



United States Department of the Interior

OFFICE OF SURFACE MINING

Reclamation and Enforcement

BROOKS TOWERS

1020 15TH STREET

DENVER, COLORADO 80202

OFFICE OF THE REGIONAL DIRECTOR

5 AUG 1980



Mr. Leland Spencer
 Reclamation Engineer
 Utah Department of Natural Resources
 Division of Oil, Gas, and Mining
 1588 West North Temple
 Salt Lake City, UT 84116

Dear Mr. Spencer:

The Region V staff has just completed the apparent completeness review of the proposed disposal plan for the Des/Bee/Dove Mines. The plan is not complete with respect to the interim program, specifically the plan does not meet the performance standards of 30 CFR 717.15 and as presently proposed is not in compliance with this section. The following are the details of what must be in an application for an excess rock fill.

Section 30 CFR 715.15(a)(1) requires that the Applicant must demonstrate:

(i) Stability of the fill which requires a stability analysis be performed based on strength testing;

(ii) That leachate and surface runoff from the fill will not degrade surface or ground waters or exceed the effluent limitations of Section 715.17(a).

(iii) That the land mass designated as the disposal area is suitable for reclamation and revegetation compatible with the natural surroundings. This data should be collected this summer and it must demonstrate that revegetation of the area is possible.

The Applicant has not demonstrated compliance with these requirements. A leachate analysis and vegetative baseline data are required to meet these requirements.

The specific design details are extremely sketchy. There is no information demonstrating that the fill was designed using recognized professional engineering standards [30 CFR 715.15(a)(2)]. It is not demonstrated that "all vegetative and organic materials shall be removed from the disposal area and the topsoil shall be removed, segregated, and stored or replaced under Section 715.16."

There is no indication that "the fill will be inspected for stability by a registered engineer or other qualified professional specialist experienced in the construction of earth and rockfill embankments at least quarterly throughout construction and during the following critical construction periods: (1) removal of all organic material and topsoil, (2) placement of underdrainage systems, (3) installation of surface drainage systems, (4) placement and compaction of fill materials, and (5) revegetation. The registered engineer or other qualified professional specialist shall provide to the regulatory authority a certified report within 2 weeks after each inspection that the fill has been constructed as specified in the design approved by the regulatory authority. A copy of the report shall be retained at the minesite."

There is no demonstration that "the foundation and abutments of the fill shall be stable under all conditions of construction and operation. Sufficient foundation investigation and laboratory testing of foundation materials must be performed in order to determine the design requirements for stability of the foundation. Analyses of foundation conditions must include the effect of underground mine workings, if any, upon stability of the structure."

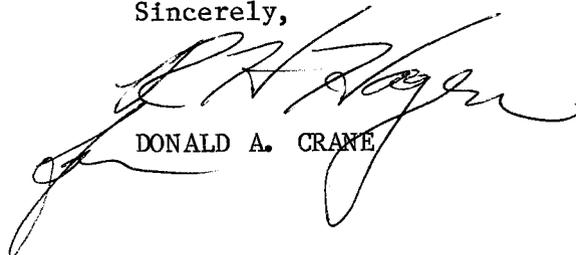
OSM has determined that the fill will be considered a valley fill, based on the maps and photos supplied by the Applicant. The Applicant therefore, must demonstrate compliance with 30 CFR 715.15(b) which requires an underdrain and filter system. There is no information in the application on underdrains or filters.

Section 30 CFR 715.15(b)(3) requires that spoil be placed in no more than 4 ft. lifts. The Applicant proposes 6 ft. lifts and, unless it can be demonstrated that the fill is a durable fill it is not in compliance with this section. No information is included on surface runoff to demonstrate compliance with 30 CFR 715.15(b)(4) and 30 CFR 715.15(b)(6). Also, it must be demonstrated that the surface water monitoring program is adequate to evaluate the impact of the fill on water quality as required under 30 CFR 717.17(b). There is no information on the top slope of the fill in order to demonstrate compliance with 30 CFR 715.15(b)(5). The Applicant states that the final slope of this fill will be 1 to 1.5. Section 30 CFR 715.15(b)(7) requires that the outslope be no steeper than 1 vertical to 2 longitudinal, therefore, the proposed plan is not in compliance with this section.

In conclusion, the proposed Des/Bee/Dove disposal plan is inadequate and does not demonstrate compliance with the interim program and further, as presently proposed, is not in compliance. Therefore, I suggest that the application be returned to the Applicant for review so that the needed changes and additions can be included.

If you have any questions, please contact Keith Kirk of my staff. He is responsible for this review.

Sincerely,



DONALD A. CRANE