

July 23, 1981

Inspection Memo  
to Coal File:

RE: Utah #2 Mine  
Valley Camp of Utah, Inc.  
ACT/007/014  
Carbon County, Utah

DATE: July 9, 1981  
TIME: 1:00 p.m. through 9:00 p.m.  
WEATHER: Warm and Fair turning to Cool and Rainy  
COMPANY OFFICIAL: Trevor Whiteside  
STATE OFFICIALS: Rex Fidler, David Lof, Tom Portle  
ENFORCEMENT ACTION: None

Compliance With Permanent Performance Standards

771.13(3) Continued Operation Under Interim Permits

A letter from the State of Utah dated May 11, 1978, constituting interim approval, was available for inspection at the minesite.

817.11 Signs and Markers

- A. A sign bearing the required information and durable in nature was available at the mine entrance.
- B. In addition to perimeter markers, which had been on the minesite, new perimeter markers had been added in response to the State's guidelines and July 1st deadline. These perimeter markers were marginal in the quality consisting of wooden stakes with orange tips in areas particularly near the lower sediment pond. They were posted in such a way as to not be in accordance with the guidelines. More specifically, one could not draw a line of sight between one perimeter marker to another because of an obstruction of the embankment and the sediment pond. State inspectors discussed this with Mr. Whiteside who was reluctant to agree to any improvement in the situation.
- C. Buffer zone markers. Buffer zone markers were not in place at the time of the inspection along Pleasant Valley Creek. This situation should be pursued during the next inspection.
- D. There was no blasting in occurrence.
- E. Since the area was predisturbed, there was no need for any topsoil markers.

817.13-.15 Casing and Sealing of Exposed Underground Openings.

At the Utah #2 minesite, several openings are not fenced or otherwise equipped to protect public safety or the welfare of livestock and wildlife. Mr. Whiteside commented that the reason for this was because the mine was an active mine by definition falling under MSHA regulations and the mine is then required to run a fan, in his words, they were making the mine. Inspectors discussed the situation with Mr. Whiteside who later revealed that the extent of the underground workings was minimal since most areas that led into the old workings had been shut from the inside and that the area currently being utilized was minimal in nature and used primarily for storage purposes. The impression was that there was very little safety hazard involved with this operation.

817.21-.25 Topsoil

The area was mainly predisturbed. Any topsoil resulting from sediment pond excavation was stored along the embankments of the sediment pond. These areas were protected through revegetation. Any areas of the topsoil exposed were again seeded and mulched in November. It should be determined at the next inspection if there are plans for any reseeding in these areas for the fall. There were no signs of erosion on the outslopes of any of the ponds.

817.41-.52 Hydrologic Balance

An NPDES permit, UT-0022985 was available for inspection at the minesite. The permit was issued on August 24, 1977, and expires on June 30, 1982, allowing Valley Camp to discharge waters into Eccles Canyon Creek and Pleasant Valley Creek. A hydrologic monitoring plan for surface and ground water had been done by Vaughn Hansen. The State granted them approval in a letter on January 30, 1980. Data was available for inspection on the minesite and no violations were noted.

A need for some work was discovered in an area east of the maintenance shed. In this area, storage bales need to be removed and a berm needs to be employed. These measures are necessary in order to prevent runoff from this material storage area from entering the natural drainage diversion. Another concern identified during the inspection was a 12-inch culvert which appears to come out of the area near the maintenance shed or directly above it. The origin of this pipe is unclear. However, since it empties into the natural drainage, some concern was expressed and a need to identify it was related to Mr. Whiteside. Namely, that this source of the water entering this culvert, if any, needs to be identified. Mr. Whiteside has been sent a letter addressing this point.

In an area east and north of the processing facility near the conveyor, a berm was breached. This berm had kept water in a relatively low area from running down the adjacent slope. All water from this area enters the sediment pond, however, some erosion was observed on the downslope from this area.

Because of this, Valley Camp was instructed to repair this area either through repairing the berm and doing associated ditch work or in dressing up the outlet from this area and simply conveying water down through here in such a manner as to not cause any additional erosion.

#### 817.57 Stream Buffer Zones

Sediment ponds for this operation are located within 100 feet of Pleasant Valley Creek. In this case, the stream buffer zone signs should be employed immediately. Since the outlets of the sediment ponds are riprapped and the outslopes of the ponds are revegetated, no immediate hazard to the creek can be inferred. This concern for buffer zone signs was also expressed in a letter to Mr. Whiteside.

#### 817.61 Use of Explosives

No explosives are being used on the minesite.

#### 817.71-.73 Disposal of Underground Development Waste and Excess Spoil and Nonacid and Nontoxic-forming Coal Processing Waste

No such waste is currently being generated as a result of the operation.

#### 817.81-.93 Coal Processing Waste

Since Utah 2 is a loadout facility and it simply sizes coal rather than processing, there is no process waste currently from this facility.

#### 817.89 Disposal of Noncoal Wastes

There is currently a noncoal waste disposal problem at the Utah 2 loadout. Wheelbarrows, some of which have leaked slightly, can be seen in several locations on the minesite. One area in the southern most part of the operation, materials have been stored for years. There are no current plans for removal of these materials. This is not a permanent waste disposal site. It was suggested that Valley Camp begin to remove these materials. In other areas of the mine, which are utilized more frequently, place needs to be consolidated. There is no designated portions of the mine as such. Mr. Whiteside was requested to develop such areas as to insure that waste was properly stored in these areas.

#### 817.97 Protection of Fish, Wildlife and Related Environmental Values

The operator was not able to provide any evidence of taking any initial steps in identifying whether the area was hazardous, whether power lines in the area were hazardous to raptors. Ed Faust, engineer for Valley Camp, had done a very general survey in the area. As a result of the inspection, he has committed to presenting the Division with a written report by the 15th of August 1981.

817.111-.117 Revegetation

All areas which were exposed had been hydrolmulched in December of 1980. Success is varied. The situation should be monitored throughout the summer months and a recommendation for areas in need of revegetation should be given to Valley Camp prior to the fall seeding season.

817.121-.126 Subsidence Control

Valley Camp has all operations which are involved with the Manti-LaSal Forest Service in a subsidence plan. This was approved in January 1980 by the Division along with the hydrology plan. Valley Camp has placed monuments and it has been flown by the Forest Service. To this date, Valley Camp has stated they have photos but have not received any data. A determination needs to be made as to whether Valley Camp is required to obtain this data from the Forest Service.

817.150-.176 Roads

The Class I road providing access to the Utah 2 loadout facility was in a state of fairly good repair. However, the ditch immediately south of the road utilizes straw bales in order to control runoff which does not go into the pond. In this area, the straw bales were beginning to show signs of wear. Mr. Whiteside agreed to replacing these straw bales.

THOMAS L. PORTLE <sup>TLP</sup>  
RECLAMATION OFFICER

cc: Tom Ehmett, OSM  
Trevor Whiteside, Valley Camp of Utah  
Inspection Staff

TLP/btm

Statistics:

Vehicle: #EX64405--516 miles  
Per Diem: Three persons x one day and 14 hours @ \$37.50/day = \$135  
Grant: A & E