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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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October 26, 2007

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor  
Karl Houskeeper, Team Lead *KH*

FROM: Wayne H. Western, Environmental Scientist III *WHW*

RE: Refuse Drainage to Pond 8, Consol Coal Company, Emery Deep, C/015/0015,  
Task ID #2852

**SUMMARY:**

In response to violation #10005 the Permittee submitted and amendment to revise the mining and reclamation plan on September 10, 2007. This memo deals with the engineering aspects of the amendment.

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TECHNICAL ANALYSIS:

## OPERATION PLAN

### SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

#### Analysis:

##### Refuse Piles

The Permittee did not meet the minimum requirements for this section. The Permittee must have a specific plan for the temporary storage and final disposal of all coal mine waste/refuse material. The Permittee states in several sections of the MRP about the temporary storage of coal mine waste/refuse material.

At a minimum the Permittee must state the maximum capacity of a temporary coal mine waste storage site and the maximum length of time that the material will be stored at the site.

The Utah coal rules do not have provisions for the temporary storage of refuse material. The Permittee must have a specific timetable for the final disposal of coal mine waste. In general the Division wants all coal mine waste to be placed in a permanent disposal facility within a practical time.

The Permittee also needs to clarify in the MRP the location of all refuse piles. For example Plate III-7 shows a different refuse pile than Plate IV-4.

#### Findings:

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

**R645-301-536**, The Permittee will include in the MRP a detailed description of how coal mine waste and underground development waste will be handled in the operation phase of the mine. At a minimum the Permittee will state the maximum volume/weight of refuse material that will be stored in the temporary storage site

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and the maximum amount of time that the material can stay there until the Permittee places the material in a permanent disposal facility.

The Utah coal rules do not mention temporary refuse material storage facilities. The Division understands the need for small amount of refuse material to be temporarily stored. The Division usually allows small amount such as 10-15 cubic yards of material to be temporarily stored for up to six months. The amount is usually based on the capacity of a haul/dump truck and the time to minimize the small loads being shipped.

**R645-301-536.110** The Permittee must show that the refuse pile slopes will have a minimum safety factor of 1.5.

**RECOMMENDATIONS:**

The Division should deny the amendment until all of the above mentioned deficiencies have been addressed.