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STATE OF UTAH
DEPARTMENT OF HEALTH

NORMAN H. BANGERTER, GOVERNOR

SUZANNE DANDROY, M.D., M.P.H., EXECUTIVE DIRECTOR

FILE COPY

March 30, 1987

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Mr. D. Wayne Hedberg
Division of Oil, Gas and Mining
355 W. North Temple
3 Triad Center Suite 350
Salt Lake City, Utah 84180-1203

**DIVISION OF
OIL, GAS & MINING**

Re: Application for Permit Change, Coarse Refuse Area Expansion,
Kaiser Coal Corporation, Sunnyside Mines, ACT/007/007-87D,
Folder #2, Carbon County, Utah

Dear Mr. Hedberg:

I have completed review of the referenced preliminary plans and offer the following comments:

1. Disturbed runoff will be contained and treated in three sediment ponds. Two of these ponds, the Rail Cut Pond and the Coarse Refuse Toe Pond have been approved by the Division of Environmental Health. According to the preliminary plan, the third pond, referred to as the Coarse Refuse Pond will collect runoff from the uppermost development terraces of the refuse pile and will not be needed for several years. The plans submitted for the Coarse Refuse Pond lack sufficient detail for review.

2. Disturbed runoff will be collected in ditches generally located at the toe of the refuse pile. It appears runoff from ditch 2A is to be routed across one of the refuse pile terraces. Additional clarification is needed as this could contribute to percolation through the pile as well as the stability of the pile.

3. The chemical analyses of water samples in Exhibit 1 refers to several different sources, none of which match those labeled on the drawings. Without clarification of source identification, assimilation of results is not possible.

4. Section 817.48 states "The coarse refuse expansion area is specifically designed to be available for disposal of acid-forming and toxic-forming materials...". The preliminary plan lacks adequate information on the types of acid and toxic forming materials which may be disposed of in the refuse pile and the special techniques which will be utilized in disposal of these materials.

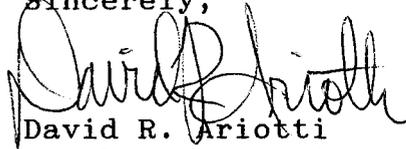
KENNETH L. ALKEMA, DIRECTOR • DIVISION OF ENVIRONMENTAL HEALTH

Mr. D. Wayne Hedberg
March 30, 1987
Page Two

5. Numerous complaints have been received concerning coal dust in the East Carbon/Sunnyside area. The Bureau of Air Quality will review the proposed mitigation plan and comment directly.

If you have any questions concerning these comments, please contact me at (801) 637-3671.

Sincerely,



David R. Ariotti
Southeast District Engineer
Division of Environmental Health

c: Dale Parker, Division of Environmental Health
Don Ostler, Bureau of Water Pollution Control
Dave Kopta, Bureau of Air Quality
Brent Bradford, Bureau of Solid and Hazardous Waste