



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, 1993

Mr. David Pearce
Sunnyside Cogeneration Associates
P.O. Box 58087
Salt Lake City, Utah 84158-0087

Dear Mr. Pearce:

Re: BTCA Amendment, Sunnyside Cogeneration Associates, Refuse and Slurry, ACT/007/035-93A, Folder #2, Carbon County, Utah

The Division has reviewed the June 4, 1993 submittal for the permit amendment to include an area north of the Clearwater pond as a Best Technology Currently Available (BTCA), see enclosed memo. This amendment must be denied until the following have been provided:

- 1) A discussion as to why the area cannot be treated using a sediment pond, which could be incorporated into the text on page 700-5 and 700-6,
- 2) Erosion and sediment production calculations based on RUSLE or Sedcad or other program designed to predict erosion and sediment production from the area, and
- 3) A commitment to perform water quality monitoring from this area during precipitation events to verify the calculated soil loss and provide water quality data to demonstrate that water quality standards are being met from this BTCA area.

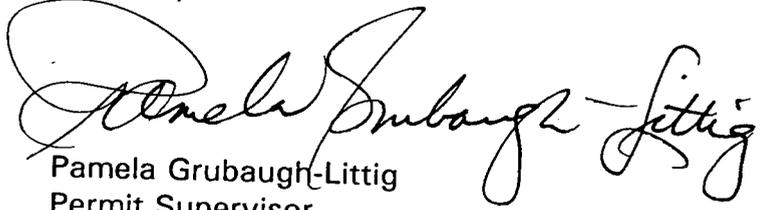
A second option may be to demonstrate that the area was not disturbed due to mining activity, that reclamation revegetation standards are being met and remove this area from the permit area due to the fact that the area is already vegetated, is not planned for future development, and is located in an isolated corner of the permit area.



BTCA Amendment
ACT/007/035-93A
Sunnyside Cogeneration Associates
Page 2

Please respond to these deficiencies by September 1, 1993. If you have any questions, please call me.

Sincerely,

A handwritten signature in cursive script, reading "Pamela Grubaugh-Littig". The signature is written in black ink and is positioned above the printed name and title.

Pamela Grubaugh-Littig
Permit Supervisor

pgl
Enclosure
cc/enc: KWyatt



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)

June 11, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Ken Wyatt, Senior Reclamation Hydrologist

RE: BTCA Amendment Review 93A, Sunnyside Cogeneration Associates, Sunnyside Refuse Pile, ACT/007/035, Folder #2, Carbon County, Utah

SYNOPSIS

On June 4, 1993, Sunnyside Cogeneration Associates (SCA) submitted, via Eckhoff, Watson and Preator (EWP), a permit amendment to include an area north of the Clearwater pond as a Best Technology Currently Available (BTCA). This memo will review this information.

ANALYSIS

According to the submittal, SCA intends to use existing vegetation as a vegetative filter to control runoff from a small area (1.9 acres) and maintain a berm along the lower portion of the topsoil pile to retain any runoff and topsoil. The submittal included a new chapter 7 and Plate 7-1 showing the general area.

An arrow on Plate 7-1 shows the BTCA area north of the Clearwater pond. The map does not define the extent of the BTCA area. An untitled map was included in the submittal which defines the extent of the BTCA area. Plate 7-1 should be revised to better outline the boundaries of the BTCA area.

The amendment also included a new chapter 7. Additional text was added in various sections to incorporate the BTCA area. Runoff calculations were provided based on a 10 year 24 hour storm event.

The Division considers sediment ponds to be the Best Technology Currently Available. Normally, the Division requires proposals for non-sediment pond BTCA areas to include a discussion as to why the area cannot be treated with a sediment pond. In this case the operator is proposing to use a vegetative filter to provide erosion and water quality protection.



This proposal does not discuss why the area cannot be treated using the Best Technology Currently Available (sediment pond). The use of the universal soil loss equation would be appropriate to demonstrate that erosion and sedimentation are within tolerable rates and that water quality from the area meets water quality standards. Water samples of runoff from the area could also be used to demonstrate that water quality standards are being met.

Since no sediment control structures are planned other than vegetation the operator will need to quantify the existing vegetation, the soil texture and rock fragment distributions. This information can then be used in the Revised Universal Soil Loss Equation (RUSLE) or SEDCAD to predict erosion potential and sediment production.

RECOMMENDATION

I recommend that the amendment be denied until the operator provides the following.

1. A discussion as to why the area cannot be treated using a sediment pond. This could be incorporated into the text on page 700-5 and 700-6.
2. Erosion and sediment production calculations based on RUSLE or Sedcad or other program designed to predict erosion and sediment production from the area.
3. Provide a commitment to perform water quality monitoring from this area during precipitation events to verify the calculated soil loss. Provide water quality data to demonstrate that water quality standards are being met from this BTCA area.

Since the area involved is already vegetated, is not planned for future development, and is located in an isolated corner of the permit area; a second option would be to demonstrate that the area was not disturbed due to mining activity, that reclamation revegetation standards are being met and work to remove this area from the permit area.