easy St.  
MISSOULA, MT 59802

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Protects the workers involved in excavation with adequate HazMat personal protective gear. Please don't let coal ash residue into Our groundwater, Montana's most priceless resource.

Sincerely,

Laulette Hansen

Laulette HANSEN

Lauran Emerson  
377 GIFFEN RD  
STOCKETT, MT 59480

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

In re: Colstrip Units 1&2 ash ponds

Now is the time for Montana to have a real and permanent solution to protect all the downstream waters from the Colstrip 1&2 coal ash. The DEQ should require excavating all coal ash from the Units 1&2 ponds and moving it to a secure, lined landfill above the water table. This is the only way to protect the farms and ranches downstream of Colstrip, and doing the job right will provide jobs and avoid a future of contaminated water and taxpayer nightmares.

Please approve a Remedy Evaluation Report that completely de-waters the ash ponds and the wells drilled into them; moves all the ash to a secure, lined landfill on Talen's property above the water table; and protects the workers involved in the project with adequate HazMat protective gear.

Sincerely,

Lauran Emerson

Lee Bartlett  
710 S. California St.  
Helena, MT 59601

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I am contacting you to demand that the DEQ approve a REMEDY EVALUATION REPORT that requires excavating ALL coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana residents have had to deal with a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,  
Lee Bartlett

Lee Bartlett

Leone Harmon  
106 E Kent Ave  
Missoula, MT 59801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Leone Harmon

Linda Cencer  
223 S 4th  
Manhattan, MT 59741

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Nothing less is acceptable! Please hold them accountable for their waste!

Sincerely,

Linda Cencer

Linda Cencer

Linda Healow  
312 Clark Avenue  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

While owners of the remaining Colstrip units play 'hot potato' with ownership, the clean up of the ash pond complex of Units 1 and 2 complex needs to be done and done well.

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Linda Healow

Lindsey Myers  
Po box 143  
Drummond, MT 59832

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to stongly request that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades. It would also be good transition work for those people unemployed by the closure of units 2&3.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,  
Lindsey Myers

Lindsey Myers

Linnea Forseth  
1056 Picador Way  
Billings, MT 59105

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Linnea Forseth

Lisa Sukut  
515 East Montana Street  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades. Montanans have the constitutional right, granted in our state constitution, to a clean environment.

Therefore, please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Lisa Sukut

Lisa Ventura  
1404 Cook Ave  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Clean, uncontaminated water is becoming a rarity these days. Montana should treasure what's left of its clean water and protect it at all costs. If not, it could end up being an environmental problem that could be beyond our ability to fix.

Sincerely,  
Lisa Ventura

Lisa Ventura

Lynne Oulman  
816 14th St  
Bellingham WA 98225, MT 98225

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Lynne Oulman

Marie Bourgeois  
1630 STUART ST  
HELENA, MT 59601-2334

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I worked for years with the EPA Denver office cleaning up superfund mining sites. We need to stop this pollution at it's source rather than wait until a clean up is initiated due to people and animals getting sick. I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,  
Marie Zanowick Bourgeois, Engineer  
Certified Biomimicry Professional

Marie Bourgeois

Marilyn Hill  
P.O. Box 160277  
Big Sky, MT 59716

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Marilyn Hill

Mark Fix  
584 Tongue River Road  
Miles City, MT 59301

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Talen cannot do a cap in place for the ponds. These ponds are too big to throw a blanket on and expect it to do any good. The pollution plume will continue to expand and damage the water table for all the people of Colstrip and the surrounding farmers and ranchers.

Talen needs to give some of the water right from the Yellowstone to the City of Colstrip so that the town can continue into the future. The ground water is most likely already contaminated and replacing the Yellowstone water with groundwater for the city of Colstrip is not an option.

Talen needs to continue pumping the capture wells so that the contamination will not spread. The pumping may be perpetual.

Talen needs to bond so that good cleanup is performed.

The reclamation and cleanup of Colstrip will provide jobs for many years into the future. DEQ must require that a good reclamation plan is approved.

DEQ must require good cleanup. Montana does not need another superfund site.

Sincerely,

Mark Fix  
584 Tongue River Road  
Miles City MT 59301

mfix@rangeweb.net  
406-421-5460

Mark Fix

Marshall Swearingen  
409 1/2 S 13th St  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Marshall Swearingen

Mary Kathryn Mrgudic  
700 Rollins St.  
Missoula, MT 59801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

We are writing as very concerned Montana residents to insist that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,  
Mary "Kate" Mrgudic  
Joseph Stauffer

Mary Kathryn Mrgudic

Marya Grathwohl  
1134 N. 22nd St. Apt. 7  
Billings, MT 59101

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Marya Grathwohl

Mary Owens  
10529 Coulter Pine St.  
Lolo, MT 59847-9214

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

Mary Owens

Michael Enk  
PO Box 1408  
Great Falls, MT 59403

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

The science is clear and the record is indisputable: Colstrip's coal ash ponds are severely polluting the groundwater, and remedial action must be taken to completely eliminate this environmental threat. Thus, I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table.

Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

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Sincerely,

Michael Enk

Nadene Falagan  
3 North 2nd St.  
Roberts, MT 59070

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Nadene Falagan

Nancy Carrel  
29 Red Bluff Loop  
Birney, MT 59012

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Nancy Carrel

Nancy Kessler  
914 W Clark St  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Nancy Kessler

Nora Workman-Weaver  
1245 N 12th Ave Apt 302  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Nora Workman-Weaver

Norman Bishop  
4898 Itana Circle  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I am gravely concerned about the health of Colstrip community citizens and nearby farmers. That's why I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Norman Bishop

onno Wieringa  
9550 Hwy 2 East  
hungry horse, MT 59919

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to ask that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries, we are a conservative State and there is nothing more conservative than to leave the land as we inherited it ..... leaving coal ash to leach into the water table has to be remedied.

Sincerely,  
Onno Wieringa

onno Wieringa

Pat Smith  
1733 McClure Road  
Arlee, MT 59821

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Pat Smith

Patty Laughlin  
422 Lynx Ln  
Stevensville, MT 59870

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Protecting the aquifer and providing employment in Colstrip is a win-win for all Montanans!

Please approve a Remedy Evaluation Report that:

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Sincerely,

Patty Laughlin

peter Murray  
POB 82  
Enugrant, MT 59027

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

peter Murray

Priscilla Bell  
1310 Wild Horse Drive  
Laurel, MT 59044

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Priscilla Bell

Rachel Stansberry  
906 W Boulevard  
Lewistown, MT 59457

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality  
It's hard to believe that anyone would allow any pollution in our beautiful state of Montana.

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Rachel Stansberry

Richard Newman  
P.O. Box 833  
Bozeman, MT 59771

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Richard Newman

Richard Wiebe  
406 1st St. S.E.  
Shelby, MT 59474

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Richard Wiebe

Robert Rasmussen  
1027 Billings Ave  
Helena, MT 59601-3504

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to suggest that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup or an approach that requires additional monitoring or perpetual treatment; it must be done right the first time so agricultural producers in the region or the ratepayers or the taxpayers do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on property that is above the water table
- Protects the workers involved in excavation and other activities of remediation with adequate HazMat personal protective gear.

Sincerely,

Robert Rasmussen

Robin "Cat" Billau  
126 Quinn Creek Road  
Bozeman, MT 59715

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to request that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Having worked on several Superfund sites I have first hand knowledge of how difficult it is to clean up contaminated water. Our state's water resources are too precious to allow the ponds to be capped as they are. Although the remedy's recommended are expensive in the short term, the dollars saved in the long run will obviously be tremendous. The benefits to the local community will also be positive and bring an economic boost greatly needed for this area.

I thank you for your consideration.

Sincerely,  
Robin Billau

Robin "Cat" Billau

Robin Alexis Byron  
1079 Community School Rd  
Hardin, MT 59034

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to push the DEQ to approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so everyone is guaranteed reliable, clean water.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Robin Alexis Byron

Robin Kratschmer  
2606 Missouri  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Robin Kratschmer

Ronis Bollinger  
PO Box 675  
Absarokee, MT 59001

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Ronis Bollinger

Roxa Reller  
PO Box 1331  
Helena, MT 59624

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

For 40 years the issue of leaking ash ponds at Colstrip have concerned Rosebud County and surrounding area residents. Thank you for the opportunity for my concerns to be included in the DEQ Remedy Evaluation Report of Units 1&2 cleanup plans.

Contaminated groundwater and its associated expensive cleanup costs affect Montana taxpayers. I've listened to the histories and observed how other Montana extractive industries around the state have left taxpayers on the hook for incomplete, ineffective, or downright unlawful cleanup – Zortman-Landusky, Libby, Mikehorse, and Butte are a few places that come to mind – and that eventually even taxpayers around the nation have to pay for cleanup (Superfund sites at Libby and Butte, for example). I don't want an eastern Montana Superfund site – my wallet and our water can't afford it.

I strongly urge the DEQ to require a "high and dry" cleanup solution that involves digging up the coal ash and moving it to a lined landfill high above the water table. I want heavy metals and contaminants removed so that groundwater contamination is permanently halted. I want water quality restored now before the owners of Units 1&2 walk away – cleaning up leaking ash ponds is expensive– because it's the best way of protecting all taxpayers from absorbing future financial burdens.

Sincerely,  
Roxa Reller

Roxa Reller

Sarah Hoffman  
515 Third Street SW  
Park City, MT 59063

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Sarah Hoffman

Sara Ihrie  
960 W Magic Rd Unit 37  
West Magic, MT 83352

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Sara Ihrie

Shari Dayton  
1203 Rimhaven  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Shari Dayton

Sharyl Siegel  
1459 Stillwater River Rd  
Nye, MT 59061

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Sharyl and Rob Siegel

Sharyl Siegel

Steve Held  
10 Turret Buttes  
Broadus, MT 59317

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

Shaun, Approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,  
Steve Held

Steve Held

Steven McArthur  
3406 West Central Ave.  
Missoula, MT 49804

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Steven McArthur

Steven McConnell  
2705 Downer Lane  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to insist that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from extractive mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Steve McConnell

Steven McConnell

Steven Smith  
112 E Center Street  
Butte, MT 59701

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Steven Smith

Sue Dickenson  
620 Riverview Dr. E.  
Great Falls, MT 59404

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Sue Dickenson

Susan Mershon  
3015 Chapman  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Susan Mershon

Susan Stubblefield  
951 Ronald Ave., #109  
Missoula, MT 59801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

Because Colstrip must not become a new Superfund site in Eastern Montana, I'm writing to demand that the DEQ approve a Remedy Evaluation Report requiring excavation of all coal ash in the Units 1&2 ponds. That coal ash must be moved to a secure, lined landfill sited above the water table - a "high and dry" cleanup solution. Capping the ponds in place, as Talen Energy argues, is a woefully inadequate and unethical proposal. It is not a solution.

Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

A Remedy Evaluation Report must include the following before being approved:

- Fully de-water all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Remove all coal ash and store it in a secure, lined landfill on Talen's property that is above the water table
- Protect the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Susan Stubblefield

Susan Thomas  
P.O. Box 1792  
Livingston, MT 59047

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Susan Thomas

Suzanne Vernon  
751 Triceratops Road  
Condon, MT 59826

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I wrote my Senior Paper in College at the University of Montana in 1979 on Colstrip units 1 and 2. I have followed the story of these power plants my entire life, as my family owns ranches on Rosebud Creek.

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

We have too many Superfund sites in Montana already. We don't need another one. My sister lives at Troy and has many friends who have experienced the horrors of the Libby's problems first hand. I have lived upstream of the Blackfoot River, where the Mike Horse Dam site is still causing problems.

Make the mining company at Colstrip take care of this problem NOW, before it gets worse!

Sincerely,

Suzanne Vernon

Teresa Savage  
510 Blacktail Rd  
Lakeside, MT 59922

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Teresa Savage

Tim Holmes  
446 N. Hoback St.  
Helena, MT 59601

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Tim Holmes

Tim Skufca  
107 North Ave. W.  
Missoula, MT 59801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Tim Skufca

Todd Davis  
3855 N Collister Drive  
Boise, MT 83703

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Todd Davis

Tom Tully  
2210 Pryor Ln  
Billings, MT 59102

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Sincerely,  
Tom Tully

Tom Tully

Wade Laird  
P O Box 987  
Eureka, MT 59917

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Wade Laird

Wade Sikorski  
19 Wicklow Ln.  
Baker, MT 59313-9631

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Wade Sikorski

William DeGroot  
96 Caribou Circle  
Red Lodge, MT 59068

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

William DeGroot

William Tramp  
5336 Valley Drive East  
Miles City, MT 59301

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

These ash ponds need to be removed ASAP to stop the source of contaminants. Then the parties responsible for contaminating the groundwater must be held responsible for cleaning up the groundwater they've already poisoned.

Sincerely,

William Tramp

Corey Schade  
11 Buena Vista Court  
Loch Arbour, NJ 7711

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Corey Schade

George Bourlotos  
2213 Gates Ct  
Morris Plains, NJ 7950

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

George Bourlotos

Louise McClure  
13 Green St  
Princeton, NJ 8542

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Louise McClure

Mark Canright  
8 Deboer Farm Ln  
Asbury, NJ 8802

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Mark Canright

Rebecca Canright  
8 Deboer Farm Ln  
Asbury, NJ 8802

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Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Rebecca Canright

margo wyse  
110 EL OTRO LADO Rd  
Mimbres, NM 88049

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

margo wyse

fay forman  
355 8th Ave Apt 9F  
New York, NY 10001

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

fay forman

janet forman  
351 west 24 street apt 12c  
new york, NY 10011

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

janet forman

JoAnne Metzler  
1400 Plymouth Av South  
Rochester, NY 14611

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

JoAnne Metzler

Pamylle Greinke  
P.O. Box 456  
Peconic, NY 11958

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Pamylle Greinke

Peter Nicholas  
316 Haddonfield Dr  
Syracuse, NY 13214

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Peter Nicholas

Sarah Hamilton  
9087 Tioughanack Rd.  
Canastota, NY 13032

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Sarah Hamilton

Sylvia Rodriguez  
227 E. 5th Street, #3FW  
New York, NY 10003

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Sylvia Rodriguez

Susan Galante  
5209 Red Wing Ct  
Fuquay Varina, NC 27526

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Susan Galante

Randy Sailer  
1018 cherry lane  
Beulah, ND 58523

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Randy Sailer

Amy Schumacher  
4127 middlebrook dr  
Dayton, OH 45440

Sara Edinberg  
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Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Amy Schumacher

Laura Mazar  
8627 Gibson Road  
Canfield, OH 44406

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Laura Mazar

Nancy Dollard  
11255 Cottingham Cir., NW  
Uniontown, OH 44685

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Nancy Dollard

Pamela Foley Simmons  
21494 Ball Ave  
Euclid, OH 44123

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Pamela Foley Simmons

LAM WEISMAN  
532 N.W. 41st. ST.  
OKLAHOMA CITY, OK 73118

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to DEMAND that the DEQ approve a Remedy Evaluation Report that requires EXCAVATING ALL COAL ASH IN THE UNIT 1&2 PONDS AND MOVING SAID ASH TO A SECURE, LINED LANDFILL ABOVE THE WATER TABLE. MONTANA HAS A LONG, SORRY HISTORY OF LEGACY POLLUTION AND CRIMINAL NEGLIGENCE FROM OUR MINING INDUSTRIES. WE CANNOT HAVE THE USUAL 'WAIT-AND-SEE- BULLSHIT APPROACH WITH THIS CLEAN-UP; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- FULLY DE-WATERS ALL PONDS WITH AGGRESSIVE PUMPING., including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- REEMOVES ALL COAL ASH AND STORES IT IN A SECURE, LINED LANDFILL on Talen's property that is ABOVE THE WATER TABLE.
- PROTECTS ALL WORKERS INVOLVED IN EXCAVATION AND REMOVAL WITH ADEQUATE HAZMAT PERSONAL PROTECTIVE GEAR.

Sincerely,

LAM WEISMAN

Dean Sigler  
18845 SW Vista St  
Aloha, OR 97003

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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If you want to review the long-term evil effects of the ash holding ponds, review the effects on "downstreamers" affected by those in Kentucky, West Virginia, and other coal-mining states subject to mountain-top mining.

<https://science.howstuffworks.com/environmental/energy/deadly-problem-coal-ash.htm>

Sincerely,

Dean Sigler

Dean Sigler  
18845 SW Vista St  
Aloha, OR 97003-2907

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Just look at the terrible health records of those living downstream from coal ponds and mines in Kentucky and West Virginia. You don't want Montana to end up like that.

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Sincerely,

Dean Sigler

Diana Saxon  
4098 Market St NE Apt 23  
Salem, OR 97301

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Sincerely,

Diana Saxon

Michael Halloran  
2062 Scotsman Ln NE  
Salem, OR 97305

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Michael Halloran

Peter Cornelison  
205 Oak St. Suite 17  
Hood River, OR 97031

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing from Oregon to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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Sincerely,

Peter Cornelison

Peter Cornelison

susan delles  
2801 sykes creek rd  
rogue river, OR 97537

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

susan delles

susan Delles  
2801 sykes creek rd  
Rogue River, OR 97537-9771

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

susan Delles

Henry Frank  
2763 Island Ave  
Philadelphia, PA 19153

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Henry Frank

Jason Crawford  
3224 Randy Rd  
Lancaster, PA 17601-1408

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jason Crawford

Johnny Schaefers  
109 west wild cherry dr  
Mars, PA 16046

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Johnny Schaefers

Robin Pappas  
Box 133  
Pocono Manor, PA 18349

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Robin Pappas

Jan Modjeski  
4315 Lotus Ct Unit A  
Murrells Inlet, SC 29576

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jan Modjeski

Gerald McNellis  
1252 Laurel Way  
Monterey, TN 38574

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Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Gerald McNellis

Carolyn Riddle  
900 W Braker Ln  
Austin, TX 78758

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Carolyn Riddle

Dorothy Lynn Brooks  
720 Briarwood Blvd  
Arlington, TX 76013

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Protects our planet and its people.

Sincerely,

Dorothy Lynn Brooks

James Lowe  
P.O. Box 978  
Manor, TX 78653

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

James Lowe

Jane Chischilly  
710 FLORENCE ST  
ATLANTA, TX 75551-2504

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Jane Chischilly

Lois Lommel  
2636 traymore rd  
richmond, VA 23235

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Lois Lommel

Victor Escobar  
11747 N Briar Patch Dr  
Midlothian, VA 23113

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Victor Escobar

Adina Parsley  
20420 Marine Dr P2  
Stanwood, WA 98292

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Adina Parsley

Amy Hansen  
11589 Martin Rd  
Rockport, WA 98283

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Amy Hansen

Dan O'Keefe  
10414 SW 238th ST  
Vashon, WA 98070-7656

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Dan O'Keefe

elyette weinstein  
5000 Orvas Ct SE  
Olympia, WA 98501

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

elyette weinstein

George Keefe  
960 5th Avenue South  
Edmonds, WA 98920

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

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Sincerely,

George Keefe

Glen Anderson  
5015 15th Ave SE  
Lacey, WA 98503

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

FOR MANY, MANY YEARS, MINING COMPANIES HAVE BEEN DESTROYING MONTANA'S ENVIRONMENT  
AND PEOPLE'S HEALTH!!!!!!

I'm calling upon the DEQ to STOP THE CORRUPTION -- and START PROTECTING MONTANA FROM  
ABUSE!!!!!!

I demand that the DEQ approve a STRONG, SCIENCE-BASED Remedy Evaluation Report that requires  
excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above  
the water table.

I implore you to approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
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Sincerely,

Glen Anderson

James Chesky  
18108 SE 35th St  
Vancouver, WA 98683

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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The maintaining of water quality cannot be overestimated

Please approve a Remedy Evaluation Report that:

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Sincerely,

James Chesky

James Day  
865 High Prairie Rd.  
lyle, WA 98365

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

James Day

Janet Wynne  
607 PleasantBay Road  
Bellingham, WA 98229

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

Janet Wynne

Jeffrey Panciera  
3636 S.Orcas St.  
Seattle, WA 98118

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
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Sincerely,

Jeffrey Panciera

judith cohen  
1608 E. Republican St.  
seattle, WA 98112

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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Sincerely,

judith cohen

Mary Riley  
121 Karr Ave  
Hoquiam, WA 98550

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

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- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Mary Riley

Sammy Low  
20420 Marine Drive, #P2  
Stanwood, WA 98292

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Sammy Low

Thom Lufkin  
212 21st Ave SE  
Olympia, WA 98501

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

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- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Thom Lufkin

Thom Lufkin  
212 21st Ave SE  
Olympia, WA 98501-2928

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to request that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Thom Lufkin

Tracy Ouellette  
14078 MacTaggart Ave  
Bow, WA 98232-9246

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Tracy Ouellette

Charlotte Fremaux  
175 Fern Drive  
Harpers Ferry, WV 25425

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

Coal ash is toxic. It contaminates groundwater and affects all ecosystems. It creates a public health disaster. These facts are all well known. The only things that stand in the way of dealing effectively with this problem is human greed, capitulation with industry, and apathy.

I live in a state where all of the above have created a coal ash emergency. Please do something about this problem in your state.

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Charlotte Fremaux

Helgaleena Healingline  
112 Owen Rd Unit 6121  
Monona, WI 53716

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Helgaleena Healingline

Christine Valentine  
1500 De Smet Ave., #2B  
Sheridan, WY 82801

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

I'm writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Christine Valentine

Neil and Jennifer Miller  
P.O. Box 742  
Basin, WY 82410

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

ATTENTION: Shaun McGrath, Director, Montana Department of Environmental Quality

Dear Director,

We believe it is critical that these coal ash ponds be completely cleaned up to avoid any contact with groundwater or streams whether they flow constantly or intermittently. The coal ash needs to be secured as it is toxic. The pollution of any groundwater or waterway wherever it exists affects the quality of our environment in America. It is a national issue. We approve the follow message.

We are writing to demand that the DEQ approve a Remedy Evaluation Report that requires excavating all coal ash in the Units 1&2 ponds and moving the ash to a secure, lined landfill sited above the water table. Montana has a long history of legacy pollution from our mining industries. We cannot have a "wait and see" approach with this cleanup; it must be done right the first time so agricultural producers in the region do not pay the price of poor water quality in the coming decades.

Please approve a Remedy Evaluation Report that:

- Fully de-waters all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.
- Removes all coal ash and stores it in a secure, lined landfill on Talen's property that is above the water table
- Protects the workers involved in excavation with adequate HazMat personal protective gear.

Sincerely,

Jennifer and Neil Miller  
Basin, Wyoming

Neil and Jennifer Miller

## Comment Period Two: 1 & 2 Pond Closure

My name is Cecily Schroepfer  
first name last name

My address is 1134 N 22 ST #9  
street

Billings MT 59101  
city or town state

cecilyosf@gmail.com (406) 259-1927  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please permanently clean-  
up the Ash Ponds. Fully  
dry, trash and store  
it in a lined landfill  
above the water table.  
Leaving the coal ash in  
place (cup-in-place) creates  
a long term risk for Pe-  
bed Co. residents & tap-pages.  
Responsible "high & dry cleanup  
is a huge job creator when  
coal country needs them most

Thank you, Cecily Schroepfer 10-30-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jill Van Alstyne  
first name last name

My address is 152 Fairway Dr  
street

Helena MT  
city or town state

jills@onewest.net 461-3648  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: As a concerned citizen who

formerly worked in Eastern Montana,

I am respectfully asking the DEQ  
require the

to excavate ~~the~~ of coal ash in

ponds 1+2, de-water it, and

store it in a lined landfill.

