

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

September 9, 2009

TO: Internal File

THRU: David Darby, Project Lead 

FROM: Daron Haddock, Coal Program Manager 

RE: Construction of Concrete Trash Pit, Canyon Fuel Company, LLC, SUFCO Mine, C/041/002, Task #3359

SUMMARY:

Canyon Fuel Company, LLC proposes to construct a concrete trash pit in the same location that they have been utilizing for the storage of trash.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

MAPS AND PLANS

Regulatory Reference: 30 CFR 777.14; R645-301-140.

Analysis:

Canyon Fuel has proposed to install a concrete trash pit at the same location presently used for storage of non-coal waste. They have revised Plate 5-2 to show the location of the pit and have revised page 5-46 and 5-53 of their MRP to reflect the change. They have also submitted a revised cost estimate to show the additional bond cost associated with the demolition and removal of the 26.5 yards of concrete.

Findings:

The application contains the necessary components to effectuate a permit change and meets the requirements of the R645 regulations.

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OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

The construction of a new concrete trash pit will be in the same area that is currently utilized for storage of non-coal waste. No new disturbance or permit area will be needed. There will be no change in the runoff, vegetation, or topsoil of the area. The main change is that the non-coal waste will now be stored in a concrete pit, which should be a more secure area and easier to maintain.

Findings:

The application meets the requirements of the R645 regulations with regard to mining facilities.

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:

Disposal Of Noncoal Mine Wastes

The proposed plans call for the temporary storage of non-coal waste in a constructed concrete bunker. No other changes are made to the plan with this amendment. The waste is still loaded into a truck and hauled to the Sevier County Landfill for final disposal. The plan anticipates that the pit will be cleaned out approximately 2 to 3 times per week.

Findings:

The application meets the requirements of the R645 regulations with regard to disposal of non-coal waste.

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

The surface facilities map (Plate 5-2A) was revised to show the new concrete waste pit. Engineering designs of the trash pit showing top and side view and cross-sections were also provided.

Certification Requirements

The map and the engineering designs were both certified by a registered professional engineer.

Findings:

The application meets the requirements of the R645 regulations with regard to maps and cross-sections of mining facilities.

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

There is no real change to the reclamation plan as a result of this amendment. Demolition of the proposed trash pit will take place along with the demolition and reclamation of the rest of the mine facilities.

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Findings:

The application meets the requirements of the R645 regulations with regard to general reclamation requirements.

BONDING AND INSURANCE REQUIREMENTS

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

Analysis:

General

The new construction will increase the concrete demolition yardage by 26.5 cubic yards. This is insignificant in comparison to the amount of concrete demolition on the rest of the site during reclamation. Canyon Fuel did provide a revised cost estimate and included the demolition as a line item on the cost estimate spreadsheets provided to the Division.

Determination of Bond Amount

A line item was added to the bond cost estimate to reflect the demolition of the additional 26.5 yards of concrete. The additional cost would be \$542. This is insignificant in comparison to the \$4,439,000 bond currently held and is well within the excess bond amount currently posted by the company.

Findings:

The application meets the requirements of the R645 regulations with regard to bonding requirements.

RECOMMENDATION:

This application is recommended for approval.