

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 24, 2008

TO: Internal File

THRU: Steve K. Christensen, Senior Environmental Scientist/Hydrologist, Lead *S/KC*

FROM: David Darby, Senior Environmental Scientist 

RE: Permit Application Wellington Dry Coal Cleaning Facility, Covol Engineering Fuels (COVOL), LLC, C/007/0045, Task ID #2899

SUMMARY:

In January 2008, COVOL Engineered Fuels, LLC submitted a permit application for the Wellington Dry Coal Cleaning Facility. The facility has been in operation since January 2006. Canyon Fuel Company LLC submitted a revised amendment to the Dugout Canyon Mine plan.

DEFICIENCIES

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

PERMIT AREA

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

Analysis:

The permit area consists of 30 acres. There will be no mining at this facility. Coal will be transported to the site from mines in the adjacent coalfield. Coal will be stockpiled blended

and shipped from the facility. COVOL is a dry operation where no flotation or chemical separation will occur. A map showing the site and facilities is provided in Plate 5-1.

Findings:

The Permittee has addressed the minimum requirements of the Permit Area Section of the regulations.

GEOLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR 784.22; R645-301-623, -301-724.

Analysis:

The Applicant provided information to describe the geology of the area. Regional geology is described in Chapter 6 of the MRP. Figure 6-1 is a generalized stratigraphic section of the site. The rock surrounding and underlying the permit area is sedimentary. For the most part of the permit area, the facilities sit on alluvium that covers the Bluegate Shale member of the Mancos Shale Formation. COVOL site will process coal from customer mines in the adjacent coalfield. No mining will take place and no exploration holes exist on the permit area. No faults occur on or adjacent to the facilities. The general dip of the consolidated strata is 3 to 6 degrees to the northwest.

The applicant states in Section 5.2.8.3 that no spoil is generated at the site. The geological regulation R624.320 does not apply to this facility, because there is no coal seam to be mined. However, R645-301 731.300 will apply if refuse or spoil is stored at the site. The applicant needs to consider the acid and toxic levels of material brought onto the site to be processed. The PHC, Section 7.2.8.3, in Chapter 7 states there is no acid and toxic forming material present at the facility, however the Division Inspector has stated that a spoil pile does exist on site. The applicant should supply verification of the acid and toxic levels for coal and any refuse material sent to the site. The applicant should either sample the coal or submit confirmation from the customer mines as to the acid and toxic nature of the coal received at the site. Any spoil should be analyzed for acid or toxic material and handled in a manner to facilitate treatment and reclamation.

Findings:

The information provided by the Permittee meets the minimum requirements of the Environmental Resource Information – Geologic Resources Information section of the regulations.

TECHNICAL MEMO

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Coal Resource and Geologic Information Maps

There are no coal resources at the site to be mined. This is a coal processing facility, handling coal from mines in the adjacent coalfield.

Permit Area Boundary Maps

The Permit area boundary is illustrated on Plate 5-1. Figure 6-1 presents a geologic map and a stratigraphic column of the area surrounding facility.

Well Maps

No well or boreholes are currently proposed at the facility.

Findings:

The information provided by the Permittee meets the minimum requirements of the Maps, Plans and Cross Sections of Resources Information section of the regulations.

OPERATION PLAN

COAL RECOVERY

Regulatory Reference: 30 CFR 817.59; R645-301-522.

Analysis:

No coal mining will take place at the COVOL facilities.

Findings:

The Permittee has submitted sufficient information to address the minimum requirements of the Coal recovery regulations.

RECOMMENDATION:

It is recommended that the geologic section of this application be approved.

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