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August 28, 2002

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor *DRH*

FROM: Joe C. Helfrich, Sr. Reclamation Specialist *JCH*

RE: Midterm Permit Review, Savage Industries Inc., Savage Coal Terminal ACT/007/022-MT02-2

SUMMARY:

The midterm review for the Savage Coal Terminal facility was initiated by way of Division correspondence to James T. Jensen, (Vice President of Savage Industries Inc.), on March 26, 2002. The following items were chosen for review:

1. An AVS check to ensure that Ownership and Control information is current and correct.
2. A review of the plan to ensure that the requirements of all permit conditions, division orders, and notice of violation abatement plans, and permittee-initiated plan changes are appropriately incorporated into the plan document.
3. A review of the applicable portions of the permit to ensure that the plan contains commitments for application of the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flows outside of the permit area.
4. A review of the bond to ensure that it is in order and that the cost estimate is accurate and is escalated to the appropriate year dollars.

TECHNICAL MEMO

On April 19, 2002 the Division approved amendment # 02A-1, submitted by Savage Industries Inc. to remove topsoil and develop a 13-acre parcel for coal storage. Three additional requirements were incorporated into the Midterm Review. They were:

5. Climatological information
6. Violation history information.
7. Reclamation of high water table areas.

The Division received a response to these items on May 13, 2002. On May 23, 2002 the Division provided Savage Industries Inc. with the technical analyses and findings for the Midterm review. There were two deficiencies described in the TA document, they were;

R645-301-244,-301-353,-301-354,-301-355,-301-356,-302-280,-302-281,-302-281,-302-282,-302-283,-302-284, S seed mix of lowlands within the disturbed area, are evaluated for the location and species composition of the current reference area, and a revised vegetation map , plate 9-1, and;

R645-301-724, Precipitation data from 1992 to present must be provided. The information can be acquired by contacting Don Jensen (State Climatologist at Utah State University), (435) 797-2190.

The permittee submitted a response to the Midterm review on August 19, 2002. This memo will address the two referenced deficiencies associated with items 5 and 7.

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

CLIMATOLOGICAL RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.18; R645-301-724.

Analysis:

Updated climatological information is provided for in Section 11 of the MRP. Table 11-1 has been revised to include the temperature, precipitation, snowfall and evapotranspiration data from 1992 - 2002. From the data provided in Table 11-1, the mean annual precipitation over a 24 year period is 9.3 inches.

Table 11-2 summarizes the mean wind speeds in Castle valley The mean annual soil temperature is 47 – 48 degrees Fahrenheit and the frost-free period ranges from 118 to 196 days.

Findings:

The current climatological and air quality information is adequate to meet the requirements of item five of the midterm review and this section of the Regulations.

RECLAMATION PLAN

REVEGETATION

Regulatory Reference: 30 CFR 785.18, 817.111, 817.113, 817.114, 817.116; R645-301-244, -301-353, -301-354, -301-355, -301-356, -302-280, -302-281, -302-282, -302-283, -302-284.

Analysis:

Standards for Success

As shown on Plates 3-2 and 9-1 and discussed in Sections 3.4.4.2 (page 3-48) and 9.3.2.5, the reference area was set up in 1980 for the shadscale phase of the salt desert community to establish revegetation success standards for the entire mine site. Production of the reference area was estimated at 450-lbs/acre air dry and the site was rated in good condition in September 1983 by Mr. Don Andrew, Range Conservationist with the USDA SCS (MRP, Figure 9-1). The Permittee has provided the current condition of the Upland Shadscale and lowland Greasewood reference areas during the 2002 growing season. The upper site was classified as "high good" condition with a production estimate of 240 lbs. Per acre. The lower site was classified as "high fair" condition with a production rate of 560 lbs. Per acre.

The reference area soils are described as Chipeta silty clay slopes 3-20%. The reference area soils differ from much of the permit area including a small acreage of those to be disturbed in that their elevation places them above the water table and they are not subject to accumulations of salt from ponding water as are the Killpack soils that support the wetland salt grass vegetation.

The Division suspects that upon reclamation, sizeable areas of ponded water will exist at the entire site for the following reasons:

- During recent removal of refuse, the Permittee was obliged to remove equipment from areas along the eastern boundary of the permit due to the elevated water table.
- As noted in the MRP Section 9.5 "eventual soil saturation or inundation of the low western permit area is possible upon final reclamation."
- As noted in the MRP Section 9.2.1, page 9-2, "A sedge meadow was mapped during the original study (June 1980), adjacent to the current western permit boundary. Although no such type was actually mapped within the permit area, a low area does exist within the currently mapped Disturbed, Agricultural area, now drained by a French drain."

TECHNICAL MEMO

These wetlands will not likely meet the criteria for success established for higher ground, i.e. diversity. The Permittee has documented the condition of the wetland vegetation within the proposed disturbed area (Appendix 9-3). Reclamation for wetland areas within the permit can be patterned after previously existing wetland descriptions. i.e. the baseline data method described in the Vegetation Information Guidelines.1 The wetland within the proposed disturbance is one of two last wet areas remaining in the permit area. Savage Industries has developed a wetland mix for lowlands within the disturbed area as noted in table 3-2b. Also provided is the seed mix for the upland areas found in table 3-2a, and a revised vegetation map plate 9-1. Plate 3-7, (Postmining Topography and Drainage), identifies the location of the two reference areas and the location of the areas to be seeded with the corresponding seed mixes.

The site will receive the final reclamation seed mix as described in Table 3-2 of the MRP: Crested wheat grass, Thickspike wheatgrass, Indian ricegrass, Fairway crested wheatgrass, Squirreltail grass, Russian wildrye, Globemallow, Sunflower, Palmer penstemon, Yellow sweetclover, Kochia, Winterfat, Shadscale, Matbush, Whitestem rubber rabbitbrush, and Four-wing saltbush. As stated on page 3-58 the final mix may undergo alteration depending upon the success of the interim seed mixture.

Savage Industries has made plans for a wetland mix along the Price River Pipeline (page 3-58). This mix is found in Table 3-3. Reclamation of the pipeline will include willow plantings and streambank wheatgrass.

Findings:

The information provided is adequate to meet the requirements of item 7 of the midterm review and this section of the Regulations.

RECOMMENDATION:

The midterm review for the Savage Coal Terminal is recommended for approval.