

**BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING**

**IN THE MATTER OF OBJECTIONS TO ANCHOR)
ENVIRONMENTAL PERMIT APPLICATION)
FILE NUMBER 50.022) DOCKET NO. 13-5802
)
)**

**ANCHOR ENVIRONMENTAL’S ANSWER TO TOWN OF MILLS
INTERROGATORIES**

Anchor Environmental – AAA Services, pursuant to the Wyoming Environmental Quality Council’s (EQC) December 30, 2013 scheduling order in this case, submits this Answers to the Town of Mills Interrogatories.

INTERROGATORY NO. 1: Please identify any witnesses you intend to call to testify at the Hearing in this matter, identify any all documents you intend to use in connection with such testimony, describe the subject matter of his or her testimony, and state the substance of the facts and opinions to which he or she is expected to testify and a summary of the basis therefore.
ANSWER:

Anchor provided this information in its designation of witnesses filed January 8, 2014. On file with the WDEQ EQC. This answer can be viewed at:

<https://deq.state.wy.us/eqc/Docket/13-5802%20Anchor%20Environmental/Anchor%20Environmental%20Witness%20List.pdf>

INTERROGATORY NO. 2:

Please identify all factors you considered in selecting your proposed location for this new Solid Waste Transfer, Treatment and Storage facility and identify any alternate sites or locations which were considered or could have been considered regardless of economic cost.
ANSWER:

This site was selected because it is properly zoned by Natrona County for industrial use, Anchor Environmental – AAA Services applied for and was granted a conditional use permit by Natrona County.

No other locations were considered.

INTERROGATORY NO. 3:

Please identify any other facilities located within the State of Wyoming, whether owned by Anchor Environmental, Inc. or other persons/entities performing similar services with regard to the transfer, treatment, or storage of used drilling fluids and sump wastes and if known, or can be determined through reasonable diligence, please explain the process or processes used to treat the waste materials at each facility identified.

ANSWER:

Anchor does not own any other facilities. I don't know of any other facilities or processes.

INTERROGATORY NO. 4:

Please identify any other facilities you have operated, inspected, considered, or modeled whether owned by Anchor Environmental, Inc. or other parties/entities using the same or similar mechanical reduction or separation processes to treat equal quantities of similar wastes as proposed by your application. Please identify any other person or entity you have consulted with, in developing your business plan and design specifications for the proposed facility.

ANSWER:

Anchor has not owned or operated, inspected, considered or modeled any facility of this type. Anchor retained Inberg Miller Engineers, 1120 E C Street, Casper WY 82601 to prepare this permit application.

Inberg Miller Engineers completed the design of the facility as it must be constructed according to our permit application. See section 4.0 of the permit application. (on file with Natrona County Library)

INTERROGATORY NO. 5:

Please identify your protocols for screening and profiling any used/waste material prior to being accepted at your proposed facility. Please identify the difference in any screening protocol as may be applied to different types of wastes (i.e. sump wastes vs. used drilling fluids), identify the minimum qualifications of all persons performing any screening and identify the types of inspection and testing that will be performed on every material.

ANSWER:

Waste screening is described in Section 4.3 of the permit application. There is only one screening protocol it is described in Section 4.3 of the permit application. Minimum qualifications of persons performing screening are not a permit requirement because we plan to manage non-hazardous materials. Testing and screening is described in Section 4.3 of the permit application.

INTERROGATORY NO. 6:

In addition to mechanical separation, please identify any other, additional or alternative processing methods which are, or could be used to perform the same or similar functions regardless of the economic cost of using such alternate technology.

ANSWER:

I do not know of any other alternative processing methods which will achieve the results we want to achieve at the proposed facility.

INTERROGATORY NO. 7: Please describe, in detailed narrative fashion, each and every structure, equipment, implement or other device you anticipate will or may be used outside of your proposed enclosed facility, including but not limited to the number and capacity of all outdoor storage tanks, receiving tanks, drying beds, evaporation ponds and other outdoor operations and explain in detail how each such device, structure and equipment will or may be used.

ANSWER:

There will be four storage 21,000 gallon tanks one for receiving one for water one for oil and one for reclaimed drilling fluid. There are no outdoor drying beds, evaporation ponds or other outdoor operations. Storage tanks will be used for storage.

INTERROGATORY NO. 8: To the best of your ability, please estimate the ratio of SOLID to LIQUID (or combined sludge wastes as defined in Chapter 1, Section 1 (e) (I)) you anticipate will or may be processed at your proposed facility.

ANSWER:

The material processed at the facility is generally wet material which contains enough liquid that it cannot pass the paint filter test and therefore it can't be sent directly to the landfill. There is no way to estimate the ratio of solid to liquid.

INTERROGATORY NO. 9: With regard to any proposed wastewater storage tanks you will or may use upon the premises, please identify the physical dimensions including capacity of each such tank and specify the size and volume of all openings exposed to the environment to facilitate evaporation.

ANSWER:

Typical tanks are 12' wide by 20' long and hold 21,000 gallons. There will be no openings exposed to the environment to facilitate evaporation.

INTERROGATORY NO. 10: Have you set a maximum limit for the amount of wastewater which will be stored upon the premises, and if so, please specify such amount and whether such information is contained in your application and where such information may be found.