Thank you, Jill Van Alstyne 10/17/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Doug (Stin) Miller  
first name last name

My address is 1213 North Ave  
street

Helena MT  
city or town state

stin1/1213@gmail.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Removing coal ash from the  
ponds and putting them in a properly  
designed <sup>landfill</sup> repository is the only  
permanent solution - best way!

Thank you,

Doug Miller  
signature

10/30/19  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is MARK FIX  
first name last name

My address is 589 TONGUE RIVER ROAD  
street

MILT CITY MT  
city or town state

mfix@rangeweb.net 406-921-5960  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: EXCAVATE THE

PONDS AND DRY OUT

THE POLLUTANTS & STORE

THE POLLUTANTS IN AN

APPROVED STORAGE FACILITY.

Thank you, Mark Fix 10-28-2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is SAS WEBER  
first name last name

My address is 11055 Greenhorn Rd  
street

Belgrade MT  
city or town state

Sas@stuartweber.com 406-600-9310  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Cap in Place is ineffective,

we we know that from what's happened in  
other states. Lets take this opportunity  
to deal with the waste properly. Creating  
jobs + a safe living environment  
for the people in the area.

Thank you, Sasha 10/5/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Carol Kulich  
first name last name

My address is PO Box 145  
street

Orando MT 59854  
city or town state

missinglynx@blackfoot.net 406-793-5733  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please seriously consider removal  
of all the coal ash now causing polluted  
ground water and storing it in a lined  
landfill above the water table. This is  
the only responsible solution for the  
H2 Pond Closures,

Thank you, Carol Kulich 109-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is BARBARA Needham  
first name last name

My address is 3088 Rosebud Creek Rd  
street  
Forsyth mt  
city or town state

bneedham@orangeweb.net 406-347-5338  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

digit up  
digit out  
+ fix it forever

Thank you,

Barbara Needham  
signature

Oct 19  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Katharine Koughan  
first name last name

My address is 2217 Main St.  
street

Miles City MT 59301  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Don't leave Rosebud County  
residents at risk!

1. Excavate coal ash, dry it out and  
store above the water table.
2. Do the clean-up right the first time.
3. Use the skills of the existing workforce.

Thank you, K Koughan 10-5-2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is \_\_\_\_\_

My address is \_\_\_\_\_

E

Michael Enk  
PO Box 1408  
Great Falls MT 59403

\_\_\_\_\_

city or town

\_\_\_\_\_

state

\_\_\_\_\_

email

\_\_\_\_\_

phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Montanans deserve a permanent  
cleanup of these ponds. Coal ash must be  
excavated, dried out and safely stored  
in a lined landfill above the water table.  
High-and-dry cleanup provides economic  
benefits of good jobs for the existing  
workforce as coal jobs are lost.

Thank you, \_\_\_\_\_

signature

Michael Enk

Date

10/4/2019

## Comment Period Two: 1 & 2 Pond Closure

My name is Becky Grey  
first name last name

My address is PO Box 1621  
street

RedLodge MT 59068  
city of town state

hik66gray@aol.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Permanent Clean Up

Creates Jobs!!! We need to  
excavate coal ash in contact  
with the water table. Then it must

be dewatered & stored in a  
landfill above the water table.  
MT has no money for

future pollution costs

Thank you Becky 10/7/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Leslie Adams  
first name last name

My address is 1 Buckshot Lane  
street

Twin Bridges MT  
city or town state

lesadamsmt@gmail.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please keep all Montana

water safe from coal ash.

Permanent storage using excavation

seems the safest for Colstrip.

Protect our people and land-  
scapes. It is your purpose!

Thank you, Leslie Adams 10/5/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is DAV BURKHART  
first name last name

My address is 80 S. FIDDLE CR  
street

FISHTAIL MT 59028 MT  
city or town state

hummingbird ranch @ 4064252692  
email gmail.com phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: LEB DO IT RIGHT SO IT IS

PERMANENTLY FIXED. REMOVE THE  
COAL ASH, DRY IT OUT AND STORE  
IT IN LINED LANDFILL. STILL WATER  
MINING DOES THAT SO NO REASON  
TO ALLOW A QUICK FIX THAT ISN'T.  
"CAP IN PLACE" IS LIKE NOT EMPLOYING  
CAT LITTER BOX - IT STINKS.

Thank you, [Signature] 10/1/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Terese Blanding  
first name last name

My address is 539 Clark Avenue  
street

Billings Montana  
city or town state

971-237-4418  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: \_\_\_\_\_

Excavate & dewater - do it right!

Thank you, Terese Blanding 9/30/2019  
signature date

## Comment Period Two: 1 & 2 Pond Closure

My name is John Sugden  
first name last name

My address is 1922 Ave F  
street

Billings MT  
city or town state

sugdenj82@yahoo.com 9149231173  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Polluted groundwaters in the Colstrip  
area pose grave risks to the present current  
and future residents. All ash residing in  
unlined impoundments should be removed,  
dewatered, and stored in a lined landfill.  
Please respect our groundwater resources.

Thank you, [Signature] 10/7/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Kathy Heffernan  
first name last name

My address is 3851 Duncan Dr.  
street

Missoula, MT  
city or town state

Kjohnheff@gmail.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: The coal ash at

Colstrip must be dewatered,

excavated and stored in

lined landfill. Anything less

will allow coal ash pollution to

continue to pollute local groundwater.

Thank you, [Signature] 10-2-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is KEN KINGMAN  
first name last name

My address is 1023 HARVARD AVE  
street

BILLINGS MT  
city or town state

\_\_\_\_\_ (406) 256-4975  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: IT IS WAY PAST TIME

FOR THE DEQ TO STOP ALL  
GROUND WATER CONTAMINATION

BY REMOVING THE COAL ASH.

I DON'T CARE IF IT IS DRIED OR  
DEWATERED - JUST DO IT!

Thank you,

[Signature]  
signature

10/5/19  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is \_\_\_\_\_



My address is \_\_\_\_\_

Mr. Tim Holmes  
446 N. Hoback St.  
Helena, MT 59601-3717

\_\_\_\_\_  
city or town

\_\_\_\_\_  
state

\_\_\_\_\_  
email

\_\_\_\_\_  
phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Please assure the coal  
ash ponds are excavated and dewatered  
so they cannot pollute yet again.  
We promised our kids a clean  
environment & the Montana constitution  
agrees! Thank you

Thank you,

\_\_\_\_\_ signature

10/4/19  
\_\_\_\_\_ Date

# Comment Period Two: 1 & 2 Pond Closure

My name is \_\_\_\_\_ name \_\_\_\_\_

My address is \_\_\_\_\_



\_\_\_\_\_ city or town \_\_\_\_\_ state \_\_\_\_\_

\_\_\_\_\_ email (406) 587-2300 phone \_\_\_\_\_

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Dear Director McGrath,

It's really time to fix these two leaking, contaminating ponds forever. I hope that DEQ will decide to excavated the two saturated ponds & secure dried out the contents in high, dry landfills so that the coal ash is no longer sitting in ground water and leaking in to the soil below.

Thank you, [Signature] 10/11/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is STEVE HARPER  
first name last name

My address is 14 HARPER  
street

HEZENA MT  
city or town state

sharper@carroll.edu 443-4210  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

WE DO NOT WANT TO GET STUCK

WITH A BILL DOWN THE ROAD

DIG IT UP & STORE IT

HIGH & DRY

Thank you, Steve Harper 10/2/14  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is LAURIE TALCOTT  
first name last name

My address is 410 S. 11<sup>th</sup> St  
street

LIVINGSTON MT  
city or town state

laurietalcott@skcglobal.net 831-234-4237  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I STRONGLY SUPPORT AND URGE YOU  
TO SUPPORT THE EXCAVATION OF THE  
COAL ASH IN THE ASH PONDS IN COLSTRIP.  
LEAVING THIS IN PLACE CONTINUES TO POLLUTE  
THE GROUNDWATER, WHICH EVERYONE, INCLUDING

RANCHERS AND FARMERS, USE FOR OUR

LIVELIHOODS, WHILE CLEANING IT UP USING  
"HIGH AND DRY" METHODS, CLEANS IT UP  
FOREVER WHILE CREATING GOOD JOBS

Thank you,  10/12/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Shayla Walker  
first name last name

My address is 3332 Agui Esta Dr.  
street

Billings MT  
city or town state

sradaywalker@gmail.com (406) 245-4771  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Require all coal ash to be

removed from the water table &

be dewatered. Please note the

job creation of doing a responsible

"high and dry" cleanup.

Thank you, Shayla Walker 10/14/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is JEFFREY J. SMITH  
first name last name

My address is 105 CHANNEL DRIVE  
street

MISSOULA MT  
city or town state

yswift@howlegmail.com 880-8320  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Montana needs a permanent  
solution, not a halfway measure.  
Excavate and dry all the coal ash  
in contact with the water table. Don't  
let the company get away with its  
cap-in-place fraud. Create jobs!

Thank you, Jeff Smith 9/30/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Caroline Day  
first name last name

My address is 1631 Cook Ave  
street

Billings MT  
city or town state

210-6268  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please enforce a responsible  
clean up of the coal ash ponds - don't  
leave the problem to the future by just  
capping in place. I have friends in  
Colstrip who would benefit from responsible  
cleanup and the jobs it would create.

Thank you, [Signature] 10/5/19  
signature Date

My address is 127 Jetterson  
street

Helena MT  
city or town state

sanna.porteo@gmail.com 443-6397  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Cap-in-place = pollute-in-  
place. Please remove all coal ash,  
and dry it out completely, & store  
in a lined landfill above the water  
table where it can't keep leaching  
into groundwater. It will protect  
ranchers & wildlife  
and create jobs.

Thank you, [Signature] 9/10/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jonathan Motl  
first name last name

My address is 3755 Juniper Dr  
street

Helena MT  
city or town state

Jmotl47@gmail.com 4315513  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

I favor excavating and drying  
the coal ash. Do Not Allow  
cap in place as it will just shove  
the pollution cost onto  
future generations

Thank you,

J Motl  
signature

9/30/19  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is \_\_\_\_\_

first name

last name

My address is \_\_\_\_\_



**Shirley A. Bollinger**

2025 Cartersville Rd  
Rosebud, MT 59347-9527

city or town

state

email

phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I am a resident of Rosebud County. I believe it is very important that a responsible "high & dry" clean-up that permanently repairs to ground water should entail:

1. Removing coal ash in contact with ground water.
2. Clean-up should be done right the first time to prevent future pollution costs.
3. Permanent clean-up will create jobs when coal country (Rosebud County) needs them the most!

Thank you, \_\_\_\_\_

signature

Date

Shirley Bollinger 10/12/19

## Comment Period Two: 1 & 2 Pond Closure

My name is \_\_\_\_\_

My address is \_\_\_\_\_



**Bob D. Oset**  
394 Lost Horse Rd.  
Hamilton, MT 59840

\_\_\_\_\_

city or town

\_\_\_\_\_

state

\_\_\_\_\_

email

\_\_\_\_\_

phone

Dear Shaun McGrath, MT. *Dept. of Environmental Quality:*

Comment:

"Fix IT Forever"

EXCAVATING &

dewatered.

- NO - P CAP - IN - PLACE -  
PLEASE

Thank you,

\_\_\_\_\_

signature

10/1/19

\_\_\_\_\_

Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Patrick Burke  
first name last name

My address is 4285 Sundown Road  
street

Missoula MT  
city or town state

patrick.burke@montana.com 406-529-6130  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: All coal ash must be excavated,  
dewatered and then placed in a fully lined  
storage facility above the water table. No  
other approach provides an adequate  
solution. We cannot leave this horrendous  
problem to future generations to solve

Thank you, [Signature] 10/5/15  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Ann Harding  
first name last name

My address is 144 Daly Ave  
street

Hamilton MT  
city or town state

annmontana33@gmail.com 363-6684  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I urge you to adopt the Colstrip coal ash

solution of removing the deposits that currently  
leak into the aquifers, dry it, and place it in

lined landfills forever, and thereby  
offer employment to the present miners

and laborers, and perhaps protect the

surrounding landscape from toxic pollution.

Thank you, Ann Harding 10/15/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is James Gillison  
first name last name

My address is 21 Greenbrier Lane  
street

Missoula MT  
city or town state

james.gillison@msn.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Let's clean up

Coalstrip right the first  
time.

Excavate, move, and  
dry the coal ash.

Thank you, [Signature] 24 Oct '19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Janet McMillan  
first name last name

My address is 833 South 60th St W  
street

Missoula MT 59823  
city or town state

janetmcmil@gmail.com 370 6307  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Make Them

dig up the coal ash  
ponds, & store, dry & high  
the toxic mess they've  
allowed to poison the area's  
groundwater for decades

Thank you, Janet McMillan 10-20-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is WILL SWEARINGEN  
first name last name

My address is 59 HITCHING POST ROAD  
street

BOZEMAN MT  
city or town state

wd559hp@gmail.com (406)551-5119  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: The coal ash in these ponds

needs a permanent solution to prevent future  
pollution. The coal-ash needs to be  
removed from the ponds, dried out, and  
stored in a lined landfill above the water  
table. The cap-in-place proposal doesn't  
cut it!

Thank you, Will Swearingen  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Zelinda Hart  
first name last name

My address is 7117 King Ave W  
street

Billings MT  
city or town state

janesmetalart.com 406-697-1553  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Don't cover up your  
contamination - deal with it  
right! Haul it away from  
aquifers and contain it so  
water is NOT contaminated.

Pay a fair wage for cleanup

Thank you, Zelinda Hart 10-24-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Marta Meengs  
first name last name

My address is 107 North Ave W.  
street

Missoula MT 59801  
city or town state

mmeengs77@gmail.com 406-207-5252  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please mandate that

the cleaning up of the Coal Ash Ponds  
require the excavation, drying and  
removal of all coal ash contaminants,

The surrounding area, ranches,  
residents and animals/fish need  
clean, unpolluted water!

Thank you, Marta Meengs 10-23-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Mary Sedwick  
first name last name

My address is 739 Murza Way  
street

Ennis MT 59729  
city or town state

onefalredhead@msn.com 206-682-3531  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Remove coal Ash in contact

with water table; dry it  
out, + store in lined landfill  
above the water table.

- A good JOB creator!

Don't pollute the water!

Thank you, Mary Sedwick 10/12/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Patricia Oertli  
first name last name

My address is 1012 Terry Avenue  
street

Billings MT  
city or town state

ppoertli@gmail.com 406 361 5460  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I would strongly  
support measures that  
would require Taken Energy  
to stop the leaking of  
contaminated water into the  
groundwater by removing, +  
drying it. Water is too precious!

Thank you, Pat Oertli 10-22-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Rep. Mary Ann Durwell  
first name last name

My address is 2811 Alexis Ave  
street

Helena MT 59601  
city or town state

maryannodurwell@mtlego.gov 461-5358  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Excavate this toxic coal ash,

skwater well, store the waste  
high & dry in secure well-lined  
repository. Do it right please.  
Create local jobs for Montanans!

Thank you!

Thank you, Mary Ann Durwell 10-18-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Ann Schoch  
first name last name

My address is 2211 Pryor Lane  
street

Billings MT  
city or town state

aschoch@gmail.com 701-425-1630  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: It is wrong that 500,000 gallons  
of polluted water from the ponds leak  
into local groundwaters daily. DEQ do the  
excavation, dewatering + storage required  
to make it safe for folks of Rosebud  
County residents, Colstrip people,  
wildlife, taxpayers. It cannot be  
a "cap-in place" approach. NO  
to partial cleanup. Yes, to helping  
create ~~the~~ good-paying clean up jobs for  
the existing workforce to do a permanent  
clean-up job! Thank you.

Thank you, Sister Ann Schoch 10-28-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Katherine Appling-Freistadt  
first name last name

My address is 507 1st  
street

Helena MT  
city or town state

KFreistadt@gmail.com \_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: DEQ should have only  
one plan to permanently stop  
the coal ash leaking. Fix it  
forever by excavating the ash,  
dry it out and prevent future  
leaking by storing it in a lined  
landfill.

Thank you, Katherine Freistadt 10-15-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Hester and John Dillon  
first name last name

My address is 323 E. Morse St  
street

Dillon MT  
city or town state

(406) 451-2471  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Coalstrip's ponds 1 & 2 should  
be excavated and dewatered, then  
stored in a lined landfill above the  
water table. Cap in place is a  
long-term risk for the land and  
human taxpayers. High and dry  
clean up would create good jobs.

Thank you, Hester Dillon 10/19/19  
signature Date

# Comment Period Two: 1 & 2 Pond Closure

My name is SUSAN HILLSTROM  
first name last name

My address is PO BOX 333  
street

CHOTEAU MT  
city or town state

gabheron5@yahoo  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: DO NOT ALLOW THE  
"COMPANY'S PLAN" WHICH WILL  
COST MT TAXPAYERS IN PERPETUITY.  
ALL OAR ASH MUST BE EXCAVATED  
& DEWATERED, THEN STORED IN A  
LINED LANDFILL! MAKE COMPANY PAY!

Thank you, Susan Hillstrom 10/20/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is TOM HEALD  
first name last name

My address is 2714 W. BRIDGER  
street  
BILLINGS MT  
city or town state

vietnaminfantry@icloud.com  
email phone  
406-671-7181

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Cleanup needs to be done  
correctly the first time. All coal  
ash needs to be excavated, dried  
out and stored in a lined  
landfill above the water  
table.

Thank you, Tom Heald 9-29-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jim Parker  
first name last name

My address is 3700 Zettlesville Dr. #1  
street

Missoula MT  
city or town state

wetridge@montana.com 406-516-0985  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Permanent clean up of sags ground  
water containing iron. Remove/excavate all  
coal ash in contact with water table.  
Then de-water all the coal ash and store it  
in lined landfill above water table. This  
process is GREAT job creator. Thank you.

Thank you, [Signature] 10/18/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Dan Cohn  
first name last name

My address is 220 S. 27th St.  
street

Billings MT  
city or town state

dcohn@wore.org 406-252-9672  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please direct your staff to require  
that Talen dewater & excavate all  
of its coal ash ponds. This is a totally  
commonsense long-term solution that  
will also extend jobs of folks losing their  
job at the plant & mine.

Thank you, Dan Cohn 9/30/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Michael L. Hathaway  
first name last name

My address is 403 Augusta Drive  
street

Missoula MT 59801  
city or town state

mlhathawaymontana@gmail.com 406-493-4597  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: The cleanup plan must  
meet the high standard of correcting  
the problem NOW and in perpetuity.  
The ash must be completely excavated  
and dried or de-watered - then stored  
in a lined landfill above and  
distant from the water-table.  
We can utilize existing plant  
employees who are well-trained to do  
the work-creating jobs & saving \$.

Thank you, M. J. Arthur 30/September/2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jim Kammerer  
first name last name

My address is 852 Cheryl Rd.  
street

Helena MT  
city or town state

jimkammerer406@gmail.com 459-9368  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please consider complete  
removal of coal ash to a new, lined  
site. This is a better method  
and actually creates more  
jobs. Thank you

Thank you, Jim Kammerer 11/20/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is ELAINE (SKINNER) HALE  
first name last name

My address is 203 N. 5<sup>th</sup> ST, PO Box 1123  
street

MANHATTAN MT  
city or town state

\_\_\_\_\_ 406-284-9046  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment Concerning the Coalstrip Clean-  
up of Toxic Coal ash, the only way  
is to excavate and dewater it  
then store it above ground  
high & dry so that future leaks  
are prevented & local jobs created.

Thank you, Elaine (Skinner) Hale 10/1/2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Gayle h. Joslin  
first name last name

My address is 219 Vawter Str  
street

Helena MT 59601  
city or town state

joznpoz@bresnan.net 449-2795  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Actual Reclamation must happen! The coal ash waste must be excavated and stored Hot & Dry in lined pits. Water in old pits must be treated forever to get contaminants out. Ground water must be drinkable. There must be Adequate BONDS for total cleanup. DEQ has a moral responsibility to protect its citizens! Not the companies. NW Energy should NOT transfer their stupid economic decisions to rate payers who Demand renewable energy. And - why doesn't YOUR website work?

Thank you, Gayle Joslin 11-20-2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is FRANK KUEHN  
first name last name

My address is 2613 YELLOWSTONE AVENUE  
street

BILLINGS MT  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: MAKING THE RIGHT DECISIONS TO REMOVE

AND TREAT THE COLLASH AT COLSTREP WILL

MINIMIZE FUTURE POLLUTION COSTS AND

SERVE TO CREATE MANY LONG-TERM, GOOD

PAYING JOBS. WHY WOULDN'T THE DEQ

NOT CHOOSE THIS COURSE OF ACTION?

Thank you, Frank Kuehn 10-2-2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Dan Groshens  
first name last name

My address is 607 McLeod St.  
street

Big Timber MT  
city or town state

\_\_\_\_\_ phone  
email

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: We need to fix

this right away the first

time! Dig it up and dry

it out so it doesn't turn

in to a Super Fund site

Thank you, Daniel Groshens 10-1-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Bruce Bender  
first name last name

My address is 365 Kensington  
street

Missoula MT  
city or town state

\_\_\_\_\_ email \_\_\_\_\_ phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: \_\_\_\_\_

@ cleanup Ash ponds -  
remove & dry Ash &  
properly land fill

Thank you, Bruce Bender 9/30/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jerald Anderberg  
first name last name

My address is 2510 Roth Lane  
street

Billings MT 59102  
city or town state

jerryanderberg@gmail.com 406-534-2623  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: The ponds should be

excavated, the fly ash  
dewatered, and the dry ash  
put in a lined landfill  
above the water table.

Sincerely  
Jerald A. Anderberg  
Thank you signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Sandra K. Anderson  
first name last name

My address is P.O. Box  
street

Miles City MT 59301  
city or town state

406 951-5336(c)  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Sallen needs to

clean up the coal ash

right, and it will create jobs,

protect the water, and

preserve the Colstrip community.

Enforce corporate responsibility

Thank you  
Sandra K. Anderson

Thank you, Sandra K. Anderson 10/28/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Gary LeDean last name  
first name

My address is 2750 Schley Creek Rd  
street

Arlee MT  
city or town state

726-3824  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Water pollution is a sin  
a disrespect to a wonderful  
gift - clean air the same

Please expedite clean up  
of the Ash Ponds

Thank you, Gary LeDean 10-1-2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Helen Heller  
first name last name

My address is 615 Weldon Rd  
street

Circle MT 59215  
city or town state

406-485-3490  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Montanans deserve  
clean water -

Make it happen

Thank you, Helen Heller 10-5-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Janet Shappless  
first name last name

My address is P.O. Box 522  
street

Emigrant, MT 59027  
city or town state

\_\_\_\_\_ email \_\_\_\_\_ phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Those who own these  
units need to pay for  
their permanent clean-  
up Now. The dirty  
ground water greatly  
affects the rivers  
& ground water at  
neighbors a general popula  
Thank you, Janet Shappless 10/2/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Edwin Fielder  
first name last name

My address is 511 LAKEWOOD CT  
street

WHITEFISH MT  
city or town state

feldscasa@gmail.com (406) 862-7269  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: GROUNDBATER CONTAMINATION

SHOULD NEVER BE ALLOWED TO

BEGIN WITH. THOSE WHO MINE

SHOULD NOT DISPOIL THE LAND.

IF THEY CAN'T DO IT RIGHT THEY

SHOULDN'T MINE AT ALL.

Thank you, Edwin Fielder 10/5/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Ryan Mershon  
first name last name

My address is 1819 Lecount Ln  
street

Billings MT  
city or town state

ryanm@msw.org  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: IT IS important for our

future generations to have

access to clean and healthy

water. No matter who, no matter

where.

