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DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

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Division Director

July 15, 2016

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

Subject: 2015 Annual Report Review Completion, Sunnyside Refuse, C/007/0035, Task ID #5148

Dear Mr. Hascall:

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

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\WG5148 ANNUAL REPORT\ReviewCompletionLetter.doc



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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	<input checked="" type="checkbox"/> Required <input type="checkbox"/> Not Required	Submitted quarterly to DOGM
Refuse Piles	<input checked="" type="checkbox"/> Required <input type="checkbox"/> Not Required	Submitted quarterly to DOGM
Impoundments	<input checked="" type="checkbox"/> Required <input type="checkbox"/> Not Required	Submitted quarterly to DOGM
Other:		

OPERATOR COMMENTS

Quarterly inspections of the impoundments, refuse pile and excess spoil piles were completed during 2015 and submitted to DOGM. All impoundments performed as designed with no discharges during 2015. The refuse Pile is being excavated as intended and the Disposal Areas are being constructed in conformance with the approved plan SCA Bond was renewed during 2015 as part of mid term review. SCA submitted two permit amendments during 2015. These were to address comments received during the mid-term review and also to show a new road cutting across the refuse pile. 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: 3/19/15, 6/25/15, 9/24/15, 12/30/15. The inspection reports were completed by Scott Carlson, a Utah PE certified professional engineer. The field inspections state that approximately 78,129 ton of refuse from Sunnyside has been burned at the Sunnyside Facility. Approximately 295,407 tons from the Start Point facility and 150,000 tons from the Price River Terminal have been burned at the Sunnyside facility. 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 reviewed the quarterly inspection reports of the excess spoil piles completed on: 3/19/15, 6/25/15, 9/24/15, 12/30/15. The inspection reports state that 32,410 tons was placed in Spoil #2 Phase 2 area during 2015. 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 requested Phase 1 bond release for this area in Spring 2016.

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

Reviewer Comments Met Requirements Did Not Meet Requirements

Sunnyside Cogen submitted an application for Phase I on February 3, 2016 (2016 Incoming 02032016.pdf). It was returned the same day (Outgoing file 02032016.pdf). The application has not been resubmitted. (PB, 7/12/2016)

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 #2 Phase 2 in 2015. Samples were composited and tested at BYU soils lab for parameters and methods as directed by the Division. Test results were received in January 2015 and February 2016 and are included with this Annual Report. The 2016 results are also submitted to the Division with the 1st Quarter 2016 Inspection Reports.

Reviewer Comments Met Requirements

Did Not Meet Requirements

The locations of Excess Spoil Pile #2 Phase 1 and Phase 2 are shown on the Annual Report Map dated March 2016. Excess Spoil Pile #2 Phase 2 is an active pile. The fourth quarter inspection report (Incoming 01122016a.pdf) states the weight of rock placed during the year 2015 was 32,410 Tons (approximate density is 0.98 Tons/CY). Analysis of waste rock dated January 28, 2015 included with the 2015 fourth quarter report (Incoming file 01122016a.pdf) and the 2015 Annual Report (Incoming 03312016.5148.pdf) represents material placed in 2014. A single sample analyzed 2/19/2016 by Brigham Young University Environmental Analytical Laboratory represents the four foot lift containing 32,410 Tons (31,762 CY) placed in 2015. The material is mostly sand in texture with pH 6.7, low salinity, low Boron and low SAR. The waste has very little buffering capacity, with an ABP of 2. If this waste were the final layer, it would require an organic amendment to provide water holding capacity and to add nutrients and carbon for microbial/soil development. This waste will not be the final layer, as Excess Spoil #2 has a remaining storage volume of 140,000 - 190,000 CY. No spoil was placed in Excess Spoil pile #1 during 2015. (PB, 7/12/2016).

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 78,129 tons of material excavated from the Sunnyside site, in addition to material transported in from other locations (295,407 tons from Star Point and 150,000 tons from Price River Terminal).
Approximately 32,410 tons of material was placed in the Excess Spoil Disposal Area 2, Phase 2 area during the year.

Reviewer Comments

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 documents	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 annual report included an updated contour map to show the removal of coal waste relative 2013 elevations compared to 2010 elevations. An updated mining sequence map is currently located within the MRP, Plate 9-4. (CP)