

July 12, 2003

TO: Internal File

FROM: Priscilla Burton, Environmental Scientist III/Soils

RE: Topsoil Salvage Reports for Substation and Refuse Pile Construction, Dugout Mine, Canyon Fuel Co., LLC., C/007/039-AM03D, Task # 1308 & AM03E, Task #1200.

**SUMMARY**

Salvage of topsoil during recent construction activity at the Dugout Mine was observed and monitored by Mr. Daniel Larsen, a soil scientist with Environmental Industrial Services. Mr. Larsen's reports to the Permittee are being submitted as addendums to the Dugout Canyon Mine MRP to fulfill the performance standard requirement of having a soils specialist on site during topsoil salvage. The substation topsoil salvage report is an addendum to Appendix 2-5 of the MRP and the refuse pile topsoil salvage report is an addendum to Attachment 2-1 of the Refuse Pile Amendment supplement to the MRP.

The reports provide a valuable record of Mr. Larsen's observations during the topsoil salvage activity, but should be followed by an as-built of the topsoil and subsoil piles that provides a surveyed accounting of the volume of topsoil/subsoil in storage at the Dugout Refuse Storage site and the Soldier Canyon Topsoil Storage site.



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TECHNICAL MEMO

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**TECHNICAL ANALYSIS:**

**REPORTING OF TECHNICAL DATA**

Regulatory Reference: 30 CFR 777.13; R645-301-130.

**Analysis:**

Mr. Daniel Larsen is the soil scientist who conducted the soil survey for the refuse pile amendment. His qualifications as a soil scientist have been established with the Division. His familiarity with the sites (refuse pile and mine site substation) made him a good candidate for the position of observing and directing topsoil salvage during the construction activity.

**Findings:**

The information provided meets the minimum requirements for Reporting of Technical Data.

**OPERATION PLAN**

**TOPSOIL AND SUBSOIL**

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

**Analysis:**

**Removal and Storage**

Section 232.100 of the MRP and Section 232.100 of the Refuse Amendment indicate that a professional soil scientist will be on-site during soil salvage operations to supervise and optimize salvage volumes. Mr. Larsen's reports fulfill this requirement and provide a valuable record of Mr. Larsen's observations during the topsoil salvage before construction of the small substation at the mine site and before construction of the refuse disposal area.

Currently it is estimated that 27,450 cubic yards of Dugout Canyon topsoil is stored in three stockpiles at the Soldier Canyon topsoil storage pile (Table 2-2, MRP, pg 2-31 and Plate 2-3). Topsoil and subsoil salvaged and stored at the Refuse site amounts to approximately 15,000 cubic yards (personal communication with Vickie Miller, June 2003).

These consultant's reports should be followed by a revision of the text and plates describing topsoil storage (Refuse Amendment Section 234.100 and MRP Section 231.400 page 2-30 and 2-31), **including cross-sections of the topsoil piles as constructed** as per R645-301-231.400.

**Findings:**

The information provided meets the minimum requirements for Operations Topsoil Subsoil Performance Standards.

**RECOMMENDATIONS:**

The information fulfills the performance standard requirement of having a soils scientist on site during topsoil salvage and should be incorporated into the MRP.

The information should be followed by an as-built of the refuse storage site topsoil and subsoil stockpiles as well as an as built of the topsoil storage site at the Soldier Canyon Mine. The as-builts should include a surveyed accounting of the volumes of topsoil and subsoil salvaged during the construction activity at the mine site substation and the refuse storage site.