



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Daron Haddock, Permit Supervisor

FROM: Thomas Munson, Senior Reclamation Hydrologist *TM*

RE: Plateau Refuse Pile Division Order, Cyprus Plateau Mining Corporation, Star Point Mine, ACT/007/006, Folder #2, Carbon County, Utah

Synopsis

This review will attempt to bring together any operational issues or reclamation issues which are outstanding or deficient in the PAP.

Analysis

R645-301-742 states that the appropriate sediment control measures will be designed, constructed, and maintained using the best technology currently available (BTCA) to prevent, to the extent possible, additional contributions of sediment to stream flow or to runoff outside the permit area and to minimize erosion to the extent possible.

The PAP is deficient in that it fails to specifically identify how this will be accomplished with the methods proposed in the reclamation plan. The plan currently shows that the ponds will be removed upon initiating reclamation contrary to the requirements of the rules. The operator is responsible for providing treatments for all reclaimed areas specifically outlining the BTCA for each area which meets the requirements of R645-301-742. The operator has argued that it is impossible to leave the ponds in place during reclamation because of road removal and subsequent access. On page 700-181 the PAP talks about "silt fence sediment traps used at several locations throughout the permit area to control sediment loss from roadside ditches as discussed in section 742. This is certainly inadequate to address the requirements of sediment control and erosion control for all reclaimed areas. This needs to be looked at in greater detail.

Specific Areas of Concern

1. Refuse Pile

In order to comply with this rule, the operator must supply an acceptable erosion and sediment control plan for the refuse pile. The current refuse pile design during reclamation calls for long slopes with a minimum cover of 17 inches of substitute topsoil. This cover depth is by no means adequate for mechanical treatments such as soil pitting or significant surface roughness. The use of long slopes is a major liability in terms of successful erosion control. The Division suggests that the operator look at lessening slopes and breaking up the length of slope with terraces, using a greater depth of substitute topsoil so that mechanical treatments such as soil pitting or surface roughness can be applied. The operator must provide sediment control for the whole area during reclamation whether it be sediment ponds or BTCA.

2. Road Cuts and Pad Outslopes

In order to comply with this rule, the operator must provide erosion control and sediment control for all reclaimed road cuts and pad outslopes providing a feasible plan which addresses what sort of BTCA sediment control measures will be implemented for each area.

3. Any areas not draining to a pond

In order to comply with this rule, the operator must have an approved plan which addresses sediment and erosion control for all reclaimed areas. The operator must discuss the BTCA measures which will be used to comply with R645-301-742. This discussion will include how these BTCA measures will be designed, constructed, and maintained. The removal of these structures, if necessary following bond release, will be addressed in this plan.