July 15, 1987

TO: Technical File

FROM: R. Harden, Reclamation Engineer

RE: Response to Mine Permit Stipulations, Summit Coal Company, Boyer Mine, ACT/043/008, Folder #2, Summit County, Utah

Technical review of the stipulation responses received by the Division on June 25, 1987 for the Boyer Mine are as follows:

Stipulation UMC 800-(1)-JRH

1. Within 90 days from the date of permit approval and concurrent with the submittal of information required in other stipulations contained within this document, the permittee shall provide to the Division, any revisions or modifications to the calculations and estimate for reclamation of the mine facilities.

Comments:

This stipulation has not been addressed by the operator in this plan. Other stipulations are still pending.

Stipulations UMC 817.46-(1-2)-JRH

1. Within 30 days from the date of the permit approval, the permittee shall provide a compliance plan for the reconstruction and modification of the sediment pond facilities. The compliance plan shall include the design specifications for the modification or reconstruction of the structure to meet the design and performance standards of Subchapter K of the rules; a reconstruction schedule which shows anticipated dates for beginning and completing interim steps and final reconstruction; provisions for monitoring the structure during and after modification or reconstruction to ensure that the performance standards of Subchapter K of the rules are met; and, a showing that the risk or harm to the environment or to public health or safety is minimized during the period of modification or reconstruction.

Comments:

With respect to stability and embankment design, the operator has submitted to the Division, a stability analysis in order to achieve a variance from UMC 817.46(m). The initial study has been presented in the stipulation response, however, analysis of the embankment based on the results of field samples and their analysis has not been provided in the plan. The operator must include in the analysis, the results of the soil sample analysis and the indicated factors of safety and stability analysis based on the results of those samples.

2. Within 90 days from the date of the permit approval, the permittee shall provide to the Division, a design for the proposed catch basin which is in compliance with the performance standards of Subchapter K of the regulations.

Comments:

No information was found in the submittal detailing or the designs for a catch basin as proposed in the plan and on the drawing. The operator has not sufficiently responded to the requirements of this stipulation. The requirements of this stipulation may be met by the submittal of reclamation plans for the those facilities as indicated to be reclaimed in the near future.

Stipulation UMC 817.71-(1)-JRH

1. Within 90 days from the date of permit approval, the permittee shall provide to the Division, a plan for the location and disposal of excess spoil, mine development waste, sediment pond waste and other coal waste related materials anticipated on the site. The plan shall include a determination as to the total estimated amount of waste materials to be taken from the mine during the expected life of the operations so as to correctly size the facility; determination as to the nature, extent and treatment of acid- and toxic-forming materials which may have been utilized in the construction of the portal and mine facilities pads; analysis of the foundation and liner materials used to construct the waste facility; determination of the location of the waste facilities such that they are not constructed within surface drainages and will not potentially contaminate surface and groundwater; and plans for the amount and type of materials used to cover the waste material, topsoil requirements and revegetation requirements for the waste disposal facility.

Comments:

In lieu of construction of an on site permanent waste disposal facility, the operator has requested to dispose of mine development waste and coal spoils in the county landfill which has been approved for the disposal of hazardous wastes. The operator references Appendix 3-2 for the location of the approval letter by the county landfill and other required information for the disposal of this material in the landfill. This information was not found in appendix 3-2. On letter in this appendix does indicate that disposal of such waste materials may be acceptable for disposal, but no specific approval is found in the letter for disposal. Additional information must be provided to the Division which shall include sufficient information so as to show that the county disposal facility meets or exceeds the requirements of UMC 817.71 and other regulations as they apply. Such information shall include a copy of State Health's final approval of the hazardous waste landfill, and the landfill's current permit status and any outstanding conditions which may be subject to the hazardous waste landfill permit; approval from State Health for the use of the facility for coal waste disposal; a comittment by the operator to transport and dispose of the material in the landfill in accordance with federal, state, and local regulations pertaining to the transportation and disposal of the waste material; a map showing the location of the hazardous waste disposal facility. It is of the opinion of the Division that the proposed alternative of disposal of spoils and waste material can be disposed of in a hazardous waste landfill if the above information is provided and the facility can be shown to be in accord with the requirements of this section.

Stipulation UMC 817.150-.156-(1)-JRH

1. Within 30 days from the date of permit approval the permittee shall be required to incorporate into the text of the mining and reclamation plan, specific plans regarding the operation of the haul roads. This would include a commitment that the west haul road shall not be utilized for loaded coal trucks leaving the site. Due to the steep gradient of the road as it leaves the site and enters onto the county road, loaded vehicles could pose a safety hazard during poor road conditions and in the event of equipment (brake) failure. The permittee should also include other appropriate measures to be taken such as the installation of one way signs or other such signs directing the traffic on the road for proper use.

Comments:

The operator has provided in the stipulation response, replacement pages containing the information required under this stipulation. The requirements of this stipulation have been met by the operator and the operator is considered to be in compliance with the requirements of this section.

Stipulation UMC 817.180-(1)-JRH

1. Within 30 days from the date of permit approval, the permittee shall provide to the Division, a complete plan for the coal handling and storage facilities proposed to be utilized at the mine site. The plan shall include, but not be limited to the following: capacities for the raw and clean coal stockpiles, materials handling flow sheet, waste handling and materials rehandling requirements, temporary and permanent storage locations and capacities for coal and coal-related waste materials.

Comments:

The operator has sufficiently addressed the requirements of this section. The plan allows for the raw coal storage of 1500 tons, clean coal storage of 500 tons and a temporary coal waste storage area with a capacity of 2500 tons. Permanent storage of the waste materials is addressed under stipulation UMC 817.71 - (1) - JRH.

cc: S. Linner

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