

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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August 10, 2010

TO: Internal File

THRU: Daron Haddock, Permit Supervisor *DQH*

FROM: Kevin Lundmark, Hydrologist & Lead *KLW*

RE: Roads D, F & L, Sunnyside Cogeneration Associates, Star Point Waste Fuel, C0070042 Task ID #3598

### SUMMARY:

On August 2, 2010 the Division received a permit amendment to designate three roads as "Primary Roads" at the Star Point Waste Fuel site. Proposed Primary Roads D, F and L are intended for regular and ongoing use by haul trucks at the site. The proposed primary roads are located in the northwest permit boundary area.

This memo presents the analysis of the permit amendment relative to hydrology requirements of the State of Utah R645 Coal Mining Rules. Upon review of the amendment, the Division finds that additional information is necessary in order to comply with the State of Utah R645 Coal Mining Rules. The Permittee must address the following deficiency prior to Division approval:

**R645-301-742.423** The application does not contain the drainage control design criteria and plans required by the State of Utah R645 Coal Mining Rules. The Permittee must revise/update the MRP to include the drainage control plans for primary roads as follows:

- Update MRP Section 742 text and Tables 742a thru 742d, as necessary, to provide drainage control design for all primary roads at the site, including roads D, F, L and Haul Road;
- Identify primary roads D, F, L and Haul Road and their associated drainage controls on MRP Maps 731.720a and 731.720b; and
- Remove all references to Map 731.720c from MRP section 742.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 784.24, 817.15; R645-301-742.

**Analysis:**

**Road Drainage**

According to Section 5 of the MRP, the only primary road currently existing at the site is the Haul Road. Drainages, drainage control features (culverts, diversions) and primary roads are shown on MRP Maps 731.720a and/or 731.720b. The only primary road shown on Maps 731.720a and 731.720b is County Road 290. Revised maps showing drainage control for primary roads D, F & L were not included in the submittal. Utah coal rule R645-301-742.423 identifies the requirements for drainage control for primary roads, including the design requirement for primary roads to safely pass the peak runoff from a 10-year, 6-hour precipitation event. Drainage design calculations are presented in Section 742 of the MRP; however, drainage control for primary roads D, F, L and Haul Road are not described in Section 742.

**Findings:**

The amendment does not meet the minimum Hydrologic Information requirements of the State of Utah R645 Coal Mining Rules and should not be approved. Prior to the Division approving the application, the following deficiency must be addressed:

**R645-301-742.423** The application does not contain the design criteria and plans as required by the State of Utah R645 Coal Mining Rules. The Permittee must revise/update the MRP to include the drainage control plans for primary roads as follows:

- Update MRP Section 742 text and Tables 742a thru 742d, as necessary, to provide drainage control design for Primary Roads D, F, L and Haul Road;
- Identify primary roads D, F, L and Haul Road and their associated drainage controls on MRP Maps 731.720a and 731.720b; and
- Remove all references to Map 731.720c from MRP section 742.

**RECOMMENDATIONS:**

The application does not meet the requirements of the State of Utah R645 Coal Mining Rules. The Permittee must address the deficiency identified above prior to obtaining Division approval.

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