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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 15, 2011

TO: Internal File

FROM: Priscilla Burton, CPSSc, Environmental Scientist III/Soils *PWB m SAS*

RE: Addition of Soil Data, Coal Hollow Mine, Alton Coal Development, LLC, Kane County, C/025/005, Task ID #3866.

SUMMARY:

Topsoil and subsoil analyses were received on July 5, 2011. The sampling protocol is described in Section 232.500 of the MRP. The weekly composite samples describe the topsoil and subsoil stockpiled on site. The information should be incorporated into the MRP.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

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

Analysis:

Topsoil Removal and Storage

Dwg. 2-2 illustrates topsoil removal and storage locations as well as the source of topsoil live-haul for contemporaneous reclamation sites. The analyses in Appendix 2-2 provide laboratory analyses of the soil in the stockpiles. Both topsoil and subsoil are suitable for use in the rooting zone. The Division notes that these analyses indicate that the topsoil is heavier (contains more clay) than the subsoil and retains more water. To improve water retention and rooting depth during reclamation, a mix of subsoil and topsoil may be used. Seeding of the stockpiles was done in April 19 2011, as referenced in Inspection Report #2721. The seed mixture is described in Section 231.100 and 231.400 of the MRP.

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Findings:

The information should be approved and incorporated into the MRP.

RECOMMENDATIONS:

These analyses indicate that the topsoil is heavier (contains more clay) than the subsoil and retains more water. To improve water retention and rooting depth during reclamation, a mix of subsoil and topsoil may be used.

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