

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

OK

June 30, 2004

TO: Internal File

FROM: Karl R. Houskeeper, Environmental Scientist III, Team Lead *KRH by an*

RE: 2004 Midterm Permit Review, Andalex Resources Inc., Centennial Mine, C/007/019, Task ID #1886

SUMMARY:

The Division is required to review each active permit during its term in accordance with R645-303-211. This review takes place at the midpoint of the permit term. The midpoint of this permit term is July 4, 2004.

This memo addresses the AVS check that ensures that Ownership and Control information is current and correct and that the requirements of all permit conditions, division orders, notice of violations, abatement plans and permittee initiated plan changes are appropriately incorporated into the plan.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

VIOLATION INFORMATION

Regulatory Reference: 30 CFR 773.15(b); 30 CFR 773.23; 30 CFR 778.14; R645-300-132; R645-301-113

Analysis:

The permittee has requested an Incidental Boundary Change (IBC) Task ID # 1919. It was noted in this Task that the violation history was outdated and that it would be required to be updated prior to approval. Once this information is provided to the Division for Task #1919 it will update the approved MRP.

TECHNICAL MEMO

An AVS Check was done by the Division on May 10, 2004. No violations were retrieved by the system. Legal information from the AVS check was compared to the MRP and the information correlated with the approved MRP.

Findings

The information in the approved MRP is not adequate to meet the requirements of this section of the regulations, prior to midterm approval the permittee must provide the following information in accordance with:

R645-301-113.300 A three (3) year history of violations preceding the application date must be provided for the applicant or any coal mining and reclamation operation owned or controlled by either the applicant or by any person who owns or controls the applicant. A history of violations was requested by the Division in Task ID #1919, Summit Tract (IBC). The violation information needs to be incorporated into the approved MRP by Task #1919 or by this Task #1886.

PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

Analysis:

A review to ensure that past permit conditions, division orders, notice of violation abatement plans and permittee initiated plan changes was done in conjunction with the midterm review. The approved plan contains the required information.

Findings

Information contained in the approved MRP meets the minimum requirements of this section.

RECOMMENDATIONS:

The condition listed for a complete and current listing of violation history under R645-301-113.300 needs to be addressed as part of Task #1919 (IBC) or this Task #1886 (Midterm Review).