From: Priscilla Burton
To: Netz Rusty; OGMCOAL
CC: Helfrich, Joe; Steab, Suzanne
Date: 4/13/2011 2:11 PM
Subject: 00700035 Sunnyside Cogeneration Outgoing and Internal, Inspection Rpt #2701
Attachments: Insp Rpt 2701.pdf

Hello Rusty,
Attached is the inspection report for my recent site visit.
Priscilla.

The State of Utah

Department of Natural Resources

Division of Oil, Gas & Mining

ROBERT L. MORGAN
Executive Director

LOWELL P. BRAXTON
Division Director

OLENE S. WALKER
Governor

GAYLE F. McKEACHNIE
Lieutenant Governor

Inspection Report

Representatives Present During the Inspection:	
OGM	Priscilla Burton
Company	Rusty Netz

Permit Number:	**C0070035**
Inspection Type:	COURTESY
Inspection Date:	Monday, April 04, 2011
Start Date/Time:	4/4/2011 9:30:00 AM
End Date/Time:	4/4/2011 1:00:00 PM
Last Inspection:	Tuesday, March 15, 2011

Inspector: Priscilla Burton,

Weather: clear skies, windy, 45F

InspectionID Report Number: 2701

Accepted by: jhelfric
4/12/2011

Permitee: **SUNNYSIDE COGENERATION ASSOCIATES**
Operator: **SUNNYSIDE COGENERATION ASSOCIATES**
Site: **SUNNYSIDE REFUSE & SLURRY**
Address: **PO BOX 159, SUNNYSIDE UT 84539**
County: **CARBON**
Permit Type: **PERMANENT COAL PROGRAM**
Permit Status: **ACTIVE**

Current Acreages

323.95	**Total Permitted**
202.00	**Total Disturbed**
5.35	**Phase I**
5.35	**Phase II**
	Phase III

Mineral Ownership

- ☐ Federal
- ☐ State
- ☐ County
- ☑ Fee
- ☐ Other

Types of Operations

- ☐ Underground
- ☐ Surface
- ☐ Loadout
- ☐ Processing
- ☑ Reprocessing

Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

Inspector's Signature: Priscilla Burton **Date** Tuesday, April 05, 2011

Priscilla Burton,
Inspector ID Number: 37

Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining.

1594 West North Temple, Suite 1210, PO Box 145801, Salt Lake City, UT 84114-5801
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REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS

1. *Substantiate the elements on this inspection by checking the appropriate performance standard.*
   a. *For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.*
   b. *For PARTIAL inspections check only the elements evaluated.*
2. *Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.*
3. *Reference any narratives written in conjunction with this inspection at the appropriate performace standard listed below.*
4. *Provide a brief status report for all pending enforcement actions, permit conditions, Divison Orders, and amendments.*

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	☐	☐	☐	☐
2. Signs and Markers	☐	☐	☐	☐
3. Topsoil	☑	☐	☑	☐
4.a Hydrologic Balance: Diversions	☑	☐	☑	☐
4.b Hydrologic Balance: Sediment Ponds and Impoundments	☐	☐	☐	☐
4.c Hydrologic Balance: Other Sediment Control Measures	☐	☐	☐	☐
4.d Hydrologic Balance: Water Monitoring	☐	☐	☐	☐
4.e Hydrologic Balance: Effluent Limitations	☐	☐	☐	☐
5. Explosives	☐	☐	☐	☐
6. Disposal of Excess Spoil, Fills, Benches	☑	☐	☑	☐
7. Coal Mine Waste, Refuse Piles, Impoundments	☐	☐	☐	☐
8. Noncoal Waste	☐	☐	☐	☐
9. Protection of Fish, Wildlife and Related Environmental Issues	☐	☐	☐	☐
10. Slides and Other Damage	☐	☐	☐	☐
11. Contemporaneous Reclamation	☐	☐	☐	☐
12. Backfilling And Grading	☐	☐	☐	☐
13. Revegetation	☐	☐	☐	☐
14. Subsidence Control	☐	☐	☐	☐
15. Cessation of Operations	☐	☐	☐	☐
16.a Roads: Construction, Maintenance, Surfacing	☐	☐	☐	☐
16.b Roads: Drainage Controls	☐	☐	☐	☐
17. Other Transportation Facilities	☐	☐	☐	☐
18. Support Facilities, Utility Installations	☐	☐	☐	☐
19. AVS Check	☐	☐	☐	☐
20. Air Quality Permit	☐	☐	☐	☐
21. Bonding and Insurance	☐	☐	☐	☐
22. Other	☐	☐	☐	☐

