0004

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

July 20, 1994

TO: Daron Haddock, Permit Supervisor

FROM: Henry Sauer, Senior Reclamation Soils Specialist

RE: DRAFT REVIEW Amendment to Abate Notice of Violation N94-34-1-3, Parts 1 & 2 of 3 and Facilities Expansion, Andalex Resources, Inc., ACT/007/033-94C, Folder #2, Carbon County, Utah

SYNOPSIS

The permittee submitted (received April 25, 1994) an amendment proposal to relocate four topsoil stockpiles (N94-34-1-3, Part 1) and remove deposited coal fines from a previously undesignated disturbed area (N94-34-1-3, Part 2). The Division reviewed the proposed amendment and identified technical deficiencies (June 10, 1994). The permittee has responded (July 14, 1994) to the Division original deficiencies and included the Facility Expansion Proposal.

The proposal to relocate the topsoil stockpiles may be approved with commitments to fulfill Stipulation #1 & 2 as noted below.

The proposal to expand the facilities must be denied until the permittee adequately characterizes the acid-and/or-toxic forming potential of the "boney reject material" proposed as fill for the new truck dump.

ANALYSIS

Stipulation #1

R645-301-244. Soil Stabilization

The revegetation and stabilization of the relocated topsoil stockpiles requires additional information and discussion so that the treatments performed on the new topsoil stockpile are explicit. This writer suggests a meeting be held with the permittee, at the Division, to discuss these revegetation techniques in more detail.

Stipulation #2

R645-301-234. Topsoil Storage

The permittee must provide topsoil designs and cross-sections as noted in the Divisions June 10, 1994 correspondence.

The permittee states on page 80-A (revised July 13, 1994) that "Slopes on the topsoil pile will not exceed 2V:1H." This must be revised to state 1V:2H.

R645-301-731. Acid- and Toxic- Forming Materials

The permittee has not adequately demonstrated the acid- and/or toxic- forming potential of the boney reject material proposed as fill for the new truck dump. The permittee has not provided analysis of coal mine waste as specified on page 23, paragraph three of the approved plan.

RECOMMENDATION

The proposal to relocate the topsoil stockpiles may be approved with commitments to fulfill Stipulations #1 & 2 noted above.

The issues enumerated in reference to the acid- and/or toxic- forming potential of the boney reject material must be adequately addressed prior to approval of the surface facilities expansion portion of Amendment ACT/007/033-94C.