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DEPARTMENT OF NATURAL RESOURCES

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Outgoing
C0070035
#3821
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June 30, 2011

Mr. Rusty Netz, Environmental Coordinator
Sunnyside Cogeneration Associates
One Power Plant Road
P.O. Box 159
Sunnyside, UT 84539

Subject: Permit Boundary Amendment, Sunnyside Cogeneration Associates, Sunnyside Refuse/Slurry, C007/0035, Task #3821

Dear Mr. Netz:

The Division of Oil, Gas and Mining has (the Division) has reviewed the Sunnyside Refuse and Slurry Mining Permit Boundary Amendment received on May 26, 2011.

The Division has identified deficiencies that must be addressed prior to final approval of the amendment. The deficiencies are listed as an attachment to this letter. The initials of each deficiencies author are provided so that your staff can communicate directly with that individual.

The plans as submitted are denied. Please resubmit the entire application.

If you have any questions please call me at (801) 538-5325 or Steve Christensen at (801) 538-5350.

Sincerely,

Daron Haddock
Coal Program Manager

DRH/SKC/sqs
Attachment
cc: Price Field Office
O:\007035.SRS\WG3821\WG3821Def_Ltr.doc



Deficiency List

Task No. 3821

The members of the review team include the following individuals:

April Abate (AA)
Steve Christensen (SC)
Joe Helfrich (JCH)
James Owen (JO)

R645-301-622 Plate 6-1 references three cross sections: A-A', B-B' and C-C'. These cross sections are subsequently referred to as Plates 6-4, 6-5 and 6-6, respectively. These cross sections will need to be modified to address the reduction in the permit area. (AA)

R645-301-622 Plate 6-2 – the Hydrogeologic Map will require updating based on the permit boundary change. All geologic maps should be resubmitted in color such that the lithologic symbols are clearly demarcated by the colors each formations represents. (AA)

R645-301-622 There appears to be no existing Plate 6-3 based on the information presented in the Chapter 6 Table of Contents. Unless there is a plate missing from the MRP that needs to be included, please renumber the cross sections as 6-3, 6-4, and 6-5 so that it does not appear that there is a break in the map sequence. Please also resubmit an updated Chapter 6 Table of Contents based on these map changes. (AA)

R645-301-521 The Permittee must revise Plate 1-1, *SCA Permit Area Legal Description*. Upon review of the plate, it appears that the depicted permit boundary encompasses the main surface facility and does not correspond to the call out of Parcels A, B and C in the bottom left corner of the plate. The Permittee must revise Plate 1-1 to accurately depict the permit area boundary.

R645-301.121.200 The scale information for Drawings 7-1 and 7-1F must be corrected. The Graphic Scales identified on the drawings (1 inch = 200 feet) do not agree with the scale bar (1 inch = 400 feet) and a comparison of these drawings reveals that different scales are used. (SC)

R645-301-121.200 The following errors and discrepancies in Appendix 7-3D must be corrected:

- Cover sheet – The cover sheet references drawings 7-1 (Hydrologic Index Map), 7-1G (Clear Water and East Slurry Cell Drainage) and 7-9 (Pasture Pond Record Drawing) for the Railcut Sediment Pond. The drawing references for Appendix 7-3D should be 7-1 (Hydrologic Index Map) and 7-8 (Railcut Pond and Topsoil Pile Record Drawing).
- Introduction (Page 1, 1st paragraph) – The last sentence of this paragraph states that the Railcou Pond treats runoff from a 114-acre watershed; however, based on the Hydrologic Index Map (Drawing 7-1) and the table Sub Watershed Characteristics (Appendix 7-3D, page 3), the total area treated by the Railcut Pond is 133.7 acres. This discrepancy must be corrected or explained.
- SEDIMOT model inputs for RC-SWS1 and RC-SWS2 ('Rail Cut 10yr 24hr' Page 2, 'Rail Cut 25yr 6hr' Page 2 and 'Rail Cut 100yr 6hr' Page 2) – The areas identified as

model inputs for RC-SWS1 and RC-SWS2 are 13.00 acres and 64.90 acres, respectively, which appear to be transposed compared to the area values identified on the Hydrologic Index Map (Drawing 7-1) and the table Sub Watershed Characteristics (Appendix 7-3D, page 3). SEDIMOT input values for times of concentration for RC-SWS1 and RC-SWS2 (0.250 hour and 0.600 hour, respectively) also appear to be transposed compared to the values identified on the Hydrologic Index Map (Drawing 7-1) and the table Sub Watershed Characteristics (Appendix 7-3D, page 3). The curve number identified in the SEDIMOT input files for RC-SWS2 is 70.00, which does not agree with the curve number identified in the table Sub Watershed Characteristics (Appendix 7-3D, page 3). These discrepancies must be corrected (SC)

R645-310-121.100 The as-built drawings for the East Slurry Cell and Clearwater ponds (Drawing 7-4 and Drawing 7-12, respectively) should be removed from the MRP, as these ponds are no longer present at the site. (SC)

R645-301-121.200 The following corrections must be made to Appendix 8-1D:

- The cover sheet references drawings 8-3 (Permit Term Reclamation Plan Drainage and Diversion Plan) and 7-9 (Pasture Pond Record Drawing) for the Railcut Sediment Pond. The drawing references for Appendix 7-3D should be Drawing 8-3 and 7-8 (Railcut Pond and Topsoil Pile Record Drawing).
- The Introduction to Appendix 8-1D (page 1, 1st paragraph) identifies a 110-acre watershed associated with the Railcut pond; however, the sum of acreages associated with each sub-watershed on the Sub Watershed Characteristics Table (page 3) is 108.7 acres.
- The Sub Watershed Characteristics Table (page 3) identifies RC-SWS8 as 13.5 acres; however, Drawing 8-3 identifies this sub-watershed as 13.9 acres.
- There are multiple discrepancies between the model inputs compared to Appendix 8-1D text. These discrepancies were noted for all five model simulations (10-year / 6-hour Phase 1, 10-year / 24-hour Phase 2, 25-year / 6-hour Phase 1, 10-year / 6-hour Phase 2 and 100-year / 6-hour Phase 2):

Sub Watershed	Parameter	App 8-1D Text	App 8-1D Model Input
RC-SWS1	t_c	0.51 hrs	0.50 hrs
RC-SWS3	Area	11.2 acres	11.1 acres
	t_c	0.43 hrs	0.40 hrs
RC-SWS4	Area	18.3 acres	18.4 acres
	t_c	0.35 hrs	0.37 hrs
RC-SWS5	t_c	0.16 hrs	0.14 hrs
RC-SWS8	Area	13.5 acres	12.1 acres
	t_c	0.31 hrs	0.30 hrs

(SC)

R645-301-121.200 The labels for many diversions and sub-watersheds are illegible on the drawing, therefore Drawing 10-5 must be revised to improve the legibility of sub-watershed and diversion labels. (SC)

R645-301-512 Maps, cross-sections and drawing must be properly certified. Proper certification includes signature, seal, and date. The Division recommends that the applicant follow the requirements detailed in State Rules R156-22-601 for seal requirements. (JO)

R645-301-341, Page 900-17 paragraph one needs to be revised to include the Division in determining if it is appropriate to use fertilizer in the reclamation of the spoil piles. [JCH]