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# State of Utah

DEPARTMENT OF NATURAL RESOURCES
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July 6, 1989

TO: Sue Linner, Permit Supervisor

FROM: Randy Harden, Reclamation Engineer
Rick Summers, Reclamation Hydrologist

RE: Deficiencies, Aberdeen Mine Facilities, Andalex Resources, Inc., Centennial Project, ACT/007/019, Folder #2, Carbon County, Utah

SUMMARY:

The information provided by Andalex in conjunction with the as-built designs and drawings is inadequate. Information submitted by the operator has not been certified nor presented in a manner for insertion into the MRP.

The operator must address those comments as outlined in the February 1989, Conditional Approval for the Aberdeen facilities.

Additionally, significant changes to the Andalex facilities were made since the conditional approval. These include the design of the sediment pond, diversions and the general configuration of the facilities. These changes in the plans will require numerous changes to the information in the plan which had been previously approved by the Division.

ANALYSIS:

The operator has provided a consultant's report addressing the geotechnical analysis for the field modified slopes of the sediment pond, but no certification statement as to the completion of the pond has been provided by the operator. The operator has provided no means of incorporating the consultant's report into the MRP.

The operator has only provided preliminary as-built drawings of the surface facilities. These drawings are inadequate in that they are not certified, do not delineate the disturbed area boundaries, do not label or reference the culverts and diversions, and do not identify the facilities or the features as the exist on the site.

No certification statement regarding the construction of the sediment pond in accordance with the requirements of the regulations UMC 817.46(r) and UMC 817.49(h) and (i) was presented by the operator. No stage volume or capacity curves were included in the draft submittal to determine the construction of the pond to be adequate. The addition of a diversion to the facilities has affected the sizing and the design criteria for the pond.

A major portion of the surface hydrology has been impacted with regard to the construction of the Aberdeen facilities. Changes in the facilities from those proposed and conditionally approved by the Division will require that the operator resubmit the designs and calculations with regard to those facilities as they were constructed.

The addition of a Class I road has been made in conjunction with the Aberdeen facilities. Certification of this road will be required in conjunction with the as-built designs and drawings in accordance with UMC 817.150 (d).

Diversions, ditches and culverts which were installed or modified in conjunction with the new facilities must be clearly labeled on the drawings. Calculations should utilize the same numbering system for those structures and those calculations should be provided in a manner for incorporation into the Mining and Reclamation Plan.

All of the as-built facilities must have drawings and design calculations sufficient to approve the operations. These drawings and the supporting text for these facilities must be modified and presented to the Division in a manner so that they can be incorporated into the MRP.

The operator has not addressed how these changes to the plan will affect the bonding requirements for the site. However comments regarding this section will be addressed in conjunction with the mid-permit term review.

The operator has not addressed the amount or the condition of the topsoil materials which were recovered and stored in conjunction with the construction of the facilities. The proposed plan indicated that calculation of the amount of material recovered from the area during construction would be required for determination of adequacy as to the suitability and amount of topsoil materials required for reclamation.

Deficiencies with regard to hydrology related regulatory requirements for the as-built designs and drawings are as follows:

UMC 783.25 (i) and (1)
UMC 784.11 (b)(1)
UMC 784.16
UMC 784.22
UMC 784.23 (b)(6), (b)(10), (b)(12), (c)
UMC 784.24 (a) and (d)
UMC 800
UMC 817.11 (c)
UMC 817.23
UMC 817.43
UMC 817.44
UMC 817.45
UMC 817.46
UMC 817.47
UMC 817.49
UMC 817.101
UMC 817.150 - 817.156

These regulations should be addressed completely and adequately relative to the Aberdeen facilities area.

CONCLUSION:

The operator has not provided sufficient information in response to the requirements for the conditional approval of the Aberdeen Mine facilities and agreements made at the site as a result of site configuration modifications necessary during construction. To date, no formal submittal of the information required in the conditional approval has been made by the operator. Review of the Mining and Reclamation Plan in conjunction with the mid-permit term review has been significantly hindered by the operator's failure to submit the information required for the as-built construction of the Aberdeen facilities in a timely manner.

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