



**LAND RECLAMATION DIVISION
Memorandum No. 2020-02 Revised**

To: All Coal Mining Operators/Consultants

From: Daniel W. Barkley, Supervisor
Land Reclamation Division

Date: August 27, 2025

Re: Requests for Neutralizing Material Rate for Refuse Cover

NOTE: This Memorandum Supersedes Operator Memorandum 2020-02 issued on January 17, 2020, and Revised September 26, 2022.

The regulations found at 62 Ill. Adm. Code 1816/1817.71(o) require any excess spoil that is acid- or toxic-forming to be adequately covered or treated to control the impact on surface and groundwater, to prevent sustained combustion, and to minimize adverse effects on plant growth. Additionally, 62 Ill. Adm. Code 1816/1817.83(c)(4) allows the Department to require the addition of neutralization material to coal mine waste, if the material is needed to prevent acid mine drainage.

The Department has determined that all requests for the addition of neutralizing materials shall be formally submitted for review and response. These requests may come in as part of an Abandonment and Closure of Refuse Disposal Areas (Form 9.9 of the ePermit Application) or as a stand-alone Insignificant Permit Revision (IPR).

Stand-alone Insignificant Permit Revisions shall include an engineering sealed report certifying that grading of slopes, benches, bench drainage ditches, haul roads, haul road drainage ditches, and down-drains into coarse refuse was performed in accordance with the approved operations or reclamation plan. The sealed report shall include the Department's Refuse Pile Engineering Certification Form or Impoundment Engineering Certification Form and shall be accompanied by appropriate cross-sections, profile drawings, and plan views of all of the graded areas that are proposed for neutralizing material placement and soil covering.

NOTE: SAMPLING FOR LIME RATES MUST BE PERFORMED AFTER THE AREA HAS BEEN GRADED AND PREPPED FOR FINAL SOIL COVER.

At a minimum, all requests for the addition of neutralizing materials must include:

- 1) An Acid Base Accounting (ABA) of the material to be covered (slurry and/or coarse refuse, as applicable*), including sulfur forms.

- 2) The approved final cover thickness. If a refuse cover variance was granted, the applicant shall provide the date of that approval and, where applicable, the permitting action of the approval (e.g. IPR No. 1 to Permit No. 1000).
- 3) A map showing the slurry and/or coarse refuse sampling location(s). The Department recommends a sampling grid of 1 acre at a minimum depth of 6 inches, up to 12 inches.
- 4) Identification of the neutralizing material proposed for use. (e.g., Quarry source and physical location).
- 5) An ABA of the neutralizing material proposed for use**.
- 6) The applicant's proposed neutralizing material application rate; and
- 7) A map showing the areas proposed for neutralizing material placement and final soil covering.

*Please note, the refuse ABA must be recent (less than six (6) months old and collected from non-weathered refuse.

**Also note, the ABA of the neutralizing material must be less than twelve (12) months old.

Operators electing to use composite sampling to determine lime rates will be subject to the following additional requirements:

- 1) Composite sample results must include a narrative explanation of the sample and analysis methodology. For example: a) equal-weighted samples were collected, composited, and thoroughly blended before an amount equal to a single sample was removed for analysis; or b) samples were composite based on sample volume(s) and were combined before a volume was selected for analysis.
- 2) Composite sample analysis must also include the individual sample analysis results for each sample collected to ensure that the composite sample is representative of the site and/or sample grid.

Upon receipt of this information, the Department will provide a written response that clearly outlines the approved neutralizing material application rate(s) and the proposed final cover thickness.

- Lime Rate/Neutralizing Material Approvals will expire one (1) year from the original approval date, as soil placement/reclamation activities are expected to occur within weeks to months of approval for a specific area.
- Neutralizing materials shall be incorporated into the refuse material at a minimum of six (6) inches, up to a maximum of twelve (12) inches.

The Department will evaluate the use of Lime Sludge materials (Wastewater/Sewage Treatment Sludge, Drinking Water Treatment Sludge, etc.) on a case-by-case basis. All Lime Sludge requests MUST be submitted to the IEPA for concurrent review and approval.

Please also refer to the Department's Technical Guidance Document No. 5 and/or the Department's SCML-9 Refuse Cover Variance Request Form for additional information.

The Department will attempt to continue to review these requests in an expeditious manner to allow continued contemporaneous reclamation to occur in a timely manner.