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DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

August 25, 2015

Gerald Hascall, Plant Manager
Sunnyside Cogeneration Associates
One Power Plant Road
Sunnyside, Utah 84539

Subject: 2014 Annual Report Review Completion, Sunnyside Refuse, C/007/0035, Task ID #4855

Dear Mr. Hascall:

The Division staff has completed the review of the 2014 Annual Report. Enclosed is a copy of the review with each reviewer's comments completed on August 25, 2015.

Thank you for your diligence in completing the Annual Report. If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock
Coal Program Manager

DRH/sqs
Enclosure
O:\007035.SRS\WG4855 ANNUAL REPORT\ReviewCompletionLetter.doc



Print Form

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Annual Report

This Annual Report shows information the Division has for your mine. Submit the completed document and any additional information identified in the Appendices to the Division by the date specified in the cover letter. During a complete inspection an inspector will check and verify the information.

GENERAL INFORMATION

Company Name	Sunnyside Cogeneration Associates	Mine Name	Sunnyside Refuse and Slurry
Permit Number	C/007/0035	Permit expiration Date	2018-02-04
Operator Name	Plant Manager - Gerald Hascall	Phone Number	+1 (435) 888-4476
Mailing Address	PO Box 159	Email	
City	Sunnyside		
State	UT	Zip Code	84539

DOGM File Location or Annual Report Location

Excess Spoil Piles

- Required
- Not Required

Submitted quarterly to DOGM

Refuse Piles

- Required
- Not Required

Submitted quarterly to DOGM

Impoundments

- Required
- Not Required

Submitted quarterly to DOGM

Other:

OPERATOR COMMENTS

Quarterly inspections of the impoundments, refuse pile and excess spoil piles were completed during 2014 and submitted to DOGM. All impoundments performed as designed with no discharges during 2014. The refuse Pile is being excavated as intended and the Disposal Areas are being constructed in conformance with the approved plan SCA received renewal of its Title V air permit in 2013 UPDES permit was renewed in 2013

REVIEWER COMMENTS

- Met Requirements
- Did Not meet Requirements

The Division reviewed the quarterly inspection of the Refuse pile completed on: 3/27/14, 6/26/14, 9/25/14, 12/17/14. The inspection reports were completed by Scott Carlson, a Utah PE certified professional engineer. The field inspections state that approximately 129,798 tons of volume was removed during 2013. The reports detail that all slopes showed no signs of instability such as rills, gullies, or sloughage. The Permittee has addressed the requirements of this commitment. (CP)

The Division reviews the quarterly inspection reports of the excess spoil piles completed on: 3/27/15, 6/26/14, 9/25/14, 12/17/14. The inspection reports state that 59,710 CY was placed in 2014. The elevation of the active benches is approximately 6500-6520 ft for excess spoil #1 and 6550 feet for excess spoil #2. The reports detail that all slopes showed no signs of instability such as rills, gullies, or

sloughage. The Permittee has addressed the requirements of this commitment. (CP)

COMMITMENTS AND CONDITIONS

The Permittee is responsible for ensuring annual technical commitments in the Mining and Reclamation Plan and conditions accepted with the permit are completed throughout the year. The Division has identified these commitments below and has provided space for you to report what you have done during the past year for each commitment. If additional written response is required, it should be filed as an attachment to this report.

Title: ANNUAL RECLAMATION

Objective: To reclaim areas no longer needed for mining activities and to reduce the acreage under the currency reclamation cost estimate.

Frequency: Annually

Status: Ongoing, excess spoil pile #2 may have reached designed capacity in 2010.

Reports: Annual- Summary of Reclamation work and include vegetation monitoring reports (if any).

Citation: MRP, Book 6, Chapter 9, page 900-25, section 9.12, paragraph 2.

Operator Comments

The Phase 1 portion of the Excess Spoil Disposal Area #2 (which reached designed capacity) was reclaimed in 2011. Due to low precipitation in 2012, SCA seeded again in Fall 2012. Vegetation cover appears to be improving. SCA may request Phase 1 bond release for this area.

No other areas within the permit boundary are ready for reclamation.

Reviewer Comments Met Requirements Did Not Meet Requirements

The statements above match inspector reports detailed throughout 2014. The Division should schedule a site visit to evaluate the success of the companies seeding efforts. (CP)

Title: EXCESS SPOIL (REFUSE) SAMPLING

Objective: To evaluate the chemistry of the waste rock for the purpose of determining final cover depth requirement per R-645-301-553.252.

Frequency: After completion of each 2-4 ft. lift.

Status: Ongoing.

Reports: Annual report

Citation: MRP, Chapter 9, page 900-12 and Appendices 9.5 and 9-7.

