

0017



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

Michael O. Leavitt  
Governor  
Kathleen Clarke  
Executive Director  
Lowell P. Braxton  
Division Director

1594 West North Temple, Suite 1210  
PO Box 145801  
Salt Lake City, Utah 84114-5801  
801-538-5340  
801-359-3940 (Fax)  
801-538-7223 (TDD)

August 8, 2001

TO:



FROM:

Karl R. Houskeeper, Reclamation Specialist II, Team Lead

*Still for KRH.*

RE:

Refuse Pile Use as Waste Fuel Resource by Sunnyside Cogeneration Facility,  
Plateau Mining Corporation, Star Point Mine, C [REDACTED] AM01C

**SUMMARY:**

On August 8, 2001, the Division reviewed the amendment submitted by Plateau Mining Corporation (PMC) relative to the Star Point Mine. The amendment material submitted contains clarifications and removal of inconsequential information due to the current status of the Star Point and Willow Creek Mines. Star Point has begun the reclamation process and Willow Creek is in temporary cessation of operations.

PMC's current MRP allowed for the removal, processing, and transporting of the refuse material.

The amendment addresses Refuse Pile Use as Waste Fuel Resources by Sunnyside Cogeneration Facility. Sunnyside Cogeneration Associates (SCA) has evaluated the waste as a fuel resource and has asked PMC to amend its MRP to allow the refuse material to be moved to SCA's permitted facility.

As indicated on PMC's cover letter, PMC and SCA are considering under-taking permitting actions that would ultimately transfer the refuse pile responsibility from PMC to SCA.

**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**SPOIL AND WASTE MATERIALS**

**TECHNICAL MEMO**

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**

Pages 500-11, 500-12, 500-52 & 500-55 have been submitted for change to the MRP.

Page 500-11 clarifies the type of equipment to be used.

Page 500-12 states that tonnage records of refuse removed will be maintained by SCA. This page should be modified to indicate that a copy of this information is maintained by PMC since they are the current permit holder for the refuse pile. Information is provided to indicate that the refuse material will be used as fuel source for SCA (C/007/035) and removes information regarding the transportation and processing by PMC.

Page 500-52 removes information from the MRP on reprocessing the refuse pile by PMC.

Page 500-55 defines the refuse pile as waste fuel instead of coal.

**Findings:**

The information is clear and concise clarifying the equipment used and the use of the refuse material as a fuel source by SCA. However, page 500-12 should be modified to indicate that the tonnage records of refuse removed should be kept on file by PMC, since they are the present holder of the MRP for the refuse pile, see **R645-301-528.322**.

**R645-301-528.322** – Maintenance, inspections, and records of materials should be maintained by the operator and the information should be submitted to the District Manager of MSHA every twelfth month.

**RECOMMENDATION:**

Prior to approval, the requirements of R645-301-528.322 must be provided as outlined above.