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DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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August 3, 1989

Mr. Benjamin Grimes
Environmental Coordinator
Cyprus-Plateau Mining Company
P. O. Drawer P M C
Price, Utah 84501

Dear Mr. Grimes:

Re: Deficient Stipulation Responses UMC 817.71-.74-(1)-(PGL/RVS/DD) and UMC 817.101-(1)-(PGL), Cyprus-Plateau Mining Company, Starpoint Mine, ACT/007/006, Folder #2, Carbon County, Utah

Division staff have reviewed and determined that the above referenced stipulation responses are deficient.

The attached technical memorandum dated May 25, 1989, identifies the deficiencies in the response to UMC 817.101-(1)-(PGL). Please respond to the identified deficiencies in UMC 817.101-(1)-(PGL) by no later than September 30, 1989.

With regard to responses concerning Stipulation UMC 817.71-.74-(1)-(PGL/RVS/DD), it appears that the approach asserted by Cyprus-Plateau Mining Company (CPMC) will not achieve compliance with the regulation. Accordingly, this stipulation has been revised to clarify CPMC's responsibilities under the Utah Coal Mining Regulations. The attached revision in Stipulation UMC 817.71-.74-(1)-(HS) should replace the previous Stipulation UMC 817.71-.74-(1)-(PGL/RVS/DD) in Attachment "A" of the approved permit, dated August 7, 1987.

Sincerely,

Richard V. Smith

Richard V. Smith
Permit Supervisor

djh
Attachments
cc: L. Braxton, DOGM
AT8/69

an equal opportunity employer

SUPPLEMENTAL ATTACHMENT "A"
(REVISED AUGUST 3, 1989)

Stipulation 817.71-.74-(1)-(HS)

1. Cyprus-Plateau must conduct a refuse pile monitoring program, at least two years prior to topsoil redistribution in the following manner:

   (a) A grid system encompassing the entire surface of the refuse pile will be laid on 300 foot centers. If acid and/or toxic or alkaline-producing materials are encountered through the initial sampling procedures, sub-samples will be taken at 150 foot intervals or a lesser distance to identify the extent of the suspect high level contaminant.

   (ii) At each sample site, the refuse will be sampled at 0-6 inches, 6-12 inches, 12-24 inches, 24-36 inches, and 36-48 inch depths.

   (iii) At a minimum, the following constituents will be analyzed for each depth-segregated sample: Selenium, Acid-Base Potential [to include Pyritic-Sulfur percent and Organic-Sulfur percent], Electrical Conductivity, Sodium Adsorption Ratio [SAR], Boron, and pH. Laboratory methodologies of the above constituents will follow those procedures outlined in Table Six of the Division's Guidelines for Management of Topsoil and Overburden.

   (iv) If acid and/or toxic alkaline-producing is identified, a total cover depth of four feet of non-combustible, non-acid, non-toxic and non-alkaline producing material will be utilized to cover the said acid and/or toxic or alkalinity-producing materials.

   (v) Based on current results obtained from the revegetation test plots, the upper 10 inches of the four feet of non-acid, non-toxic, and non-alkaline producing material shall be comprised of topsoil material. The total depth of topsoil redistributed may vary in accordance to future test plot results.