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DEPARTMENT OF NATURAL RESOURCES
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December 15, 1989

TO: Minerals File

FROM: Holland Shepherd, Reclamation Specialist HLS

RE: Site Visit, Lemington Quarry, Nielson Quarry, Navajo Quarry, Ash Grove Cement West, Incorporated, M/023/004, M/023/012, M/023/010, Juab County, Utah

Wayne Hedberg and I visited the above listed Ash Grove Cement sites on December 11, 1989. We met at these sites with Mr. Terry Kerby, Plant Draftsman, and Mr. Bob Feaman, Quarry Superintendent.

The primary reason for our visit was to discuss the permit transfer and any changes to the reclamation contracts/surety which might need to be made. Ash Grove Cement recently purchased (on March 8, 1989) the above properties from Martin Marietta. The paperwork for transferring the site from Martin Marietta to Ash Grove, has not yet been completed.

The Nielson Quarry is permitted and bonded for 40 acres. Currently, only 3.2 acres have been disturbed at the site. The operator expressed no desire to change the bonded acreage at this site.

The Navajo Quarry is permitted and bonded for 18 acres at $51,000. Currently, approximately 8 acres have been disturbed. The operator wants to reduce the bond for this site. Portions of the site have already been reclaimed. The operator hopes to reclaim the site in its entirety, in the near future. The Division needs to estimate a new bond amount for this site before the mine transfer can proceed.

The Leamington Plant and Quarry site will remain as currently bonded. The disturbed acreage totals 273.

The operator should complete mine transfer forms and reclamation contracts for the Leamington and Nielson sites. Nothing will change regarding the permit or bond at these sites, unlike the Navajo site.

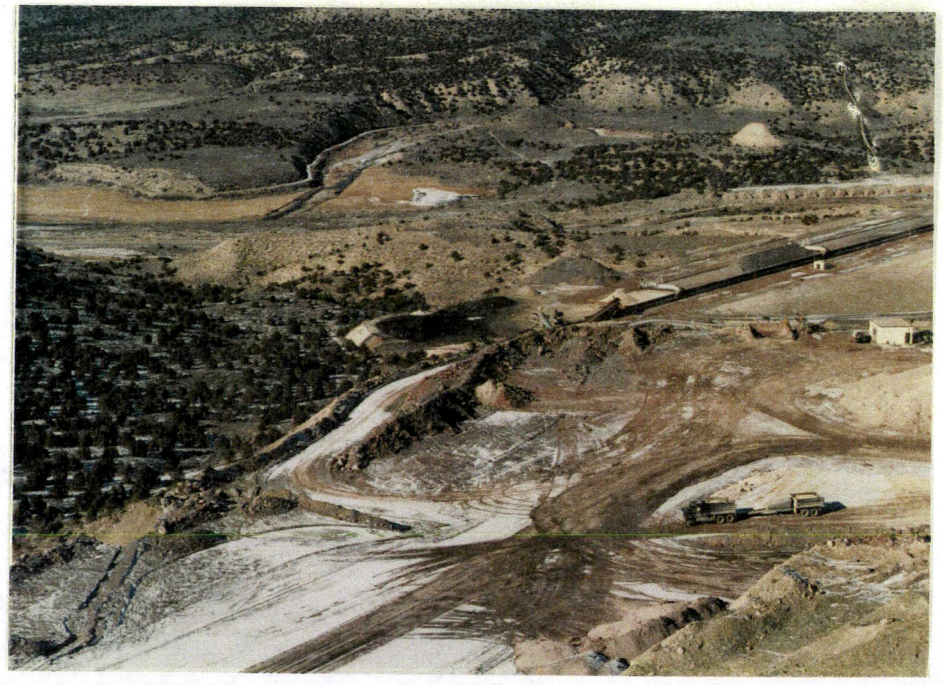
The Leamington site presently maintains an unpermitted sedimentation pond. The pond acquires water from the processing plant and surface drainage. It is full year-round, and discharges into an irrigation ditch. The operator indicated the company is currently obtaining a permit from the Bureau of Water Pollution Control (BWPC) via Mr. Mike Hercamer.

