

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 10, 2006

TO: Internal File

THRU: Wayne H. Western, Environmental Scientist/Engineering, Bond, Team Lead *waw*

FROM: Peter H. Hess, Environmental Scientist/Engineering *PHH by an*

RE: Refuse Pile Access Road, Canyon Fuel Company, LLC., Dugout Canyon Mine, C/007/0039, Task ID #2577

SUMMARY:

The Permittee submitted an application to the Division on July 17, 2006 to make a grade change and improve the surfacing on 840 feet of the primary haul road accessing the Dugout Mine waste rock site. The proposal will implement 226 cubic yards of asphalt material.

The proposed changes will affect a road that has already been permitted in the current disturbed acreage of the waste rock site.

This memo will address the adequacy of the proposed changes to the access road as they relate to the requirements of R645-301-500, Engineering.

TECHNICAL ANALYSIS:

OPERATION PLAN

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

Analysis:

Road Classification System

The haul road accessing the Dugout Mine waste rock site has been classified as a primary road since it was first permitted. No change is being proposed; the road will continue to be used for the hauling of coal mine waste and coal processing waste for final disposal.

Plans and Drawings

The Task ID #2577 application contains two Plates, which depict the details of the proposed road modifications. Plate 1, (drawing # RA 5-5) shows the plan view of the proposed road, and shows the compass bearings and distances for the access route. The waste rock road will continue to intersect the Carbon County road that accesses the main mine facilities area.

Plate 2, (drawing # RA 5-5A) depicts a longitudinal profile of the 840 foot road length which is to be modified, as well as two cross sections. One cross section depicts a center crowned road, with intercepted drainage reporting to the ditches located on both sides. The other cross section depicts a sloped road with drainage reporting to one side.

The longitudinal profile depicts a gradient change in the following manner:

- 1) The lower 430 feet of road will have sub-base material installed to raise the gradient to + 10%. The maximum thickness of the overall fill will be approximately six feet. The fill will be tapered to zero on both ends to conform to existing gradients at each end.
- 2) The next section of road (260 foot length) will have material removed (two feet is the maximum to be shaved) just below the crest.

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- 3) The last fifty feet of the project will have material added up to approximately eighteen inches to bring it to grade.

Both road cross-sections show a pavement width of 22 feet, with a travel width of 18 feet.

All road base size requirements and compaction requirements are shown as meeting specifications established by the AASHTO (American Association of State Highway Transportation Officials).

Performance Standards

The specifications for this project will comply with requirements established by the American Association of State Highway Transportation Officials. This meets or exceeds the performance standards for roads established within the R645 Coal Mining Rules.

Primary Road Certification

Plates 1 and 2 as well as the road design are certified by Mr. Brad Derrick, a Utah registered professional engineer.

Findings:

The Task ID #2577 application meets the minimum regulatory requirements for roads established in the R645 Coal Mining Rules.

RECLAMATION PLAN

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 701.5, 784.24, 817.150, 817.151; R645-100-200, -301-513, -301-521, -301-527, -301-534, -301-537, -301-732.

Analysis:

Reclamation

Although the access road to the waste rock site has been classified as a “primary” road, the permittee also considers this road as a “temporary” road, (See section **527.100 Road Classification**, page 5-9, paragraph one of the approved plan).

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Section **542.600 Roads** (page 5-23 of the approved refuse pile amendment document) states the following; “all temporary access roads constructed during refuse pile construction activities will be reclaimed when no longer needed for access to the site. Any surfacing material will be removed, the area will be regraded, ripped, and the final reclamation seed mix will be applied as specified in Chapter 3.” This commitment meets the minimum regulatory requirements of this section.

Findings:

The approved reclamation plan for temporary roads meets the minimum regulatory requirements of this section of the R645 Coal Mining Rules.

RECOMMENDATION:

This application should be approved.