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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter  
Governor

Dee C. Hansen  
Executive Director

Dianne R. Nielson, Ph.D.  
Division Director

355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203  
801-538-5340

January 28, 1992

Mr. Mike Glasson  
Andalex Resources, Inc.  
P.O. Box 902  
Price, Utah 84501

Dear Mr. Glasson:

Re: Mid-Term Review Response, Andalex Resources, Inc., Wildcat Loadout Facility, ACT/007/033, Folder #2, Carbon County, Utah

As a result of your January 13, 1992 submittal, NOV #92-32-1-2, a hindrance violation had to be written. A memorandum is enclosed that describes this scenario. In addition, please submit the correct Air Quality Approval Order by February 19, 1992.

If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Grubaugh-Littig".

Pamela Grubaugh-Littig  
Permit Supervisor

jbe  
Enclosure  
cc: Henry Sauer  
Jesse Kelley  
007033MT



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January 22, 1992

**TO:** Pamela Grubaugh-Littig, Permit Supervisor

**FROM:** Henry Sauer, Senior Reclamation Soils Specialist 

**RE:** Mid-Term Permit Review Response, Andalex Resources, Inc., Wildcat Loadout Facility, ACT/007/033, Folder #2, Carbon County, Utah

## Synopsis

Andalex Resources, Inc. responded (received, January 13, 1992) to the Divisions mid-term permit review of November 22, 1991. Subsequent to the review of the information provided, this writer has determined that the permittee has failed to comply with certain permit conditions and agreements. Therefore NOV 92-32-1-2 of 2 was written for failure to comply with the terms and agreements of the approved permit.

## Analysis & Recommendations

### R645(614)-301-233 Topsoil Substitutes and Supplements

The laboratory results submitted do not fulfill the permit requirements for the identification of potentially acid- and/or toxic-forming materials (i.e., analysis of coal processing waste and reject material). As specified on Page 23 and Table IV-10, "leachate" will be analyzed for "normal surface water baseline parameters." In addition, coal waste material will also be tested, as required in the PAP, for the following constituents: pH, E.C., SAR, Selenium, Boron, Acid-Base Potential, % Organic Carbon, % Sat., and Texture. The required analyses have not been provided. Therefore, the coal waste material disposed of on site was not adequately characterized in 1989, 1990, and possibly 1991 (i.e., correspondence indicates that analysis for 1991 has already occurred).

The permittee must submit for review, approval and insertion into the PAP an operational plan, to be conducted immediately, for the collection and analyses of the material presently in the coal waste storage site, to identify potential acid and/or toxic, or alkalinity producing materials.

Page 2  
Memo/PGL  
ACT/007/033  
January 22, 1992

R645(614)-301-420 Air Quality

The Air Quality Approval Order, from the Utah Department of Health, dated November 2, 1988, does not include the Wildcat Loadout Facility. Please submit the appropriate air quality approval order.

R645(614)-301-731 General Requirements

The permittee has not obtained formal approval to discontinue the erosion pin study nor has he/she obtained or sought formal approval to implement any management practice to reduce erosion within the disturbed area ditches. All ditch erosion solutions discussed in the PAP are tentative and contingent upon the outcome of the erosion pin study and Division approval. The PAP does not accurately represent conditions in the field and it is not possible to determine the design of each ditch, culvert inlet or outlet (i.e., half-round, belting, rip-rap, inlet and outlet protection, channel cross-section and roughness, velocities, etc.)

NOV 92-32-1-2 of 2 must be adequately addressed in order to fulfill sections R645 (614)-301-233. and R645 (614)-301-731., above.

jbe  
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