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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 15, 2011

TO: Internal File

THRU: Steve Christensen, Team Lead *SPC*

FROM: Priscilla Burton, CPSSc, Environmental Scientist, III

RE: Permit Boundary Amendment, Sunnyside Refuse and Slurry, Sunnyside Cogeneration Associates, LLC. C/007/0035, Task #3821

SUMMARY:

Approval is recommended for this permit boundary amendment. Drawings require a PE stamp prior to incorporation in the MRP.

Subsequent to the Phase III bond release of the Old Coarse Refuse Road (Outgoing folder, document 05192011.3718), the Sunnyside Refuse/Slurry permit boundary is being reduced. The application was received on May 2, 2011. The boundary change removes 67.9 acres from Parcel A shown on Drawing 1-1. Along with many other drawings, the boundaries on drawings referenced in Chapter 2 have been revised accordingly. The application also includes minor changes to plate reference numbers on pages 200-2, 200-5 and 200-6. The information meets the requirements for Soil Resource, Operations and Reclamation plan requirements of the Utah Coal Rules.

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TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

SOILS RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.21; 30 CFR 817.22; 30 CFR 817.200(c); 30 CFR 823; R645-301-220; R645-301-411.

Analysis:

Minor changes were made to the narrative on pages 200-2, 200-5 and 200-6 to correct plate references. The boundary change removes 67.9 acres from Parcel A shown on Drawing 1-1, SCA Permit Area Legal Description. Beginning just east of the Rail Cut Sediment Pond and Topsoil Pile, the boundary adjustment moves the permit boundary north, such that it now follows a straight line from the Old Coarse Refuse Road to (and including) the Old Coarse Refuse Road sediment pond. This eliminates the out-slopes and portions of the reclaimed portal road from the permit area.

The following drawings referenced in Chapter 2 have been revised with the new boundary:

- Plate 2-1 Soil Identification Map
- Plate 3-1 Pre-law, Post-law and Future (Anticipated) Disturbed Areas Map.
- Plate 5-3 Access Road Drawing
- Plate 5-1 Surface Facilities
- Plate 8-4 Permit Term Reclamation Plan Borrow Material Plan
- Plate 10-6 Final Reclamation Plan Borrow Material Plan

Comments on these changes:

- The scale (1ft. = 300 ft.) and sampling points identified on Drawing 2-1 are identical to the previous map. Dwg 2-1 has been provided in 20 x 30 inch size, which is much easier to read than the previous 11 x 17 inch map.
- Plate 5-1 no longer shows Roads C, D, H, and T which have been eliminated by excess spoil placement and/or terracing of the spoil piles.
- Plate 5-3 now provides contour elevations on the plane view.
- Plate 8-4 is now provided in color which is very helpful. The area of Phase III bond release (reclaimed coarse refuse road) is no longer shown on the map. The outline of the

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acreage within each area designated by borrow material depth appear exactly the same, but the calculated acreage has changed slightly, due to the accuracy of the AutoCad program. In addition, a small area on the west end of the coarse refuse pile where the terraced area has been covered by two feet, was re-disturbed and will now require four feet of cover at final reclamation. Consequently the quantity of borrow material required has changed from 644,656 yd³ to 656,182 yd³. That is an increase of 11,526 yd³. Similarly, changes to the number of acres to be scarified prior to seeding have been reduced slightly. Plate 8-4 makes a distinction between 51 acres to be scarified and seeded and 8.7 acres that will be scarified, topsoiled and seeded. This distinction is not color coded, but is identified on the Plate.

- Reference to Plate 10-1 has been corrected to Plate 10-6 with this amendment. (Note: Plate 8-4 provides a permit term reclamation plan and Plate 10-6 provides a best-scenario final reclamation plan.)
- All drawings require a PE stamp prior to incorporation into the MRP.

Plate 5-5 Topsoil Stockpile Cross-sections was not revised with this boundary amendment.

Findings:

The information meets the requirements for Soil Resource, Operations and Reclamation plan requirements of the Utah Coal Rules.

RECOMMENDATIONS:

Approval is recommended. All drawings require a PE stamp prior to incorporation in the MRP.