

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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# 4317

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April 15, 2013

TO: Internal File

THRU: Priscilla Burton, Environmental Scientist III, Soils, Team Lead *PWB by sjs*  
Steve Christensen, Environmental Scientist III, Permit Supervisor, Task Manager *SC*

FROM: Peter Hess, Environmental Scientist III, Engineering *PHH by sjs*

RE: MIDTERM PERMIT REVIEW, Alton Coal Development LLC, Coal Hollow Mine, C/025/0005, Task ID #4317, Joint Review Assigned with Ken Hoffman

### SUMMARY:

The Division initiated a mid-term permit review of the Coal Hollow Mine mining and reclamation plan on April 2, 2013. Five items were identified (A-E) as requiring an analysis of the permit to determine if the currently approved mine plan is in compliance with the minimum regulatory requirements of those sections.

Item C, which addresses the permitting of areas which utilize the best technology currently available (BTCA) to prevent additional contributions of suspended solids to stream flows outside of the permit area and their associated permit commitments was assigned as a joint review to the assigned Coal Hollow hydrologist and engineer.

This document will address the engineering portion of the requirements of Alternate Sediment Control Areas and Small Area Exemptions, i.e., those areas which utilize BTCA measures to treat intercepted disturbed area flows.

## **TECHNICAL ANALYSIS**

### **OPERATION PLAN**

#### **OTHER TREATMENT FACILITIES**

Regulatory Reference: R645-301-742.230, 742.231, 742.232

##### **Analysis:**

Chapter 7, Page 7-80, section 742.230, Other Treatment Facilities addresses this section of the R645 Coal Mining Rules.

According to the currently approved Mining and Reclamation Plan, *"if other treatment facilities become necessary, they will be designed to treat the 10-year, 24-hour precipitation event unless a lesser design event is approved by the Division based on terrain, climate, other site-specific conditions and a demonstration by the operator that the effluent limitations of R645-301-751 will be met.*

*No other treatment facilities are planned for the Coal Hollow Project."*

Thus, there are no areas within the Coal Hollow Mine permit area which utilize Best Technology Currently Available measures to treat disturbed area runoff , (i.e., there are no Alternate Sediment Control Areas).

##### **Findings:**

There are no ASCA areas permitted within the Coal Hollow Mine permit area. The requirements of these regulations are not applicable at this time.

#### **EXEMPTIONS**

Regulatory Reference: R645-301-742.240

##### **Analysis:**

Chapter 7, Page 7-80, section 742.240, Exemptions, of the approved Mining and Reclamation Plan states that the requirements of this section of the R645 Coal Mining Rules are *"Not Applicable"*.

**Findings:**

There are no areas within the Coal Hollow Mine which are classified as “Small Area Exemptions” as they do not use BTCA methods to meet the effluent limitations for runoff from the disturbed area into Utah or Federal receiving waters. These requirements are not applicable.

**RECOMMENDATION**

There are no ASCA or SAE areas currently permitted within the Coal Hollow Mine permit area.

The requirements of R645-301-742.230, et al, and 742.240 are not applicable. The currently approved mining and reclamation plan clearly states this information.

This section of the mid-term permit review for 2013 should be approved.