



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangarter  
Governor

Dee C. Hansen  
Executive Director

Dianne R. Nielson, Ph.D.  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

October 4, 1990

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Jesse Kelley, Reclamation Engineer *JK*

RE: Review of BTCA Designations in Light of New BTCA  
Criteria, Cyprus-Plateau Mining Corporation, Starpoint  
Mine, ACT/007/006-90A, Folder #5, Carbon County, Utah

## Synopsis

In an April 20, 1990 memorandum, this writer approved Cyprus-Plateau Mining Corporation's designation of four areas as Best Technology Currently Available (BTCA) areas. Since that time, it has come to this writer's attention that new criteria for the designation of BTCAs were approved by the Division in February 1990. As this writer was not aware of these criteria at the time he approved the Cyprus-Plateau BTCA areas, he has reviewed these areas to ensure that they conform to the criteria.

## Analysis

The present criteria for BTCA designation, as approved by the Division in February 1990, are as follows:

- (1) Each area must be shown clearly on a map.
- (2) The area of each BTCA must be calculated.
- (3) The total BTCA area as a percentage of the total disturbed area must be calculated.
- (4) The specific treatment or treatments for each BTCA must be shown.
- (5) The total runoff volume for the 10-year, 24-hour storm must be calculated for each BTCA.
- (6) The operator must commit to monitor the drainage from each area for compliance with state and federal effluent limitations.

Page 2  
Memo to P. Grubaugh-Littig  
ACT/007/006-90A  
October 4, 1990

The BTCA areas in question comply with Criteria Numbers 1, 2 and 4. They are all clearly shown on Map 42 and their areas and treatments are shown in Table 95 of the mine plan. They do not, however, comply with Criteria Numbers 3, 5 and 6. The total BTCA area as a percentage of the total disturbed area has not been calculated, the runoff volumes for the individual areas for the 10-year, 24-hour storm have not been calculated, and the operator has made no commitment to monitor the drainage from the areas for compliance with the state and Federal effluent limitations.

#### Recommendations

The operator must do three things in order to bring the BTCA areas in question into compliance with the present criteria:

- (1) Calculate the total BTCA area as a percentage of the total disturbed area at each operation and show this figure in the appropriate table.
- (2) Calculate the total runoff volume for each area for the 10-year, 24-hour storm and show these figures in the appropriate table.
- (3) Commit to monitor the drainage from each area for compliance with state and Federal effluent limitations. For BTCA's, these limitations are set forth in 40 CFR, Chapter 1, Sections 434.42 and 434.63 (7-1-86 Edition) and are as follows:
  - i) Iron, total - 7.0 milligrams per liter (mg/L) for any one day and a daily average of 3.5 mg/L for 30 consecutive days.
  - ii) TSS (Total Suspended Solids) - 70 mg/L for any one day and a daily average of 35 mg/L for 30 consecutive days.
  - iii) pH - Within the range of 6.0 to 9.0 at all times.
  - iv) SS (Settleable Solids) - 0.5 milliliters per liter (ml/L); measured during precipitation event; not to be exceeded.

djh/jbe  
ATSTARREVU