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FINDINGS DOCUMENT
Utah Coal Regulatory Program

PID:	C0410002
TaskID:	4393
Mine Name:	SUFCO MINE
Title:	SEDIMENT OVERFLOW POND AS-BUILT

Environmental Resource Information

Soils

Analysis:

Plate 5-2Bv17 outlines several pre-SMCRA coal dumps in the vicinity of the proposed overflow pond and topsoil storage area.

Prior to disturbance, the Permittee conducted a site specific soil survey of the overflow pond area (Sec. 2.2.2 p. 2-3), which was to be added to Appendix 2-2 (Sec. 2.2.2 p. 2-8). The information from the soil survey was used to determine topsoil salvage depth to be approximately 12 inches. This amendment does not include the Order I soil survey completed in the fall of 2009. This amendment does include the soils analyses that were taken from five locations in 2009. The locations of the soil sampling is not shown on a map. There is no narrative to accompany the soils analyses. The deficiency remains unresolved.

Deficiencies Details:

R645-301-222, Prior to disturbance, the Permittee conducted a site specific soil survey of the overflow pond area (Sec. 2.2.2 p. 2-3), which was to be added to Appendix 2-2 (Sec. 2.2.2 p. 2-8). Please provide the Order I soil survey of the overflow pond soils completed in October 2009 by Robert Long and Mt. Nebo Scientific.

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Operation Plan

Topsoil

Analysis:

Soil salvage operations are described for new surface operations in Sec. 2.3.1.1 of the MRP. The MRP states that the A & B horizons will be stockpiled together or separately and a third stockpile of boulders will be in an adjacent location. The stockpiles will be graded to a 3h:1v slope and seeded.

In Sec. 2.2.4 the Permittee states that the outslopes of dams will be used as substitute topsoil at final reclamation. The overflow pond dam was to be constructed from a former road pad that was well vegetated and would provide a source of suitable substitute topsoil. Using the outslope of the pond in reclamation of the overflow pond is described in Sec. 5.4.2.2,

p. 5-68A. Please include the outslope of the overflow pond as in the narrative of Section 2.2.4. The shaded area at the inlet and outlet of the overflow pond and at the south end of the topsoil storage pile represents rip rap, and should be included in the legend of Map 5-2Bv20.

Sec. 2.3.1.4 of the MRP describes the construction, modification, use and maintenance of topsoil storage piles. The information states that the stockpiles will be placed on a stable site, and protected by vegetation (seed mix minus shrubs and trees) and by a silt fence below the topsoil stockpiles. In Section 2.3.1.4 of the MRP the narrative refers to Plate 5-2B and App. 2-2 for information on the construction of the overflow pond topsoil stockpile. An exhibit presented in App. 2-2 to verify of the topsoil quantity stored at the overflow sediment pond. The exhibit requires labeling and a legend. The figure also requires an explanation of its source, since it was reproduced from Plate 7-4A which provides surrounding topography and illustrates the situation of the pile. Plate 5-2B was revised with the As-built submittal, but there is much more detail of the overflow pond bypass culvert and topsoil stockpile provided on Plate 7-4A which was a design drawing.

The overflow pond topography is shown on Plates 7-4A and 7-5A. The topsoil stockpile was estimated at 1,850 cu yds (based upon 12 inches of topsoil salvaged from a proposed 1.14 acres. Actual volume recovered was 1,488 yd³ (Sec. 2.3.1.1, p. 18). The stockpile occupies 0.141 acres (Sec. 7.4.2.1). Plate 7-4A has 5 ft contours. It shows the location of the topsoil stockpile on an existing 4h:1v slope. The stockpile is shown having an outslope that rises 52 ft. horizontal :20 ft. vertical or 2:1 slope at the steepest face, which is also the south face. The overflow pond stockpile will be protected with a berm and silt fencing (Sec. 7.4.2.1). The design installation for the berm's spillway is presented on Plate 7-5C.

Topsoil was temporarily stockpiled along the length of the bypass culvert installation. The stockpile was replaced after culvert installation and the soil was seeded with the reclamation seed treatment (Section 2.3.1.1, p. 18, and email confirmation from Mike Davis on June 21, 2013 forwarded to file on 9/12/2013).

Deficiencies Details:

R645-301-233.100, Please include the outslope of the overflow pond as in the narrative of Section 2.2.4.

R645-301-231.400 and R645-301-140, An exhibit is presented in App. 2-2 to verify of the topsoil quantity stored at the overflow sediment pond. The exhibit requires labeling and a legend. The exhibit should provide surrounding topography sufficient to illustrate the situation of the pile.

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Maps Affected Area

Meets Requirements

Analysis:

In the previous submittal, the permit lines on Plates 5-2A and B were incorrectly plotted. This amendment shows the corrected permit boundary locations.

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