

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

December 6, 2006

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*
Dave Darby, Team Lead

FROM: Wayne H. Western, Environmental Scientist III, Engineering and Bonding *W46*

RE: Plant Overflow Pond, Savage Services Corporation, Savage Coal Terminal,
Permit C/007/0022, Task ID #2706

SUMMARY:

On November 27, 2006, the Division received an application for an additional sediment pond at the Savage Coal Terminal. The Permittee called the new sediment pond the Plant Overflow Pond. The pond will be constructed in the existing pad area. This amendment mentions the engineering and bond aspects of the proposed amendment.

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TECHNICAL ANALYSIS:

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Ponds, Impoundments, Banks, Dams, and Embankments

The Permittee met the minimum requirements for the Plant Overflow Pond by:

- Having the plans and maps prepared and certified by a qualified, registered professional engineer.
- The pond is similar to those already in existence. Therefore, the approved MRP contains information about the operation and reclamation of the pond and further information is not needed in the application.

Findings:

The Permittee met the minimum requirements of this section.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The Permittee did not meet the minimum requirements for this section. The Permittee must show the pond, culvert and 6-inch waterline as if they were installed. The map meets the other requirements by showing the location of the new facilities.

Certification Requirements

The maps and cross sections have been properly certified.

Findings:

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

R645-301-521.168, The Permittee must revise the maps such that the Plant Overflow Pond and associated features are shown as if they were installed instead of being labeled as proposed facilities.

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

The reclamation of the Plant Overflow Pond is minor and does not require any significant changes to the reclamation plan.

Findings:

The Permittee met the minimum requirements of this section.

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

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Analysis:

Determination of Bond Amount

The Permittee did not meet the minimum requirements for this section. The Permittee must include detailed reclamation costs for the Plant Overflow Pond. The Division needs that information so they can have an updated reclamation cost estimate.

Findings:

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

R645-301-830.140, The Permittee must include detailed reclamation costs for reclaiming the Plant Overflow Pond. The Division needs the information to ensure that there is an updated reclamation cost estimate.

RECOMMENDATIONS:

The Division should deny the amendment until all of the above mention deficiencies have been addressed.