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October 27, 1986

TO: Memo to File

From: James Leatherwood RE: Determination of Completeness Review, Utah Fuel Company, Skyline Mines, ACT/007/005, Folder #2, Carbon County, Utah

The August 29, 1986 permit submittal has been reviewed. I have found the permit application to be incomplete. The following concerns must be addressed prior to completeness approval.

UMC 783.21 - Soil Survey - JSL

This section is not complete. The applicant must include the updated order 1 and order 2 soil survey for all areas to be disturbed. The submitted soils map is not sufficient. A soils map for the load out area and the conveyor belt area must be submitted. All soil maps/surveys must be surveyed to a series level of intensity, not the family level (see soils map). "Cryoboralls" must be changed to Cryoborolls on the soils map. The applicant may submit the referred to soil survey in Volume A-8. However, maps 3-100-C, 2-101-C through 2-109-C are illegable. Clear and concise soil maps must be submitted. The soil survey must also include the present and potential productivity and the moisture regime for each soil series.

Technical Adequacy

UMC 817.22 - Soil: Removal - JSL

In section 2.11, pg. 2-186 through 188, tables 2.11-1 and 2.11-2 various analytical errors have been identified. The volume of useable topsoil from the load out facility is 35,589 cyd, not 25,589 cyd. The conveyor route, mapping unit 2 useable topsoil equals 1694 cyd not 2258 cyd. Mapping unit 10 useable topsoil equals 2017 cyd not 1371 cyd. Mapping unit 13 useable topsoil equals 806 cyd not 80 cyd. The grand total volume of topsoil would now equal 131,742 cyd not 120,934. Please amend. Also include the basis for the determination for a poor soil.

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UMC 817.24 - Soil: Redistribution - JSL

- (a) The applicant must elaborate on the "necessary measures" that will be used to ensure topsoil stability on graded slopes (see pg. 4-27).
- (b)(2) The applicant must commit to a minimum ripping depth of six inches.
- (b)(3) The period of time between topsoil redistribution and revegetation shall not be greater than 30 days, unless specific applicable soil stabilization techniques are committed too.

UMC 817.25 - Soil: Nutrients and Soil Amendments - JSL

The applicant must submit a detailed listing of all parameters to be analyzed for fertilization. The applicant must also include: (A) Data to support the fertilizer recommendation of 150 lb per acre of nitrogen, (B) Specific fertilizer distribution plan (ie. broadcast, band, ect.), and (C) The equipment to be implemented for fertilizer distribution.

UMC 817.89 - Disposal of Non-Coal Waste - JSL

On page 4-40 the applicant states that non-coal waste will be transported to a "state approved sanitary landfill". Please define this landfill. Approval from the landfill operator for non-coal waste disposal must also be included.

UMC 817.106 - Regrading and Stabilizing Rills and Gullies - JSL

The operator must commit to fill, regrade, and reseed all rills and gullies prior to an eroded depth of nine inches.

0534(41-42)
cc: S. Linner
R. Harden