ANSWER:

Maximum water storage is 21,000 gallons as listed in the permit application in section 4.4 paragraph 5.

INTERROGATORY NO. 11:

Please explain in detail your protocol for disposing of unused liquid (or sludge) wastes in your daily operations and please identify any specific arrangements, plans or protocols for the removal of such wastes in case of emergency.

ANSWER:

You assume that there will be such a waste generated from our proposed operations. Such wastes will not exist and no imagined waste plans and imagined waste plan emergencies can exist.

We have applied for this permit and set-up a process for dealing with waste generated in the course of recycling drilling fluids and drying shop and sump waste. I would direct your attention to the permit application in it's entirety for an answer to your questions.

INTERROGATORY NO. 12: Please specify the projected life expectancy of your proposed facility. Please identify whether such information is contained in your application and/or your public notices published in a newspaper of general circulation in the affected area.

ANSWER:

I am unaware of the life expectancy of the facility or where that information might be found.

INTERROGATORY NO. 13: Please identify each and every method, process and technique which will be used to monitor, sample or detect potential air, soil and groundwater contamination at your proposed facility.

ANSWER:

Environmental monitoring is covered in section 5.0 of the permit application.

INTERROGATORY NO. 14: Please identify each and ever person, including name and address who you provided notice of the re-zoning of the subject property to Light Industrial use, and identify whether such notices were received by such persons or were returned undelivered.

ANSWER:

I asked Inberg-Miller Engineers to prepare this permit application. They provided the required notices and kept records.

INTERROGATORY NO. 15: Please identify each and every person, including name and address who you provided notice of your application for the proposed facility, and identify whether such notices were received by such persons or were returned undelivered.

ANSWER:

I asked Inberg-Miller Engineers to prepare this permit application. They provided the required notices and kept records. I don't have access to this material.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce any and all documents, lists, books, notes, memoranda, or other references which were consulted, referred to or identified in or used in responding to the Mills' Interrogatories and, for each document so produced, please set forth the specific Interrogatories to which the documents are responsive.

RESPONSE:

I used the permit application and nothing else to answer.

REQUEST FOR PRODUCTION NO. 2: Please produce a true and accurate copy of your application filed with the Wyoming Department of Environmental Quality for the proposed facility including all exhibits, attachments and signature pages.

RESPONSE:

Ok

REQUEST FOR PRODUCTION NO. 3: Please produce any exhibits you intend to introduce at the hearing in this matter.

I intend to use the permit application and nothing else.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Please produce copies of all notices provided to landowners, governmental agencies and others pertaining to your application for the proposed facility, including all documents pertaining to the receipt of any certified mailings if applicable.

RESPONSE:

I asked Inberg-Miller Engineers to prepare this permit application. They provided the required notices and kept records. I don't have access to this material.

REQUEST FOR PRODUCTION NO. 5: Please produce copies of all notices provided to landowners, governmental agencies and others pertaining to the re-zoning of the property to Light Industrial, including all documents pertaining to the receipt of any certified mailings if applicable.

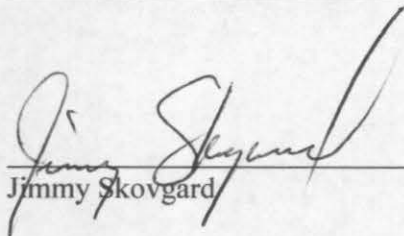
CERTIFICATE OF SERVICE

I, Jim Skovgard, certify that at Casper, Wyoming, on February 11, 2014, I served a copy of the foregoing **ANCHOR ENVIRONMENTAL'S ANSWER TO TOWN OF MILLS INTERROGATORIES** by electronic mail and by depositing copies of the same in the United States mail, postage prepaid, duly enveloped and addressed to the following:

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| Dennis Herrick 5210 Westside Place Mills, WY 82604 drh66flh@gmail.com | Jonathan Phillips 144 N. 7 TH Mills, WY 82604 ejpwy@hotmail.com |
| Jo Ann and Donnie Kenyon 4215 S. Skyline Road Casper, WY 82604 | |

and by electronic mail to the following:

| | |
|--|--|
| Jim Skovgard Anchor Environmental, Inc. jim.skovgard@anchor-inc.com | Town of Mills and Lisa Whetstone c/o Lisa Whetstone, Mills Town Clerk lwhetstone@millswy.com |
| Mike Barrash Asst. Attorney General mike.barrash@wyo.gov | Jeremy Gross Attorney General's Office jeremy.gross@wyo.gov |
| Alan Edwards SHWD Administrator alan.edwards@wyo.gov | Todd Parfitt Director, DEQ Todd.Parfitt@wyo.gov |



Jimmy Skovgard

RESPONSE:

I asked Inberg-Miller Engineers to prepare this permit application. They provided the required notices and kept records. I don't have access to this material.

REQUEST FOR PRODUCTION NO. 6: Please produce copies of all contracts, memoranda of understanding or other documents pertaining to the disposal of any liquid or solid wastes by any third parties.

RESPONSE:

Acceptance letters are included in Exhibit 12 of the permit application.

Dated this 11th day of February, 2014

By: _____

Jim Skovgard, Authorized Agent