Thank you, Ryan Mershon 10-1-2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Diana Hilden  
first name last name

My address is 720 Judicial Ave  
street

Billings MT  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Please do permanent  
clean up of Colstrip  
of the ash ponds. Don't  
leave the people of Colstrip  
with a water system  
that is undrinkable.

Thank you, Diana Hilden  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Pauline Catchpole  
first name last name

My address is 236 Avenue F  
street

Billings MT  
city or town state

pauline.shakti@gmail.com (703) 581-8042  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: The environment given to  
us by the grace of God and  
Mother Nature - it, being land  
and water, are not disposable  
commodities, let's treat what  
we are given with respect

Thank you,  9/21/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is MARI VON HOFFMANN  
first name last name

My address is P.O. Box 704  
street

MISSOULA MT  
city or town state

marilaxmi@gmail.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: The coal ash ponds need to  
be cleaned up! They're leaking into  
the aquifer and surface water too!!  
The ash should have been stored  
in dry containment places, but ponds  
were cheaper for the companies. Make  
these companies clean up their mess!!

Thank you, Mari von Hoffmann 17/NOV/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is David Gano  
first name last name

My address is P.O. Box 246  
street

Melville MT  
city or town state

406-537-4574  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Water is such a precious  
resource, we simply cannot foul  
it without paying a terrible  
cost - one way or another.

Cleaning up our mess is the  
only responsible thing to do.

Thank you, David Gano 10/7/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is DAN G CHAPMAN  
first name last name

My address is Box 495 - 52 Jardine Rd  
street

Cardiner Ut  
city or town state

406-848-9499  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Store it High & Dry

The Prestine Yellowstone

River is down grade from

the polluting units. Protect

the Yellowstone forever

Thank you, Dan G Chapman 10-13-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Kurt Olson  
first name last name

My address is 3208 harness loop  
street

Helena 59602 MT  
city or town state

Viking60@outlook.com 406-431-3133  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Storage of coal ash high and dry is  
critical. Now is the time. Please get the pollution  
cleaned up now. An appropriate clean-up plan  
will create jobs for the future. Please do  
not pass the buck on the clean-up. A  
comprehensive plan is needed now

Thank you, Kurt Olson 11/19/11  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Emily Petrik  
first name last name

My address is 1101 E 6th Ave  
street

Helena MT  
city or town state

emilyannpetrik@gmail.com 701-426-2041  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I am a teacher in Helena and

I believe it is important to do things the

right way for future generations. Please

Consider excavating <sup>high & strong</sup> <sub>draw</sub> rather than cap-in-place.

Also, I understand this would provide 700+

jobs for Coleslip. A double win! or triple - if

Thank you, Emily Petrik 11/20/19  
signature Date  
we consider our kids.

## Comment Period Two: 1 & 2 Pond Closure

My name is Laura Ericksen  
first name last name

My address is 6153 Lazy Man Gulch  
street

Helena MT  
city or town state

lauralericksen@gmail.com 406 431 4674  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Please move the coal ash  
from ponds to a site  
more suitable for  
storage and monitoring i.e.  
away from groundwater.

Thank you, LLE 11/20/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is MELVIN HART  
first name last name

My address is 7117 KING AV W  
street

Big MT  
city or town state

4855410118  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

I WOULD LIKE  
TO SEE HIGH DRY  
ASH STORAGE IN  
COLE STRIP

Thank you, Dennis Hand 10/24/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Josh Thoden  
first name last name

My address is 137 Morning Star Lane  
street

Miles City MT  
city or town state

j.thoden@live.com 858-8325  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

I like the idea of  
closing these by the  
end of 2019 no matter  
what but it must be  
'high and dry'!

Thank you,

  
signature

10-28-19  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is CLARE WITCOMB  
first name last name

My address is 415 N. PLATT Box 1547  
street

Red Lodge MT 59068  
city or town state

SAZZLOVEEMT@GMAIL.COM  
email phone

425-2308

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

High And DRY !!!!!!!

Fix The Problem FOREVER!

CLEANUP CREATES JOBS

Enough SAID !!!!!

Thank you, Clare Witcomb 10-10-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jana Steton  
first name last name

My address is 629 Beverly Ave  
street

Missoula MT  
city or town state

jsteton@montana.com  
email phone

Dear Shaun McGrath, M.T. Dept. of Environmental Quality:

Comment: As a daughter of Butte,  
Please don't allow Colstrip  
to become another toxic waste dump.

Note to store the ash

"High and Dry."

Thank you, Jana Steton  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Bob Adams  
first name last name

My address is 1029 State St,  
street

Helena MT 59601  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Pollution from coal

ash ponds at units 1+2,

Colstrip, should be addressed

permanently by using "high and

dry" techniques. More jobs, too,

using this method of cleanup

Thank you, Bob Adams 10/11/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Gregg Wheeler  
first name last name

My address is Wendy 1716 Highland St  
street

Helena MT  
city or town state

\_\_\_\_\_ phone

Dear Shaun McGrath, MT. *Dept. of Environmental Quality:*

Comment:

Montana's legacy of allowing the coal ash ponds at Colstrip to leak and pollute the groundwater needs to stop. DEQ must require a robust cleanup plan to dry and permanently store the ash waste rather than risk a short-term solution that likely would require additional mitigation in the future. The cleanup plan can also result in significant jobs to help Colstrip workers impacted by closures of the Colstrip power plants.

Thank you,

Gregg Wheeler  
signature

10/9/19  
Date

Wendy L. Wheeler 10/9/19

## Comment Period Two: 1 & 2 Pond Closure

My name is Julie Holzer  
first name last name

My address is PO Box 2152  
street  
Red Lodge (59068) MT  
city or town state

jholzer29@gmail  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: NWE has reaped profits

for years at Colstrip. They now

have an obligation to store

the toxic ash pond waste in

High-Dry conditions They owe

it to the community, workers and

landowners

Thank you, Julie Holzer 10/10/2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Sara Toubman  
first name last name

My address is 940 Wilder Ave  
street

Helena MT  
city or town state

59601  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please do the Colstrip

cleanup right i.e. store the  
~~etc~~ coal ash <sup>high</sup> ash and dry +  
fix it so it does not continue  
to pollute. That way us taxpayers  
are NOT left w/ the bill.

Thank you, Sara Toubman 10/7/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Lisa Schmidt  
first name last name

My address is 564 Graham Ranch Lane  
street

Conrad MT  
city or town state

alandofgrass@3riversdbs.net 406-278-0159  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please implement a thorough and sustainable cleanup policy for the Colstrip ash ponds by requiring companies to store coal ash high dry. This will protect groundwater, create jobs and prevent leaching.

Thank you, Lisa Schmidt 10-2-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is LOIS CANON  
first name last name

My address is #17 6TH AVE  
street

LAUREL MT.  
city or town state

LOISCANON@YAHOO.COM 406-694-3443  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I THINK THE "HIGH AND

DRY" OPTION IS MUCH THE BETTER

PLAN FOR LONG TERM CLEAN-UP

AND CLOSURE OF THE COAL ASH

PONDS. QUALITY LONG TERM

IS MORE IMPORTANT THAN COST HERE.

Thank you Lois J Canon 10/3/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Patricia Bik  
first name last name

My address is 16 So Rodney  
street

Helena MT  
city or town state

ploursebik@gmail.com 431-3933  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please, this problem with the  
coal ash disposal has existed since plants  
opened in 1970's. Economic prosperity has  
been achieved. Now, DEQ's job is to require  
adequate clean up to protect future. Cap in  
place allows continued groundwater pollution,  
dewater and store this toxic stuff in high, sub  
location.

Thank you, Patricia Bik

signature

Date

Patricia Bik 10/3/19

## Comment Period Two: 1 & 2 Pond Closure



My name is \_\_\_\_\_

Ms. Judie Frey

111 Shining Mountains Loop Rd.

Ennis, MT 59729-9153

My address is \_\_\_\_\_

\_\_\_\_\_  
city or town

\_\_\_\_\_  
state

\_\_\_\_\_ jjfrey@3rivers.net (406) 682-5-4488  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Cap-in-place is NO  
solution for coal ash. High and  
dry ash above the water table  
is the only SAFE long term  
solution. People in the area  
need clean un contaminated H<sub>2</sub>O

Thank you, \_\_\_\_\_

Judith C. Frey  
signature

10-1-2019  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Barbara Gulick  
first name last name

My address is 2018 12th St W.  
street

Billings MT 59102  
city or town state

bjgulick@bresnan.net 406-259-3622  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Pennywise, poundfoolish

would aptly describe the "cap in place"  
strategy for cleanup of the coal ash  
ponds. Fix it right the first time  
by storing 'high & dry,' creating  
good long term jobs.

Thank you, Barbara J. Gulick 9/23/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Donna Quick  
first name last name

My address is 707 Lehman Ave  
street

Circle Mt.  
city or town state

none 406-485-2432  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I would ask that it

(being 1 & 2 closures) be done the  
"high-dry way" - a permanent  
cleanup which will create long  
term jobs. It is important  
cleanup is done right the first time.

Thank you,  
you -

Donna Quick 10-21-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Lindsay & Daniel Lande  
first name last name

My address is 5357 Horn Rd  
street

Missoula MT  
city or town state

Lindsayann.Indelman@gmail.com (406) 546 5953  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please stop groundwater  
contamination! please fix  
this permanently with high  
& dry clean-up. This creates  
jobs and a temporary solution  
is not enough! Thank you!

Thank you, L. Indelman 10/13/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Nancy Stockman  
first name last name

My address is 1704 Three Bars Tr  
street

Billings MT  
city or town state

nancystockman@gmail.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please consider a "high dig"

Permanent fix to prevent  
future leaks & contamination.

Thank you, Nancy Stockman 9/24/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Nancy N. Erickson  
first name last name

My address is 3250 Patter Canyon Rd.  
street

Missoula MT 59803  
city or town state

\_\_\_\_\_ email \_\_\_\_\_ phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please stop the leakage from  
coal ash ponds right now & store in  
lined landfills

Thank you, Nancy N. Erickson 10-16-2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is CATHERINE MUDD  
first name last name

My address is 310 CUTLER ST  
street

HELENA MT 59601  
city or town state

cathymudd@gmail.com 406 459 6703  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: PLEASE DECIDE ON THE "HIGH  
& "DRY" method for cleanup &  
closure plan of the COLSTRIP PONDS.  
Permanent cleanup creates jobs &  
permanently repairs the groundwater.  
This "high & dry" solution is the most  
responsible decision for our STATE.

Thank you, Catherine Mudd 10/16/19  
signature Date

# Comment Period Two: 1 & 2 Pond Closure

My name is Joan Kresich  
first name last name

My address is 410 S 6th  
street

Livingston MT  
city or town state

joankresich@gmail.com  
email

phone  
(510) 710-6922

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

• Store it "High & Dry"  
thus

• Fixing it Forever

• Permanent clean-up  
means jobs.

Thank you, Joan Kresich 10/10/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Adrien MARX  
first name last name

My address is 380 Morrell Cr. Drive  
street

Seeley Lake MT  
city or town state

adrienmarx@gmail.com 406-677-4753  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Again! - There is only one

responsible and right choice to

protect people, community & life

giving waters - for us all.

STORE It High and Dry!

Thank you, Adrien Marx 10/29/2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Nancy Standley  
first name last name

My address is 1509 10<sup>th</sup> St W  
street

Billings MT  
city or town state

nstanclen@bresnan.net  
email phone

406-259-7403  
Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Require Talon to cleanup  
the Coal Ash Ponds at Coaktrip  
correctly. Require high and dry  
storage in lined ponds! Create  
jobs in the cleanup process!

Thank you, \_\_\_\_\_  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Gary Adatson  
first name last name

My address is PO Box 308  
street

Milltown MT 59851  
city or town state

gjmatson@montana.com (406) 370-6584  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Closure and clean-up of

the old ponds is critical for

the future of Colstrip and its

residents. Ash should be taken

to a place where it can be

stored "high and dry."

Thank you, GJ Mat 10/24/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is ERIC SCHMIDT  
first name last name

My address is 2915 2ND AVE S #205  
street

BULLINGS MT  
city or town state

EJR.SCHMIDT@GMAIL.COM 206 914-6583  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: It makes no sense to pollute  
one of our essential resources because  
one company could be bothered to do a  
job right. Lets do right & ensure  
ponds 1 & 2 are stored high & dry  
and the fix is done right.

Don't allow our water to be polluted.

Thank you [Signature] 10/24/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Shelly Young  
first name last name

My address is 3444 Poly Dr.  
street

Billings MT  
city or town state

RAGGLE@yahoo.com 406-248-3847  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I urge you to require Talon  
Energy and other RFPs to responsibly  
remediate the coal ash ponds at  
Coalstrip - to do it right for storage into  
perpetuity. Store it "high and dry"  
in lined and capped ponds.

Thank you, [Signature] 10/24/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is MARYANNE MOTT  
first name last name

My address is 818 Tom Miner Creek Rd  
street

EMIBRANT MT 59027  
city or town state

maryanneebbar.com406 848 7773  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Coal ash must not be left to  
leach into groundwater - it  
must be made high & dry on a  
permanent basis. This will protect  
our water & generate good jobs.

Thank you, Maryanne Mott 10/18/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Kris Glenn  
first name last name

My address is 209 Yellowstone Ave  
street

Billings MT  
city or town state

406.530.4397  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I'm a 5<sup>th</sup> generation Montanan and a realist. I support business and business interests, but we need to be smart and make decisions based on a long view, rather than near term. The ash ponds have a risk of consuming Montana's cleanup funds far into the future. Let's please do it right the first time. Store the ash 'high and dry', so we can count on no further pollution - AND provide jobs for our neighbors that need them.

Thank you, Kristin Glenn 10/21/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Michael Childers  
first name last name

My address is P.O. Box 728  
street

Colstrip mt  
city or town state

\_\_\_\_\_ phone  
email

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I am in favor of a  
'do it right' the first  
time approach to clean  
up the ponds  
Store it High + Dry.

Thank you Michael Childers 10/23/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Kathryn Matlock  
first name last name

My address is 317 E 4<sup>th</sup> Ave  
street

Big Timber MT  
city or town state

Krynmatlock@gmail.com (406) 930-5716  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Thanks for helping maintain

a high living standard for all  
Montanans. Please adopt the  
store it High and Dry clean up  
plan. Lets be proactive and  
stop groundwater contamination.

Thank you, Kryn Matlock 10-14-19  
signature Date

Blessings

## Comment Period Two: 1 & 2 Pond Closure

My name is Karen Tibbs  
first name last name

My address is 742 Moon Beam Ln  
street

Billings MT  
city or town state

KarenTibbs42@gmail.com 406-656-0125  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: It seems to me

that the permanent  
cleanup of "high & dry"  
creates jobs while  
permanently getting  
rid of the coal ash.

Thank you, \_\_\_\_\_  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Paula Childers  
first name last name

My address is P.O. Box 728  
street

Colstrip mt  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: \_\_\_\_\_

I am in favor of a  
'do it right' the first  
time approach to clean  
up the ponds.  
Store it High & Dry

Thank you, Paula Childers 10/23/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Laurel Hanson  
first name last name

My address is 1035 Princeton Ave  
street

Billings MT  
city or town state

laurelhanson@ 406-256-9181  
yahoo.com email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: We need a permanent  
solution which requires coal  
ash be dewatered and  
stored in lined landfill  
above the water table

Thank you Laurel Hanson 10-2-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Diane Bayuk  
first name last name

My address is 1520 Charlie Russell Dr.  
street

Helena MT  
city or town state

entremom3@yahoo.com 443-7823  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: It is so important to  
clean up Colestrip with a long-  
term view! Please insist on  
"High & Dry" as a permanent  
solution. It also creates good  
jobs. Please protect MT and tax payers.

Thank you, Diane W. Bayuk 9-30-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Paula Berry  
first name last name

My address is 220 S. 27<sup>th</sup> St  
street

Billings MT  
city or town state

paula@northernupdains.org 248.1154  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I support a permanent

clean-up solution that removes

toxic materials from the ash

ponds + stores them away

from groundwater. The companies

who made the mess, should have to  
pay to clean it up.

Thank you, [Signature] 11-22-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Kurt Olson  
first name last name

My address is 3208 harness loop  
street

Helewa 59602 MT  
city or town state

viking60@outlook.com 406-431-3933  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Storage of coal ash high and dry is  
critical. Now is the time. Please get the pollution  
cleaned up now. An appropriate clean-up plan  
will create jobs for the future. Please do  
not pass the buck on the clean-up. A  
comprehensive plan is needed now

Thank you, Kurt Olson 11/19/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Carolyn Taylor  
first name last name

My address is 66 Spindel Ln.  
street

Miles City MT  
city or town state

carolynrtaylor91@yahoo.com  
email ~~phone~~

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please DEQ- Wake up -

Be responsible. Clean it

up appropriately! You will

be held accountable!

The Company needs to be

responsible. I don't dead children!  
START USING THE UNDERDRAIN!

Thank you, Dr. Carolyn Taylor 10/28/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Liz Ametsbichler  
first name last name

My address is 2405 Raymond Ave.  
street

Missoula MT  
city or town state

liz.ametsbichler@gmail.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I am deeply concerned about the cleanup  
of the ash ponds. Montana has been the victim of  
extractive corporations that have left environmental  
disasters behind at the expense of Montana  
citizens. The units at Colstrip are already  
beyond their lifespan and have been contaminating  
the ground water for decades. Responsible cleanup  
of the ponds will improve the quality of ~~the~~  
life for residents and guarantee a better  
future for them, and will mean jobs - a win-  
win situation. Please do the right thing and hold the  
corporations accountable. As a Montana native,  
I thank you for making the well being of Montanans  
Thank you, a priority!

signature

Date

Liz Ametsbichler

11-02-2019

## Comment Period Two: 1 & 2 Pond Closure

My name is Marilyn Thaden  
first name last name

My address is 137 Morning Star Ln  
street

Miles City MT  
city or town state

m.thaden@hotmail.com (406) 853-1651  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Cleanup HAS to be done,  
companies who benefitted to  
the detriment of landowners &  
generations on-going need to be  
held responsible. NO MORE  
BERKLEY PITS!

Thank you, Marilyn J Thaden 10/28/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Wilky van Straaten  
first name last name

My address is 12500 Big DAVIS  
street

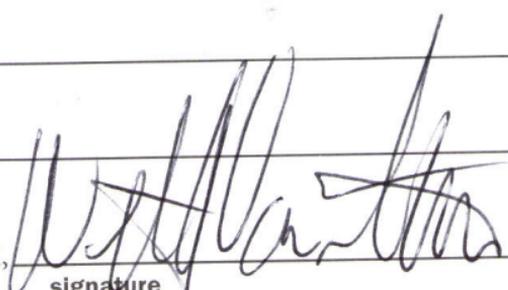
3-forks MT  
city or town state

2850031  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: \_\_\_\_\_

Northwest energy  
needs to pay for clean-up  
not TAXPAYERS

Thank you,  10-3-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Laura Morris  
first name last name

My address is 4021 O'Leary St  
street

Missoula MT 59808  
city or town state

laromer48@gmail.com 406-702-9586  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please make the Colstrip mining and power companies responsible for cleaning up and preventing further contamination from their coal ash ponds. It should not be up to the taxpayers to clean up their mess. ~~It is~~. They should have no right to endanger water, air, and soil vital to surrounding people, wildlife, and business. They need to eliminate all ability of these ponds to leach into the ground water—now and forever into the future.

Thank you, Laura Morris 10/03/2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Virjeana Brown  
first name last name

My address is 720 Northern Pacific Ave.  
street

Belgrade MT  
city or town state

jbrown89531@live.com 406 388-1833  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Montanans should not be on the  
hook to clean up after Corporations that  
reap the benefits. Dry out the coal ash  
and store above the water line.  
This would keep those with the  
qualifications employed! a win-win

Thank you, Virjeana Brown 10/31/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Linda Weeks  
first name last name

My address is 822 Rimrock Rd  
street

Billings Montana  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: One of the first rules we learned in

kindergarten is: Clean up your  
own "messes"! Obviously there is a coal

ash pond "mess" which needs to be  
correctly and completely cleaned up once

and for all by the Company which caused  
the "mess" while profiting from it.

That's who is responsible to pay for a good  
job to clean it up; not the public,

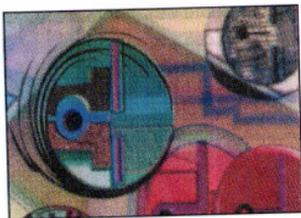
tax payer, or added fuel bills. The  
"Company" needs to be held accountable!

Thank you, Linda M. Weeks Oct 2, 2019  
signature Date

# Comment Period Two: 1 & 2 Pond Closure

My n

My a



Karl Schmiedeskamp  
4215 Montana Sapphire Dr Apt 313  
Billings, MT 59106

city or town

state

Kschmiedeskamp@gmail.com (406) 269-0097  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Energy companies need to  
acknowledge the full cost of their  
product & not pass clean up  
costs on to the tax payers & customers.  
Total, permanent clean up  
paid for by the responsible parties.

Thank you

signature

Date

Karl W. Schmiedeskamp 9/28/19

## Comment Period Two: 1 & 2 Pond Closure

My name is Wes James  
first name last name

My address is 55 Hidden River Ln  
street

Bigfork MT  
city or town state

WJames@msn.com 237-4041  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Power co should  
pay for clean-up

Thank you,

Wes James  
signature

9/30/19  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Anne Black  
first name last name

My address is 3285 Ravenwood Lane  
street

Missoula MT  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: DEQ needs to ensure that the proper action is taken. When you have a rotten tooth, the dentist will do a root canal, not put a cap on it. You pay for it & it hurts, but it's much healthier, cheaper & more effective than the alternative. Taking Co's need to pay for this, not wait for the Feds to bail them out - as we have w/ The Aracanda Ponds.

Thank you, Anne Black 10/23/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Richard Newman  
first name last name

My address is 204 N. Black Av  
street

Bozeman MT  
city or town state

solarfeller@gmail 4065803763  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: DO IT RIGHT.

DO NOT ALLOW COAL CO'S  
TO RIPOFF OUR  
RANGERS! TELL THEM  
TO CLEAN UP THEIR  
MESSES NOW!!

Thank you Richard Newman 10/1/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jean DAHLMAN  
first name last name

My address is 3335 Old Hwy 10 Road  
street

Forsyth MT  
city or town state

Lemire Dahlman@rangeweb.net (301)9921  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: The Dahlman Ranch 25 miles

north of Colstrip (as the crow flies).

We rely on our spring-filled creek

(Wildcat) to water our cows & our

Require water taken

wells for our drinking water. Clean

up those ash ponds & do it right

Thank you, Jean Dahlman 10/28/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Maggie Gordon  
first name last name

My address is 910 N 31<sup>st</sup> St  
street

Billings MT  
city or town state

maggie@northernplains.org 307-421-7411  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: We can't let one more  
corporation walk away from a  
Montana community to deal with  
the mess, workers to deal with  
the loss, and taxpayers to pay  
the cost.

Thank you, Maggie Gordon 11-22-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Bob THADEN  
first name last name

My address is 137 MORNING STAR LN  
street

MILES CITY MT  
city or town state

BMTHADEN@MIDRIVERS.COM 406 453 1028  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Strongest possible cleanup  
effort should be used on the  
years of coal ash. Please  
pursue strongest possible effort  
which will create many  
new temporary jobs.

Thank you, Robert Thaden Oct 28, 19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is LINDA HELDING  
first name last name

My address is 316 B INEZ  
street

MISSOULA MT  
city or town state

HELDING64.GMAIL 4062414261  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: JOBS IN MONTANA - GOOD

PAYING INDUSTRIAL JOBS - ARE NOW  
AVAILABLE IN MONTANA THROUGHOUT  
CLEAN OF COAL ASH POLLUTION.

