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DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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July 27, 1989

Mr. Steve Tanner
Valley Camp of Utah, Inc.
Scotfield Route
Helper, Utah 84526

Dear Mr. Tanner:

Re: Permit Renewal Review, Belina Mine Complex, ACT/007/001,
Folder #2, Carbon County, Utah

The Division has reviewed the first four chapters of the resubmitted Mining and Reclamation Plan (MRP) for the Belina Mine Complex, received June 30, 1989. Deficiencies have been found as detailed in the attached review document.

Please provide as complete a response to these deficiencies as possible by August 24, 1989.

Feel free to contact me if I can provide any assistance.

Sincerely,

A handwritten signature in cursive script that reads "Susan C. Linner".

Susan C. Linner
Reclamation Biologist/
Permit Supervisor

c1
Attachment
cc: R. Summers
BT45/271

PERMIT RENEWAL REVIEW
CHAPTERS 100-400
VALLEY CAMP OF UTAH, INC.

BELINA MINE COMPLEX
ACT/007/001
CARBON COUNTY, UTAH

July 27, 1989

UMC 771.25 Permit Fees - SCL
(R614-301-118)

There is no evidence of a \$5.00 fee being submitted with the package. However, this is not considered necessary for permit renewal. This section should be revised to show it is not applicable.

UMC 771.27 Verification of Application - SCL
(R614-301-123)

A verification of application must be part of the resubmitted MRP.

UMC 782.17 Permit Term Information - SCL
(R614-301-116)

This section should contain a reference to a map which shows the starting and termination date of each phase of mining which has been completed, and which will be undertaken during the term of the renewal.

UMC 782.19 Identification of Other Licenses and Permits - SCL

The NPDES permit, Air Quality Approval letter, and the letter from the State Historic Preservation Officer, determining no sites eligible for the National Register, should be provided as part of the MRP.

UMC 782.20 Identification of Location of Public Office for Filing
of Application - SCL
(R614-300-121.200)

This section has not been addressed.

UMC 782.21 Newspaper Advertisement and Proof of Publication - SCL
(R614-300-121)

The newspaper advertisement must show that a copy of the application is available for public review at the Division's Salt Lake Office.

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Permit Renewal Review
Valley Camp of Utah, Inc.
Belina Mine Complex
ACT/007/001

UMC 783.19 Vegetation Information - LK
(R614-301-321.200)

The submittal only includes vegetation data that was submitted with the original MRP, which at that time was determined to be inadequate. Several supplementary studies were conducted on the Valley Camp properties to address data gaps of the original study. Reports from these studies must be incorporated in the text of the MRP in order to correctly identify and describe vegetation communities which exist in the permit area and properly characterize the vegetation of the reference areas that will be used for determining revegetation success.

During the original permit review, reclamation feasibility using the proposed revegetation plan was questioned. As a result, the original permit contained conditions 5 and 6, which requested additional information necessary to resolve the revegetation concerns. Valley Camp has implemented testplots and conducted further vegetation monitoring to address these conditions. These actions need to be described and documented in the renewal application.

The application does not contain any vegetation maps which must be provided before this section can be considered complete.

UMC 783.20 Fish and Wildlife Information - LK
(R614-301-322)

Page 67 of the submittal contains incorrect information regarding bald eagles. In recent years, bald eagle nesting has been documented in Utah.

The permit application should include a copy of the U.S. Fish and Wildlife Service's report (dated November 10, 1982) which documents the adequacy of raptor protection technology implemented on power lines.

UMC 783.21 Soil Resource Information - JSL
(R614-301-222./R614-301-223.)

The Permit Renewal Application package did not include a map delineating the soils, within the permit area, that may be affected by the mining operations.

The submittal did not contain any language pertaining to the in-place testplot program as required by Conditions 5 and 6 of the past five year permit. Cross-sections and maps identifying the potential suitable growth material in addition to the potential suitable growth material sample location points, mass balance and analysis must also be included as part of the Permit Renewal Package.

UMC 783.22 Land Use Information - LK
(R614-301-411)

The application refers to a land use map which is not included. Please submit. Premine land use information alludes to an industrial use of mining. However, page 3 (under R614-301-411) indicates that there was no previous mining at the Belina site. While County Zoning may include industrial land uses for the area, actual premining land use of the area would be recreation, grazing, forestry, and wildlife habitat. This needs to be made clear in the land use section.

With regards to previous mining activity, the application does not include the requisite narrative required under UMC 783.22(b) for the Valcam Loadout Facility or the Belina site (mining activity, as per statements on page 2, commenced at the Belina site in 1976).

UMC 783.24 Maps: General Requirements - JSL

UMC 783.25 Cross-Sections, Maps and Plans - JSL
(R 614-301-140.) (R614-301-511.100)

No cross-sections or maps were submitted within the Permit Renewal Application. A thorough and adequate review pertaining to soil issues cannot be addressed until complete and accurate maps are included within the submittal.

UMC 783.27 Prime Farmland Investigation - JSL
(R614-301-221.) (R614-302-310.)

The negative prime farmland determination, referenced under R614-301-221, was not included within the Permit Renewal Application. The negative determination from the Soil Conservation Service must be included within the submittal.

UMC 784.13 Reclamation Plan: General Requirements - LK
(R614-301-341)

(b)(5)(i) The application does not include a schedule of revegetation which documents that seeding/planting will occur during the normal period for favorable planting (see UMC 817.113). Normally, this would be late fall for seeding (after October 1) and early spring for planting (prior to May 15).

(b)(5)(ii) Linum lewisii (blue flax) is a forb, not a grass as listed on the seed mixes for the Valcam Loadout Facility Area and for the South-West Facing Aspects.

