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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

August 27, 2015

Gerald Hascall, Plant Manager  
Sunnyside Cogeneration Associates  
One Power Plant Road  
P.O. Box 159  
Sunnyside, Utah 84539

Subject: Completion of Midterm Permit Review, Task ID #4946, Sunnyside Cogeneration Associates, Sunnyside Refuse, C/007/0035

Dear Mr. Hascall:

The midterm review has now been completed and will now be closed; however, the Division has identified deficiencies that must be addressed. The deficiencies have been included with this letter (See Attached). The name of the author for each of the respective deficiencies has been provided.

Your response to these deficiencies will need to be submitted as an amendment to your MRP and will be processed as a separate task. Please submit the required amendment with the accompanying C1 and C2 forms by no later than September 25, 2015.

If you have any questions regarding these requirements or the Midterm Review process, please don't hesitate to call me at 801-538-5350.

Sincerely,

Steve Christensen  
Permit Supervisor

SKC/sqs  
O:\007035.SRS\WG4946 MIDTERM REVIEW\MidtermCompletion.doc





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# Technical Analysis and Findings

## Utah Coal Regulatory Program

**PID:** C0070035  
**TaskID:** 4946  
**Mine Name:** SUNNYSIDE REFUSE & SLURRY  
**Title:** MIDTERM PERMIT REVIEW

### General Contents

#### Reporting of Technical Data

##### *Deficiencies Details:*

SCA should make the following updates to their MRP in accordance with R 645-301-121.100:

Topsoil salvaging and distribution were discussed at two areas on the coarse refuse pile during the on site visit. They included a portion of the North East corner of the coarse refuse pile that had been reclaimed in 2011 and a portion of the middle of the pile that had been mined down to the original surface contour. The type and volume of topsoil used in the reclaimed area as well as the volume of soil to be salvaged from the original surface area must be provided as an amendment to the current MRP. Locations should be shown on map 2-1 and possibly 5-2. In order to initiate the ten year liability period beginning in 2011 on the reclaimed area SCA could only do supplemental seeding for the first four years of the liability period or 2015. Optional MRP update: SCA may want to retain the topsoil borrow area sediment pond as a wildlife enhancement structure as referred to in section R645-301-342.100 of the coal rules. This would require a minor amendment to the reclamation portion of the current MRP.

jheffric

### Operation Plan

#### Topsoil and Subsoil

##### *Deficiencies Details:*

R645-301-121.100,

- 1) Quantities of stockpiled topsoil are listed in MRP Section 234. This list of quantities should be revised to reflect current conditions, since the clearwater pond topsoil stockpile was consumed in reclamation of the Excess Spoil Pile #2.
- 2) A report on the test plots from 1982 appears to be the most current information on the revegetation test plots. A summary of the more recent test plot results concerning appropriate reclamation techniques and procedures should be added to the narrative of the MRP section 230.

pburton

### Reclamation Plan

#### Bonding Determination of Amount

*Deficiencies Details:*

The application meets the minimum requirements of R645-301-830.140 as the Permittee submitted detailed bond information in regards to the application. The Permittee submitted a draft version of the bond calculations to the Division on August 11, 2015 with updated 2015 unit costs received from local construction companies, the Caterpillar Performance handbook 2015, and the 2015 R.S. Means Heavy Construction Cost Data Handbook. Soil volumes estimated to reclaim the disturbance were obtain from the approved reclamation plan with the cost estimate subsequently determined. The updated demolition, earthwork, and revegetation costs result in a bond amount of \$1,532,000.

The applicant will submit official updated bond sheets to the Division by Sep. 25, 2015.

**cparker**