I spoke with Mr. Hercamer of BWPC on December 15, 1989. He verified the company was in the process of permitting the pond; however, the pond is undersized for proper containment and will need to be upgraded. The pond discharges into waterways used ultimately for agricultural irritation and warm water fisheries (Sevier River), therefore the requirements will be somewhat stricter. Mr. Hercamer also indicated that, if the company eventually stores hazardous wastes on site, as they propose (reference fuels for kiln), then these wastes must be isolated from the pond. Regarding this discussion, I asked Mr. Hercamer if the company has a Spill Prevention Control and Counter Measure Plan (SPCC) (reference 40 CRF part 112, Clean Water Act). He said that some of the current oil storage facilities were bermed but that the company would need to upgrade such facilities if hazardous wastes were to be stored on site. He also indicated that he was unsure whether the company had a formalized SPCC plan.

We spoke to Mr. Kerby about the company's plans to initiate the use of hazardous wastes for fuels in driving their kiln. Mr. Kerby indicated that we should talk to Mr. Dwayne Krutchfield, Plant Manager. Currently, the operator has made a proposal to the Bureau of Air Quality Control (BAQC) to obtain the proper permits for the burning of: shredded tires, solvent derived fuels and waste oils.

I earlier spoke with Mr. Robert Broadhead of BAQC, regarding Ash Groves plans to incinerate these types of wastes. Apparently, the regulations addressing this type of burning facility, categorizes the process as "energy recovery" and not strictly as a hazardous waste burning facility. The regulations are less stringent for energy recovery facilities vs. hazardous wastes incinerators. According to Mr. Broadhead, the paperwork is in order, thus far. The Division intends to obtain a copy of this proposal either from BAQC or the operator.

jb
cc: Terry Kerby
Wayne Hedberg
Lowell Braxton
M023004.(3)



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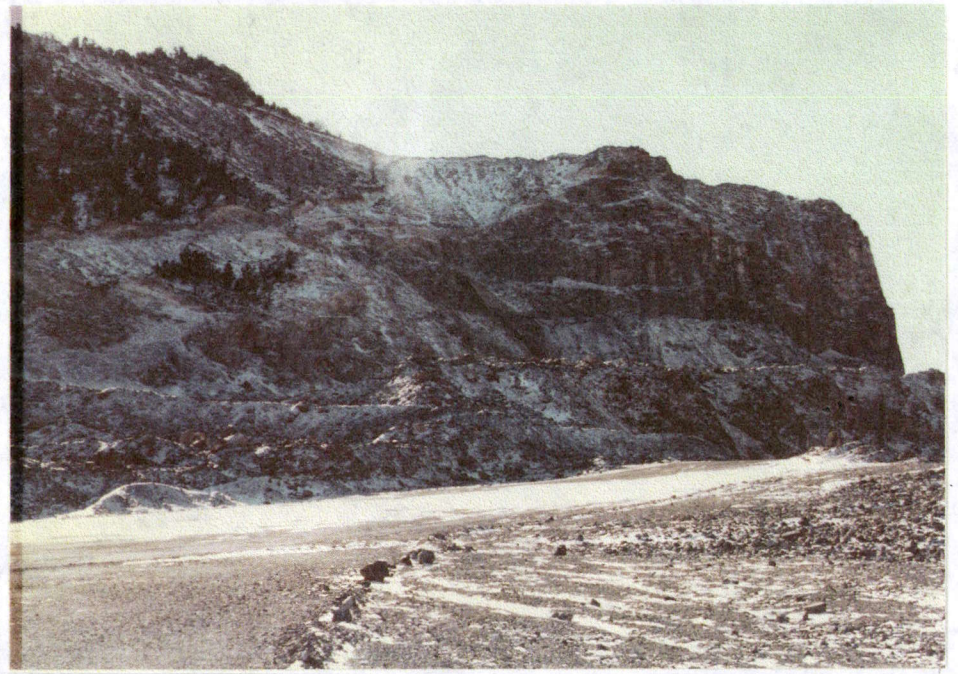

Ash Grove Cement Sites

Leamington Quarry M/023/004

Nelson Quarry M/023/012

12-11-89

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12/11/89 Nielson Quarry M/023/012 Ashgrove Cement West

Topsoil Stockpile