

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

April 4, 2006

TO: Internal File

THRU: Wayne Western, Environmental Scientist III/Team Lead.

FROM: Priscilla Burton, Environmental Scientist III/Soils.

RE: Prep Plant & Refuse Pile Phase I and Phase III, Plateau Mining Corporation, Willow Creek Mine, C/007/0038, Task ID #2424

SUMMARY:

Foundation Coal Company applied for Phase I bond release for 49.1 acres associated with the Schoolhouse Canyon Refuse Pile and Phase III bond release for the industrial post mining land use portion of the site (46.2 acres). The bond release application was received September 23, 2005.

Earthwork (including seeding) at the Willow Creek site was mostly completed in the fall of 2005. However, the 1.17-acre train loadout reclamation plan shown on Ex. 3.4-17AB and described in Vol. 11, Sec. 3.8 has yet to be completed. The industrial post mining land use boundary is shown on Ex. 3.4-13AB. The unit train loadout is not within the Phase III bond release area.

As Built information for these areas is found in App. 3.4N of Ex. 19 of the MRP. Structures remaining after reclamation to support the industrial post mining land use are labeled on Exhibit 3.4-12. They are the substation, warehouse/bathhouse/shop, pumphouse, and water treatment plant at the mouth of Barn Canyon.

Appendix 3.4N indicates that the train loadout will be reclaimed, but this activity has not yet occurred. The Division inspector was at the site on November 30, 2005. He indicated that the complete removal of the unit train loadout will take another three weeks. In addition, a cistern must be removed and surface coal will be graded into this location. Reclamation will follow.

The Division should reserve funds adequate for final reclamation of the unit train loadout.

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TECHNICAL ANALYSIS:

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Redistribution

The requirements for Phase I bond release are outlined in R645-301-880.310. Requirements for Phase III bond release are described in R645-301-880.330. The Rule specifically states “no bond will be fully released under provisions of this section until reclamation requirements of the Act and the permit are fully met. The industrial post mining land use area is outlined on Plate 3.4-13AB.

Reclamation plans in Vol. 10; Ex 19 sections 3.4-6, 3.4-7 and 3.4-8 for the site were reviewed by the Division under tasks 1788 and 1875. Final soil placement over the waste in Schoolhouse canyon averaged 36 inches. The waste was sampled before placement and during reclamation (App. 3.4M and Map 3.4-12). The soil cover came from the Gravel Canyon stockpile and from the embankment of pond 013.

The preparation plant was reclaimed using “in site” soils that were sampled in 1991 and again in 1994. The results of the 1991 analyses are shown on Map –8-4 and located in App. 8-2. The 1994 analyses are shown on Ex. 3.4-12 and in App. 3.4M.

Topsoil salvaged from the coal stockpile location was returned to the slope at a depth of 20 inches.

The 1.17-acre train loadout reclamation plan shown on Ex. 3.4-17AB and described in Vol. 11, Sec. 3.8 has yet to be completed. Bonding for the unit train loadout is described in Vol. 11, Section 3.8-8. This area does not fall within the Phase III bond release portion of the site.

Findings:

The information provided meets the requirements for Phase I and Phase III bond release, except that the Division should withhold from Phase I bonding an amount adequate to reclaim the unit train loadout. Vol. 11, Section 3.8-8.

STABILIZATION OF SURFACE AREAS

Regulatory Reference: 30 CFR Sec. 817.95; R645-301-244.

Analysis:

The regraded topsoiled site was covered with hay (2 tons/ac.) that was gouged into the surface before seeding. The hydroseeding operation was followed by a surface application of 1.5-tons/ac hay mulch and 500-lbs/ac tackifier. Locations of the gouging and seeding treatments are shown on Ex. 3.4-17AB.

Findings:

The Permittee has adequately applied best management practices to control erosion and prevent sediments from leaving the site.

RECOMMENDATIONS:

Phase I bond release for the Preparation Plant and Schoolhouse Refuse site is recommended except that the Division should withhold from Phase I bonding an amount adequate to reclaim the unit train loadout, Vol. 11, Section 3.8-8. The Division expects that this requirement will be met by mid-winter. Bonding for final reclamation of the 1.17 acre, unit train loadout is described in Vol. 11, Section 3.8-8.

Phase III bond release for the PRWID post mining land use portion of the preparation plant is also recommended.