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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

June 10, 1988

TO: John Whitehead, Permit Supervisor

FROM: James S. Leatherwood, Reclamation Soils Specialist

Re: Determination of Completeness and Technical Adequacy, Wildcat Loadout, Andalex Resources Inc., PRO/007/033, Folder #2, Carbon County, Utah

The Wildcat Loadout Facility Initial Completeness Review response, received May 16, 1988, has been reviewed. The submitted response is not complete or technically adequate. The following concerns should be addressed prior to final approval.

UMC 783.21 Soil Resources Information - JSL

The applicant has adequately supplied the soil profile description. However, this section cannot be considered complete without the base line soil physio-chemical data. The operator has stated that soil samples have been submitted to a laboratory for analysis and that this information will be submittted to the Division upon receipt. This section will be considered complete upon receipt of the required soil physio-chemical characterization data.

Technical Deficiencies

UMC 817.22 - Topsoil Management - JSL

Due to the failure of adequate topsoil salvaging and previous disturbance of the site, the need for topsoil substitute material exist. The plan contains various commitments to redistribute topsoil (and substitute topsoil) to predisturbance depth. This would be a nine inch redistribution depth or 67,760 cubic yards (cyd) of material. A topsoil deficit of 52,211 cyd would then exist.

The plan request for a six inch or possibly lower topsoil and substitute topsoil redistribution depth. No information was found in the plan to indicate reclamation success with the six inch or lower substitute topsoil redistribution depth.

The plan did not indicate the location, volume or physio-chemical characteristics the substitute material. No physio-chemical or vegetative productivity results were found within the submitted plan.

To insure reclamation feasibility, the physio-chemical results coupled with a field-site in-situ disturbed soil revegetation study plot must be implemented. The study plot should be installed in the same manner as described in the reclamation plan. The location of the study plot and the potential substitute material must be identified on a surface facilities map. This map should indicate all soil sample points. The specific agronomic practices to be implemented will be dependent upon the outcome of the substitute soil data. The potential substitute materials must be identified as such on site with a sign and must be protected from wind and water erosion and contaminants as required under UMC 817.23.

The submittal does not adequately define the topsoil or potential topsoil substitute stockpile protection measures. The exact seed mix should be included within the text of the plan.

UMC 817.48 Hydrologic Balance: Acid-Forming and Toxic-Forming Materials - JSL

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

No data has yet been submitted. The Division cannot make a determination of potential acid-or toxic-forming materials until this information has been submitted. The exact physio-chemical characteristics of the waste material must be quantified to determine an adequate management plan and potential mitigation plan if potential acid- or toxic-forming conditions exist. In all cases, the waste material must be disposed of within a permitted area.

The location of the waste disposal site must be specific. The plan indicates that a disposal site may be used outside of the permit area. All completeness and performance standards must be met for the disposal area prior to any such disposal of the waste material outside of the currently proposed permit area.

JL/as
cc: A Team
S. Linner
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