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DEPARTMENT OF NATURAL RESOURCES
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file

Replace previous Memo
with this memo. 11/15/88
CHANGE IN WORDING-HS

November 10, 1988

TO: John Whitehead, Permit Supervisor

FROM: Henry Sauer, Reclamation Soils Specialist HS

RE: Technical Deficiencies, Andalex Resources, Wildcat Loadout, PRO/007/033, Folder #2, Carbon County, Utah

Synopsis and Analysis

In response to the Division's September 26, 1988 Technical Deficiencies Review for the Wildcat Loadout, the applicant has committed to submit information requested (Technical Deficiencies, Wildcat Loadout, dated September 26, 1988) for the following sections.

UMC 817.22 Soil: Removal - (HS)

soil lab analysis of proposed substitute material

UMC 817.48 Hydrologic Balance: Acid-Forming and Toxic-Forming Materials - (HS)

analyses of coal total nitrogen

However, coal data submitted October 29, 1988 under section UMC 817.22 for sulfate sulfur, pyritic and organic sulfur, continues to indicate an acid production potential from the coal material (Acid Base Potential [ABP] of -7.31 Tons $CaCO_3$/1000 Tons material). Based on these findings, a groundwater monitoring plan (UMC 817.52) and a backfilling and grading plan for toxic and acid-forming material disposal (UMC 817.103) remains to be adequately addressed.

Recommendations

UMC 817.48(A)

Based on ABP determinations, further analysis of the coal storage areas must be performed to adequately assess the extent and amplitude of the acid-forming material.

To accurately identify the potential for acid formation, the applicant must submit ABP analyses for each individual coal storage pile to include: one sample of the coal-soil interface; one composite sample of accumulated sediments within sediment ponds adjacent to coal storage piles and one composite sample of the existing salable coal pile.

The results of the aforementioned analyses must be submitted to the Division for review. Based on this review, it will be determined if UMC 817.52 and UMC 817.103 are applicable, and if so, would require further consideration.

djh
cc: J. Fricke
AT30/7-8