LET'S MAKE MONTANA THE  
BEAUTIFUL BIG SKY STATE AGAIN.

Thank you Linda Helding 10/2/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Terry Minow  
first name last name

My address is 502 lower valley Rd  
street  
Boulder MT  
city or town state

billhendmead@aol.com 225-4397  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please protect beautiful  
eastern MT & her people. Create  
jobs by requiring a permanent  
clean up. I'm disappointed  
Montana has let the ponds leak  
for years without requiring a  
fix. Please fix it now.

Thank you, Jay L. Minow 10/1/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Max Makich  
first name last name

My address is 126 Heather Lane  
street

Glasgow MT  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: We must insist the  
workers in Colstrip get  
busy on the cleanup.  
They are there and will  
need jobs when the plants  
close

Thank you, Max Makich 3 Oct 2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Ronnis Bollinger  
first name last name

My address is 203 West Church Street  
street

ABSARokee MT  
city or town state

ron.daugin@leafy.lodge@outlook.com 406-321-0136  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: START hiring people to clean  
up this mess. Do it the right  
way not the half-assed way.

The people of MONTANA PAY you  
and depend on you to do the  
job right. Get going please!

Thank you Ronnis Bollinger 10/13/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is \_\_\_\_\_

\_\_\_\_\_



JOHN & DARLENE

GROVE

332 TURNER ST.

STEVENSVILLE, MT 59870

My address is \_\_\_\_\_

city \_\_\_\_\_

slippy771@centurylink 406-771-2428  
email net phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Clean up of the Coal Strip  
Ashponds provides jobs & economic  
benefits for the community & its  
citizens. Talen & NW Energy must be  
required to contain the waste into  
perpetuity.

We have too many examples of  
destruction left by corporations who  
have used and abused our resources.

It is the obligation of the DEQ  
& the State of Montana to force a  
realistic clean-up plan.

Thank you,

John D. Grove

signature

Date

10/1/19

## Comment Period Two: 1 & 2 Pond Closure

My name is Patty Dickerson  
first name last name

My address is 482 Fowler Ave  
street

Bozeman, MT 59718  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Coal is dirty, expensive & no longer viable

for the future of our planet. The coal ash ponds leak

50000 gals of polluted water into the groundwater. Please

store it high & dry. Permanent clean-ups creates jobs needed

in Colstrip. Think of the people living in Colstrip as your  
family. You wouldn't want your family living with this  
contaminated groundwater, Please do the right thing for  
the health of the Planet.

Thank you, [Signature] 30 Sep 19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Austin Allery Allery  
first name last name

My address is 517 South Jordan  
street

Miles City MT  
city or town state

406-696-4702  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: It's a necessary move now.

Also the jobs it creates.

"2 liners" in layers

Same or other comment ~~CAW~~

"Think of complete final solution"

Metaphorical.

Thank you, Austin Allery 10-28-19  
signature Date

# Comment Period Two: 1 & 2 Pond Closure

My name is gregg Sizer  
first name last name

My address is 3120 Medea  
street

Billis VT  
city or town state

g.sizer@roanoke.com 640840  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Take care of it

Thank you, \_\_\_\_\_  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is ED GULICK  
first name last name

My address is 3015 10th AVE. N.  
street

BILLINGS MT 59101  
city or town state

egulicke@bresnan.net (406) 698-2747  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

SAME COMMENTS

← As for 3:4

Thank you,  9/21/19  
signature Date

# Comment Period Two: 1 & 2 Pond Closure

My name is Kate Mrgudic  
first name last name

My address is 700 Rollins St.  
street

Missoula MT  
city or town state

Kmrgudic@gmail.com 2134340356  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: \_\_\_\_\_

\_\_\_\_\_ ditto \_\_\_\_\_

Thank you, Kate Mrgudic 10/1/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Linda Gillison  
first name last name

My address is 524 S. 2<sup>nd</sup> St. West  
street

Missoula MT 59801  
city or town state

lgillison@bresnan.net 406-546-  
email phone 2356

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: must approve a clean-up

plan which protects clean  
water for the future thro "high  
dry" mediation AND WHICH  
provides good jobs at Coldrip  
while the city transitions  
HIGH + DRY - not hide + forget

Thank you, \_\_\_\_\_  
signature Date

Linda W. Gillison 10/30/19

## Comment Period Two: 1 & 2 Pond Closure

My name is Same  
first name last name

My address is \_\_\_\_\_  
street

\_\_\_\_\_  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: also the possibility of mixing waste with municipal sewage for potting soil, fertilizer or other possibilities!!!

also possible use of wind and solar power to augment the operation of the plant and use commercially when coal runs out. - 10/1/19

Thank you,

signature

Date

Dwight E. Vannatter

## Comment Period Two: 1 & 2 Pond Closure

My name is R. Tookildson  
first name last name

My address is \_\_\_\_\_  
street

\_\_\_\_\_  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Please - Same

Approach Applies

High + Dry -

- Thanks -

Thank you,

[Signature]  
signature

10/5/19  
Date

**Comment Period One: 1 & 2 Pond Closure**

My name is Alex Cunha  
first name last name

My address is 322 S 29th St.  
street

Billings MT  
city or town state

alex@northnoplains.org 207-616-3580  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: DEQ must store all

coal ash high, dry, & lined.

Excavate SOEP/STEP now so

future ratepayers don't have to

pay for the same job twice.

Do this right for us

Thank you, Alex Cunha 10/25/19  
signature Date



## Comment Period Two: 1 & 2 Pond Closure

My name is Claire Overholt  
first name last name

My address is 201 S 30<sup>th</sup> St, Apt 201  
street

Billings MT  
city or town state

claireliz75@yahoo.com 970-310-5747  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I have lived in eastern

Montana since I graduated college

in 2014.

the town  
help transition

Thank you, \_\_\_\_\_  
signature Date

Sara Edinberg,  
Waste Management and Remediation Division  
P.O. Box 200901  
Helena, MT 59620-0901  
November 24, 2019

or to [DEQColstrip@mt.gov](mailto:DEQColstrip@mt.gov)

RE: Colstrip Waste Water

I have been a resident of Colstrip, MT since 1973. I was raised here, and have continued living here after I graduated from Colstrip High School.

I am concerned what will happen in the years to come. I know that there have been issues with the water in Colstrip... Drinking water as well as groundwater leaking over the years.

My concern, is who is going to pay the cost for all of the cleanup and control of future water leaking issues. As the power plants are being phased out, and shut down, it appears that the companies who have been involved in all of the power plants construction, and operation, are all wanting to bail out of the state and leave us here to deal with the existing environment.

It is disturbing that these corporations were all great when the generation of these plants was generating big money for these corporations, but now they are wanting to jump ship and leave the residents and taxpayers to figure out how to fix the problems with our water. "Take the money and Run"

This is not a new discovery, the groundwater leaking has been a known fact for several years. I as a resident and taxpayer of Colstrip, do not feel I should have to foot the bill to correct this problem.

I feel the corporations who benefited largely from our Colstrip Operations, should be held responsible for the situation that has been created. These corporations, need to be assisting our community with the cost of addressing and correcting the problem. This cost should not be a burden to the citizens and taxpayers of our town or our state.

Thank you for your time and understanding of our concerns.

Sincerely,



Shelly Holum  
PO Box 662  
Colstrip, MT 59323

**RECEIVED**

DEC 3 2019

Dept. of Environmental Quality  
Remediation Division

P.O. Box 928, 6640 Browning Drive  
Colstrip, MT 59323-0928  
November 29, 2019

Montana DEQ  
Attn: Sara Edinberg, Hydrogeologist  
Waste Management and Remediation Bureau  
P.O. Box 200901  
Helena, MT 59620-0901

Re: Talen Energy's "Units 1 & 2 Revised Remedy Evaluation Report, Part 1"

Dear Ms. Edinberg:

I am responding to your request for public comments on the referenced report, addressing the issue of stopping the leakage of the Colstrip Units 1 & 2 ash ponds and cleaning the contamination from the surrounding groundwater.

To briefly introduce myself, I have been a resident and property owner in Colstrip for nearly 40 years, having retired from Western Energy Company in 2014 as one of the Mine Engineering Staff. In years past at the height of construction here, I chaired the Colstrip Townsite Expansion Property Owners' Association and the Architectural Review Commission. I currently serve on the Innovation and Technology Think Tank (IT3) board, a group of Colstrip people who are seeking solutions for the future wellbeing of this city.

My comment is –

As with any engineered solution, there remains an unknown degree of risk of failure of the proposed remedy posed in the referenced Report. My case in point is the failure of the originally engineered, approved and installed clay liners which were intended to stop the seepage of the waste ash slurry contaminates, according to the "best engineering practices" of the times (1970's?). The proposed remedy calls for capping the existing ponds, capturing the groundwater and cleaning the contamination therefrom. But, in reality, what is the risk of failure of this scheme?

I also observed that the report notes the monitored, lateral movement of the contaminated shallow groundwater layer and does not provide data for the depths of seepage of the plume(s) of the contaminates. Is there any data available on this vertical seepage component?

I ask these questions in concern for the looming water supply crisis facing the City of Colstrip, resulting from the accelerated power plant closure schedules. Earlier this year, I addressed the pending water supply issue in several papers that I presented to the City of Colstrip and Rosebud County. Very briefly, the current raw water supply system is owned and operated by the Colstrip Project partnership of companies. It is sized to supply about 5 billion gallons of

**RECEIVED**

DEC 6 2019

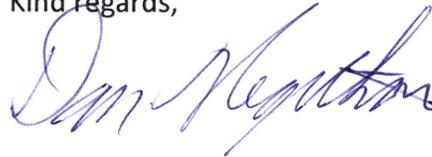
Dept. of Environmental Quality  
Remediation Division

water per year from the Yellowstone River to the Colstrip Surge Pond (Castle Rock Lake) for consumption by the plants, of which about 200 million gallons is supplied to the City under a transportation agreement. Considering the magnitude of this system, there is little chance, as I estimated and reported in said papers, that the City will be able to operate and maintain it after the plants are idled, without considerable financial support. Therefore, in response to the impending water crisis and as reported by Mayor John Williams at the November 25 SEMDC (Southeastern Montana Development Corporation) public meeting, "the City has contracted an Engineer to study alternatives for our future water supply" – one option potentially being to develop a new groundwater-based supply system.

As you can surmise, groundwater contamination remediation could become a more vital issue for the survival of Colstrip. This will depend on future developments and engineering feasibility studies. Certainly, the accelerated plant closure schedule has intensified the need for prompt, sound engineering solutions for both water issues – groundwater contamination remediation and developing a viable water source for the City of Colstrip. The outcome of these efforts will determine our future existence here.

Thank you for your attention to my concerns. I remain available for further discussion at your convenience.

Kind regards,



Dan Negethon

Home: 406-748-4347

Cell: 406-740-0992

December 12, 2019

**RECEIVED**

DEC 18 2019

Dept. of Environmental Quality  
Remediation Division

Montana DEQ  
Attn: Sara Edinberg  
Box 200901  
Helena, MT 59620-0901

Subj: Colstrip Power Units 1 & 2 Coal Ash Disposal

I have lived in Forsyth, MT since 1979; presently serve as mayor of the City of Forsyth; serve as a member of the Forsyth Area Chamber of Commerce & Agriculture; board member of the SouthEastern Montana Development Corporation and the Rosebud County City/County Planning Board.

I encourage DEQ to approve a plan for the removal of the coal ash and the transportation of the coal ash to a new, appropriately built and maintained landfill site.

The City of Forsyth is a neighbor to the City of Colstrip, the community members and the surrounding farmers/ranchers. There is concern with the accumulation of toxic minerals that have leached into ground water and there is a need to stop this ongoing process.

The "removal" option provides the best long-term opportunity to solve the problem and provide high paying jobs for many of the employees that may be displaced by the closure of the power plants.

I encourage DEQ to approve a plan for the removal of the coal ash and the transportation of the coal ash to a new, appropriately built and maintained landfill site.

Respectfully,

  
Dennis Kopitzke  
#1 Poplar Place, Box 1266  
Forsyth, MT 59327  
406-346-1488  
djk\_7491@rangeweb.net

## Comment Period Two: 1 & 2 Pond Closure

My name is JIM POSEWITZ  
first name last name

My address is 219 VAWTER ST  
street

Helena MT  
city or town state

Jim.posewitz@bresnail.net (406) 441-2795  
email phone

Dear Shaun McGrath, MT, Dept. of Environmental Quality:

Comment: Dear Shaun, see comments  
made re: ponds 3 & 4. The  
point again is to store the  
toxic stuff high, dry & permanent.  
Perpetual treatment is not an  
option - One Berkeley Pit is too many!

Thank you, James H. Posewitz 11/21/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is DAVID OMEN  
first name last name

My address is 259 NUBIAS PL.  
street

BILLINGS MT  
city or town state

PERFECTGRACE@HOTMAIL.COM  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: we are all about  
making more material things  
an example is the  
corporate tax break  
it is time for us  
to protect Mother Earth

Thank you, David Omen 10-1-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Leo (Dick) R. DeCock  
first name last name

My address is 225 Highway 39 59327  
Four L Land + Livestock street  
Forsyth city or town MT state

djdecock@trageweb.net email 406-356-2464 phone  
406-201-0055

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Let's do this Ashponds right- not  
draw and them. I'm A 3rd generation  
Rancher- since 1941, I Live 28 miles North of  
the plants on Arnalls Creek. Over time  
the water has got worse. Cattle use to  
drink out of the creek but now walk  
across the water & drink out of water  
trunk from well water, which is not  
the best. Lets fix these Ash Ponds right!  
We use to have frogs & turtles in the  
creek & some trash fish. but no longer. They  
have disapperad.

Thank you, Leo R. DeCock 10-02-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Brian Shavers  
first name last name

My address is 210 S. California  
street

Helena MT.  
city or town state

sholace@848@  
email gmail.com phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Each minute 367 gallons of polluted water leaks from the ponds polluting the local aquifer, these ponds need to be drained and toxic soil removed.

Thank you, Brian Shavers 10/9/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Gary & Judy Matson  
first name last name

My address is PO Box 308  
street

Missoula MT 59851  
city or town state

gmatson@montana.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: In the early 1970s we opposed the building  
of Colstrip 3&4, in public programs in Missoula.

One reason was leakage from ash ponds. A  
Montana Power engineer objected, saying  
that concern was "groundless." Please remove  
the ash, dewater, and store "high quality."

Thank you, G. Matson Judy 10/5/19  
signature Date  
Matson

## Comment Period Two: 1 & 2 Pond Closure

My name is DAVID OMEN  
first name last name

My address is 259 NUBIAS PL  
street

BILLINGS MT  
city or town state

PERFECTGRACE@HOTMAIL.COM  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: IN OUR DRY AND

WINDY MONTANA

CLIMATE, I WANT

A GOOD PLAN TO

STOP WIND EROSION

OF COAL ASH

Thank you,

David Omen  
signature

10-24-19  
Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Connie Keogh  
first name last name

My address is 211 Eddy Ave.  
street

Missoula MT  
city or town state

conniekeogh33@gmail.com 406-298-0985  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Thank you in advance from all

Montanans, and those <sup>not</sup> directly affected  
by the decision you make concerning  
a long-term cleanup and closure plan  
for Colstrip 1 & 2. Please permanently  
store the coal ash - High & dry. It  
is time to fix this environmental  
hazard forever! A cleanup ~~that~~  
that permanently repairs ground-  
water will create many jobs. The  
existing ~~work force~~ <sup>work force</sup> can be assured  
that they will have good paying jobs.  
Connie Keogh 10/20/19  
Thank you, signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Deane McRAE  
first name last name

My address is 3952 Rosebud Cr. Rd.  
street

FORSYTH MT  
city or town state

477-6655  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: At a site visit to the 1 + 2

disposal ponds, it was disclosed that  
vegetation growing on the capped pond  
tested for elevated levels of boron.

To eliminate this type of concern the  
ash should be removed and covered.

Thank you,   
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Martha Adkins  
first name last name

My address is 1076 Hwy 89 South  
street

Gardiner Montana  
city or town state

406-848-7224  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: only at night and for naps

shield goes on for a week

2:00 do drops 5 min. <sup>apart</sup> Today

4 Good water is as important as

6 good eyesight after a

8 cataract operation!

Thank you, Martha Weaver Adkins  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Bill DeGrat  
first name last name

My address is 96 Carbon Circle  
street

Red Lake MT  
city or town state

billdegrat@gmail.com (630)-750-1040  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: As a retired chemist and

a former resident of Mobile, AL, a  
community ravaged by coal ash contamination  
return I am aware of the dangers  
of coal ash. No coal combustion is best  
but wet storage is a disaster.

Thank you, Bill DeGrat Sept 21, 2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Keyle Grans  
first name last name

My address is 242 Blvd  
street

Billings MT  
city or town state

Keylegrans@glblw.com 970-776-2118  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: please clean up and

close Coalstrip ash ponds.

Save our water and environment

Thank you, Keyle A. Grans 9/29/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is ROBERT LINDSTROM  
first name last name

My address is 535 LAKEVIEW RD  
street

WEST yellowstone MT  
city or town state

BLINDSTROM@WYLLOWSTONE.COM  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: THANK YOU FOR

DOING YOUR JOB!

COAL POLLUTION IS KILLING

THE ATMOSPHERE!

Thank you, [Signature] 10/01/2019  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Fred LaBeau  
first name last name

My address is 1419 N. River Rd  
street

Laurel MT  
city or town state

N/A 628-7208  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: What will we leave  
our grandchildren?

Thank you, LaBeau 9/30/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Claudia S. Brown  
first name last name

My address is 520 Dearborn  
street

Missoula MT  
city or town state

c4775@icloud.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: \_\_\_\_\_

I want reassurance that DEQ  
is not in the pockets of M W Energy.

Store the Colstrip ash ponds

High And Dry!

Fix the groundwater Permanently!

Thank you, Claudia S Brown  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Susan Miles  
first name last name

My address is Co 13 Hollins Ave.  
street

Helena MT 59601  
city or town state

suesmiles44@gmail.com  
email phone

402-465-3148  
Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Here's my vote for

a long-term cleanup

of the ash ponds @

Culstrip. If you do it

right - we all win.

Thank you, Susan Miles 11/20/14  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Elizabeth Vandukost  
first name last name

My address is 1003 Victory Ave  
street

Billings MT 59105  
city or town state

env032@charter.net 245-5218  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please remove the coal ash  
that has been contaminating our water &  
Fix the problem permanently so life  
can go forward in the future without  
the constant massion roulette quality  
we don't enjoy now.

Thank you, Elizabeth Vandukost 9/30/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Jay Singer Petla  
first name last name

My address is 3030 Glenvar Ave.  
street

Billings MT-02  
city or town state

(406) 655-9285  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Do the right thing

for MT & it's future.

Clean up the mess!!!

MT should not become

a toxic wasteland for

our kids, pets, wild life. We

Thank you, D. M. Singer Petla 9/21/19  
signature Date

take care of our home-MT!!

## Comment Period Two: 1 & 2 Pond Closure

My name is CATRIONA SIMMS  
first name last name

My address is 910 RONALD AVE  
street

MISSOULA MT 59801  
city or town state

cjms42@gmail.com 4063780702  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I AM A 77 year old

Resident of Montana & a  
grandmother who cares deeply  
about our environment -

We need to ensure that Colstrip  
is cleaned up. This is an  
enormous job that will take  
years - and also create jobs as  
the mine closes. We must protect  
the aquifer - Please ensure  
that that coal ash is stored high  
& dry.

Thank you, Catriona Simms  
signature

Date ~~10/16~~ 11/6/19

## Comment Period Two: 1 & 2 Pond Closure

My name is Ita Killeen  
first name last name

My address is 1504 50 3rd Ave  
street

Bozeman MT  
city or town state

ikilleen@bridgergeoplan.com  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Permanent high + dry cleanup  
of Colstrip Ashponds will secure the  
water quality of local ranches + communities  
The companies that have profitted from  
mining Colstrip should pay for  
this clean up.

Thank you, Ita Killeen 11/7/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Becky Piske  
first name last name

My address is 303 State  
street

\_\_\_\_\_  
city or town state

\_\_\_\_\_  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please just clean  
up this mess for good.  
It is time to clean up  
the ash ponds of Colestrip.

Thank you, Becky Piske 4/18/19  
signature Date

# Comment Period Two: 1 & 2 Pond Closure

My name is GAROLD LAZAROWSKI first name JENNIFER ROHRER last name

My address is 5448 HWY 83 N street

SERLEY LAKE city or town MT state

ROHRERVID@AOL.COM email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: PERMANENT CLEAN UP

Creates JOBS - Fix it forever,

STORE it High AND Dry

Thank you, Garold A Lazarowski signature Jennifer S. Rohrer Date

## Comment Period Two: 1 & 2 Pond Closure

My name is CURT & SANDY HANEY  
first name last name

My address is 2405 GRANITE  
street

BILLINGS MT  
city or town state

CURTSANDYH@GMAIL 656-1569  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: LET'S FIX THE PROBLEM

NOW & FOREVER. DRY IT

OUT & STORE IN LINED

LANDFILL - NO "CAP IN

PLACE!" LOTS OF JOBS

HERE!

Thank you Sandy Haney  
signature  
Curtis B. Haney Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Charles Bertsch  
first name last name

My address is 35679 Memory Lane  
street

Polson MT  
city or town state

cbertsch@gmail.com 406-883-2177  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Store it High and Dry

Fix it For ever

Make permanent

cleanup and create jobs.

Thank you, Charles Bertsch 10-2-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Steven D. McArthur  
first name last name

My address is 3406 W. Central Ave.  
street

Missoula MT.  
city or town state

stevemcarthur@aol.com 406-370-4653  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I want Remediation Cleanup  
that will restore groundwater & create  
good jobs for the local people  
here in Montana!

We have a Constitutional Right to  
a Clean Environment! Do the right thing

Thank you, Steven D. McArthur 9/30/19  
signature Date

**Comment Period Two: 1 & 2 Pond Closure**

My name is Margaret Beeson  
first name last name

My address is 322 yellowstone Ave  
street

Billings MT 59101  
city or town state

mbeeson@yuncnative.com  
email phone

4066957959

Dear Shaun McGrath, MT, Dept. of Environmental Quality:

Comment: There is no question  
that this pond needs  
to go & be handled  
proper for all  
generations to come

[Signature] 9/21/17  
signature Date

Thank you.

## Comment Period Two: 1 & 2 Pond Closure

My name is \_\_\_\_\_



Thomas Graff

\_\_\_\_\_ name

My address \_\_\_\_\_

824 Beverly Ave

Missoula, MT 59801

\_\_\_\_\_ city or town

\_\_\_\_\_ state

graffitic@bigsky.net

\_\_\_\_\_ email

406.543.3305

\_\_\_\_\_ phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I totally support Northern Plains proposals to clean up the coal ash ponds. It should be done the right way to protect ground-water in the area. I don't think that I can improve on J.R. Bradley's remark: "You can't cap a rotter tooth, it needs a root canal."

As a grandfather who has paid taxes for decades, I want more sustainable solutions. I have paid for too much for the perpetual pollution in our state, beginning w/ Zertman.

Thank you, \_\_\_\_\_

\_\_\_\_\_ signature

10/28/2019 Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Earleen Stanwarty  
first name last name

My address is 117 Custer Ave  
street

Billings MT  
city or town state

\_\_\_\_\_ phone  
email

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Fix it forever. Don't

risk further pollution of the  
groundwater. Permanent  
clean up creates jobs.

Thank you Earleen Stanwarty 10-24-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Anne Greene  
first name last name

My address is 303 Tremont St.  
street

Missoula MT  
city or town state

annegreenerster@gmail.com 406-721-1941  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Please do the right

thing and cleanup the coal

ash ponds at Colestrips so they

are permanently prevented

from polluting the surroundings

Cap-in-place is NOT a good  
option.

