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May 15, 1989

TO: Susan Linner, Permit Supervisor

FROM: Mike DeWeese, Reclamation Hydrologist *MD*

RE: New Subsoil Storage Area, Southern Utah Fuel Company,
Convulsion Canyon Mine, ACT/041/002-89A, Sevier County, Utah

SUMMARY:

The operator's submittal received April 22, 1989, proposing to create a subsoil storage area at the Waste Rock Disposal Site, has been reviewed regarding hydrologic concerns. Minor deficiencies are discussed in the following analysis.

ANALYSIS:

Map 2 of the submittal depicts a subsoil stockpile area of 0.55 acres adjacent to the southwest perimeter of the waste rock disposal site. The total disturbed area in the approved permit is 17 acres, of which 0.3 acres are identified as small area exemptions. The addition of the subsoil storage area will bring the total small area exemptions to 0.85 acres, equivalent to 5.0% of the total disturbed area.

The proposed subsoil stockpile site cannot be located within the existing sediment pond drainage area as this area is required for waste material. The operator's cover letter states that alternate sediment control measures such as silt fences, straw bales, or other sediment control devices will be employed to treat surface runoff from the stockpile. The operator has verbally informed the Division (personal comm., Mike Davis, May 22, 1989) that the stockpile is currently in place and sediment control measures are installed. A silt fence approximately 20 feet long has been placed along the lowest portion of the stockpile perimeter and the remainder of the perimeter bermed. Map 2 must be revised to depict, with labels, the location and extent of the sediment control measures implemented on the subsoil stockpile and also depict the existing sediment fences below the topsoil stockpiles. The subsoil stockpile must be identified as a small area exemption on this map.

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Volume 8 page 31 of the MRP states that the only topsoil storage area is at the mine site sedimentation pond. This section of the text must be corrected to include the waste rock disposal site topsoil stockpiles. In addition, any other references in the text to small area exemptions must be appropriately revised to include the subsoil storage area.

RECOMMENDATIONS:

The Division recommends that the proposed amendment classifying the subsoil storage area as a small area exemption be granted final approval upon receiving the aforementioned revised items.

BT98/30-31