Operator Comments

SCA completed sampling of material placed in the Excess Spoil Disposal Area #1 in 2014. Samples were composited and tested at BYU soils lab for parameters and methods as directed by the Division. Test results are included with this Annual Report and also submitted to the Division with the 1st Quarter 2015 Inspection Reports.

Reviewer Comments Met Requirements

Did Not Meet Requirements

The operator erroneously refers to the Excess Spoil Disposal Area #1 above. The samples were drawn from material placed in Phase 2 of the Excess Spoil Pile #2. Approximately 59,710 tons of excess spoil waste were placed in the Phase 2 Excess Spoil pile #2 during 2014 as follows: 13,090 in the 1st Qtr.; 11,585 tons in the 2nd Qtr; 21,595 tons in the 3rd Qtr; 13,440 tons in the 4th Qtr. Analysis of the waste is found on p. 7-8 of the electronic copy of the 2014 Annual Report. Two composite samples of the waste were analyzed by BYU Environmental Analytical Lab on March 12, 2014 and January 28, 2015. The sandy loam material has a neutral pH, and contains adequate carbonate buffering capacity for the pyritic sulfur content. The March sample of the waste was high in selenium and should be buried under four feet of cover. Boron and SAR values remain within acceptable values, but are quite variable between samples. The annual mine map provided with the annual report should include labels for the Phase 1 and Phase 2 locations of the Excess Spoil Pile #2 along with an outline of each location (similar to that provided for the Excess Spoil pile #1 location). (PWB, 8/24/2015).

The spoil pile quarterly deposition is reported for the current year each quarter, but the annual total is reported for the previous year. i. e. 2013 volume = 129,798 tons removed from the refuse pile and 2013 volume = 85,505 tons placed in the Phase 2 Excess Spoil Pile #2. The reviewer must look at the first quarter 2015 quarterly report to find the total removed from the refuse pile and the total placed in the excess spoils pile #2 in 2014. The annual total for 2014 was 117,027 tons removed from the refuse pile and 59,710 tons placed in phase 2 of the excess spoils pile #2. Lift heights were approximately 2 ft on the average (not 50 ft. as stated on the quarterly reports). Phase 2 of Excess Spoils pile #2 has been in use for three years and the refuse has been placed approximately 8 - 10 ft. deep. The pile grows by 2 - 4 ft a year. (Approximate density of the excess spoil rock is 95 - 100 lbs/CF.) The maximum height of the pile will be 50 ft. (communication with Rusty Netz, 8/25/2015). Reviewed by PWB, 8/25/2015.

FUTURE COMMITMENTS AND CONDITIONS

The following commitments are not required for the current annual report year, but will be required by the permittee in the future as indicated by the "status" field. These commitments are included for information only, and do not currently require action. If you feel that the commitment is no longer relevant or needs to be revised, please contact the Division.

Title: REFUSE SAMPLING PRIOR TO FINAL RECLAMATION

Objective: To sample the remainder of the refuse and slurry areas for acid/toxic parameters prior to final reclamation.

Frequency: Final Reclamation

Status: Ongoing

Reports: Annual

Citation: MRP, Chapter 7, Section 731.300 thru 731.320, page 700-15.

OPERATOR COMMENTS (OPTIONAL)

Surface sampling of refuse material remaining in the coarse refuse pile is scheduled to occur prior to final reclamation. No reclamation has occurred on the pile, hence the sampling program is deferred.

SCA has sampled other areas prior to final reclamation in past years. No acid/toxic concerns were noted.

REVIEWER COMMENTS

REPORTING OF OTHER TECHNICAL DATA

Please list other technical data or information that was not included in the form above, but is required under the approved plan, which must be periodically submitted to the Division.

Please list attachments:

Sunnyside City climate data (temperature and precipitation) for 2014 is not available. (The city has discontinued data collection and no other local source is in operation)
No subsidence monitoring is required
No raptor surveys are required
Quarterly water monitoring reports are submitted to the Division throughout the year
No Geological monitoring is required.
SCA burned approximately 117,027 tons of material excavated from the Sunnyside site, in addition to material transported in from other locations.
Approximately 59,710 tons of material was placed in the Excess Spoil Disposal Area 2, Phase 2 area during the year.

Reviewer Comments

Water monitoring data has been submitted to the electronic database quarterly, as required. (AD)

MAPS

Copies of mine maps, current and up-to-date, are to be provided to the Division as an attachment to this report in accordance with the requirements of R645-301-525.240. The map copies shall be made in accordance with 30 CFR 75.1200 as required by MSHA. Mine maps are not considered confidential.

Map Name	Map Number	Included		Confidential	
		Yes	No	Yes	No
Mine Map	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mine sequencing plan is current in Permit document	9-4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reviewer Comments Met Requirements Did Not Meet Requirements

The Permittee included a mine map with location of operations at the refuse site. The mine map meet the Division's annual report requirements. (CP)