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December 18, 1986

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FROM: James Leatherwood, Reclamation Soils Specialist *JSL*

RE: Resubmittal of Final Closure and Reclamation Plans, Blazon #1 Mine, ACT/007/021, Folder No. 2, Carbon County, Utah

The reconsolidated Final Closure and Reclamation Plan submitted October 29, 1986 has been reviewed. While the submittal contains information requested by the Division (April 11, 1986), it also includes superseded information. The following comments must be addressed.

UMC 817.21 Topsoil: General Requirements - JSL

Pages VIII-I and VIII-2 in Exhibit 21 contains outdated information. These two pages must be removed.

UMC 817.22 Topsoil: Removal - JSL

In response to the Divisions April 11, 1986 comment the applicant refers the reviewer to pages 55 and 61 in Exhibit 12. Exhibit 12 contains only 30 pages. Exhibit 12 does not contain page 55 or 61. The Division has not approved any topsoil borrow area. All language reflecting a topsoil borrow area must be removed. The first page of Exhibit 21 states that the BI stony loam and CI loam topsoil depths are 3 and 4 inches, respectfully. The submitted soil survey delineates the actual topsoil depths equal to 11 and 12 inches, respectfully. The applicant must replace the topsoil depths for the BI stony loam and CI loam to that referred in the soil survey.

UMC 817.24 Topsoil: Redistribution - JSL

The first page of Exhibit 21 states that the topsoil will be redistributed in the BI stony loam, CI loam, and DI loam soil units. The Division has only approved the redistribution of topsoil in Area C (Little Snyder drainage). The applicant must delete all language from the plan that states otherwise. Pursuant to UMC 817.103 the Division (August 18, 1986) has approved a two foot soil redistribution depth over the underground development waste if the operator distributes calcium carbonate proportionately to the waste materials. That is, 9 tons calcium carbonate to 4190 cyd of development waste. The reclamation plan and map 8 must support this decision.

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UMC 817.25 Topsoil: Nutrients and Soil Amendments - JSL

The soil sampling plan is incorrect. Page 35 refers to the Topography/Revegetation map (Map 2) for sample locations. The Topography/Revegetation map is actually map 8. The applicant also describes another sampling plan on the second page of Exhibit 21. The soil sampling plan described on the second page of exhibit 21 is acceptable. The soil sampling points delineated on map 8 are not acceptable. Therefore, page 35 and map 8 must be updated to include the approved soil sampling plan. Page A-1 of Exhibit 21 refers to plate 4 for the location of soil samples. Map 4 does not delineate any soil sample locations. Please update page A-1 to reflect the actual map in reference.

UMC 817.103 Backfilling and Grading: Covering Coal and Acid- and Toxic-Forming Materials - JSL

Page 26 references an alternate disposal site for underground waste disposal on map 2. Map 2 does not identify any disposal site. Please update page 26 to reflect the actual map in reference. Page 26 must also be updated to reflect the August 18, 1986 DOGM submittal which approved a minimum two foot soil redistribution depth over the underground development waste when calcium carbonate is applied to the underground development waste materials at the rate of 9 tons calcium carbonate to each 4190 cubic yards of development waste. The Division does not approve a one foot depth of cover over the waste materials as requested on page 26. This request must be deleted from the plan.

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