Thank you, Anne Greene 23 Oct '19  
signature Date

## Comment Period Two: 1. & 2 Pond Closure

My name is \_\_\_\_\_  
first name last name

My address is \_\_\_\_\_  
street



John M. Herbert  
5759 W Fork Rd  
Darby, MT 59829

email

phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment:

Coal ash storage must be permanent  
as "Dry & Dry". Do it right the  
first time to prevent future  
contamination.

Thank you,

signature

Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Ms. Sarah Neiter  
first name last name

My address is 340 Moccasin Trail  
street

Billings MT  
city or town state

NE-2020@mail.com (515)  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: \* Priority: Farming/Ranching

I would like to see

permanent clean up.

I want my Nation Clean.

Think Jobs!

Thank you-

Thank you, Sarah Neiter 10/1/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is JACQUELINE CRANDALL  
first name last name

My address is 78 TURNER RD  
street

ROBERTS MT  
city or town state

LWACO.WALT@GMAIL.COM 406-446-3996  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: Store it High and Dry;  
Fix it forever Permanent  
Clean up Creates jobs.  
MAKE SURE THE COAL  
COMPANIES PAY FOR IT!!

Thank you Jacqueline Crandall 10/1/19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is Lana Sangmeister  
first name last name

My address is 3514 Stanley Coulee Way  
street

Nje MT  
city or town state

Kidstravel@nemenet.net 406-328-4843  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: As a fellow MT landowners

living around industrial waste, I know  
how important it is to completely clean  
up the ash pond contamination for  
all time. Stop the decades long  
contamination!

Thank you, Lana Sangmeister 10-1-19  
signature Date

## Comment Period Two: 1 & 2 Pond Closure

My name is William H. Geer  
first name last name

My address is 6135 Delarka Dr  
street

Lolo MT 59847  
city or town state

whgeer@bridgemail.com (406) 396-0909  
email phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: I'm a retired fish & wildlife biologist with long experience in water pollut, or harm to fish & wildlife. The original cap-in-place of the ash pond failed in 1997, and the pollution risks to wildlife, cattle and humans is high and severe. We must move ~~the~~ coal ash to a "high & dry" place. The ash pond removal project will create more and better jobs for Colstrip workers than the temporary cap-in-place fix.

Thank you, William Geer 10-23-19  
signature Date

Comme

id Closure

My name is

JO A. GREATHOUSE  
824 BEVERLY AVE.  
MISSOULA, MT 59801

~~\_\_\_\_\_~~  
st name

My address is

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

MISSOULA

MT

city or town

state

graffiti@bysky.net

406.543.305

email

phone

Dear Shaun McGrath, MT. Dept. of Environmental Quality:

Comment: As a grand mother, I know the importance of clean water and healthy environments. The "cop in place" solution failed in 1997. Why repeat that bad idea. Other states have dealt with their coal ash problems in a responsible way providing a long term solution. Why can't Montana do this?

Thank you,

Jo Greathouse

signature

10/28/19

Date



-WOHEHIV-  
The Morning Star

**NORTHERN CHEYENNE TRIBE  
ADMINISTRATION**

P.O. Box 128  
LAME DEER, MONTANA 59043  
(406) 477-6284  
FAX (406) 477-6210



-WOHEHIV-  
The Morning Star

December 13, 2019

*Submitted electronically to [DEQColstrip@mt.gov](mailto:DEQColstrip@mt.gov) and [sedinberg@mt.gov](mailto:sedinberg@mt.gov)*

Sara Edinberg  
Waste Management and Remediation Division  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620

Ms. Edinberg,

On behalf of the Northern Cheyenne Tribe, I submit the following comments to the Montana Department of Environmental Quality (“DEQ”) in response to the October 2019 Revised Remedy Evaluation Report (“RER”) Part I for the Units 1&2 ponds at Colstrip, which was submitted to DEQ by Talen Energy.

Introduction

The Northern Cheyenne Tribe (“Tribe”) is a federally recognized Indian tribe that occupies the Northern Cheyenne Reservation (“Reservation”), which encompasses over 444,000 acres of land in southeastern Montana. The Units 1&2 ponds are in close proximity – about 14 miles – to the northern boundary of the Reservation and are within the ancestral territory of the Northern Cheyenne people. Additionally, there is a sizable Tribal-member population in the town of Colstrip and nearby areas. As the Colstrip population decreases with the closure of the plant and, consequently, Colstrip property values decrease, the Tribe expects more of its membership to relocate to Colstrip given the paucity of inadequate housing stock on our Reservation.

As expressed in the attached Tribal Council Resolution DOI-054 (2019), the Tribe hereby urges DEQ to:

- take strong measures to protect against environmental harm from the Units 1&2 ponds including removal of the coal ash, recycling any usable coal ash, and storing the remainder in a properly lined landfill; and
- require that Talen and its contractors implement a Northern Cheyenne preference when hiring for the above-referenced work.

The Tribe also requests that the RER include financial assurance to cover the costs of long-term and likely perpetual pumping, including, for instance, through the endowment of a trust fund.

**LITTLE WOLF AND MORNING STAR – Out of defeat and exile they led us back to Montana and won our Cheyenne homeland that we will keep forever.**

In support of these requests, we explain below: (1) the important place of water in the Tribe's culture; (2) the many efforts that the Tribe has undertaken to avoid or limit the environmental and socioeconomical impacts of the Colstrip plant, including employment preference contracts and environmental protections; and (3) why the RER put forth by Talen Energy is inadequate.

In this letter, we cite *The Northern Cheyenne Tribe and its Reservation* (2002), which is a report of the Tribe that was provided to the United States Bureau of Land Management and Montana Department of Natural Resources and Conservation to protect against impacts on water and other resources that could have been impacted by then-proposed large-scale coal bed methane development in southeastern Montana. With this letter, we are providing a copy of that report, which is an important resource we encourage DEQ to rely upon in granting the Tribe's above requests. Also, we incorporate by reference the technical analysis and findings prepared by KirK Engineering & Natural Resources, Inc. and strongly encourage that they be given substantial consideration and weight.

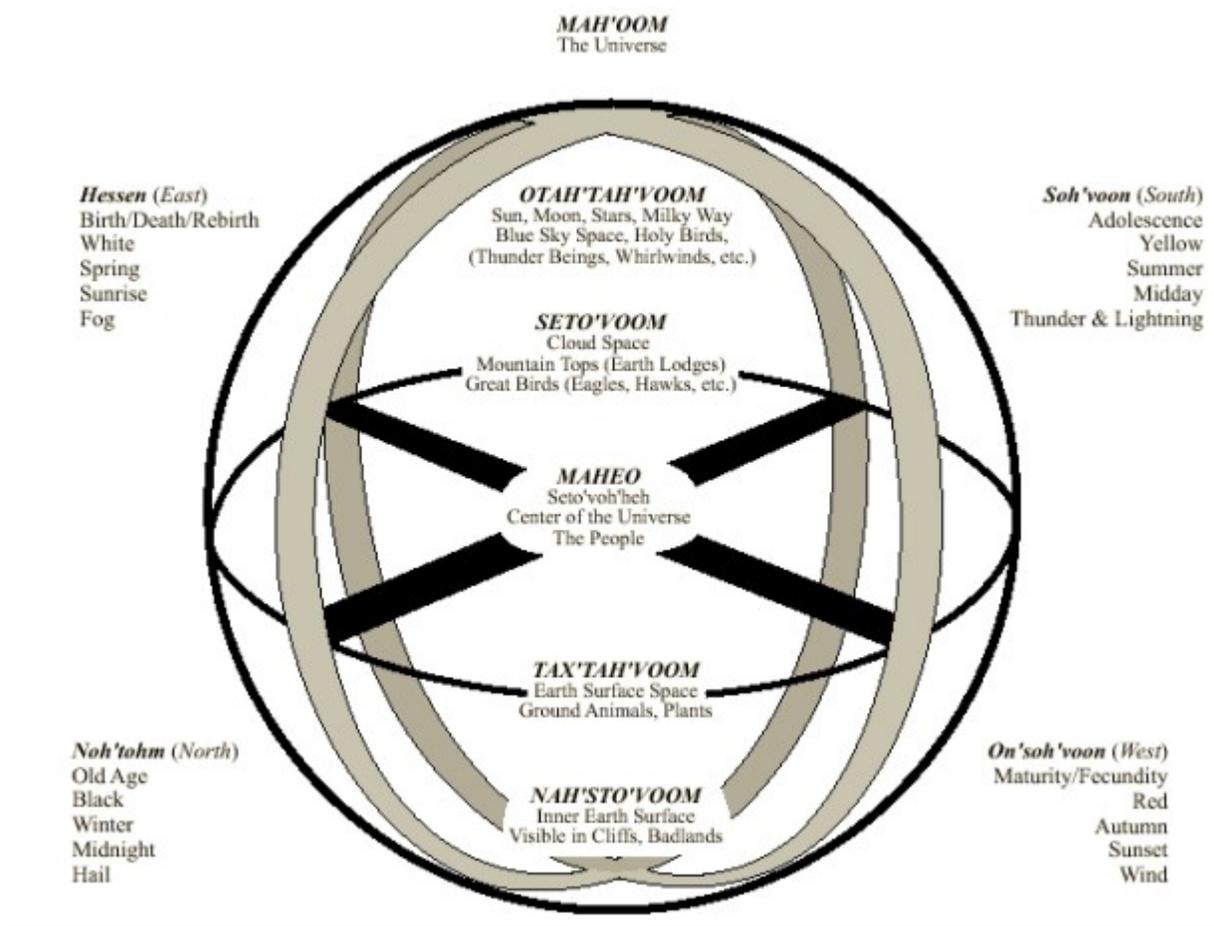
#### Water is Central to the Northern Cheyenne<sup>1</sup>

According to Cheyenne cosmology all things are related. People, land, water, animals as well as rocks, minerals and fossils all have a spiritual connection to each other. As a result, the Northern Cheyenne use the term cultural site to include water resources, plant gathering areas, hunting areas, as well as mineral (paint) and fossil sources.

To understand the cultural importance of natural resources to the Northern Cheyenne, one must first understand the Cheyenne cosmology. To review the basic Cheyenne cosmology (discussed in Chapter 2 of *The Northern Cheyenne Tribe and its Reservation*), *Maheo*, the epitome of energy and spirituality, is contrasted with *Heestoz*, the symbol of substance and matter. Both are sacred and necessary for the continuation of the universe. Maleness and zenith, the highest point in the universe, are associated with *Maheo* just as femaleness and nadir, the lowest point in the universe, are associated with *Heestoz*. (The term *Heh'voom* is used when referring to the animate female principle.) These concepts are understood to be complimentary and balanced in the universe. At the same time that aspects of the *Maheo*, like the Sun, grandfather to the Cheyenne, are associated with zenith, he is also understood to be everywhere. He is the creative expression of the universe and the spiritual essence of the universe. When the *Maheo* interacts with the earth (grandmother) – *Heh'voom* they bring about all life. The below figure illustrates the basic structure of the universe.

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<sup>1</sup> This Section relies heavily on Section III of Chapter 7 of *The Northern Cheyenne Tribe and its Reservation* (2002).

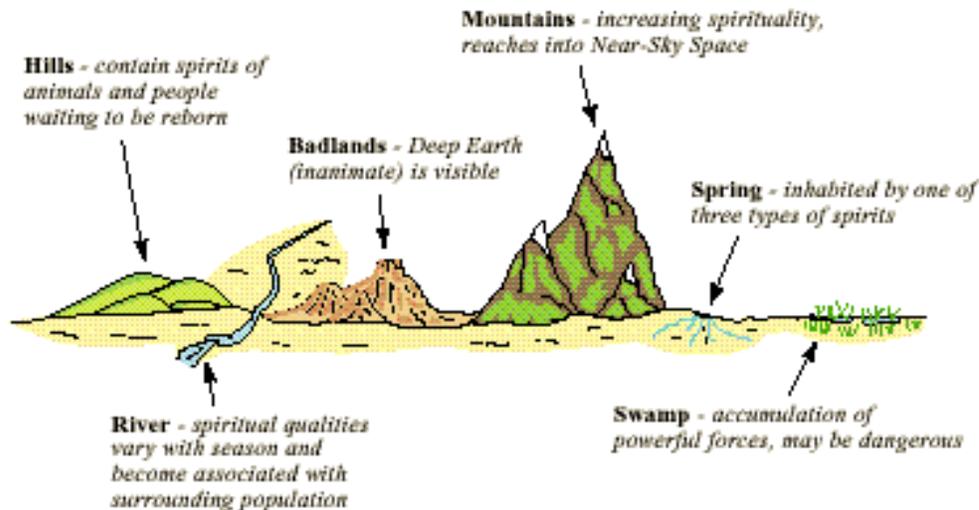


Between these two points there are several levels or spaces. These are the Blue-Sky Space (*Otah'ta'voom*), the Nearer-Sky Space (*Novah'voom*), the Atmosphere (*Tax'tah'voom*), the Earth-Surface Dome (*Matah'voom*) and Deep Earth (*Nah'stoh'voom*). The Blue-Sky Space contains the sacred manifestations of the *Maheo*, including the sun (grandfather), the night sun (the moon [mother]) and the Milky Way, which is the road to the land of the dead. The stars in the Blue-Sky Space are brothers and sisters of the Cheyenne. Those creatures, primarily the Great Birds (eagles, hawks, dragonflies and butterflies), that mediate between man and the sacred forces of the Blue-Sky Space, inhabit the Nearer-Sky Space. Nearer-Sky Space contains dust devils, clouds, birds, tornadoes and high places like mountaintops. Some Northern Cheyenne refer to mountain tops and hills as “earthlodges.” These are natural landscape features that are “power points” or favored locations for fasting, praying and making offerings. They are favored because they are associated with increasing spirituality. “Earthlodges” reach into the *Setovoom* where the mediators (eagles, hawks, dragonflies, butterflies) between *Maheo* and humans live.

The Atmosphere is in direct contact with the Earth-Surface Dome. This is the area in which dust rises, objects can be thrown, and insects fly. The Earth-Surface Dome is animate and extends to the roots of the prairie grasses. It is characterized by living things that are

useful to humans who derive their material and spiritual existence from this environmental setting.

The below figure illustrates the basic cosmological qualities of visible topographic features in the Earth-Surface Dome. First, the earth's surface is animate. Hills contain the spirits



of animals and people waiting to be reborn. Extinct species are those that *Maheo* does not allow to be reborn. The present increasing rate of extinction of species is explained

by the fact that *Maheo* is withholding the animals in order to protect them from the destruction caused by the actions of industrial development. Exposed cliffs or badlands are Deep Earth and are inanimate. Mountain tops and other high places are places of increasing spirituality because they reach the realm of Nearer-Sky Space. Surface water is alive, ever moving, and has spiritual qualities. Springs are the homes of spirits. Offerings are commonly left at springs today. For example, there is one on the divide between Birney and Lame Deer that the Birney people leave offerings at and clean up when it is polluted by vandalism. There are three varieties of spirits that live in springs. The first have short brown hair/fur, like prairie dogs. The second type is white and furry. They do not want to associate with anyone. Thunder always strikes around them. People should not frequent springs associated with these spirits. The third type is black. These spirits/animals come out to pay their respects when ceremonies are held.

Deep Earth is dead and sterile earth; it is basically all substance and, hence, most female. It is visible to man in cliffs and in the badlands. It is characterized by being spiritually inert. Animals that live in caves and burrow into dead earth (such as bears and badgers) are considered female. While badgers and bears are important as symbols of the Deep Earth, buffaloes receive the most attention in all sorts of Cheyenne ceremonies and religious thought. Buffaloes live in great caves under the surface and they present themselves to be killed whenever *Maheo* wants to bless the Cheyenne. The Sacred Buffalo Hat embodies the female principle as it relates to buffaloes.

Water systems have always played a central role in Tribal lifeways and beliefs, to the

present day. Springs, rivers, swamps and ground water are living beings with spirits. According to the 2001 Northern Cheyenne Reservation Survey on Traditional Economy and Subsistence, over 97% of the people believe that springs have spiritual value. Furthermore, over 90% recognize that water is very important to their social, economic and spiritual way of life. As one elder stated, “The conceptual meaning of water to us would be the physical manifestation of the essence of life, of life itself, the fabric of life.” And, the Sacred Buffalo Hat “came to us out of the waters.”

The Northern Cheyenne communicate with these spirits. The ongoing traditional cultural importance of these water locations can be seen in the respect shown to these locations and in the offerings made at these locations. Routine archaeological surveys on the Reservation always consider water sources relative to the survey boundaries. For example, when U.S. 212 was widened east of Lame Deer, a survey documented the ongoing use of three springs for traditional cultural purposes and design changes were made to avoid affecting these areas.

The traditional water drum is still used by the members of the Native American Church. As one elder stated, “When you take those drums apart after ceremonial use, the breath of life comes out of them.” Water drums must be taken apart after every ceremony. The water must be disposed of in a ritually specific fashion. Water is also associated with the turtle. The turtle is good to eat and is always associated with ceremonies. Some of the sweat lodges are patterned after the turtle and its longevity. These sweats are made for long life.

The Northern Cheyenne recognize the spiritual qualities of ground water. There are special prayers for digging wells. Ground water represents the quiet nature of the earth. It should not be disturbed. Swamps are filled with many spirits and may be dangerous due to the accumulation of power at these localities.

In addition to the major efforts detailed in the next section below, the Northern Cheyenne government has taken many actions to protect water on and under the Reservation on a daily, monthly and yearly basis through its governmental programs, most prominently its environmental departments. This includes surveys of wetlands and springs, and adoption and enforcement of water and solid waste codes.

#### Tribal Efforts to Maintain its Maintain its Homeland and Surrounding Natural Environment Since Settlers Arrived

Beginning in the early 1800s, large numbers of settlers and gold seekers began to move into southeast Montana. These early settlers and miners brought with them diseases that ravaged large numbers of Cheyenne people. They also brought European cattle, which began to disrupt the grazing and migration patterns of the buffalo, which the Northern Cheyenne relied on for subsistence and ceremonial purposes. These encroachments, which did not respect the territorial and cultural interests of the Cheyenne and other Indian people, resulted in decades of war. *The Northern Cheyenne Tribe and Its Reservation* at 2-12 (Apr. 2002).

In the mid-1800s, there were numerous attempts to remove the Northern Cheyenne from their homeland near the Tongue River and relocate them to other parts of the west. For example, the 1851 Treaty of Fort Laramie anticipated the removal of the Cheyenne to lands south of the North Platte River; however, following treaty execution, many Northern Cheyenne people continued to live and hunt in their traditional homeland, leading to escalating conflict and violence in the 1850s. In 1861, the U.S. government again attempted to relocate the Northern Cheyenne to the south, but the Northern Cheyenne refused to abandon their traditional hunting grounds and continued to resist the commercial and military intrusions into their territories. Conflict continued into the 1870s, as the U.S. military sought to open the Cheyenne lands to settlers and gold miners, and the Northern Cheyenne sought to protect their lands and traditions from encroachment. These conflicts include the 1876 Battle at Little Big Horn, where the Northern Cheyenne allied with the Sioux and Arapaho to defeat General George Armstrong Custer and the U.S. Seventh Cavalry. They also include the Battle of the Tongue River in 1877 (also known as the Battle of Wolf Mountain), where a group of Northern Cheyenne battled a detachment of the Fifth Infantry along the east bank of the Tongue River near the present-day location of Birney. Following these conflicts, many Northern Cheyenne were forcibly relocated to Oklahoma. *The Northern Cheyenne Tribe and Its Reservation* at 2-12 to 2-17.

The Northern Cheyenne resisted these repeated attempts to remove them from their homeland and have maintained their connection to the lands near the Tongue River. In 1878, following the relocation to Oklahoma, Chief Dull Knife and Chief Little Wolf led bands of Northern Cheyenne on a long and arduous return trip from Oklahoma to their traditional homeland. In the late 1870s and early 1880s, the Northern Cheyenne began to reestablish themselves in areas near the Tongue River, settling on Lame Deer Creek, Muddy Creek, Rosebud Creek, and the Tongue River between Otter Creek and Hanging Woman Creek. Recognizing the importance of this area to the Cheyenne people, President Arthur signed an executive order on November 16, 1884, establishing the Tongue River Indian Reservation, which at that time did not include lands settled by the Northern Cheyenne on the Tongue River itself. However, in 1900, President McKinley signed an executive order changing the name of the Reservation to the “Northern Cheyenne Reservation” and extending the eastern boundary of the Reservation to its current location on the Tongue River. Tom Weist, *A History of the Cheyenne People*, at 103-105 (1977); Orlan J. Svingen, *The Northern Cheyenne Indian Reservation, 1877-1900*, at 145-146 (1993); *The Northern Cheyenne Tribe and Its Reservation* at 2-17 to 2-19.

Despite establishment of the Reservation, Northern Cheyenne lands and culture remained under threat throughout the 20th century. The early 1900s saw the forced acculturation of the Northern Cheyenne people through federal policies that prohibited or discouraged traditional cultural and religious practices and sent Cheyenne children to boarding schools where they were forbidden to speak their native language. In the mid-20th century, mining companies began to express interest in developing coal reserves on the Northern Cheyenne Reservation. The first coal sale on the Reservation took place in 1966, and by 1971 lease options were held by mining companies to virtually the entire unallotted portion of the Reservation. However, review of these leases revealed that the financial terms were below fair market value and the leases were issued in violation of various federal laws, including NEPA. In 1973, the Northern Cheyenne Tribal Council formally petitioned for cancellation of the lease agreements, and in 1974 the Secretary

of the Interior issued a decision suspending coal development on the Reservation. Ultimately, pursuant to legislation passed by Congress at the Tribe's request, the leases were cancelled. Around the same time, the Tribe began to fear that individual Tribal members would attempt to lease allotted lands for coal development and requested that Congress terminate the grant of mineral rights to allottees and reserve mineral rights on the Reservation "in perpetuity for the benefit of the Tribe." Congress took action conditioned on a judicial determination that the allottees did not have vested rights to the mineral deposits under the 1926 Northern Cheyenne Allotment Act. In *Northern Cheyenne Tribe v. Hollowbreast*, 425 U.S. 649 (1976), the United States Supreme Court confirmed that the 1926 Act did not give allottees vested rights to the mineral deposits on the Reservation and the Tribe formally regained control of the mineral rights underlying the Reservation. *The Northern Cheyenne Tribe and Its Reservation* at 2-26 to 2-28.

The Tribe has not developed its on-Reservation coal resources and has resisted attempts to develop off-Reservation resources in the Tribe's traditional homeland. In the 1970s, as a result of the plan to construct two 750-megawatt coal-fired generators in Colstrip, the Tribe became the first governmental entity to voluntarily classify its air shed as "Class 1" under the federal Clean Air Act, a designation that had previously been applied only to national parks and wilderness areas. In the 1980s, the Tribe successfully challenged a massive sale of federal coal in the Powder River region on the grounds that the sale breached the trust responsibility to the Tribe, violated federal coal leasing regulations, and violated NEPA. In 1996, the Tribe joined forces with other groups to successfully challenge the proposed extension of a mining permit for the proposed Montco mine. *The Northern Cheyenne Tribe and Its Reservation* at 2-28 to 2-30.

In the 2000s, the Tribe led successful litigation in federal and state courts to protect water quality in the Tongue River from impacts associated with coal bed methane operations. This included a successful federal court litigation challenging federal approval of full-field coal bed methane development surrounding our Reservation and enforcing Tribal consultation requirements in the National Historic Preservation Act. The Tribe also successfully challenged the State of Montana's issuance of water discharge permits to the coal bed methane industry in violation of the federal Clean Water Act.

