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July 17, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor DRH

FROM: Sharon Falvey, Senior Reclamation Hydrologist SFC

RE: Wellington Proposed Modular Coal Fines Wash Plant 6/30/97, Nevada Electric Investment Company, Wellington Preparation Plant, ACT/007/012 97-D, Folder #2, Carbon County, Utah

SUMMARY:

The Permittee submitted this amendment to construct a Modular Coal Fines Wash Plant at the Wellington Preparation Plant adjacent to the coarse slurry and fine slurry impoundments. The proposed construction site is in an area leased from EARTHCO by Covol Technologies. There are no proposed operations beyond construction and there are no reclamation changes beyond removal of the buildings proposed with this amendment.

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Surface Water Resource Maps

Exhibit 712a, submitted with this amendment, includes the proposed Tailings Water Line. The Pump house located near the Price River is proposed to be refurbished and it is assumed the existing location for the water line and pump house will be used. If the work in this area is to extend beyond the existing disturbed are boundary additional information is required. Existing sediment control measures must be maintained.

Information denoting cross section turn lines on the existing sheet, 712a 1 of 2, were removed from the sheet. This information needs to be retained as it is referenced in other parts of the plan.

Contour Maps

Existing contour information for the proposed wash plant is provided on Sheet 712a.

Findings:

The amendment does not meet the requirements of this section. The permittee must provide the following in accordance with:

R645-301-120, Retain the cross section turn lines and other pertinent information provided on sheet 712a, 1 of 2 that is referred to in other parts of the plan.

HYDROLOGIC INFORMATION

Surface Water Resources

Water Rights

The application does not provide a description of what water rights are being leased from EARTHCO by Covol. The water right number, the timing of use, and the type of use needs to be described.

Probable Hydrologic Consequences

The PHC discussions on Hydrocarbon Products and the Spill Prevention and Control Plan are considered applicable as the proposed facilities are indicated in this section. The permittee should assure the section that commits to construct concrete bases for hydrocarbon products in volumes adequate to contain the maximum storage applies to the proposed facilities (see page 7.29). This will provide for minimizing potential impact to ground and surface water quality. Appropriate sections of the plan and the PHC discussing water balance and water use need to be updated.

Water Monitoring

Prior to pumping the water to the clear water pond the applicant should provide

information on leachate of the waste water that will be returned to the pond in future operations. This waste water quality may require the pond be lined prior to operations thus, the permittee would need to remove the water placed in the pond prior to commencing operations. A baseline water monitoring plan for the operations should be conducted and implemented in order to assure quick turn around time when the operations plan is submitted.

Findings:

The amendment does not meet the requirements of this section. The permittee must provide the following in accordance with:

R645-301-724-200, Provide information identifying the water right, the timing of use, the type of use, the point of diversion and the point of use for the water rights proposed to be used in the operations.

R645-301-731, Amend the applicable discussions in the PHC on Hydrocarbon Products and the Spill Prevention and Control Plan to clearly apply to the proposed Modular Coal Wash Plant. Amend appropriate water use and water balance sections in the plan.

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: R645-301-742.300.

Diversions

No diversions were provided with the proposed amendment. The site will be graded to drain to the existing slurry cells. The applicant has not addressed regulation 740 and specifically 742.123. The applicant should have a drainage design to transport water from the wash plant to the lower refuse basin to minimize erosion. The proposal suggest that the runoff will be controlled by grading. No design information was presented to demonstrate that erosion or runoff will be controlled by grading. The ditch adjacent to the proposed wash plant and existing road that crosses the course slurry should be designed to include any additional runoff from the area if drainage is to report there.

Sediment control measures.

Based on the small size of the additional area to be disturbed the amount of

additional runoff that may reach the slurry cells would be negligible. All runoff must be treated before flowing off the site onto areas outside the permit area. Consideration of the erosion control measures at the pump house should be made. Future designs may need to be adjusted as the refuse is removed and areas are reclaimed. Calculations may need to be provided if storage capacity of these areas change.

Measures to minimize the disturbance to the Price River a "stream buffer zone" and erosion control measures for the construction through revegetation phase for the power line must be addressed in the plan.

Findings:

The amendment does not meet the requirements of this section. The permittee must provide the following in accordance with:

R645-301-740, Provide design information that demonstrates erosion and runoff will be controlled by grading or, otherwise provide drainage designs for the wash plant site.

R645-301-742, Provide measures to minimize the disturbance in the "stream buffer zone" for the Price River and provide erosion control measures for the construction and revegetation phases where the power line is to be installed.

MAPS, PLANS, AND CROSS SECTIONS OF OPERATIONS

Analyses:

Surface Water Information maps.

No contour information is provided for the proposed grading at the wash plant site. Site grading is proposed to direct runoff into the Lower Refuse Pond. Any ditches or design drainages should be included on these maps.

Findings:

The amendment does not meet the requirements of this section. The permittee must provide the following in accordance with:

R645-301-511, Provide a map that shows contour information that will result through the grading plan in detail adequate to determine direction water flow off the site.

Recommendations:

It is recommended that the outstanding deficiencies be addressed prior to approval of this submittal. It is believed that this submittal constitutes a change in "Operator" under the definition described in R645-100 as it appears to meet the description provided in the agreement between EARTHCO and Covol. This section should be reviewed by a legal authority.

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cc: Paul Baker
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