

January 26, 1988

TO: File

FROM: James Leatherwood *JL*

RE: Castle Gate Mid-Permit Term Review, Castle Gate Coal Company, Price River Mining Complex, ACT/007/004, Folder No. 2, Carbon County, Utah

The above mentioned June 16, 1987 and September 11, 1987 submittal has been reviewed and found to be incomplete. The following concerns must be addressed.

UMC 771.23 Permit Applications - General Requirements For Format and Contents - JSL

The mid-permit term submittal did not contain a plan to sample refuse materials prior to placement of soil materials as required by Condition No. 1 of the approved permit. When reviewing previous correspondence between Price River Coal Company (PRCC), OSM and the Division a question of sampling adequacy arises. The following briefly outlines the history of transmittals related to Condition No. 1.

The Division reviewed information submitted by PRCC on November 30, 1984, January 28, and February 25, 1985 in response to conditions to the permit approval. The Division had a few comments in regard to the adequacy of the response. These comments were submitted to OSM for review March 19, 1985. OSM responded May 2, 1985 with a modification to the response for Condition No. 1. This modification included the addition of the USDA texture class and change in sampling methodology to non-composit samples.

The Division notified PRCC with their concerns July 22, 1985. The operator contacted the Division October 31, 1985. PRCC was concerned that the modified sampling program would entail additional sampling per acre. The Division responded December 19, 1985 with a clarification to sample one individual representative site for each acre (basis of argument outlined in Memo to File, 12/17/85). The operator was required to a commitment.

On the same day that the Division transmitted the clarification to PRCC, December 19, 1985, the Division received a letter from PRCC addressing the conditions to the permit approval. The operator committed to collect four to five grab samples per acre. The Division submitted PRCC response to OSM January 7, 1986. The Division regarded Condition No. 1 as being met. OSM had no further response to Condition No. 1.

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The commitment by PRCC to four to five grab samples were established prior to reviewing the Divisions December 19, 1985 letter. At this time the Division considers one sample per acre adequate. However, sampling more sites per acre is acceptable. In either case, in accordance with Condition No. 1, the operator must provide a plan, to be included within the MRP, to sample refuse materials prior to placement of soil material.

UMC 783.21 Soil Resource Information - JSL

The soil identified as 121- Travessilla - Rock Outcrop - Gerst Complex does not have a corresponding ID as shown on page 35 of chapter 8. Could it be "MRG"? The "MRG" soil ID does not have a corresponding soil series.

The soil survey association maps on page 8Axxiv and 8Axxiii are illegible. Please submit a legible copy with the permit boundary outlined.

UMC 784.13 Reclamation Plan: General Requirements - JSL

The reclamation plan presented in chapter IX does not include a soil compaction mitigation plan. It is advisable to rip or disc the soil material prior to fertilization (if broadcast) or seeding.

UMC 783.27 Prime Farmland Investigation - JSL

Section 8.2 of the submitted permit refers to the correspondence addendum for the Soil Conservation Service negative prime farmland determination. The correspondence addendum was not located. Nor was the negative prime farm land determination. Please amend.

UMC 817.22(e) Soil: Removal - JSL

As described in section 8.3, page 19 "Re-soiling materials" for areas previously disturbed with no topsoil will have tested "...suitable alternative re-soil materials..." to "...commence as soon as practicable." On page 36 it states that samples will be taken by late summer of 1984. This data has not been located within the text of the submitted mid-term permit. Please submit.

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In chapter 9 pages 79 and 81 the submittal implies that a site will be naturally invaded by surrounding vegetation when direct haulback and upper lift salvage of soil has taken place. This may be the case in instances of well developed O, A and E horizontal development. However, it is questionable when corresponding to the slightly developed, calcareous and arid soils proposed for revegetation as described in the plan. Unless the operator can justify this case for the Castle Gate soils, the presented argument provides no verification of reclamation success with the "re-soiling materials".

The following parameters should be analyzed for all re-soiling materials: pH, USDA textural class, electrical conductivity, sodium adsorption ratio, boron, selenium, percent rock fragments, percent calcium carbonate and saturation percentage. The operator may need to demonstrate the feasibility of the proposed "re-soiling materials" by approved field site trials. This determination will be based on the respective analysis of the "re-soiling material".

UMC 817.24 Soil: Redistribution - JSL

Several redistribution depths discrepancies have been found within the submitted plan. Chapter 3 page 49, Table 3.1-2 includes plans for a four foot cover over refuse in Sowbelly, Hardscrabble, Castle Gate and Crandall Canyon. Chapter eight, page 31 states that 12 inches of material will be distributed over the refuse waste at Castle Gate. Section 3.4-4(1) includes a redistribution depth of 1.5 feet of non-toxic material to be placed in schoolhouse canyon prior to six inch distribution of re-soiling materials. Review of historic correspondence between PRCC and the Division implies that the 1.5 feet of non-toxic material covered by six inches of re-soiling material to be the appropriate plan. Please amend these inconsistencies.

cc D. Darby
S. Linner

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