

The Small Area Exemption (Section 3.8-4) addresses the concerns for control of runoff during construction.

R. Harden:

Comment: UMC 784.11 Operation Plan. The Operator needs to provide a narrative description explaining the construction, modification, use, maintenance and removal of the proposed facilities to prevent: ...

Response: Castle Gate Coal Company has provided the requested information in the submitted documentation in Section 3.8-2 UMC 784.11 and other referenced sections of the submittal.

Comment: UMC 784.13 Reclamation Plan. Mr. Harden's concern in this section is lack of detail in previous submittal to calculate a bond amount. He also indicates that the surety company must be notified of the amendment.

Response: Castle Gate Coal Company has obtained an elevation view from the contractor of the conveyor and loadout building. This has been incorporated as Figure 3.8-2 in the submittal. Also see Section 3.8-02 UMC 784.13.

The bonding company does not need to be notified of the permit amendment unless there is an increase in bond amount. The bonding company is not bonding the facilities or acres but rather the monetary amount shown on the bond. The bonded amount can be used anywhere on the Castle Gate Permit 007/004 for reclamation purposes.

Comment: UMC 784.24 Transportation Facilities. The application shall contain a detailed description of the conveyor and loadout system to be constructed, used or maintained within the proposed permit area. The operator should include a description of the size, capacity and intended use of the facilities in conjunction with the current operational facilities. The description shall include a map and appropriate cross-sections.

Response: See Section 3.8-1 General Description of Facility and Section 3.8-2 UMC 784.24. Figure 3.8-2 is an elevation view of the proposed Unit Train Loadout and Conveyor System.

Lynn Kunzler, Reclamation Biologist

Comment: UMC 783.20 and UMC 788.21. Mr. Kunzler objected to the statement made by Castle Gate Coal Company that "There is no significant wildlife value to the area".

Response: Castle Gate Coal Company has changed the text in Section 3.8-2 UMC 783.20 to address the concerns of both the Division of Wildlife and D.O.G.M.

Comment: UMC 784.13 Reclamation Plans. "The applicant must identify the species and rate of application to be used in the revegetation of the disturbance..."

Response: See revised Section 3.8-2 UMC 784.13(5) Revegetation Plan.

James Leatherwood

Comment: UMC 783.21 Soils Resources Information. Conversations with Mr. Leatherwood on the phone indicated that an S.C.S. soil survey map of the area would be adequate for the needs of the Division.

Response: Castle Gate Coal Company has enclosed Exhibit 3.8-1 which is a S.C.S. Order 3 Soil Survey Map of the area.

Comment: UMC 784.13 Reclamation Plan. The applicant must develop and submit a topsoil handling plan. This plan must... (1) indicate depth of removal; (2) show location of topsoil stockpile; and (3) volume of topsoil.

Response: See Section 3.8-2 UMC 784.13 (4) and Exhibit 3.4-1 for Plan for Topsoil Redistribution.

David Lof

Comment: UMC 784.11 Operation Plan.

(b) (1) There are not design drawings...

(b) (2) There is no mention in the plan as to how the operator is going to access the site for construction.

Response: (b) (1) See Figure 3.8-2 and Table of Contents for design exhibits.

(b) (2) The access to the site will be across the Price River as shown on Exhibit 3.4-1.

Comment: UMC 784.11(b) and UMC 817.89 disposal of Noncoal Waste

1. Will there be any storage of materials or noncoal waste within the proposed unit train loadout.

Response: There are no provisions for storage of materials in the unit train loadout.

Comment: UMC 784.11 and UMC 817.181 Support Facilities

1. Will the operator need to be able to wash down the unit train loadout...
2. How will the operator address coal spillage?

Response:

1. The loadout will be cleaned with a vacuum system.
2. Coal spillage will be vacuumed into the building. Large spillages will be cleaned with shovels and loaded onto a truck or railcar.

Castle Gate Coal Company has received permits from the Corp of Engineers and State Engineers Office for this project. Only approval from the Division of Oil, Gas and Mining is lacking in order to begin construction. A contract has been awarded for design and construction of this facility.

Please expedite the approval process for this facility. Any further delays would jeopardize the start of construction which is scheduled for May.

Sincerely,


Richard H. Allison, Jr., P.E.
Project Supervisor

RHA:jcr

cc: R. Clark
D. Bryant
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Chrono

cc5.rha/037