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State of Utah

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DIVISION OF OIL, GAS AND MINING

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May 3, 1989

TO: Susan Linner, Permit Supervisor

FROM: Lynn Kunzler, Reclamation Biologist *ly K*

RE: Initial Mid Permit Term Review, U.S. Fuel Co. Hiawatha Complex, ACT/007/011, Folder#2, Carbon County, Utah

Summary:

The Hiawatha MRP has been reviewed for issues that need to be resolved during the Mid Permit Term Review. The Main issue that need to be addressed is reorganization of the plan to make it clear and concise.

Analysis:

Shortly after permit approval, U.S. Fuel Co. revised chapters 2, 3, 4 and 7 to incorporate information and plans that were piece-milled in during the permit review process (i.e. ICR, TD responses, etc.). However, not all formatting problems were resolved and not all chapters revised. To illustrate some of the formatting problems, not all page numbers are unique. Page numbering begin over for each major section or appendices in individual chapters (this makes page replacement guesswork). Since permit approval, many permit amendments have been made in response to NOV and TDN abatement plans, permit revisions and permit amendments that did not necessarily fit the format of the MRP and were added as appendices (Chapter 3 currently has 18 appendices which undoubtedly supersede text, tables, and/or maps found elsewhere in the MRP). To resolve these problems, U.S. Fuel will need to revise all chapters of the MRP (including the chapters revised in 1986) to make the MRP 'clear and concise'. It is suggested that U.S. Fuel place all technical studies, consultants reports, etc. in an appendix volume with appropriate references to these studies in the text of the MRP. This way, the appendices could then be easily carried from one permit term to the next, and it would be clear to those involved as to what constituted the mining plan and what was mere recommendations by consultants. Also, each page must be uniquely numbered (and dated?).

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Recommendations:

It is recommended that U.S. Fuel develop a schedule for submitting revised chapters of the MRP so that all chapters are revised by permit renewal time. DOGM should no longer accept revisions or amendments that are in appendix form (must be direct replacement of MRP pages. The technical staff should also review the plan for any technical problems that may need to be addressed.

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