

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 3, 2006

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*

FROM: Wayne H. Western, Environmental Scientist III, Bond *W H W*

RE: Rip Rap and Crusher Demolition Bond Costs, Task No. 2340, Sunnyside Cogeneration Associates, Sunnyside Refuse/Slurry, C0070035

SUMMARY:

The Permittee requested that the reclamation cost estimates for rip rap and demolition be modified. This memo deals solely with bonding requirements.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

Determination of Bond Amount

The Permittee did meet the requirements of this section of the regulations, because the bond amount is adequate to insure reclamation in the event of bond forfeiture.

Note: The Permittee submitted the bond calculation with Task 2389. The Division used the bonding costs from Task 2389 to determine that reclamation costs associated with Task 2340 were adequate. The Division did send out a deficiency letter for Task 2340. However, since the information in Task 2389 was adequate to address the deficiencies in Task 2340, no additional information is needed.

Findings:

The information provided in the amendment does meet the minimum requirements of the bonding and insurance requirements of the R645 – Rules.

RECOMMENDATIONS:

The Division should approve the amendment until the bond amount has been adjusted and the revised bond calculations are submitted.

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