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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Oil, Gas and Mining

JOHN R. BAZA  
*Division Director*

October 22, 2014

Gerald Hascall, Plant Manager  
Sunnyside Cogeneration Associates  
One Power Plant Road  
P.O. Box 159  
Sunnyside, Utah 84539

Subject: Response to NOV #12148, Sunnyside Cogeneration Associates, Star Point Refuse, C/007/0042, Task ID #4685

Dear Mr. Hascall:

The Division has reviewed your application in response to NOV #12148. The Division has identified deficiencies that must be addressed before final approval can be granted. The deficiencies are listed as an attachment to this letter.

The deficiencies authors are identified so that your staff can communicate directly with that individual should questions arise. The plans as submitted are denied. Please resubmit the entire application by no later than November 21, 2014.

If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock  
Coal Program Manager

DRH/sqs  
Enclosure  
O:\007042.SWF\WG4685\Deficiencies.docm



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## Technical Analysis and Findings

### Utah Coal Regulatory Program

**PID:** C0070042  
**TaskID:** 4685  
**Mine Name:** STAR POINT REFUSE  
**Title:** NOV #12148 RESPONSE

### Operation Plan

#### Road Systems Classification

##### Deficiencies Details:

R645-301-527.100 The original MRP shows that the road now referred to as Primary Road P was originally 0.16 miles long in Table 534.200a Road Specifications. MRP edits submitted show a decrease in length from 0.16 miles to 0.09 miles. Clarification is requested on the classification and intended use, if any, of the remaining 0.07 miles of original Haul Road.

cparker

#### Hydrologic Diversion General

##### Deficiencies Details:

R645-301-742.323, R645-301-740 Table 742b should be updated to reflect the new required design peak flow of culvert 80A, to ensure the culvert can still hold the required design storm, now that it is receiving flow from ditch 72 in addition to the original flow from ditch 80A.  
Table 742d was updated with a design flow of 11.39 cfs (from previous flow of 11.01 cfs) for culvert 80A, but this number is not supported by previous design calculations, given that ditch 72C has a peak flow of 4.68 cfs according to Table 742a. The design flow of culvert 80B in Table 742d should be corrected or explained further.

R645-301-742.312 Updated maps 731.720a and 731.720b indicate that ditches 72A-C will be lined. Sections of this ditch were unlined during a site visit on October 20, 2014. Work should be completed so that the ditch reflects the specifications called for in the submitted sheets.

R645-301-731.720 The MRP and maps should be updated to include the new riprapped ditch locate just north of the 72B ditch section. The MRP should include ditch sizing design specifications for the ditch. A picture of this new ditch is attached as Figure 1.

R645-301-742.300 The MRP should be updated to include an explanation of how the drainage previously collected in culverts 18A and 18B is now being handled.

R645-301-740 During the site visit, it was observed that ditch 16 has been lined with concrete. The MRP lists three options for lining ditches, riprap, half-round culverts, and conveyor belt lining (Volume 4 page 62). This section should be updated to indicate the use of concrete as lining for this ditch.

R645-301-740, R645-301-731.720 There is a culvert from ditch 6C that allows undisturbed drainage to flow off site. This

culvert is not listed in the MRP, there are no design specifications for the culvert, and it is unlabeled on the facility maps. The MRP should be updated to include this information if it is an SCA culvert.

adaniels

## **Reclamation Plan**

### **Bonding Determination of Amount**

#### *Deficiencies Details:*

R645-301-830.140,-830.200 The bond must be updated to reflect the demolition and disposal of the shotcrete lining in ditch 16.

cparker



Figure 1