

Exhibit P
Response to COE Question 12

RAIN-ON-SNOW EVENTS

COE Question 12.

“BMP’s for rain-on-snow events.

Winter rain-on-snow events and high spring runoff floods occur regularly in Sand Creek. Please indicate measures you propose to prevent erosion and sedimentation and other adverse environmental effects that may result during potential rain-on-snow events.”

Response:

Rain-on-snow events may occur primarily from October to April. During this time to prevent erosion and sedimentation that may result during potential rain-on-snow events refer to sections 2a(1), BMP 3.11, 2f, and 2g of the NPDES Storm Water Pollution Prevention Plan included in Attachment H of the permit application. The listed sections address temporary erosion and sediment, surface/soil stabilization, emergency plans, and winter shutdown periods. Temporary sediment basins and water treatment systems will be utilized during construction in addition to the permanent ponds. For day-to-day operations, silt fence, inflatable dams, turbidity curtains, sheet piles, one or more or a combination of soil Binder/tackifier, plastic covering and sandbags, mulched vegetation erosion control, or equally effective method will be implemented. For winter shutdown and emergencies, where possible, permanent measures will be in place before shutdown.