

0027

007/011 #2

From: Sharon Falvey
To: Charles Reynolds, Elliot Finley
Date: Fri, Dec 17, 1999 8:28 AM
Subject: Hiawatha Pond 005- ACT/007/011-99B

Dear Charles and Elliot:

I attached the review conducted by Priscilla Burton, and I have summarized the deficiencies below, as well as, deficiencies identified by Paul Baker and myself.

If you choose, you may ask for the amendment to be withdrawn and request an extension for responding to Divison Order 97A. (please, do not forget to provide a redline strikeout copy) After checking with Daron Haddock, Permit Supervisor he indicated the request can be sent by e-mail.

SOILS

- 1) R645-301-231.400, Adjust the volume calculations in Table II-12 to reflect the use of topsoil on the recent reclamation of a small area of slurry pond 4.
- 2) R645-301-242, Analysis of sampling of the sediment pond 5 embankments for pH, EC, texture, nitrogen, phosphorus and potassium and an estimation of soil volume in the embankment and depth of cover calculations for the pond 5 area.
- 3) R645-301-242.200, Incorporate coal fines into the subsoil prior to covering with substitute topsoil.
- 4) R645-301-731.300, Analysis of the coal fines in sediment pond 5 and a comment on the average depth of the coal fines in the pond.

Sharon Falvey's comments

Information in addition to the vegetative cover needs to be provided to determine whether the CN used is representative.

The other element that is missing is certification by an engineer for the hydrologic design. To make the process simpler I have requested applicants to supply a cover page for the hydrologic section with design certification in the past.

Paul Bakers Comments (see: sediment control measures pg. 7-95).

The applicant proposes to remove sediment pond 5 east of refuse pile 2/slurry pond 4. Erosion control would be provided by vegetation establishment, mulching, and surface roughening. Where the disturbed area is small and flat, surface roughening will be used for treatment until vegetation is established.

The application says all of the sedimentation ponds and alternate sediment control structures will remain in place following reclamation activities until the vegetation has been established on the reclaimed areas and the reclaimed areas have met the requirements for Phase II bond release. The Division has done a limited vegetation inventory on the reclaimed refuse pile/slurry pond and believes the vegetation is controlling erosion. The Division found 38.4% vegetation cover compared to 30.6% in the corresponding reference area. However, the Division is not prepared to conclude the site meets the requirements for Phase II bond release.

CC: Daron Haddock, Paul Baker, Priscilla Burton