



State of Utah
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 DIVISION OF OIL, GAS AND MINING

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May 19, 1994

TO: File

THRU: Darron Haddock, Permit Supervisor

FROM: Henry Sauer, Senior Reclamation Soils Specialist 

RE: Old Coarse Refuse Haul Road Reclamation Amendment, Sunnyside Cogeneration Association, Sunnyside Refuse Pile, PRO/007/035-94D, Folder#2, Carbon County, Utah
 ACT

SYNOPSIS

In response to Notice of Violation N93-32-5-2, 1 of 2 the permittee has submitted (Received April 25, 1994) a proposal to reclaim the Old Coarse Refuse Haul Road.

The amendment is not acceptable as submitted. The issues enumerated below must be adequately addressed prior to amendment approval.

Text has been revised which refers to subject matter with no direct bearing on the reclamation of the haul road. In particular, the original commitment of four feet of borrow material cover over "the Noncombustible Waste Pile" has been changed to ... "at least eighteen inches" of borrow material cover over the "Excess Spoil Pile". Commitments made in the general reclamation plan, which have been deemed adequate in previous permit reviews and agreed upon by Division staff and the permittee's environmental consultant as being prudent reclamation measures, have been reversed. The most obvious of these reversals is the removal of the commitment to place erosion control matting on all reclaimed slope equal to or greater than 2H:1V. The tactics described above are not conducive to permitting activities or good working relationships and must be terminated immediately.

ANALYSIS

R645-301-233. Topsoil Substitutes and Supplements

The permittee must identify which borrow area will be the source of the substitute topsoil material. The permittee must



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also quantify the volume of borrow material to be utilized and describe what interim reclamation measures will be employed on the borrow area.

R645-301-242. Soil Redistribution

In previous permit submittal the permittee has committed to placing 1.5 feet of topsoil over all disturbed areas which are not occupied with unsuitable material (i.e. refuse, precipitate, etc.). However the proposed reclamation design for the Old Coarse Refuse Haul Road calls for an unspecified depth of topsoil on disturbed areas which have had the road refuse material removed. The permit must reinstate their commitment to covering all disturbed areas not influenced by refuse or precipitate with 1.5 feet of suitable topsoil material.

The permittee must commit to scarifying all disturbed areas to the maximum depth possible. This will facilitate topsoil adherence and maximize surface roughness.

R645-301-243. Soil Nutrients and Amendments

The fertilizer recommendation is excessive and must be revised.

The permittee must seriously consider incorporation of organic material (i.e. green manure, alfalfa mulch, biosolids) into the soil surface. Given the doughty nature of the site, the borrow material to be used and the high surface erosion potential organic amendment(s) are strongly recommended.

R645-301-553.300 & 731.300

The permittee's reclamation design for refuse material within the Old Coarse Refuse Haul Road must include the excavation, disposal and adequate covering of the precipitate layer which exists at the refuse/mancos interface.

RECOMMENDATIONS

The amendment is not acceptable as submitted. The issues enumerated below must be adequately addressed prior to amendment approval.

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