In 2014, the Northern Cheyenne Lands Act, as part of the National Defense Authorization Act, was passed by Congress and signed into law, which corrected an error made by a federal agent who failed to follow the direction of Congress and acquire ownership of 5,000 subsurface acres within the newly-expanded Reservation. The Act transferred title to those subsurface acres from a coal company to the Tribe, thereby granting the Tribe complete control over its subsurface and any development thereof.

Soon thereafter, the Tribe, along with other entities, submitted comments to the United States Surface Transportation Board criticizing the proposed Tongue River Railroad which would serve the proposed Otter Creek coal mine. The Tribe emphasized the environmental, biological, socioeconomic, and other adverse impacts the railroad proposal would have on the Tribe and its members. Within months of the Tribe's comments, the railroad project proponent abandoned the project.

### The Unfortunate History of the Coal Ash Ponds

In January 1973, at a hearing in Miles City on the proposed coal ash disposal ponds for Colstrip Units 1&2, there was testimony that wet disposal of coal ash in scoria soil would result in leakages. In the following years, citizens continued to raise this issue and to demand that state agencies evaluate how Montana Power Company would control ash pond leakage. During hearings prior to initial construction of Units 1&2, local landowners gave examples of stock reservoirs not holding water due to porous substrate and soils, and recommended that dry ash storage be used to contain the contaminants in the coal ash. These recommendations were dismissed by the Colstrip plant owners and largely ignored by state agencies permitting the ponds.

The current system to control groundwater pollution relies on pump-back wells and is a temporary solution that does not address the root cause of the pollution – the leaking ash ponds. Talen proposes to contain pollution with capture wells rather than stop the pollution at its source. The pumps pull roughly 750 gallons of groundwater per minute, or 1,080,000 gallons per day, out of the aquifer to prevent the pollution from spreading according to capture well data contained in Talen Energy's Site Characterization reports. The source of pollution needs to be eliminated. The owners have been allowed to operate for four decades now in direct violation of Montana water quality law and the plant's original Major Facility Siting Act permit. The owners' and state's failure to act has made a bad problem worse.

This temporary approach to cleanup has created a permanent and once-avoidable problem in the form of bedrock aquifer contamination. The state cannot afford a "wait and see" approach with this cleanup. It is time to require aggressive source control measures that dig out the coal ash sitting in the ground water and move it to a lined landfill above the water table. To protect groundwater, DEQ cannot leave unlined or leaking coal ash ponds sitting in the water table. It will need to exercise the agency's authority as outlined in Article XIII, Section D, of the AOC throughout the RER approval process in order to protect the community's long-term health and safety and to require Talen Energy execute a responsible cleanup.

Agriculture in the Armells Creek watershed has suffered from pond leakages that have introduced high sulfate and Total Dissolved Solids (TDS) concentrations to the aquifer, and from the excessive pumping of uncontaminated groundwater to limit the spread of the contamination plume. While pumping may now be situationally necessary, it comes at a meaningful cost. The capture system daily contaminates ever more groundwater, as virgin groundwater is pumped out from the ground via capture wells and piped into storage ponds where it mixes with coal ash. According to DEQ's leakage estimates, 367 gallons of contaminated water leak per minute from the Colstrip ash ponds. The capture system, however, pumps an estimated 750 gallons of water per minute out of the aquifer according to Talen Energy's estimates in the Site Characterization Reports. We are then needlessly contaminating roughly 483 gallons of fresh groundwater per minute just to control the spread of pollution, as virgin groundwater is pumped out from the aquifer and transported for storage in the coal ash ponds, where it becomes contaminated.

Citizen lawsuits from adjacent landowners to the Units 1&2 ponds in 2008 resulted in a \$25 million settlement for damages caused by pollution from the leaking coal ash ponds. The lawsuit, however, did not result in a permanent fix to eliminate future leakages. DEQ has never required a permanent fix, only requiring expansion of the capture system to remove more groundwater in an effort to control the spreading pollution. While there are active remediation proposals in the RER, including critical *in-situ* flushing, the Preferred Alternative does not include the single most important strategy needed to remediate pollution at the Units 1&2 ponds – source removal of coal ash. Source removal is the only proven technology that will keep coal ash at the Stage Two Evaporation Ponds (STEP) out of contact with groundwater over the long term and safeguard the region's water resources.

DEQ comments to Talen Energy dated April 22, 2019 requested that source removal be thoroughly evaluated as a remediation technology for the Stage One Evaporation Ponds (SOEP). However, no alternatives in this RER evaluate source removal for the *other* pond complex associated with Units 1&2 – STEP – even though available data indicate the water table intercepts coal ash there also. For the same reasons that SOEP ash will remain a continual, long-term source of contaminants of interest (COIs) if left in place, STEP ash will continue to release COIs for thousands of years unless it is moved to a new landfill above the water table.

DEQ is not limited to approving only alternatives provided to you by Talen Energy. Indeed, Talen Energy has provided no alternative guarantees a healthy future for Colstrip and meets clean-up criteria within the AOC boundary for the Units 1&2 site, as defined in the Cleanup Criteria and Risk Assessment report (for example, bringing concentrations of Boron and Sulfate down below 4 mg/L and 3000 mg/L, respectively, in the Alluvium). Even Talen Energy admits that their seemingly preferred alternative, Alternative 5, will result in pollution levels exceeding preliminary clean-up criteria *50 years* after they have begun their remediation efforts (see, for instance, page xiii of RER which state: “As such, Alternative 5 includes MNA and institutional controls to address the small isolated Near-Source areas that do not attain the PCC, and the Distal Areas within the Plant Property boundary where the boron plume reemerges after the injection/capture system is shut down.”).

### Deficiencies in the RER

Without adequate source controls on the coal ash itself, any progress made through plume remediation stands to be reversed in future decades as a long-term source of pollution rebounds. The major deficiencies in the RER – the biggest being the lack of a source removal alternative – are summarized here:

- the RER lacks an alternative where source removal of all coal ash at STEP is evaluated;
- pond liners will not act as a permanent barrier between groundwater and coal ash;
- long-term leaching from STEP is not accurately characterized; and
- the RER lacks a plan for long-term pumping beyond 2070 is needed.

**The RER lacks an alternative where source removal of all coal ash at STEP is evaluated.** The Statement in DEQ’s April 22<sup>nd</sup> letter to Gordon Criswell that “DEQ will not accept a remedy that leaves a long-term source in place if it is in contact with groundwater” is important. Talen Energy’s present failure to evaluate source removal in the RER means they cannot possibly show they will meet this key standard. The water table is elevated above coal ash at the Units 1&2 ponds. Capping any of these ponds in place will leave coal ash in contact with groundwater long-term, making it impossible to meet AOC cleanup goals in the future.

The final remedy must include source removal of coal ash at STEP. DEQ should require this be evaluated in Part 2 of the RER. The alternatives presented by Talen Energy in this report do not allow DEQ to truly evaluate how STEP ash continues as a long-term source of COIs if it is capped in place. An alternative where both STEP and SOEP ash are removed needs to be evaluated in the Units 1&2 RER Part 2 and weighed against capping any of the ash in place. The AOC includes a clear requirement in Article XI that the RERs must contain, among other things, an “Identification and summary of feasible remedial alternatives,” (Section C.2.a). Source removal of coal ash is a standard practice for coal ash ponds that sit below the water table. In fact, state legislatures in North Carolina, South Carolina, Virginia, and Illinois have all passed laws mandating this as a requirement. Talen Energy’s failure to identify source removal of STEP ash as a feasible remedial alternative in this report means they are not meeting this important standard in the AOC.

None of the alternatives presented in the report achieve the cleanup criteria, as identified in the Units 1&2 Cleanup Criteria and Risk Assessment report, within all AOC boundaries at the Units 1&2 site. DEQ issued the AOC as an enforcement action for cleaning up the leaking 1&2 ponds, but the RER as written does not meet this important standard by leaving coal ash sitting below the groundwater table, and thus enabling future leakages. Despite four decades to resolve this issue, the Colstrip owners have failed to implement a successful strategy. An RER that includes cap-in-place closure for any of the Units 1&2 ponds that are below the water table constitutes a “wait and see” approach. The real work of the AOC – digging up coal ash – cannot be put off into the future as that would force the state to claw back funding from companies that no longer have active operations in Montana.

DEQ must require Talen Energy to include a source removal alternative in Part II of the report. The AOC process is itself an enforcement action, and the RERs are the single biggest decision-making piece of that process. It is therefore critical that DEQ view enforcement as a central theme of the RER-approval process and ensure a source removal alternative is included.

**Pond liners will not act as a permanent barrier between groundwater and coal ash.** Liners beneath STEP have been leaking for decades and will not act as a permanent barrier between groundwater and coal ash, as falsely claimed by Talen Energy in the RER. Because the water table at the 1&2 ponds is elevated above the bottom of STEP ponds, any coal ash capped in place ensures groundwater will remain in contact with a long-term source of COIs. Even if the ponds are completely dewatered and all STEP ash were temporarily dried out, clean groundwater would then well up through pathways in the liners where pond water is currently leaking out from, that groundwater would then mix with coal ash and become contaminated, and

then contaminated water would leak back out carrying COIs into the aquifer. Talen Energy estimates the HDPE liners are rated for 400 years in unexposed conditions and 36 years in exposed conditions. No matter how long it takes, when the liners eventually fail there will be a large mass of CCR freshly exposed to groundwater.

In comments to Talen Energy dated April 22, 2019, DEQ requested Talen account for horizontal groundwater flows into coal ash when modeling seepage from the Units 1&2 ponds. Talen Energy's response that "...the presence of the liners in the STEP ponds should eliminate saturated advective flow through the ash," is inadequate. A plastic liner simply will not permanently eliminate groundwater contact with coal ash. When the liners eventually fail on a large scale, groundwater contact with coal ash will be significant and result in a continual, long-term source of COIs. Talen's failure to accurately account for horizontal groundwater flows in the modeling means DEQ cannot truly evaluate how capping STEP ash in place will impact long-term AOC cleanup goals. Because horizontal flows into the STEP ponds is underestimated in the RER, DEQ cannot adequately evaluate the negative impacts of leaving coal ash in place.

**Long-term leaching of COIs from STEP ash is not accurately characterized.** Long-term leaching of COIs from STEP ash is not accurately characterized in the report, which means it is impossible for DEQ to evaluate how capping these ponds in place will impact cleanup goals. In sum, Talen argues the major source of COIs that contribute to future plume reemergence at the site are from SOEP ash, and therefore source removal is not needed at STEP. However, this does not make sense as it assumes contamination is coming from SOEP ash but not from STEP ash. Talen's decision to leave SOEP ash in place in their models is a clear attempt to minimize the negative impacts that capping STEP ash in place will have on long-term cleanup goals.

The Tribe supports dewatering of all STEP ponds as a needed first step toward excavation. Along with Cells A and E, dewatering of the Old Clearwell should be included and approved in Part I of the report because that cell is currently being filled with coal ash. However, while we support DEQ approving the dewatering in Part I of the RER, there must be clear language in the final approved RER stating this approval does not constitute a long-term source control plan for the STEP ponds. Contact between groundwater and coal ash at all Units 1&2 ponds must be addressed in Part II of the report with an alternative that evaluates source removal at all ponds.

**Financial assurance for long-term pumping and treatment beyond 2070.** The RER must include financial assurance to cover the costs of long-term, likely perpetual, pumping at the Units 1&2 ponds site to control the spread of contaminants that *in-situ* flushing does not remove including, for instance, through the endowment of a trust fund. Talen Energy's preferred alternative is not capable of meeting cleanup standards outside of the boundary of the Units 1&2 site. The low flow nature of the aquifer and decades of contaminant leakage make it difficult to remediate the groundwater. While freshwater flushing is an important tool toward removing much of the contamination, groundwater models in the RER confirm there will be a need for permanent pumping to control the boron plume from rebounding after the capture system shuts down.

Talen states several times in the RER that "...it should be noted that monitoring in perpetuity is not required for waste disposal sites." We ask DEQ to assess the validity of this claim. Several references are made in the report to "...small isolated Near-Source areas that do not attain the PCC." If Talen Energy is not required to monitor the Units 1&2 site in perpetuity, and DEQ approves a plan that does not attain cleanup criteria in the AOC boundary, we believe DEQ has formally enabled a violation of Montana water quality law in perpetuity.

DEQ should agree that this site will require perpetual pumping and monitoring and that the owners must provide financial assurance to cover those costs. New remediation technologies may be available in the future that can remove the less mobile constituents from the plume and prevent the need for perpetual pumping, but DEQ should not approve a plan that is based on that assumption. Perpetual groundwater pumping is a centerpiece of ongoing cleanups at Butte, Zortman-Landusky, and other industrial mining sites in Montana. The Colstrip power plant owners have had ample opportunity to prevent a permanent pollution problem from unfolding by voluntarily switching to dry storage. Choosing to store the coal ash in ponds has resulted in enormous pressure forcing contamination deep into the aquifers beneath the ponds for decades. There is no proof that removing those contaminants to background concentrations will ever be possible, and while DEQ must require a plan to maximize water quality, minimize degradation, and meet pollution criteria, DEQ must also prepare for the reality of ongoing water pollution by collecting a bond that will cover the cost of long-term pumping at the site. If prepared properly, the Monitored Natural Attenuation ("MNA") study that Talen Energy is completing in the coming year will be helpful in evaluating if MNA is appropriate for the Units 1&2 site, but with the data that is available today DEQ must have a plan in place to control the pollution long-term.

The circumstances surrounding industrial remediation projects inevitably change. For example, the Butte cleanup of Silverbow Creek has undergone major revisions since the project began in 1983. There must be several explicit contingency plans to reflect the uncertainty surrounding the effectiveness of the STEP underdrain in fully draining the ponds and limitations on the Hydrologic Evaluation of Landfill Performance (HELP) model used to justify meeting long-term cleanup goals. The models supporting the preferred alternative are not qualified for predictive purposes, as stated by Geosyntec in the RER. DEQ must approach remediation at the Units 1&2 site by bonding for the reasonable worst-case scenario – including, though not limited to, perpetual pumping – or accept that the state will be forced to collect funding in the future from companies that may not exist in the future. We know, and Talen Energy has admitted, that the massive pump-back well system is the only thing keeping the pollution plume from spreading into nearby Armells Creek. This begs the question: what happens when there is no more bonding to keep the pumps running? DEQ must bond for perpetual water pumping unless Talen Energy demonstrates that MNA and long-term remediation efforts will control the plume permanently.

#### Violations of the Federal Coal Combustion Residuals Rule

As written, the RER does not meet key standards contained in the 2015 Coal Combustion Residuals ("CCR") Rule, and DEQ must consider this to ensure the Administrative Order on Consent ("AOC") remedy is executed and that water and its uses are protected. Specifically, the CCR rule requires that free liquids be fully drained from ponds prior to capping (40 CFR

§ 257.60, 2015) and that the base of existing CCR impoundments be 5 feet above the upper limit of the uppermost aquifer (40 CFR § 257.60, 2015). Groundwater elevations at the Units 1&2 site are above the bottom of STEP ponds. DEQ approval of a cap-in-place remedy means the agency policy is out of line with both of these key federal standards. Anything short of source removal at these ponds provides uncertainty, risk, and prolongs consideration of this problem to a time when owners may not exist or agency leadership may seek to undermine the goals of the AOC and state and federal law.

#### DEQ Should Require that Talen Hire Northern Cheyenne as Employees and Contractors for the Coal Ash Pond Work

When the Colstrip plant was being developed, the Tribe's leaders were concerned that the Reservation community would suffer from adverse socioeconomic consequences of energy development while being unable to capture many of the economic benefits of energy development in the region. These concerns were addressed in part by the adoption of employment preferences at the Colstrip facility, which provide enhanced employment opportunities to Northern Cheyenne Tribal members. At last count, approximately 50 employees at the Colstrip facility are Northern Cheyenne members, and about 65 Tribal members are employed at the Rosebud Mine adjacent to the Colstrip facility. Put another way, approximately **18% or about 1 in every 5 jobs of Northern Cheyenne Tribal members would be lost** if the Colstrip facility closes. Such a loss would be devastating to the Tribe's underprivileged community.

Terrible economic conditions persist on our Reservation. The Reservation is located in Rosebud and Bighorn Counties and neither County has much wealth. However, economic conditions are much worse on the Reservation portions of those counties. For example, the average income per person and median household income on the Reservation are only about half of that in the non-Reservation portion of Rosebud County, Montana. The poverty rate on the Reservation is almost **35 percent** while the poverty rate in the non-Reservation portions of the County is only nine percent, and the unemployment rate on the Reservation is nearly **14 times** the unemployment rate in the off-Reservation portion of the County. These great disparities are in large part due to the lack of job opportunities on the Reservation. Despite an out of date housing stock, it is not uncommon for a dozen people to live in one household which depends on the earnings of one primary breadwinner. As a result, for every Colstrip job lost, many people on the Reservation will suffer.

A plan should be implemented to afford Northern Cheyenne Tribal members a preference in coal ash pond cleanup work to mitigate the difficult economic circumstances which will occur when Tribal members lose employment or contracts related to the Colstrip facility. The plan should include a preference for Tribal members to be notified of employment and contracting opportunities at the earliest possible time. The plan should require that those Tribal members who apply for the coal ash pond work be given a hiring preference. The plan should require cultural sensitivity training and other programs to support Tribal members and foster long-term employment for our people.

Letter to DEQ  
December 13, 2019  
Page 14 of 14

Conclusion

Because of our belief and value systems, the Northern Cheyenne Tribe and its members have made herculean efforts to protect our lands and water, including those in an around Colstrip. For those reasons, the Tribe is uniquely positioned to advocate for a proper RER. For the reasons expressed herein, DEQ should require extremely strong measures to protect further environmental harm from the Units 1&2 coal ash ponds and require that Talen and its contractors implement a Northern Cheyenne preference when hiring to implement such measures.

Sincerely,



Rynale Whiteman Peña  
Tribal President



**BUREAU OF INDIAN AFFAIRS  
NORTHERN CHEYENNE AGENCY  
P.O. BOX 40  
LAME DEER, MT 59043**

**FEB -1 2019**

IN REPLY REFER TO:  
EXECUTIVE DIRECTION

Rynalea Peña, President  
Northern Cheyenne Tribe  
P.O. Box 128  
Lame Deer, MT 59043

Dear President Peña:

This is in reference to Northern Cheyenne Tribal Council Resolution No. DOI-054 (2019) enacted on January 22, 2019 and received on January 29, 2019.

Resolution No. DOI-054 (2019) calls for proper disposal of coal ash from Colstrip Power Plant and Northern Cheyenne hiring preference.

Resolution No. DOI-054 (2019) is hereby noted. The Northern Cheyenne Tribal Council has the authority to take this action pursuant to Article IV, Section 1 (m) and (r), of the Amended Constitution and Bylaws of the Northern Cheyenne Tribe.

Pursuant to Article IV, Section 4 of the Amended Constitution & Bylaws of the Northern Cheyenne Tribe, the Superintendent has authority to respond to said resolution.

All necessary copies of this resolution have been retained for our files.

Sincerely,

Superintendent

Enclosure

**TRIBAL COUNCIL OF THE NORTHERN CHEYENNE TRIBE  
NORTHERN CHEYENNE INDIAN RESERVATION  
LAME DEER, MONTANA**

**RESOLUTION NO. DOI- 054 (2019)**

**A RESOLUTION CALLING PROPER DISPOSAL OF COAL ASH FROM COLSTRIP POWER PLANT AND NORTHERN CHEYENNE HIRING PREFERENCE.**

**WHEREAS**, the Tribal Council of the Northern Cheyenne Tribe is the governing body of the Northern Cheyenne Tribe pursuant to the Amended Constitution and By-Laws of the Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, as approved by the Secretary of the Interior on May 31, 1996;

**WHEREAS**, the Tribal Council is authorized pursuant to Article IV, Section 1 (m) of the Tribe's Constitution to protect the general health and welfare of the Tribe;

**WHEREAS**, the Colstrip Power Plant has operated for decades near the Northern Cheyenne Reservation, and has provided benefits, most prominently in the form of employment of Tribal members, and burdens, most prominently in the form of adverse environmental impacts;

**WHEREAS**, many Northern Cheyenne Tribal members have worked at the plant since its inception and received vital income for their families;

**WHEREAS**, Units 1 and 2 at the Colstrip Power Plant are scheduled to close by July 2022;

**WHEREAS**, the associated loss of jobs held by Northern Cheyenne Tribal members will have a major impact on the Northern Cheyenne community;

**WHEREAS**, the 1976 Major Facilities and Siting Act permit for the Colstrip Power Plant designated it as a zero discharge facility;

**WHEREAS**, today, there are coal ash ponds associated with the Colstrip Power Plant that discharge 500,000 gallons per day into the water table, introducing heavy metals and sulfates to the aquifer;

**WHEREAS**, for example, a large, coal ash pond associated with the Colstrip Power Plant that was capped in 1997 has a longstanding leak which is currently discharging 12,196 gallons per day;

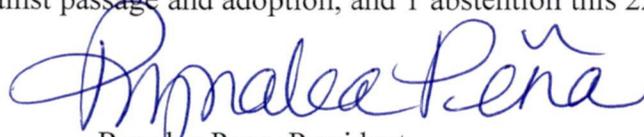
**WHEREAS**, the Montana Department of Environmental Quality (MDEQ) is in the process of considering a long-term remediation plan for the coal ash ponds; and

**WHEREAS**, the industry standard for remediation of coal ash ponds includes excavating the ash to store in a lined landfill, capping the pond in place, and surrounding the area with capture wells; now

**THEREFORE BE IT RESOLVED** the Northern Cheyenne Tribe hereby calls on the MDEQ to require that the owners of the Colstrip Power Plant take strong measures to protect against environmental harm from the Colstrip Power Plant coal ash ponds, including removal of the coal ash, recycling any usable coal ash, and storing the remainder in a properly lined landfill;

**BE IT FINALLY RESOLVED** that the Northern Cheyenne Tribe hereby calls on MDEQ and the owners of the Colstrip Power Plant to ensure that current Northern Cheyenne Tribal members who work at the Colstrip Power Plant and associated Rosebud Mine, as well as other Tribal members who seek employment associated with closure of the coal ash ponds, be notified of such employment opportunities at the earliest possible time and regularly thereafter (with a copy to the Northern Cheyenne Tribal President), and that Northern Cheyenne Tribal members be granted an employment preference when filling those employment positions.

**PASSED, ADOPTED AND APPROVED** by the Northern Cheyenne Tribal Council by 9 votes for passage and adoption, 0 votes against passage and adoption, and 1 abstention this 22<sup>nd</sup> day of January 2019.



Rynalea Pena, President  
Northern Cheyenne Tribe

**ATTEST:**



Melissa Lonebear, Secretary  
Northern Cheyenne Tribe

**Noted:**



**FEB -1 2019**  
Superintendent



December 16, 2019

Sara Edinberg  
Montana Department of Environmental Quality  
Waste Management and Remediation Division  
P.O. Box 200901  
Helena, MT 59620-0901

RE: MEIC Comments on Talen Montana's Units 1&2 Remedy Evaluation Report

On behalf of the Montana Environmental Information Center (MEIC), I submit the following comments on the "Revised Remedy Evaluation Report – Part One, Units 1&2 Stage I and II Evaporation Ponds" (hereinafter "Remedy Report") submitted by Talen Montana (Talen). For the reasons stated below, the Montana Department of Environmental Quality (DEQ) must reject the Remedy Report and instead design a remedy that immediately and effectively leads to remediation of the contamination at the site.

