

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 1, 2006

TO: Internal File

THRU: *DD* Dana Dean, P.E., Senior Reclamation Hydrologist *DDH*

FROM: Priscilla Burton, CPSSc, Environmental Scientist III *PWB by an*

RE: New Sedimentation Pond at Waste Rock Site, Canyon Fuel Company, Skyline Mine, C/007/0005, Task #2634

SUMMARY:

To expand the life of the waste rock facility another 6 years, Canyon Fuel Company plans to add an additional 0.44 acres of disturbance for construction of a new sedimentation pond and use the old pond for waste burial.

The application does not include the Appendix A-2 2006 soil survey or indicate in the operations section the plans for topsoil stripping depth.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

SOILS RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.21; 30 CFR 817.22; 30 CFR 817.200(c); 30 CFR 823; R645-301-220; R645-301-411.

Analysis:

Appendix A-3 referenced on page 2-4b, containing a 2006 soil survey of the site could not be found with the application.

Findings:

The Permittee has not complied with the Environmental Soil Resource requirements of the Regulations.

R645-301-222, Please provide the Appendix A-3 2006 Soil Survey information for the 0.44 acre area.

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Topsoil Removal and Storage

The location of the new sediment pond is shown on Map 3.2.8-4A and -4B.

The plan indicates on page 2-120 that suitable topsoil and subsoil will be separated, but does not give an indication of depth of topsoil and subsoil removal or an estimate of the volume of material to be stored.

The plan indicates that the soil will be stored on the outslope of the pond embankment road and that it will be signed and protected. The plan further indicates that the outslope of the road will be treated with a silt fence that will be removed when it is vegetated (p 3-72 (b)). There should be no plans for removing silt fence from a topsoil storage area.

Findings:

The Permittee has not complied with the Operational Soil Resource requirements of the Regulations.

R645-301-231.100, The plan must provide an indication of depth of topsoil and subsoil removal or an estimate of the volume of material to be stored. The plan must indicate topsoil storage area on a site map. The plan must not include removing silt fence from the outslope of the road which is also functioning as a topsoil storage area (i.e. p 3-72 (b)).

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Refuse Piles

The plan indicates the volume of waste currently buried at the Scofield Waste Rock site (in a table on an unnumbered page in an undesignated section of the MRP). The available capacity left at the Waste Rock site is approximately $8,000 \text{ yd}^3 @ 91 \text{ lb/ft}^3 = 9,840 \text{ tons}$ per year for seven years or $57,539 \text{ yd}^3$ (68,880 tons).

Findings:

The Permittee has met the R645-301-536 requirement to disclose the capacity of the coal mine waste storage designs.

RECLAMATION PLAN

TECHNICAL MEMO

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Redistribution

Reclamation of the site is shown on Map 4.16.1C without a pond retained and on Map 4.16.1B with the pond retained (at landowners request). Redistribution of the topsoil and subsoil removed from the site will be returned to the 0.44 ac site. Other reclamation activities remain unchanged.

Findings:

The information provided meets the requirements of the regulations for replacement of topsoil.

RECOMMENDATIONS:

The Division should not approve this application until all deficiencies listed above are resolved.