

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 5, 2004

*OK*

TO: Internal File

FROM: Karl R. Houskeeper, Environmental Scientist III/Team Lead *KRH by an*

RE: Removal/Adjustment of Culverts Along North Side of Permit Area, Sunnyside Cogeneration Association, Star Point Refuse Mine, C/007/042, Task ID #1983

## SUMMARY:

The Division received an application to remove/adjust culverts along the North side of the permit area on July 6, 2004. The application requests the removal of the following culverts adjacent to Carbon County Road 290:

- Culvert 16B
- Culvert 16C
- Culvert 16D
- Culvert 16E
- Culvert 16Ea
- Drop Inlet & Culvert (North end of Ditch 32)

The application indicates that when the culverts are removed they will be replaced with a grouted diversion ditch. The diversion ditch should be of the same design as the diversion ditch immediately above and below the culverts that are being removed.

The application also addresses administrative adjustments regarding MSHA classification, and adjustments in directors and officers in the parent companies to Sunnyside Cogeneration Associates. This memo will focus on the administrative adjustments.

## TECHNICAL ANALYSIS:

## GENERAL CONTENTS

## IDENTIFICATION OF INTERESTS

**Analysis:**

Information submitted in the application included updated Directors and officers information for (CP Sunnyside I, Inc.), (Sunnyside II, Inc. & Sunnyside III, Inc.), (Colmac Sunnyside, Inc.), and (Sunnyside Holdings I, Inc.).

Changes were also made to section 112.700 MSHA Numbers. The changes stem from the fact that MSHA has abandoned the refuse pile and number associated with the refuse pile. However, MSHA still has a Mine ID number assigned to the mine site (MSHA Mine ID Number 42-02334). Information was provided by the permittee, from MSHA, to the Division to show the abandonment of the refuse pile. Section 112.700 has been modified to indicate that the MSHA Mine ID Number 42-02334 is still in effect and that MSHA still retains responsibility at this facility.

**Findings**

Information provided in the proposed amendment is considered adequate to meet the requirements of this section.

**VIOLATION INFORMATION**

Regulatory Reference: 30 CFR 773.15(b); 30 CFR 773.23; 30 CFR 778.14; R645-300-132; R645-301-113

**Analysis:**

The violation history in the approved MRP is up to date and a check of the AVS system showed that there are no outstanding violations.

**Findings**

Information in the approved MRP is considered adequate to meet the requirements of this section.

**RECOMMENDATIONS:**

Task ID #1983 should be approved with the proposed administrative adjustments contained in this amendment.