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Executive Director

September 23, 1987

Susan C. Linner
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED
SEP 29 1987
DIVISION OF OIL
GAS AND MINING

RE: Waste Rock Disposal Site,
Southern Utah Fuel Co.

Dear Ms. Linner;

Per your letter dated August 28, 1987, I have been assigned to review the above referenced plan for environmental health concerns.

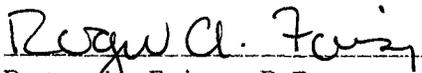
The following is a list of Health Department concerns and the response to each as provided in the Disposal Plan, as well as additional information which will be required by the Health Department prior to our approval of certain facilities.

1. Wastewater disposal- The waste rock disposal plan does not include facilities related to generation or disposal of domestic or mining wastewater.
2. Culinary water- The plan does not involve any culinary water facilities. Section 4.7 indicates that there are no streams springs or seeps within the disposal area and that there will be no disruption of underground aquifers.
3. Surface water- The plan states that there are no surface water streams or sources within the disposal area. Natural drainage courses are to be preserved (Section 4.7). Ultimate destination of sediment pond discharge is Salina Creek (see Water Quality Monitoring below).
4. Water Quality Monitoring- An NPDES discharge permit will probably be required for operation of the pond. The permit will outline monitoring requirements. The permit shall be issued to the operator upon application and prior to operation.

5. Reclamation and erosion control- Sections 2.4, 3.1 and 4 indicate that natural drainage will not be disturbed, sediment will be controlled, disturbed areas reseeded, etc. The plan seems adequate in this area.
6. Groundwater- Section 2.3 indicates that no free groundwater was encountered in test holes. Also that activity at the disposal site will have no impact on the groundwater system.
7. Solid and hazardous waste disposal- The plan indicates that the site is not to be used as a sanitary landfill or for any mining related rubbish. It also states that material to be wasted at the site is anticipated to be non-toxic, non-acid forming shale, coal and sandstone.
8. Sediment pond- The plan contains details for design and construction of a sediment pond. Complete plans and specifications must be submitted by SUFCO to the Bureau of Water Pollution Control for review and approval prior to construction.
9. Dust control- Dust control is not anticipated to be a problem since the 6.4 miles of haul road is paved. Should dust be a problem at the site itself, provision has been made for evaluation and water spray (Section 4.14).
10. Hydrology- The plan seem to adequately address hydrology, including calculations for sediment pond size, outlet size, spillway and ditch capacities, etc.

I hope this review is helpful in your processing of the plan and permit. If I can be of further help please call.

Sincerely,


Roger A. Foisy, P.E.
District Engineer

RAF:lj

cc: Don Ostler, Director, Bureau of Water Pollution Control
Dale Parker, Ass't Director, Division of Environmental Health