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ACT/007/035 #2 +5

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

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October 26, 1994

TO: File

THRU: Daron Haddock, Permit Supervisor

FROM: Henry Sauer, Senior Reclamation Soils Specialist

RE: DRAFT REVIEW, Old Coarse Refuse Haul Road Reclamation Amendment, Sunnyside Cogeneration Association, Sunnyside Refuse Pile, PRO/007/035-94D, Working File, Carbon County, Utah

SYNOPSIS

The permittee has submitted additional soil/spoil data in an attempt to demonstrate the suitability of the material which remains on the out slope of the old coarse refuse haul road below the recently placed borrow area topsoil material (approximately 6-12 inches thick). The material which underlies the recently place borrow area topsoil is unacceptable topsoil material.

The out slope of the Old Coarse Refuse Haul Road must be covered with at least eighteen inches of the borrow area soil material.

This standard must be adequately achieved prior to the termination of Notice of Violation N93-32-5-2, part 1 of 2.

ANALYSIS

R645-301-233. Topsoil Substitutes and Supplements

Unsuitable material as defined by The Division Guidelines for the Management of Topsoil and Overburden (UDOGM/ GMTO) is synonymous with Acid- and Toxic-Forming Materials (ATFM) as defined by R645-100 Administrative. Material which falls under the classification of "unacceptable" in accordance with UDOGM/GMTO, Table 2 ranks the material into the definition of ATFM. In addition, if topsoil material is available within the permit area which exceed in quality that which is proposed then in accordance with R645-301-233.100 the best available material must be utilized as the plant growth medium.

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The approved plan and the Draft Technical Analysis describes the placement of 1.5 feet of topsoil material on all post-law disturbance (Plate 3-1A thru 3-1E). The permittee must reinstate the commitment to cover all post-law disturbances with **at least 1.5 feet of topsoil**.

Based on the analytical results (Appendix 2-10, Old Coarse Refuse Road Reclamation Soil Analysis) the material represented by samples -01'Scarified Out Slopes, Outer Slope W.End-1 and Outer Slope W-3 does not meet the suitability criteria found in the Divisions Guidelines for the Management of Topsoil and Overburden, Table 2. Therefore, these areas must be adequately treated by covering the surface with at least 18 inches of topsoil material from the approved borrow area.

RECOMMENDATIONS

The out slope of the Old Coarse Refuse Haul Road must be covered with at least eighteen inches of the borrow area soil material prior to termination of NOV N93-32-5-2 Part 1 of 2.

CC: Susan White, Ken Wyatt
Jesse Kelley, Randy Harden