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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

February 24, 2011

TO: Internal File

THRU: Steve Christensen, Environmental Scientist II, Team Lead *SC*

FROM: Priscilla Burton, CPSSc, Environmental Scientist III. *pws lm srs*

SUBJECT: Midterm Review, Headwaters, Incorporated, COVOL, Permit C/0070045, Task ID #3719.

SUMMARY:

Two soil stockpiles were observed at the site on February 23, 2011. The volume provided in Section 2.3.1.4 for both stockpiles is 500 cu yds. Plate 5-1 incorporated January 18, 2011 illustrates the piles and provides approximate area, but not dimensions. From this plate and the observed height of the stockpiles, the Division estimates a greater volume of material stockpiled at the site than described. A survey of the stockpile volumes is requested. In accordance with:

R645-301-231.400, Please provide as-built volumes of the two topsoil stockpiles shown on Plate 5-1 and update MRP Section 2.3.1.4 accordingly.

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TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Topsoil Removal and Storage

Section 2.3.1.4 describes the storage of approximately 500 cu yds of topsoil in two stockpiles at the site. During a site visit on February 23, 2011, the approximate height of the stockpiles was observed. Using this information and the area shown on Plate 5-1, the Division has arrived at estimated volumes for the stockpiles that are greater than 500 cu yds.

The largest stockpile adjacent to the sediment pond in the southwest corner of the site is elliptical in shape with an approximate height of 10 ft. Based upon the dimensions shown on Plate 5-1, allowing for the area devoted to the surrounding berm, and estimating an average height of 7 ft. for the shape, the volume of the elliptical shape would be 800 yd³.

The smaller pile is a circular shape with an approximate height of 8 feet. Based upon the dimensions shown on Plate 5-1, allowing for the area devoted to the surrounding berm, the volume for the cone shape pile would be 124 yd³.

Findings:

A survey of the stockpile volumes is requested. In accordance with:

R645-301-231.400, Please provide as-built volumes of the two topsoil stockpiles shown on Plate 5-1 and update MRP Section 2.3.1.4 accordingly.

RECOMMENDATIONS:

The Division should request the as-built topsoil volumes.

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