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This memo has been superceded

September 27, 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's) areas. Since that time, it has come to this writer's attention that new criteria for the designation of BTCA's was 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.

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 TSS (Total Suspended Solids) limitation of 0.1 milligram per liter (mg/l).

Recommendations

It is recommended that the operator provide all that is required by Criteria Numbers 3, 5 and 6 as listed above. This will bring Cyprus-Plateau's BTCA system into compliance with all of the present criteria.

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