

November 18, 1987

TO: File

FROM: James Leatherwood *JLW*

RE: Determination of Completeness Review, September 21, 1987  
Submittal, Utah Fuel Company, Skyline Mine, ACT/007/005,  
Folder No. 2, Carbon County, Utah

The above-mentioned response to the April 3, 1987 Division comments has been reviewed. The submittal still contains several problems. The following concerns must be addressed:

Previous Comment:

UMC 783.21 Soil Resources Information - JSL

The portal surface facilities soil survey map found in the Skyline Project Supplement Soils Report, supplement to Soils and Vegetation Appendix A-2, does not correspond to the Portal Yard Soil Survey, Plate 2.11-1 Vol. 1 and Map D of the Soils and Vegetation section of Appendix A-2. These two plates must correspond to each other. The applicant has included various soil profile descriptions for the rock waste disposal area. However, no soil map was included. Please submit.

Determination of Completeness;

The applicant has adequately responded to the previous comments. However, Map 2-101-C, Conveyor route, as delineated in the Skyline Project Supplemental Soils Report, does not clearly identify the soils at the Portal Yard Area. Please resubmit.

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Previous Comment:

UMC 783.25 Cross-Sections, Maps, and Plans - JSL

Page 4.3, Section 4.11 of Volume 3 inadvertently refers to Map 3.2.8-2 for final contours of the rock disposal site. Map 3.2.8-2 contains the rock waste disposal area cross-sections, not final contours. Please amend.

Determination of Completeness:

The applicant has adequately addressed this concern. This section is now complete.

Technical Deficiencies

Previous Comment:

UMC 817.48 Hydrologic Balance: Acid-Forming and Toxic-Forming Materials - JSL

Pages 3-61 and 4-42 state that no acid-forming or toxic-forming materials are anticipated at the Skyline Mines. Section 4.16 states that an analysis has been run to insure that the underground development waste materials are not acid-forming or toxic-forming materials. The applicant list data in the supplemental to the Hydrology chapter Appendix A-1, the Geology chapter pages 45-47 Appendix A-3, Table 2.2.8-2 page 2-18 and Table VIII (summary of sulfur form analysis) page B-12 of the Geology chapter.

The Division finds that the presented data does not adequately reflect the previous determination that the underground waste materials are not an acid-forming or toxic-forming material. To determine if the material is acid-forming, the acid base potential must be quantified. The percent total sulfur can be used to calculate the acid production potential. To accurately quantify the acid base potential the neutralization potential (NP) must be known. The NP is derived from the percent calcium carbonate of the material (see attachment A). Furthermore, analysis of other components necessary to develop a negative

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determination for toxicity was unfortunately neglected in past reviews. To fully characterize the underground development waste, the following parameters should be analyzed: pH, electrical conductivity, sodium adsorption ratio, texture, selenium, and boron.

As reflected in Section 4.16, the applicant states that the waste material from the sediment pond will be analyzed for toxicity prior to disposal in the rock waste disposal area. The applicant has not detailed what analysis would be run to determine whether the materials are toxic. The Division advises that the above-stated parameters be analyzed for this determination.

Technical Adequacy:

The Division has not received the required data. This section is not technically adequate.

jr  
cc: R. Harden  
S. Linner  
1342R/8:10