

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 18, 2010

TO: File

THRU: Jim Smith, Hydrologist and Team Lead *JS 08/23/10*

FROM: Priscilla Burton, Environmental Scientist III, Soils *PB by SCS*

RE: Replacement of Volume 11, 11A, & 11B (RILDA Canyon Facilities), PacifiCorp, Deer Creek Mine, C/015/0018, Task ID #3585

SUMMARY:

This as-built information for the Rilda Canyon surface facilities (received June 30, 2008) reduced the footprint for the operations and eliminated the proposed experimental practice.

The existing Rilda fan portals occupy 2.33 acres (v 1, chap 1, appendix E). The as constructed North Rilda facilities cover an additional 7.3 acres, bringing the total disturbed area for Rilda Canyon to 9.63 acres, approximately 6 acres less than anticipated.

The Division should not approve this amendment until the Permittee satisfactorily addresses the following deficiency:

R645-301-422, On page 4, under Section R645-301-422, the application indicates that an air quality approval order remains outstanding for the Rilda construction. Please provide the current Approval Order number and date.

R645-301-121.200, Map 500-4 Sheet 3 of 4 refers to Map 500-3 for cross-section locations, however Map 500-3 does not show cross-sections. Please provide cross-section locations on Map 500-3. On Map 500-4 Sheet 3 of 4 please include the dashed line in the legend.

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TECHNICAL ANALYSIS:

OPERATION PLAN

AIR POLLUTION CONTROL PLAN

Regulatory Reference: 30 CFR 784.26, 817.95; R645-301-244, -301-420.

Analysis:

The Permittee committed to have an air quality approval order that would allow the Permittee to conduct mining operations at the North Rilda Canyon Portal Facilities before construction and operations.

Under Section R645-301-422, the application indicates that an air quality approval order remains outstanding. Please provide the current Approval Order number and date.

Findings:

The information provided does not meet the requirements of this section of the R645 Rules. The Division should not approve this amendment until the Permittee satisfactorily addresses the following deficiency:

R645-301-422, On page 4, under Section R645-301-422, the application indicates that an air quality approval order remains outstanding for the Rilda construction. Please provide the current Approval Order number and date.

TOPSOIL AND SUBSOIL

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

Analysis:

Topsoil Removal and Storage

The construction followed the plan to remove the A and B horizon to a maximum depth of 24 inches in one step (Section R645-301-233). Additional substitute topsoil was salvaged from the sediment pond location and stored immediately adjacent but separate from the topsoil pile. Marker fabric was used on 10 ft centers to denote the native soil beneath the stockpile.

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The topsoil stockpile now holds 4,285 cu yds of topsoil and 2,137 cu yds of substitute topsoil from the sediment pond. The total topsoil salvage in Rilda Canyon was 6,422 cu yds.

Subsoil was used as fill. There was no subsoil storage area and therefore the need for an experimental practice for the subsoil storage facility.

Map 200-2 shows the area stripped of topsoil. Maps 200-1 and 500-3 show the 0.51-acre stockpile site (Section R645-301-234). A maximum stockpile depth of 20 ft and slopes of 2h:1v are shown on Map 500-4 Sheet 3 of 4. However, the cross-section location reference map, 500-3 does not show cross-section locations.

Findings:

Information provided does not meet the minimum topsoil and subsoil storage requirements of the Regulations. The Division should not approve this amendment until the Permittee satisfactorily addresses the following deficiency:

R645-301-121.200, Map 500-4 Sheet 3 of 4 refers to Map 500-3 for cross-section locations, however Map 500-3 does not show cross-sections. Please provide cross-section locations on Map 500-3. On Map 500-4 Sheet 3 of 4 please include the dashed line in the legend.

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Redistribution

The Rilda Canyon sediment pond and portal facilities areas will be recontoured with subsoil, scarified and covered with topsoil dedicated to reclamation of the respective sites (R645-301-242 and R645-301-231.100).

Regraded subsoil will be sampled on 500 ft intervals to a depth of four feet as described in Section R645-301-231.300. (This translates into three samples for the 9 acre area of subsoil

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replacement.) The samples will be analyzed on site for pH and EC. Problem areas will be further sampled and sent to a laboratory for analysis.

When subsoil testing is complete and any problems are resolved, topsoil will be hauled to by dumptrucks and will then be redistributed by track-mounted equipment. Approximately 6.1 acres (excluding road and sediment pond) will receive 24 inches of stockpiled topsoil, depending upon actual recovery volumes (Section R645-301-242). Stakes will be used to monitor the replacement depth (Section R645-301-242). Three composite samples will be taken from the facilities area and sediment pond. Samples will be analyzed for parameters to be compared with baseline information and to determine the need for amendments, including fertilizer. Boulders will be replaced to provide 5% surface cover. The site will be gouged.

Findings:

Information provided in the application meets the minimum requirements of the Regulations.

RECOMMENDATIONS:

The application is not recommended for approval at this time.