

January 13, 2003

TO: Internal File

THRU: Karl R. Houskeeper, Environmental Scientist III/Team Lead

FROM: Priscilla W. Burton, Environmental Scientist III/Soils

RE: Fire Suppression Soil Cover Material, Sunnyside Cogeneration Associates, Sunnyside Refuse and Slurry, C/007/035-02A

SUMMARY:

The Permittee has immediate access to a large volume of clean spoil for fire suppression. In the unlikely event that the supply of clean spoil on site is not adequate for fire suppression, the Permittee proposes to import soil to the site. The material to be imported was not identified, but Division approval for the importation would be sought on a case-by-case basis.

TECHNICAL ANALYSIS:

OPERATION PLAN

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

TECHNICAL MEMO

Analysis:

Burning And Burned Waste Utilization

A revision of the mining and reclamation plan included a statement that coal mine waste fires would be extinguished by covering with either clean spoil from the Excess Spoil Area or with "approved soil materials imported from off site" (page 500-20). The Permittee anticipates importing soil only in the case of a fire that cannot be put out with the large volume of clean spoil already available on site. In that case, Division approval would be sought in advance for the importation of soil.

Findings:

The information provided is adequate for the purpose of managing burning waste.

RECOMMENDATIONS:

The amendment should be approved.