Once again, MEIC is extremely concerned that Talen is trying to force the state to approve a partial and inadequate remedy. As with Talen's proposed Units 3 & 4 EHP Remedy, Talen's Remedy Report and the five proposed alternatives for cleanup of Units 1 & 2 ash ponds, are designed to fail. Talen is attempting to force DEQ to choose between five knowingly inadequate remedies. DEQ must reject Talen's proposal and instead follow the requirements of the 2012 Administrative Order on Consent (AOC), and require Talen to implement a modified remedy, designed by DEQ, that will *effectively, permanently, and verifiably* remove contaminants from the area and meet the cleanup criteria at the actual point of compliance (the edge of the ponds) for all constituents of concern (not just the two pollutants modeled by Talen, boron and sulfate). Anything short of a significantly modified alternative remedy will leave Montana with an inadequate cleanup and equally inadequate bond to properly clean up the area in and around the Colstrip unit 1 & 2 coal ash ponds.

Talen's proposal fails to meet the remedial action objective (RAO). The RAO calls for Talen to, "Control future releases of COIs in groundwater to the extent necessary to achieve the cleanup levels at the downgradient point of compliance in a reasonable period of time." Instead of meeting that objective, throughout the document Talen contemplates making a request to extend the point of compliance. DEQ must be firm. The point of compliance must remain the edge of the ponds, not 150 meters downgradient of the waste management unit boundary. DEQ should require Talen to plan for success, not failure. Talen and DEQ must design a remedy that meets this point of compliance within a reasonable time period. Instead Talen proposes to

leave some contaminants in the subsurface above the cleanup criteria in 2150. That is wholly unacceptable and must be rejected.

A huge volume of critical information regarding cleanup is deferred until after completion of Part 2 of the Remedy Report. Such a stalling tactic should be rejected by DEQ. It is impossible to know if a remedy will meet the cleanup objective without essential details – details that Talen has decided, after a decade of analysis, not to provide to the DEQ at this time. Choosing a remedy with inadequate information is like shooting in the dark. Talen’s stalling tactics are designed to result in an inadequate remedy and lower bond than is necessary to cleanup the site. Just a few examples of flaws in the Report include the following:

- “Saturated ash and soil have been sampled and are undergoing leach tests. Results of these studies will be presented in Part 2 of this Revised RE Report and may show additional source control of the SOEP is required.” (Remedy Report, p. 35)
- “The Revised Remedy Evaluation Report – Part 2 will evaluate options for additional source controls at the SOEP, if needed.” (Remedy Report, p. 122)

As stated elsewhere in these comments, Talen admits that “the model predicts that there is still enough seepage from SOEP for the plume to reemerge,” which also won’t be evaluated until Part 2. (Remedy Report p. 122). Simply put, Talen has yet to do its job.

It’s incredibly frustrating that once again Talen explicitly admits in its evaluation of each of the proposed Alternatives that each one fails to meet the criteria for cleanup. This failure to design and consider a single alternative that would permanently clean up the site within a reasonable timeframe, should result in Talen forfeiting its right to create a viable Remedy Alternative. It’s now up to DEQ to do so. Talen’s stalling tactic is explicit. It admits that critical information won’t be provided until Part 2 of the Remedy Report. This undermines the public’s ability to comment on critical measures and it fundamentally undermines DEQ’s ability to choose anything less than complete ash removal. As Talen admits there are many fundamental shortcomings in the Remedy, such as:

- “Soils beneath the STEP cells generally have not been assessed as potential source areas either because the cells are still in service or were, or are planned to be, closed in-place.” (RER, p. 35)
- “Potential mobilization of those salts by rebounding water tables after the capture system is shut off could be an additional potential release mechanism.” (RER, p. 35)

One of the most distressing provisions of Talen’s plan that clearly indicates its failure to meet the objective is the repeated admission that low mobility contaminants such as boron will reemerge when the capture system is shut down. **This is not cleanup! This is called “kicking the can down the road.” Talen admits the low mobility contaminants will be above the cleanup criteria in 130 years!** Such a “Remedy” makes a mockery of the very term. DEQ must reject Talen’s plan based on this provision alone:

- “In the Distal Areas, the fate and transport model predicts that after the capture system is shut down the boron plumes reemerge around 2090 and remain above the PCC in off-

site Distal Areas to the east of the STEP Main Dam and north of the SOEP through 2150.”  
(Report, page 105)

These statements and so many others throughout the Report indicate that there are far too many uncertainties and projected failures for DEQ to approve Talen’s Alternative 5 as the proposed remedy.

Talen’s proposal is riddled with the notion of “good enough” even when its proposed Remedy fails to meet the cleanup objectives. A remedy that is slightly better than awful, doesn’t make that remedy good. Talen repeatedly says that “reducing” contamination is sufficient, that since a “smaller plume” is better than a larger plume that makes the Alternative the best cleanup option, that less boron is good even if it’s only a 41% reduction, or that the PCC’s are “mostly achieved.” Talen’s argument that Alternative 5 provides the greatest reduction of risk to public health, safety or welfare, is a far cry from the best reduction of risk available. It is cold comfort that Talen says Alternative 5 “would slow reemergence of the plumes” above the cleanup criteria both on and off-site after the capture system is shut down. (Remedy Report, page 123). **Slowing the reemergence of contamination is hardly the standard by which DEQ should approve a remedy.** The standard should be whether or not the plume reemerges at all. DEQ must reject any Remedy that admits the contamination will reemerge. That, by definition, is not a Remedy, it is a stalling tactic. Talen provided 5 inadequate remedies. The fact that Alternative 5 is better than four other lousy and wholly inadequate remedies, does not mean it’s acceptable or sufficient. DEQ should reject all 5 Alternatives.

The permeable reactive barrier cannot be considered a “contingency” when Talen admits that it is necessary to meet the objective. Alternative 5 says: “The volume of groundwater exceeding boron and sulfate PCC is expected to decrease by 41% and 93% respectively, from baseline (2017) to 2055. The mass discharge of boron and other less mobile constituents are expected to continue to decrease **if the PRB contingency is implemented.** This would result in even greater reductions in the volume of groundwater exceeding PCC for boron and other less mobile constituents.” (Emphasis Added) (Remedy Report p. 123). At a minimum, DEQ must require installation of PRB and a bond posted to cover the cost. Talen admits that it can’t meet the cleanup criteria without such a measure. Either a PRB is required and bonded for or the waste must be excavated and stored in a properly designed landfill far above the water table.

Talen also admits that the PRB contingency might not be feasible in some instances (Remedy Report 125). The Remedy should discuss what instances would preclude use of the PRB and outline the other measures that would be implemented should use of the PRB be infeasible.

As with the Remedy for the EHP, DEQ must also consider that Talen only evaluated two pollutants in its modeling: boron and sulfate. Modeling is purportedly conducted in this fashion in order to represent a large number of low and high mobility pollutants. However, there is no certainty that the other pollutants from the ash ponds, including such pollutants as chromium, radium, selenium, cobalt, manganese, total dissolved solids, sodium, potassium, lithium and other pollutants, will behave in an identical fashion as boron and sulfate in the groundwater,

soils, and subsurface. For example, no mid-range mobility pollutants were analyzed. The failure to consider the movement and extent of contamination of each of these specific pollutants means, at a minimum, that DEQ should either force the consideration of those pollutants in addition to boron and sulfate or, at a minimum, be extremely conservative in its remedy selection and bonding requirements. DEQ should also require extensive testing for these pollutants to establish both the existing base level for each pollutant in each geological stratum as well estimate each pollutant's predicted movement and level. In addition, DEQ should require extensive testing for each pollutant in each stratum on a regular basis going forward in order to determine that the cleanup criteria at the edge of the impoundments is met.

Talen proposes to turn the pumps off in 2050 yet it admits that this will exacerbate contamination problems at the site. A permanent pump and treat system should be required if DEQ refuses to require excavation of the ponds, especially any ponds that are in or near the groundwater table. The statement, "Only some small isolated Near-Source areas of low permeability north and east of the SOEP and east of the STEP Main Dam are predicted to remain above the PCC after the injection/capture system is shut down from 2050 through 2150." (Remedy Report, page 123) Talen has failed to provide an adequate Remedy and admits its proposal will fail when the injection/capture system ceases to operate. The appropriate response by DEQ to such a blatant disregard for the objective of the project is to either require a perpetual pump and treat system or to excavate the waste and store it in a secure landfill that is adequately located away from water sources and is monitored in perpetuity. Bonding must reflect this long-term requirement.

#### DEQ Must Significantly Modify Talen's Proposal

The 2012 AOC anticipated the eventuality that the Colstrip plant operator would submit an insufficient remedy proposal. DEQ created, and Talen agreed to, the tools created within the AOC for this circumstance. Accordingly, the AOC states that "The Department shall take action on the Remedy Evaluation Report per Article XII and shall select a remedy or a modified remedy as part of that Department action." (Emphasis Added) (AOC §VI.C.3, page 23)

Talen submitted five alternatives in the Remedy Report, none of which actually meet the cleanup criteria at the point of compliance. As mentioned elsewhere in these comments, Talen's preferred remedy admittedly fails.

MEIC endorses and incorporates by reference the comments and concerns of Kirk Engineering, submitted by the Northern Plains Resource Council. The report underscores the need for DEQ to reject Talen's proposed alternative. The wide variety of issues raised by Kirk indicate that Talen is trying to cut corners, escape its cleanup responsibilities, and jeopardize water resources for centuries to come.

Once again, Talen proposes to re-evaluate the capture system every year for the first three years of operation and then every five years thereafter until the injection/capture system is shut down. Such a schedule is woefully insufficient to guarantee the long-term viability of the

Remedy. The Remedy Report repeatedly admits that contaminants will increase after the injection/capture system closes, yet Talen proposes that it cease to evaluate the system after it closes. This proposal violates the terms of the AOC, which requires an annual review of the financial assurance by DEQ. DEQ cannot analyze the financial assurance in a vacuum. Review of the financial assurance necessarily requires review of the effectiveness of the cleanup operations. In order to assure compliance with the law, Talen must submit annually, and DEQ must review, an analysis of the critical components of the cleanup requirements (i.e., the capture system) in order to adjust cleanup requirements and the bond. The bond is tethered to site cleanup and remediation, and therefore, both must be on the same review schedule.

Water volume, treatment, and disposal have always been a significant issue for plant operations. Even though Talen brings huge volumes of water into the plant for its operations, the owners have chosen to avoid acquiring a Montana water pollution discharge permit (MPDES) for the disposal of the inevitable wastewater. The enormous volume of wastewater has resulted in Talen's use of groundwater as its primary waste disposal method despite Talen's cynical and absurd claim that the facility remains a "closed-loop system." DEQ should not be constrained in its remedy selection by Talen's desire to avoid applying for an MPDES permit from DEQ.

Units 1 & 2 are closing the plant next year. The remaining owners of Units 3 & 4 will close the plant in the next decade. This is evidenced by the fact that Washington State requires three of the owners to stop providing coal-based power to Washington customers by 2025. All of the owners that are regulated utilities are required to disclose their depreciation and/or closure schedules for the plant. All but NorthWestern Energy have agreed to be financially ready to close the plant between 2025 and 2030. Even NorthWestern Energy's long-time representative, Mike Cashell, told a public forum in Bozeman in September that he expects the plant to close by 2025.

When the plant closes it will no longer be viable to use Yellowstone River water and the plant's wastewater in facility operations. The loss of a clean water supply for flushing the groundwater, the loss of the ability to reuse of the wastewater in the plant, and the lack of an MPDES permit, underscore the need to immediately build and bond for a large treatment system for the contaminated pumped groundwater.

DEQ must craft a remedy that will address all of the flaws in Talen's submittal and require a bond that is sufficient to cover the thorough cleanup and excavation of the ash in a reasonable timeframe – not 130 years.

#### Cleanup and Financial Assurance

Talen's proposed financial assurance for its proposed remedy is absurd. \$46,270,000 is woefully inadequate to guarantee cleanup, especially in light of the numerous uncertainties, contingencies, and deficiencies noted in the Report. For example, Sections 8.3, 8.4, 8.5, and 8.6

are riddled with so many unknowns and contingencies possibilities that DEQ's bond must reflect the possibility of failure and the need for additional analysis and a revised remedy:

- "A groundwater treatment system solids disposal area would be constructed to dispose of treatment residuals." (Remedy Report, p. 124)
- "A new injection system will have to be designed and constructed to deliver the clean water from the Surge Pond to injection wells until 2022, and either the Surge Pond water or the treated groundwater could be injected thereafter." (Remedy Report, p. 124).
- "A PRB is included in Alternative 5 as a contingency for areas where it is feasible to install one in case it is demonstrated that MNA would not be sufficient to address constituents remaining after capture stops." (Remedy Report, p. 124)
- "If the ash investigation study and subsequent fate and transport modeling indicates that saturated ash is a potential source that requires additional source control measures, the ISS treatability test will be conducted and the results of the ISS treatability test will be incorporated into the fate and transport modeling. The results of the ash investigation study, updated modeling, and the ISS treatability test (if needed) will be discussed in the Revised Remedy Evaluation Report – Part 2." (Remedy Report, p. 125).
- "A geotechnical evaluation is currently underway to evaluate if there are stability concerns that might require adjustments to the proposed injection/capture system near the STEP Main Dam. An injection pilot test will also be conducted to evaluate the injection flow rates that will likely be encountered in the Sub-McKay." (Remedy Report, p. 125-6).
- "Water from the Surge Pond may require some limited pre-treatment prior to injection into groundwater to reduce long-term maintenance on the injection system. Some additional studies may be required to design the pre-treatment of injected water." (Remedy Report, p. 126).
- "Additional groundwater and aquifer solids sampling, testing, and modeling will be necessary to evaluate the effectiveness of the MNA. Additional studies will also be conducted during the remedial design or implementation to assess the reliability of a PRB in addressing residual concentrations (if any) above PCC after 2050. (Remedy Report, p. 126).

All of these measures, and the many others mentioned in the Remedy Report, must be accounted for in the calculation of the bond. But the most important Remedy that the bond should cover is excavation. The Remedy Report lists "excavation of the SOEP" as a possibility if updated modeling shows the need for additional source control. (Remedy Report, p. 127). The admission that boron and other low-mobility pollutants will increase after the injection/capture system ceases operation, is an admission of the very real possibility that the state may need to require excavation in coming decades or centuries when Talen no longer exists.

The AOC requires nothing less than a stronger, more robust, and adequate cleanup plan and bond than what has been proposed by Talen. The AOC gives DEQ the authority to do so:

“To ensure the operation and maintenance of remedial and closure actions carried out under this order, PPLM shall provide financial assurance in the amount required by the Department and by any one method or combination of methods approved by the Department, and such approval shall not be unreasonably withheld, including but not limited to insurance, third-party guarantee, performance or other surety bond, or letter of credit. Such financial assurance shall be subject to annual review by the Department, with a comprehensive review at least every five years. The amount of the assurance may be increased or decreased based on the projected costs for the operation and maintenance of remedial and closure actions.

Any disagreement between the parties with respect to the amount of the financial assurance will be subject to the dispute resolution per Article XIII. The Department shall make available, through its website or similar means, the basis and/or calculations used to determine the amount of the financial assurance.

The parties agree that provision of the financial assurance will be addressed in phases, with the first phase addressing obligations for current and continuing remedial actions including monitoring, a second phase to incrementally address obligations resulting from actions taken pursuant to the process described in Article VI, and a third phase to address the Facility Closure Plan and amendments thereto addressed in Article IX. The parties agree that the first phase of financial assurance will be addressed by the parties upon execution of this AOC.” (Emphasis added.)  
(AOC, §VIII, Page 27 and 28)

As stated below, it is critical that DEQ impose a bond that will suffice for the entire cleanup process, including worst case scenarios of cleanup requirements (especially as additional studies are necessary to determine what the cleanup requirements will be). Any bond must also include financing for perpetual water treatment. As demonstrated by other DEQ sites, water treatment in perpetuity is a financial burden on state taxpayers when it is not required as part of the financial assurance. Since boron is representative of many other contaminants and Talen’s Remedy Report acknowledges that the plume will expand over time, DEQ must insist on financing for perpetual treatment of water. As previously stated, it is essential for DEQ to be explicit that the bond required for the remedy is only the first iteration of a cost estimate that will have to be adjusted over time based on pending studies, investigations, and data collection.

The day of reckoning should be now for Talen and the other owners. DEQ cannot continue to allow it to continue to avoid its cleanup responsibilities by making false assertions that potential cleanup options can be adjusted over time. This game has lasted for decades, and has resulted in a more expensive clean up over a larger area of land.

The plant owners want to, or are legally obligated to, retire the Colstrip plant. Rumors strongly suggest they want out of the plant very soon. Talen Montana is a shell corporation that will likely cease to exist after Colstrip closes. This would shift liability to Puget Sound Energy should

it still exist at the time Talen's supposed "Remedy" fails. Puget and Talen cannot be counted on to be around when Talen's cleanup plan fails. Montana Power Company and Pacific Gas & Electric are perfect examples of dynamos in the utility world that either disappeared and/or went bankrupt. The disappearance of these two owners would mean Montana taxpayers could be on the hook in coming decades or centuries.

DEQ cannot and must not assume that it can increase the bond over time to address the inevitable failures in Talen's remedy proposal. The time to guarantee cleanup and bonding by all owners of the plant is *now*, while they still exist and are responsible. Anything less than a remedy that meets the cleanup criteria as quickly as possible is insufficient to protect Montanans pocketbooks.

**Talen's purported "Remedy" is simply unacceptable.** As with the Units 3 & 4 ash ponds, boron is an indicator of many pollutants, indicating that many other pollutants will likely not only remain in the aquifer for 130 years, but they will spread. DEQ can no longer wait for Talen to create an acceptable remedy. DEQ must choose a remedy based the meets the objectives within a reasonable timeframe. The only remedy that will result in complete and timely cleanup is one that requires requires Talen to dewater the ponds, remove the ash and safely store it in an appropriately designed landfill. Any cleanup plan should have better monitoring, better contingency plans, and bonding sufficient to guarantee that DEQ does not have the annual burden for 130+ years of determining that bonding must increase to address the admitted and inevitable failures in Talen's proposals.

Should DEQ fail to require a bond to cover all potential costs, DEQ must only provide preliminary or interim approval until all additional studies are complete, and all cleanup and contingency methods are identified, analyzed, subject to public scrutiny, and eventually approved. Financial assurance should clearly indicate that any remedy decision is only for preliminary approval of the remedy, and does not include an adjustment in the costs that will occur after completion of required testing and analyses.

In short, DEQ should significantly modify Talen's request, require dewatering and excavation of the coal ash impoundments, require secure long-term management and storage of the excavated material, and require a plan to effectively remove the remaining subsurface contamination. DEQ must establish milestones and an automatic increase to the bond in order to address measures and contingencies that eventually must be implemented.

Talen wants DEQ to approve a substandard, partial cleanup plan that will allow for the plant owners to claim the cost for cleanup is settled and is no longer in dispute. DEQ must be very clear in any decision-making documents that any bond imposed on Talen and the other plant owner will be adjusted based upon increased obligations that result from required and/or essential additional studies.

Anything less than the full remediation of the site will relieve the plant owners of important liabilities and place that burden on Montana taxpayers. MEIC urges you to protect both Montana's environment and its taxpayers from the inevitable failure of Talen's proposed remedy.

Sincerely,

A handwritten signature in black ink that reads "Anne Hedges". The signature is written in a cursive, flowing style.

Anne Hedges  
Deputy Director

December 16, 2019

Sara Edinberg  
Montana Department of Environmental Quality  
1520 E. 6<sup>th</sup> Ave  
Helena, Montana 59601

Re: Wastewater Facilities at the Colstrip Steam Electric Station

Dear Ms. Edinberg:

We are writing regarding the Department's report regarding wastewater facilities at the Colstrip Steam Electric Station. The Montana AFL-CIO strongly believes that the cleanup criteria decided by the Department will play an integral role in the future economic vitality of Colstrip. An adequately stringent cleanup criteria is necessary to ensure that Montana taxpayers are not responsible for costs associated with cleanup, as well as prevent permanent contamination that will negatively impact future economic investments in the area.

Currently, Talen is proposing a cleanup criterion that would consist of limited pond dewatering, allowing some ponds to drain into the aquifer, cap-in-place closure for all ponds, and prolonged groundwater treatment. While this option will be cost effective, we believe this cleanup method will not stop future contamination from pond closures. Instead, we urge the Department to require a cleanup criterion that will implement full dewatering and excavation of coal ash sites, pond and soil dewatering and capping, and groundwater treatment. We believe this method will adequately clean the environment while protecting taxpayers and preserve the future economic potential of the Colstrip area.

Uncontaminated water and soil are essential for the City of Colstrip and its workers to achieve their long-term economic potential. We strongly urge the Department to choose a cleanup criterion that will protect these fundamentals while enabling the community to achieve their future potential.

Sincerely,

Al Ekblad  
Montana AFL-CIO, Executive Secretary

**From:** [Erica Bidwell](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] 1 and 2 Ash Pond Clean Up  
**Date:** Sunday, December 8, 2019 4:36:45 PM

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Sent from [Mail \[go.microsoft.com\]](mailto:go.microsoft.com) for Windows 10

As a Rosebud County resident, I would appreciate the help of Montana DEQ in the 1 and 2 Ash Pond Clean up. The Power Plant Owners should be held accountable for the entire clean up, including future monitoring of our ground water. The ponds have been leaking for many years, poor liners and lack of knowing the full effects of ground water contamination has created a huge problem for Montana. These Corporation's should be the ones to bare the costs of proper clean up not the Montana tax payer. We also believe that monitoring should continue for many years to follow to protect or water resources.

**From:** [Richard Burnett](#)  
**To:** [Edinberg, Sara](#)  
**Subject:** [EXTERNAL] 1&2 remedy  
**Date:** Tuesday, December 17, 2019 8:15:02 AM

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I oppose the cleanup plan on the following grounds,

1. Pumping across from town will accelerate the water leaking from castle rock lake. The 700,000 gallons that leak, wash around foundations as the leaking water travels down hill to armells creek.

There are many homes affected as well as commercial properties.

2. There is no guarantee my trailer court property will be cleaned because of location of injection locations.

3. I have not seen any study by an engineering firm that says the ground is pourous enough to flow. Water doesn't flow through clay.

Richard Burnett

**From:** [John & Mary E. McWilliams](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] coal ash at Colstrip  
**Date:** Saturday, November 30, 2019 10:30:24 AM

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Sirs,

I was born and raised at Colstrip, a highly successful and well run company town which added well to the economy of our nation. The very thought of it becoming an environmental disaster...for years into the future...is unthinkable.

Please let's not let that happen.

Mary Ellen McWilliams

**From:** [tony reda](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Colstrip ash pond cleanup  
**Date:** Monday, November 25, 2019 4:58:46 PM

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Hello. As a concerned Colstrip resident, I believe Montana DEQ needs to hold the power plant owners accountable to clean up the pollution that has occurred with regards to the ash ponds for Units 1&2. These ash ponds shall not be allowed to be in contact with groundwater after the units cease operation. These ponds were constructed with liners that have failed and leaked from the beginning. This is documented. Ash removal and aquifer restoration is the logical and moral solution that will provide long term benefits for the community and state. The taxpayers of Montana, instead of wealthy corporations, will bear the cost to clean this mess in the event of a sub standard cleanup right now. Please hold the owners accountable for the mess they have created while making hundreds of millions of dollars of profits.

