



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801
801-538-5340
801-359-3940 (Fax)
801-538-7223 (TDD)

February 28, 1997

TO: File #2

THRU: Joe Helfrich, Permit Supervisor *JH*

FROM: Steven M. Johnson, *SMTJ*

RE: Silt Fencing Removal at Waste Rock Site, Deer Creek Mine, PacifiCorp, ACT/015/018-97A, File #2, Emery, County, Utah

SYNOPSIS:

PacifiCorp has requested, by letter dated January 10, 1997, that they be allowed to remove silt fence from the Deer Creek Mine Waste Rock Road. This memorandum is a review of this request.

TECHNICAL ANALYSIS:

OPERATIONAL PLAN

OPERATIONAL HYDROLOGY

Sediment Control

Analysis:

PacifiCorp has submitted a request to remove silt fence from various areas along the Deer Creek Waste Rock road. The submittal comes in the form of a letter explaining the rationale behind removal of the silt fence. Accompanying the letter is a vegetation study and a map of the area with hand-drawn, red lines show areas that will not change. The vegetation study describes the amount of cover on each cut and fill along the road. There is no textual change showing a design for a vegetation alternate sediment control measure.

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Findings:

PacifiCorp has explain a good rational for removing silt fence in the letter; however, all alternate sediment control measures must have adequate designs in the Mining and Reclamation Plan (MRP). This amendment is not complete.

RECOMMENDATIONS:

PacifiCorp must resubmit this amendment as a change to the alternate sediment control plan. All changes must be in compliance with the regulation and must follow the guidance provided by Technical Directive Tech-003A. In meeting these requirements, PacifiCorp must change the text of the Deer Creek MRP, alternate sediment control plan to show that vegetation on the sites in questions meets or exceeds the erosion control capabilities of predisturbance or off-site areas. This can be done by comparing the data submitted with a reference area near the waste rock road. Further all areas treated by vegetation must be clearly shown on a map.