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# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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November 2, 2008

TO: Internal File

THRU: James Smith, Permit Supervisor *JS 12/10/08*

FROM: David Darby, Senior Environmental Scientist, Lead *DD*

SUBJECT: Permit Amendment, Tipple Sump, Canyon Fuel Company (CFC), SUFCO Mine, C/041/002, Task ID #3069

### SUMMARY:

The Division received an initial amendment application to construct a sump at the tipple on August 28, 2008. Several deficiencies were found that require the application be returned to the operator on September 12, 2008. An updated submittal was received on October 7, 2008 and a review found the operator had addressed all deficiencies and concerns regarding the earlier review. The amendment is recommended for approval.

### DEFICIENCIES

None.

### 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:

#### **General**

CFC proposed to install a concrete sump at the base of the tipple facility. The purpose of the sump is to collect coal fines when the tipple is washed down for maintenance or general

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cleaning. The sump is designed to collect the coal fines so they do not enter the surface runoff regime. The sump prevents additional sediments collecting in the sedimentation trap and sedimentation pond, and prevents any hydrologic connection. Waters in the sump will be evaporated and collected coal fines returned to the coal pile.

During the previous review the sump was called three different names. The names were confusing in the text and on the maps. CFC has now distinguished the tipple sump from the sedimentation trap and sedimentation pond both in the text and maps.

## **MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

### **Analysis:**

#### **Mining Facilities Maps**

CFC updated and submitted several maps showing the location of the tipple sump. Figure 5-0C shows the location of the tipple Building and sump, although the operator now refers to the sump as part of the tipple. Figure 5-0D shows the design of the tipple sump. Plates 5-2Av14 and 5-2Bv16 show the surface facilities, which distinguishes the hydrologic facilities.

### **Findings:**

The Permittee has submitted sufficient information to address the minimum requirements of the Maps, Plans and Cross Sections of the Mining Operations regulations.

## **BONDING AND INSURANCE REQUIREMENTS**

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

### **Analysis:**

#### **General**

The Permittee met the requirements of this section. CFC submitted an update to the reclamation costs including the tipple sump. The posted bond is still 40.71 percent greater than the escalated reclamation costs.

**Determination of Bond Amount**

The Permittee met the requirements of this section. The Permittee gave the Division enough information to calculate the reclamation cost estimate. The reclamation cost estimate for the mine facilities was submitted with the amendment.

**Findings:**

The information provide in the amendment is considered adequate to meet the requirements of this section.

**Recommendation:**

This amendment is recommended for approval.