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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)

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August 26, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Ken Wyatt, Senior Reclamation Hydrologist

RE: Refuse Storage Amendment Review, Sunnyside Cogeneration Associates, Sunnyside Refuse Pile, ACT/007/035, Folder #2, Carbon County, Utah

SYNOPSIS

On June 25, 1993, Sunnyside Cogeneration Associates (SCA) submitted, via Eckhoff, Watson and Preator (EWP), a proposal to create three new refuse disposal areas. This new plan is to use these new areas for refuse storage from the Sunnyside Mine. On August 6, 1993, EWP re-submitted design drawings for the Pasture sediment pond. I met with Jessica Smith of EWP on August 11, 1993 and provided her with additional deficiencies. On August 19, 1993, another response was submitted which will be reviewed in this memo.

ANALYSIS

This submittal consists of numerous pages of text, tables and figures and several revised plates. The narrative pages are not numbered which makes it difficult to comment on particular items. This information needs to be submitted in a format that is compatible with the operators Mining and Reclamation plan (MRP). At this time the submittal is not suitable for inclusion into the MRP. The consultant should attempt to produce documents that are readily incorporated into the operators MRP.

The latest submittal states that 15.4 acres drains into the pasture pond. The drainage areas were divided into 4 sub-watersheds. Runoff analyses were conducted on each of these areas and routed to the pond using Sedimot II.

The narrative submitted describes the sub-watershed areas as they relate to the sedimot II model. Figure 1 shows the areas. The labels for these do not correspond between the text and figure 1 which makes for a confusing review of the routing and runoff analysis.



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Tables provided at the end of the submittal do not match the information that is presented in other areas of the submittal. The consultant needs to check their work to make sure that information presented is consistent and ties together.

RECOMMENDATION

I recommend the proposal be denied and that it be returned to the consultant for editing. Many areas were identified where the consultant did not check their work. These inconsistencies need to be eliminated. It may behoove the consultant to take the numerous submittals to date and compile one complete submittal where the information is presented logically and clearly and ties all aspects of the plan together. The format should be such that the pages can be inserted directly into the permit sections.