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January 9, 1989

TO: Susan Linner, Permit Supervisor

FROM: Mike DeWeese, Reclamation Hydrologist MD

RE: TDN Response, U.S. Fuel Company, Hiawatha Mine Complex, ACT/007/011-88F, Folder # 2, Carbon County, Utah

SYNOPSIS:

U.S. Fuel Company has submitted diversion designs in response to TDN 88-2-116-2 part 2 of 3. A revised MRP appendix addressing small area exemptions was also submitted in response to TDN 88-2-116-3 part 1 of 1. The Division has reviewed these items which were received December 7, 1988, and found them to be technically inadequate based on the following analysis.

ANALYSIS:

Appendix III-17 identifies 10 areas currently utilizing alternative sediment control measures in which runoff does not report to a sediment pond. The operator has provided a narrative describing the specific measures implemented in each area. Based on these descriptions, the areas appear to meet the requirements of UMC 817.42. However, the following items must submitted prior to final determination of small area exemption status.

1. Inclusion of acreage in individual area descriptions.

2. Total acreage of all approved and proposed small area exemptions within the permit area.

3. Total current disturbed acreage of the permitted operation.

4. Delineation of each area on an appropriate contour map identifying it as a small area exemption.

The submitted designs for the catch basin east of the lower railroad yard and the basin above the preparation plant bypass culvert are adequate to contain the expected design storm runoff. This provides effective alternative sediment control of the drainage reporting to these structures as required by UMC 817.42.

The submitted diversion designs have been shown to contain adequate capacity to convey the design storm runoff. However, Division calculations have shown that peak flows will produce erosive channel velocities in each diversion. Therefore the operator must submit designs for protective channel linings or a demonstration that this is unnecessary for each diversion.

RECOMMENDATIONS:

The Division recommends that the submitted MRP amendment including diversion designs and small area exemptions be denied approval until the aforementioned required items have been provided.

BT47/57-58