

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

November 7, 2005

TO: Internal File

THRU: Peter H. Hess, Environmental Scientist III/Engineering, Team Lead

FROM: Priscilla W. Burton, Environmental Scientist III/Soils

RE: SUFCO Midterm Review, Canyon Fuel Company, LLC., SUFCO Mine, C/041/002, Task ID #2363

SUMMARY:

The mid-term review was initiated on November 18, 2004. The soils Chapter 2 and the refuse information (Volume 3) were previously reviewed under Task #2068 in March 2005. Information received on September 6, 2005 has addressed all previously identified soil issues.

Plate 5-2 illustrates the Link Canyon surface disturbance. The construction of the topsoil pile is described in the narrative. The volume of soil salvaged is reported as 38 yd³.

Section 3.3 (Volume 3) indicates that 163,748 yd³ have been transported to the waste rock site to date. Map 4 (Volume 3), dated August 31, 2005, illustrates the current status of the refuse site for reclaimed, active, and topsoil salvage areas. At the current rate of transport, the waste rock site will reach design capacity in 2016.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

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

Analysis:

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Topsoil Removal and Storage

The Link Canyon topsoil stockpile holds 38 yd³ (Section 2.3.1.1). The stockpile location is shown on Plate 5-2. Section 2.3.1.4 was revised to indicate that woody plants grubbed from the area were placed on top of the topsoil stockpile.

Recent work conducted on the topsoil stockpiles (Inspection Report June 6, 2003) was limited to a 10 x 10 area on the north slope of the topsoil stockpile. The topsoil pile construction currently described in the MRP, which included roughening techniques, and applications of mulch and seed with dates of work are all still relevant.

Findings:

The information provided in the MRP meets the topsoil/subsoil operation requirements of the R645 Coal Mining Rules.

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Refuse Piles

Certification of the refuse piles is provided to the Division quarterly (not in the Annual Reports). The report form being used does not include the volume of refuse hauled to the site. In August 2005, the waste rock site was estimated to hold 163,748 tons of waste rock.

The MRP indicates the waste rock site will be contemporaneously reclaimed and that the initial cell will cover 4.5 acres (Section 3.4, Volume 3). Map 4 of Volume 3, dated August 31, 2005, illustrates the status of reclaimed, active, and topsoil salvage areas at the refuse site. The first three lifts have been reclaimed. At the current rate of transport (3,200 TPY), the waste rock site will reach design capacity in 2016.

The 2003 Annual Report contains a vegetation analysis of three cells of the waste rock site.

Findings:

The information provided in the MRP meets the spoil and waste, and the refuse pile requirements of the R645 Coal Mining Rules.

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Acid and Toxic-Forming Materials and Underground Development Waste

Sampling of the waste quarterly during periods of waste hauling is described on page 3-4 of Volume 3 of the MRP. Analytical information is provided in Volume 8 and will be included in the Annual Reports beginning in 2005. Previously, the last sampling of waste reported in the Annual Reports occurred in 1995.

Findings:

The information provided meets the requirements for hydrologic acid/toxic identification requirements of the R645 Coal Mining Rules.

RECOMMENDATIONS:

The information previously requested through the mid-term review of the MRP has been provided. The Division should express appreciation for the Permittee's cooperation in keeping the MRP up to date.