3. Topsoil

Dwg. 5-1 shows the location of Temp. Storage Area 3 (Area #3). Area #3 is eliptical in shape and covers 5.8 acres on a fairly level, previously disturbed bench. The mine waste covering Area #3 has been removed, but there remains some waste on the north border of the area (east of the historic coke ovens) that is unsuitable for fuel use. Three pits had been dug exposing native soils (Strych very stony loam, Dwg 2-1). Native soils corresponded with the Munsell color "Reddish Brown" 5 YR 5/4 and felt to be sandy loam in texture. Aside from the surface layer of mine waste, the exposed profile (5 ft) was uniform with no clear indication of horizon boundaries. (Earlier soil surveys of the native soils found in Chapter 2 appendices indicated a Bk horizon (accumulation of carbonates) appearing in within 7 - 36 inches of soil. These surveys indicate that the alluvium/outwash soils reach depths of 20+ ft. over bedrock.) There were gravels and cobbles, but no stones, boulders or rocks were exposed or removed in the soil pits. Three composite samples will be created from six locations across the Temp Storage Area 3. These samples will be analyzed for pH, EC, SAR, texture, N, P, K, water soluble B & Se, and acid base accounting. A layer of mine waste of variable depth across the storage area will be tested separately from the soils and depending upon quality, may be used as a transition zone from the coarse excess spoil to the fine textured soil. The same range of tests above will be run on one composite sample of the mine waste. Alternatively, the Permittee may decide to stockpile the mine waste for later use as fuel. The small topsoil stockpile north of the Clear Water Pond holds approximately 2,916 cu yds (MRP, Sec. 234).

4.a Hydrologic Balance: Diversions

Dwg 5-1 shows an un-named ditch dividing the Excess Spoils Area #2 and Temp Storage Area #3. The ditch was in place before the Cogeneration plant, as evidenced by the historic rock wall forming the east side of the ditch. On top of the east wall is a fence that runs the length of the ditch. Although the fence may be removed, the ditch will not be affected by reclamation of Excess Spoils Area #2, due to its proximity to the coke ovens.

6. Disposal of Excess Spoil, Fills, Benches

Excess spoil has been placed in the location of the Clearwater Pond and in Excess Spoil Pile #2 (see Dwg 5-1) Dwg 5-1 shows the area of the Clear Water Pond to be circular with a diameter of 325 ft. and shows the Excess Spoil Pile #2 to be approximately rectangular with sides of 1000 ft x 250 ft.. The combined area of the Clear Water Pond and Excess Spoil Area #2 is calculated to be 7.6 acres (332,916 sq ft.). The pile is approximately 15 ft. high. Given these dimensions, the volume of material in the pile is approximately 184,953 cu yds. The lab analyses for Excess Spoil Pile #2 were not included found the annual reports, but were provided by Mr. Netz. These 2009 and 2010 laboratory analyses were sent to the Incoming folder for the mine.

To cover the 7.4 acre pile with 4 ft. of material will require a cut and transport of 5.1 feet from the native soils in the adjacent 5.8 acre Temp. Storage Area #3. A truck/shovel and dozer operation on the Excess Spoil Pile #2 would result in less compaction than using graders to transport the material. Compaction should be evaluated during the surface roughening step of the reclamation.