Page 74 refers to a seeding plan to establish conifers. Seeding rates are not identified for this plan. However, the tree species identified on the seed mixes (pages 72 & 73) for hand planting are expected to provide adequate stocking of trees. Therefore, this portion of the application should be eliminated.

On page 75, it indicates that Ribes montigenum (gooseberry current), Sambucus racemosa (red elderberry) and Cercocarpus montanus (birchleaf mountain mahogany) may be added to the seed mix for the Valcam Loadout Facility (see page 71). If Valley Camp intends to use these species, they should be added to the seed mix (page 71) and the rate of seeding for each species identified.

(b)(5)(iii) Page 73 describes hydroseeding and mulching as combining the seed tack wood-fiber mulch and fertilizer in a hydroseeder. This methodology is not acceptable. Seed mixed with mulch does not make the proper soil contact for good establishment and seed mixed with fertilizer (even for a very short time) loses much of vitality. For best results, seed, fertilizer and mulch should be applied in separate applications.

Phase No. 3 planting section states that the planting of seedlings will be done within 2 years of seeding. Planting should be done during the early spring following the seeding of the area for optimum success. Much of this section goes into great detail regarding the care and handling of seedlings. Suffice it to say that the only information the Division needs regarding plantings is the method (i.e. hand planting vs. mechanical) by which they will be planted. Most of this section could be eliminated. Also, there is reference in the planting procedures to wildlife enhancement structures and plantings. Please refer to comments under UMC 784.15 regarding these items.

(b)(5)(iv) While the application identifies wood-fiber hydromulch to be used on the site, it does not indicate that all seeded areas will be mulched nor does it provide the rate (tons/acre) of mulch to be applied. A minimum of 2000 pounds per acre should be used with steep slopes having as much a 3000 pounds per acre.

(b)(5)(v) The application does not discuss whether irrigation will be used or what disease and pest control measures may be needed. If these are used, the applicant will need to provide detailed plans in the MRP.

(b)(5)(vi) The MRP needs to contain a detailed monitoring plan which identifies what parameters will be monitored, the frequency of monitoring, and the success standard for ultimate bond release. Sampling methodology must be in concert with current Division guidelines (methodologies used in the original establishment of the reference areas are not acceptable). The extended liability period (5 or 10 years) should also be identified.

UMC 784.15 Reclamation Plan: Postmining Land Use - LK
(R614-301-412)

The land use section seems to indicate that the proposed postmining land use will be industrial. As such, enhancing the area for wildlife and leaving the sediment pond for wildlife use may not be considered appropriate. Also, this would potentially be considered a land use change requiring the operator to provide the required information under UMC 817.133. However, page 69 of the revegetation section states the postmining land use will be rangeland and wildlife habitat. As noted in the land use information comments above, this land use description is not included in the MRP and thus to reclaim to this would constitute a land use change. Please, provide adequate descriptions of the premining land use for the permit area as well as the intended postmining land use plans to resolve this apparent conflict.

The revegetation plan (pages 75 and 76) indicate that the sediment pond will be left for wildlife enhancement. Please note, before the Division can approve retention of the pond, Valley Camp must demonstrate that the pond meets the criteria of UMC 817.49(a), including a demonstration that retention of the pond will enhance wildlife habitat.

UMC 784.21 Fish and Wildlife Plan - LK
(R614-301-331)

The revegetation plan (page 75) refers to a water enhancement structure created for wildlife. Detailed plans, including a map showing the location, must be provided for this structure.

The submittal does not include any wildlife maps which show the locations of important habitat or features for fish and/or wildlife. These must be provided before the plan can be considered complete.

UMC 817.22 Topsoil: Removal - JSL
(R614-301-232.) (R614-301-233.)

The submittal fails to address the requirements of Conditions 5 and 6 from the previous five year permit. As previously mentioned under UMC 783.21 and UMC 783.24-.25, the location of the potential suitable growth material must be delineated on appropriate cross-sections and maps. The volume of potential suitable growth material in addition to the location of the sample points must be defined. The potential suitable growth material analysis referenced to appendix R614-301-231.200a, not found within the submittal, must be included for review. In addition, a complete description pertaining to the proposed test plots, as-built, plans of the plots seed mix, soil fertilizer analysis data, fertilizer rate and application methodology, and methodology of seed placement must be embodied within the Permit Renewal Application.

The Permit Renewal Application must also change the term "topsoil" to "suitable growth material" as required under previous Division correspondence to Mr. Barry Barnum, August 28, 1988, to partially fulfill the requirements of Conditions 5 and 6.

R614-301-231.200, page 20 of the Permit Renewal Application must be updated. The suitability of any potential suitable growth materials must be compared to the Utah Division of Oil, Gas and Mining topsoil suitability criteria found within the Guidelines for Management of Topsoil and Overburden for Underground and Surface Coal Mining.

UMC 817.23 Topsoil: Storage - JSL
(R614-301-234.)

The Permit Renewal Application must reference the seed mix used to revegetate and stabilize the existing suitable growth material stockpile at the Belina Mine Complex. The submittal must also include maps, and cross-sections identifying the location and the design of the stockpile.

UMC 817.24 Topsoil: Redistribution - JSL
(R614-301-242.)

The suitable growth material redistribution plan is totally dependent upon the outcome of the test plots required under Condition 5 and 6. This should be noted within the redistribution plan.

The plan states that topsoil will be redistributed on prepared areas but does not define the preparation techniques to be employed. The Division recommends ripping the surface at an 8 to 12 inch depth at a spacing width of 15 inches for proper topsoil redistribution preparation.

UMC 817.25 Topsoil: Nutrients and Soil Amendments - JSL
(R614-301-243.)

The fertilizer plan within the Permit Renewal Application for the Belina Mine Complex should be updated to reflect the outcome of the existing test plots installed at the Belina Mine Complex.