Thank You

Tony Reda  
Colstrip Resident

**From:** [Bill Kirtley](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Colstrip reclamation  
**Date:** Saturday, December 14, 2019 3:54:34 PM

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It seems Montanans will be footing another bill from our, “energy providers”, the current scheme to mitigate pollution at Colstrip 1 and 2 is woefully inadequate in that it does nothing to protect the groundwater. The current plan to just pump the water polluted with coal ash from the ground water into ponds just to have it leak back out again makes no sense. The fact the ponds are unlined to begin with tells me this entire mess is just “smoke and mirrors” that dates back to our old friends at Montana Power. The coal ash must be removed, dried out and moved to a separate lined landfill. Other states have used this method to protect their groundwater so the science is not new or untried. We as citizens entrust you to use good science to protect our air and water. We have one of the best examples of how things like this can be done right, removing the Milltown dam and moving the contaminated soil was nothing short of an engineering marvel. I attended U of M in the 70s, today it almost looks like the dam was never there. Make Talen energy do it right, we have an incredible example right here in Montana, they can’t use “smoke and mirrors” to weasel out of their responsibility. We know it can be done, you just need to make them.

Robert Kirtley.  
Bozeman Montana.

**From:** [Rachel and Dave Rockafellow](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Colstrip waste ponds cleanup plan inadequate...  
**Date:** Tuesday, December 10, 2019 8:34:08 AM

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I am writing in support of drying out the ponds, digging up the ash, and placing it in a new lined landfill far above ground water as proposed in the letter to the editor in today's Bozeman Daily Chronicle (12/10/19) by Beth Keading. Industry has a history of screwing the public to clean up their messes, and this trend should be stopped.

Thank you,  
Rachel Rockafellow  
1202 S. Spruce Dr.  
Bozeman, MT 59715  
406-586-2405

**From:** [lynn kirtley](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Colstrip waste ponds comments  
**Date:** Saturday, December 14, 2019 8:48:54 AM

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To the DEQ,

Colstrip owners need to permanently and effectively clean up the coal ash ponds by storing the waste high and dry. This should be done by drying out the coal ash, digging it up and moving it to a new lined landfill far above the ground water table to prevent leaching of toxic by-products.

Montana has a sad history of toxic waste messes left by industry for the public to deal with. Your job is to protect our environment by using the best technology that has proved effective.

Sincerely,

Lynn M. Kirtley

**From:** [Bryan Wier](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Pond clean up plan  
**Date:** Wednesday, December 4, 2019 9:51:50 AM

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As a concerned Colstrip resident, I believe MT DEQ needs to hold the power plant owners accountable to clean up the mess that has occurred with regards to the Units 1&2 ash ponds. These ash ponds shall not be allowed to be in contact with groundwater after the units cease operation. These ponds were created with documented failed liners to begin with. Ash removal and aquifer restoration is the logical solution with long term results. Taxpayers, instead of wealthy corporations, will bear the cost to cleanup this mess in the event a poor decision is made today.

Thank you for listening

Bryan Wier  
406 740 0409  
Colstrip ,MT

**From:** [Bret Bowen](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Units 1&2 Ash pond remediation  
**Date:** Saturday, December 14, 2019 6:43:13 PM

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To whom it may concern,

As a concerned Colstrip area resident, I believe MT DEQ needs to hold the power plant owners accountable to clean up the mess that has occurred with regards to the Units 1&2 ash ponds. These ash ponds shall not be allowed to be in contact with groundwater after the units cease operation. These ponds were created with documented failed liners to begin with. Ash removal and aquifer restoration is the logical solution with long term results. Taxpayers, instead of wealthy corporations, will bear the cost to cleanup this mess in the event a poor decision is made today.

Sincerely,

Bret Bowen  
16 North Country Lane  
Forsyth, MT 59327

Sara Edinberg  
Waste Management and Remediation Division  
P.O. Box 200901  
Helena, MT 59620

*Submitted electronically to [DEQColstrip@mt.gov](mailto:DEQColstrip@mt.gov) and [sedinberg@mt.gov](mailto:sedinberg@mt.gov)*

December 15, 2019

Ms. Edinberg,

I am submitting the following comments to the Montana Department of Environmental Quality (DEQ) in response to the October 2019 Revised Remedy Evaluation Report (RER) for the Units 1&2 ponds at Colstrip submitted to DEQ by Talen Energy.

Colstrip, in southeastern Montana, has long been an agricultural region supporting many ranches and providing economic livelihoods to those ranch families and others in the community. The Colstrip area changed dramatically in the early 1970s because of a massive energy development project. Montana Power proposed building a huge coal-fired generation facility in Colstrip, bringing hundreds of workers into the small community and turning it into a “company town.” The attraction for putting the facility here was that Colstrip also sits next to the Rosebud Mine, where coal had been mined at the turn of the century to power steam engines for the Northern Pacific Railroad. Montana Power planned to re-activate this coal mine for what is called a mine-mouth power plant, eliminating transportation costs and ensuring more profits for the company.

After operating the plant for many years, Montana Power took its money, dissolved, and sold the power plants. Today, Colstrip is owned by six different companies in four different states: Puget Sound Energy, Portland General Electric, Avista, PacifiCorp, Talen Energy, and NorthWestern Energy. But, the problems that were identified at the beginning of this development project by opponents of the plant remain and have devastated the area’s aquifer even more than could have been imagined.

I was a biologist working in the Colstrip area in the mid-1970s documenting what wildlife and plant life occurred in various parts of the landscape before coal strip mining resumed in those locations. I also spent much time documenting how well reclamation was taking hold in specific areas where coal had been mined in the past and was purported to be reclaimed. I know many of the long-time ranchers in the area and know that in the early 1970s when this massive energy development project was being permitted by the State of Montana many of them testified about all the problems this development would bring. The impacts they foresaw would be incredibly devastating to their agricultural economy. Ranchers’ livelihoods depend entirely on clean air and water, native soils and vegetation, and lands that remain intact.

The ranchers and others were particularly concerned about their water resources – not only what strip mining would do to that resource, but even more what impact the power plant residues would have on their water. The air pollution controls on the power plants capture the toxic by-products created by burning coal. Those pollutants are called “coal ash.” Coal ash can be stored either wet or dry, but it is much cheaper to store it wet, in ponds, which is what Montana Power proposed. During the permitting process in the 1970s and later in 1980s for Colstrip Units 3&4, the State assured local residents and area ranchers that these coal ash ponds “would never leak,” but, **from the beginning, the ponds have leaked.** The State officials had even told the Colstrip residents and ranchers that if the ponds leaked, they would shut down the plants. No one was

dumb enough to believe them nor did that happen despite years of complaints along with credible data showing leakage and the harm.

When the leaking coal ash ponds were finally acknowledged by the State, the company installed a groundwater pollution control system that relies on pump-back wells. Colstrip hosts one of the biggest coal ash pond complexes in the nation at 837 acres and **these ponds leak 500,000 gallons of water into the aquifer each day**. In 2011 there were 900 wells surrounding the coal ash ponds, today there are close to 2,000 wells that monitor and pump about **1 million gallons of water EACH day** out of the aquifer to keep the plume from spreading.

This leaking contaminated water is polluting the aquifer with heavy metals and sulfates at levels toxic to humans, livestock, and wildlife. The coal ash-contaminated water in the ponds is 10x the background levels for sulfates in the area, 100x for boron, and 70x for lithium. The coal ash contaminated water is 1000x the EPA [Environmental Protection Agency] standard for manganese. Radium and selenium levels are high as are many other pollutants.

Colstrip Units 1&2 coal ash ponds actually sit within the area's water table. Talen Energy's RER plan for the Units 1&2 ponds as submitted to Montana DEQ is to simply cap the ponds in place. **This is totally unacceptable**. No matter what cap is placed on top of the pond, polluted water will continue to spread down into the ground and into the region's aquifer. Pumping the groundwater back into the ponds as is currently being done will have to be done in perpetuity – and that will never solve the problem. Talen Energy's plan must remove the coal ash from the ponds and store it properly – dry – to even begin to solve the problem.

The coal ash ponds **MUST** be drained, and the coal ash dried out, dug up, and then stored in an approved, lined waste facility high above the water table. Aquifer pumping must continue – and the water treated – until the aquifer is restored to its original cleanliness. This “high and dry” method will result in a permanent solution to the toxic waste disaster at Colstrip. Bipartisan legislatures in North Carolina, South Carolina, Illinois, and Virginia have all passed laws mandating that coal ash ponds having contact with the water table be excavated. Montana needs to join that list of responsible states.

DEQ is the state agency responsible for holding the corporate owners of Colstrip accountable for this pollution. These owners have made billions of dollars while operating the power plant through the years even as they have failed to ever propose an effective solution to the leaking coal ash ponds. The State of Montana is already dealing with major corporate pollution legacies – in Libby, Butte, and Zortman-Landusky to name just a few – and getting the money out of liquidated or bankrupt corporations is not an option. We the people end up paying. Do NOT let this happen at Colstrip. The corporate owners are still there. These owners **MUST** pay for the mess they made. They must clean up the pollution and restore the aquifer. Do It Right! This time, the corporate polluters must pay. Do not shift this toxic waste legacy onto the taxpayers.

Thank you for consideration of my comments.



Beth Kaeding, 1024 Boylan Road, Bozeman, Montana 59715 kaedingl@aol.com

Daniel R. Shaffer

808 12th Avenue, Helena, MT 59601 406-443-5395 [shaffed@charter.net](mailto:shaffed@charter.net)

Sara Edinberg  
Waste Management and Remediation Division  
P.O. Box 200901  
Helena, MT 59620

December 14, 2019

*Submitted electronically to [DEQColstrip@mt.gov](mailto:DEQColstrip@mt.gov)*

Ms. Edinberg,

I'm writing to request that the DEQ approve a Remedy Evaluation Report that provides a permanent solution to the groundwater pollution associated with the Units 1&2 ash ponds and the continuing adverse effects on groundwater from the 3&4 ponds at Colstrip. Talen Energy has proposed to cover the ponds with the coal ash left inside (cap-in-place) and expand its current groundwater capture system, augmented with freshwater injection wells, rather than remove the waste and contaminated soil. A complete solution will involve removal of the source of contamination and remediating the impacted groundwater.

The 1 & 2 and plant site ponds were originally constructed with a mixture of clay, compacted soil, and hypalon liners because, for many decades, the industry standard was to build ponds without liners, or with liners that are extremely permeable, ultimately resulting in leakage. In the cases where compacted soil and clay was used, this is the only barrier between the effluent slurry and the surrounding bedrock and soils. Liners originally constructed with Hypalon, partial clay, clay-lined, and a compacted bentonite/soil mixture are largely considered inadequate.

The 3 & 4 ponds were originally constructed without liners under the assumption that the leachate collection system installed beneath the pond and the concrete slurry wall would prevent most of the seepage.

During the years of Montana Power Company's ownership of the Colstrip generating units, I had literally first-hand knowledge of the effects of coal ash slurry placed in ponds on the local groundwater. As an employee of MPC's consultant in the 1980's, I was involved in the preparation of hydrologic investigation work plans and developed groundwater monitoring networks for MPC's coal-fired power plant and associated effluent holding ponds. Installation, sampling, and aquifer testing of monitoring wells were part of MPC's ongoing monitoring program at the Colstrip plants. The project involved several investigations of leaking process ponds, construction and expansion activities that were occurring at that time, and the preparation of annual hydrologic monitoring reports for review by state regulatory agencies. I watched as the 3&4 EHP's perimeter slurry wall was being constructed and the pond basin clay-lined. After the groundwater monitoring network peripheral to the EHP was installed, I also reviewed data that

showed the immediate effects to the area groundwater - hydrostatically and chemically - as the fly ash effluent had begun to be impounded within the newly constructed EHP.

The 1&2 and 3&4 process water ponds have been leaking since their construction more than 30 years ago and consequently the plume of leaked plant process water has expanded significantly through the years. The groundwater capture wells seem to be holding the plume at its current extent for the most part, but the wells do not capture all of the leakage and wells that have subsequently been installed have revealed newly contaminated areas.

At the Units 1&2 ponds, groundwater contaminant plumes with very high levels of boron, total dissolved solids, and sulfates extend more than 1,000 feet from the closed ponds and, in addition, the contaminant plume has affected several private water wells. Impacted groundwater has been identified in several downgradient locations from the Units 3 & 4 EHP ponds, including in the alluvium of Cow Creek and South Fork Cow Creek. Wells just outside the EHP walls have shown boron levels from 75 mg/L and as high as 148 mg/L in alluvium. Monitoring wells south of the ponds in alluvium have shown boron levels up to 13.3 mg/L, exceeding background screening levels for boron in the area's groundwater in the range of .818 - 4 mg/L.

The bedrock geology consists of generally flat-lying sediments of the Fort Union formation, but some of these sediments are slightly altered locally fractured. These fractures can affect groundwater flow direction and vertical and horizontal velocities. The sedimentary bedrock underlying the Colstrip area shows large horizontal changes in the parameters that govern groundwater flow. This is especially true within the shallowest coal seam, Rosebud Coal, which has naturally burned in the area in an irregular pattern resulting, in certain locations, extensively altered hard, highly fractured material. The only option for discontinuing the migration of groundwater is to fully de-water all ponds with aggressive pumping, including wells drilled into the ash itself and horizontal capture wells beneath the underdrain.

When the Units 1&2 Flyash Pond (A and B Ponds) when originally constructed, the pond basin was covered with the three-foot clay layer - but not uniformly. The three-foot minimum liner was installed on the sides of the pond and alluvial deposits that were present in the pond bottom were removed and backfilled with compacted clay. Where siltstone/shale was already present on the pond bottom, it was compacted and left in place but not covered with additional clay materials. I will add here that the "clay" used in the early pond construction came from area siltstones and mudstones that were determined to have enough clay content to qualify as pond clay liner. I have never thought that they had adequate clay development.

Personal experience monitoring groundwater on the periphery of process ponds, has led me to only conclude that I have never met a pond that didn't leak. And the Colstrip ponds will continue to leak as long as bedrock is in contact with saturated coal combustion materials present in the impoundments and effluent and process water from the generating units.

Despite all of the seepage velocity calculations and flow models that have been presented for the 1&2 Evaporation Ponds and 3&4 EHP, the real proof is what we see downgradient in the bedrock and alluvium. The hydraulic conductivities of the native "clay" lining material has been altered in transport and "compaction". No one should be surprised that the Units 1&2 Stage One

pond is still affecting local groundwater. I submit that, no matter what cap has been installed, there will always be seepage through the coal combustion materials into the underlying bedrock and alluvium as long as the coal combustion materials remain in place.

An adequate remedy to lessen and minimize area groundwater needs to include releasing the head pressure of the ponds, dewatering of underlying sedimentary bedrock and unconsolidated sediments by utilizing underdrains and a well capture system, and removal and excavating of coal combustion materials from the ponds. Dewatering will allow removal of the materials with a temporary, artificially lowered water table. An effective prescribed cap will need to be installed following the removal.

Sincerely,

Daniel Shaffer

Helena, Montana



*Figure 1 3&4 Effluent Holding Pond\_5-30-1986\_Initial fill*



*Figure 2 3&4 Effluent Holding Pond\_5-30-1986\_Initial fill*



*Figure 3 3&4 Effluent Holding Pond Overhead\_5-30-1986\_Initial fill*

November 22, 2019

Montana DEQ  
P.O. Box 200901  
Helena, MT 59620

RE: Comments on Colstrip Units 1 & 2 Ponds and the Plant Site

To Whom It May Concern:

I lived in the Superfund city of Anaconda with my husband and children, moving there shortly after the closure of the smelter. The pollution was both visible and more insidiously, invisible. It was easy to see the vast areas east, north and south of the site that were affected by a hundred years of smelting. Less visible was the damage to soil and water and the legacy of health problems left from the smelter. DEQ needs to protect the citizens of Colstrip and the land and water that they and agriculture depend on. Talen Energy needs to pay for long-term closure solutions that if not adequate, could negatively affect agriculture and the health of people, land and water.

A “clean and healthful environment” is guaranteed by the Montana Constitution. Ensure that Rosebud County residents can claim their constitutional rights by requiring Talen Energy to clean up the ash ponds in the safest possible way.

#### **High and Dry Solution**

Cap-in-place failed in 1997. The pond for Units 1 and 2 was capped in 1997 and continues to leak 12,000 gallons of wastewater per day. Cap-in-Place is at best a poor short-term solution and a completely inadequate long-term solution. Full dewatering and excavation of coal ash (“high and dry”) at Units 1 & 2 ponds and the Plant Site is a permanent solution. A case study on coal ash cleanup projects across the United States revealed that removing coal ash and dewatering ash ponds that are above the water table is a proven method to stop contamination quickly and permanently. Require Talen to do it right so it doesn’t have to be done later, after pollution has caused problems to the aquifer.

#### **Talen Energy, NOT Montana Taxpayers, Should Pay for “Fix It Forever” Solutions**

If Talen Energy is allowed to use the “pollute in place” short-term solution, Montana taxpayers will eventually end up paying for the long-term solutions. Even more importantly, the people of Rosebud County will be stuck with the health problems and soil and water pollution that resulted from the cap-in-place temporary solution.

#### **Safe, Permanent Cleanup Creates Jobs**

Talen Energy has had years to plan for site clean-up. It is estimated that doing it right will cost Talen approximately \$243 million. A few years ago, Talen paid a bonus of \$500 million to its shareholders. Talen should be able to afford the \$243 million to protect the people who worked for them and the land they used. Talen’s proposal will require approximately 92 yearly direct jobs from 2020 to 2030 and about 40 yearly direct jobs from 2030-2069. Doing the job right – which means aggressive pond and soil dewatering and capping of all ash ponds – will result in approximately 219 direct jobs from 2020 – 2030 and 66 direct jobs from 2030-2040.

Responsible cleanup is a common-sense solution for ranchers, Colstrip residents, and the taxpayers of Montana.

Thank you for the opportunity to comment.

Sincerely,  
Marylis Filipovich  
Helena, Montana

**From:** [DEQ Communications Team](#)  
**To:** [Edinberg, Sara](#)  
**Cc:** [Walker, Brian](#); [Harbage, Rebecca](#)  
**Subject:** FW: Comment on Colstrip Ash Cleanup  
**Date:** Thursday, December 12, 2019 1:18:49 PM

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Hi, Sara –

This comment came in over the DEQ Communications email. Usually when this occurs on other projects, I believe our MEPA folks just roll them in with other comments that come in over the designated email.

Thanks,

Paul D

**From:** J.may@live.com [mailto:J.may@live.com]  
**Sent:** Wednesday, December 11, 2019 10:02 AM  
**To:** DEQ Communications Team <DEQCommunicationsTeam@mt.gov>  
**Subject:** General Comment,

Hi,

In regard to Talen's proposed closure and cleanup plan for Colstrip 1 and 2: DEQ needs to require a proper cleanup which would include removal of ash, drying of ash and placement into lined landfills. It's beyond my understanding why this coal ash was ever allowed to be placed into unlined ponds which naturally precipitated a migration into the groundwater. A continuation of the current recycling process is not a solution. Thank you.

- Jody B May

**From:** [Adela Awner](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Costrip Ash Pond Cleanup  
**Date:** Wednesday, November 13, 2019 8:35:39 AM

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Dear Friends at Montana DEQ,

RE: Costrip Units 1 & 2 Ash Pond Cleanup

I write in support of digging out and removing all of the coal ash in the Unit 1 and 2 ponds and putting all of it in a new lined landfill that is entirely above the ground water table. The present Colstrip ash ponds are huge and deep, and they have been leaking toxic and dangerous heavy metals into the groundwater at the rate of thousands of gallons a day almost since their inception. The ground water underneath the community of Costrip was poisoned years ago and it continues to be a threat to ranchers and farmers in the surrounding area.

Montana has a history of corporations coming into our state, taking the riches out of the earth, making millions upon millions of dollars for their top executives and shareholders, and then leaving a toxic mess for Montana taxpayers to clean up. Some of them, like Zortman-Landusky will never be cleaned up, and we--the citizens of Montana--will be paying forever to manage what corporations left behind after they took the money and left the state. We already have enough Superfund sites in Montana. If the coal ash clean is not done right, Montana taxpayers will again end up paying millions of dollars to deal with the environmental and financial results. And I believe Colstrip will eventually become yet another Zortman-Landusky if this is not done right.

There is absolutely no justification (giving in to corporate pressure is not a justification) to just capping the ash and leaving it in place where it will, no doubt, continue to leak into and severely pollute the ground water. Although at first glance, removal may seem like a more costly option, in reality, in the long term, it is actually the less costly option. Doing this right now will save Montana millions of dollars for years and years to come. It is also the best outcome for the community of Colstrip. The removal option will create good jobs for Colstrip workers who are about to lose their jobs when Units 1 & 2 shut down, and it will help the town weather and be better able to survive the upheaval the town is about to endure. This is hugely important!

Please do the right thing for Colstrip and for all of Montana. Dig out and remove Colstrip 1 and 2 ash and put it in a new, lined pond out of contact with the water table.

Please include my comments in the official record.

Thank you,  
Adela Awner  
1109 Delphinium Drive  
Billings, MT 59102

**From:** [Paul Pacini](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Colstrip 1&2 and Colstrip 3 & 4  
**Date:** Wednesday, November 20, 2019 9:03:07 PM

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Department of Environmental Quality:

I am concerned about the future of the Colstrip electrical generating facility. I believe that shutting down these coal fired electrical generators is a positive step into the future and that step should leave an environmentally clean past. Talen should not be allowed to exit the scene without fully addressing the groundwater contamination created by their coal ash. This means:

- Full dewatering and excavation of coal ash at Units 1 & 2 ponds and the Plant site. Assurance that a similar problem does not exist at Colstrip 3 & 4.
- Aggressive pond and soil dewatering and capping at Units 3 & 4.
- Groundwater treatment.

Sincerely,

Paul Pacini

303 State Street  
Helena, Montana 59601-5788  
U.S.A.

406.443.7730 - hm  
406.431.7306 - cll  
[ppacini47@gmail.com](mailto:ppacini47@gmail.com)

**From:** [Sue Malek](#)  
**To:** [Edinberg, Sara](#)  
**Subject:** [EXTERNAL] Colstrip 1 and 2 ask ponds  
**Date:** Saturday, December 14, 2019 11:25:31 AM

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Sara,

Don't let us down on remediation of the ash ponds resulting from Colstrip 1 and 2. Zortman-Landusky is costing Montana and our nation billions of dollars and the issues will never be totally resolved.

But, at Colstrip, you have a chance to make sure the companies that have profited from the plants for years be responsible for remediating the damage to our water to the highest degree possible. Make sure the companies are required to:

- Excavate and move all coal ash in the Unit 1&2 ponds to a new, lined landfill.
- Provide bonding to pump water beyond 2070 in ensure Montana taxpayers are not required obligated to pay remediation costs that are attributable to the companies' operations.

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Senator Sue Malek  
Senate District 46  
1400 Prairie Way  
Missoula, MT 59802

**From:** [Jeri Custer](#)  
**To:** [DEQ COLSTRIP](#)  
**Subject:** [EXTERNAL] Coal Ash Pond Clean up  
**Date:** Monday, December 9, 2019 8:14:49 AM

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Dear Sara and DEQ

I apologize for using email in lieu of a formal letter on stationary, but my computer is in the repair shop.

I want to encourage the DEQ to make sure the clean up method selected will leave the groundwater for the future in drinkable and useable condition. I have been born and raised in Eastern Montana and water is in short supply and necessary for agriculture production. The farmers and ranchers in my area that I most respect have been on the same land for four and five generations and can notice changes to their land in production of crops, cattle, and water quality. I want my farm and ranch constituent's concerns to be handled, as the ag industry is our number one industry and will still be here when the plants are no longer needed for electricity.

I am most concerned with the pond that is below the water table, as all liners leak at some point.

I want adequate clean up, so we don't have problems that would be more costly down the road.

I want to thank you for making sure Montana will be healthy in the future and considering my comments.

Sincerely,  
Geraldine Custer  
Rep. HD 39

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