



DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Daron Haddock, Permit Supervisor

FROM: Henry Sauer, Reclamation Soils Specialist 

RE: Technical Deficiencies, 5-Year Permit Renewal, Valley Camp Coal Company of Utah Inc., ACT/007/001, Folder #2, Carbon County, Utah

UMC 817.22 Topsoil: Removal

R614-301-233.100 Topsoils Substitutes and Supplements - HS

The applicant proposed to utilize sediment pond waste (001A Sediment Pond) as a substitute topsoil for redistribution in the Fan Portal No. 1 area. The applicant must describe for inclusion in the PAP the vegetative/soils analyses which will be conducted after reapplication to prove the suitability of the proposed substitute topsoil.

The applicant depicts the removal of down cast material from the Belina Haul Road during final reclamation and the subsequent redistribution upon the road bed final grade (Belina Haul Road Reclamation Plan, by Morrison-Knudsen). To date there is no analyses of these materials to substantiate their use as a plant growth medium for reclamation. Additionally the volume of suitable material is nebulous. Therefore, the operator must submit, for inclusion into the PAP, adequate analyses, trials, test and mass balances which verifies or refutes the suitability and quantity of the said materials as a plant growth medium for final reclamation and quantity.

The applicant must appropriately revise text (i.e. R614-301-231.100, p. 20, etc.) so that it is clear that the material which constitutes the surface portion (approximately the upper 2 feet) of the land fill material located at the Belina Mine and Haul Road and the Valcam Loadout has not been approved by the Division as a suitable topsoil material. Presently, field-site trials are proceeding to determine the suitability of the material.

The applicant refers to the landfill material (proposed substitute topsoil) as "salvaged topsoil" and/or "stockpiled material used for reclamation". These statements are misleading and must be revised so that it is clear to the reader that the said material was not separately salvaged and/or stockpiled and that the reclamation is in fact interim reclamation.

In the event that the applicant proposes to use sediment pond waste material as a plant growth medium the applicant must commit to analyzing material to determine its suitability as a plant growth medium prior to redistribution.

On page 21 (R614-301-200 Soils) the applicant refers to laboratory analyses of the proposed substitute topsoil but fails to reference where these said analyses maybe located within the PAP. Please revise text so that analyses may be easily located.

Please fix the typing errors (i.e. print overlap) in the first paragraph, section R614-301-231.200.

UMC 817.24: Redistribution

R614-301-200.242 Soils Redistribution - HS

During the Whiskey Creek Channel Reclamation, the operations may disturb previously disturbed soil which have been revegetated (interim) or undisturbed soil. The applicant must commit to fulfilling the requirements of R614-301-200. Soils to insure that the soil medium is properly identified (ie. suitability, volume estimates, etc.), separately removed, adequately protected and redistributed.

The applicant must commit to separately removing and temporarily stockpiling all proposed substitute topsoil material after facility removal and prior to backfilling and grading operations. This commitment must be reflected in the reclamation and bonding schedules (R614-301-542-100).

The applicant must provide a topsoil mass balance table, with appropriate cross-sections and surveys, which includes, at minimum, the following: volume of suitable disturbed landfill (proposed topsoil material); volume of stored topsoil; disturbed acreage at each site; "topsoil" (proposed substitute topsoil) excavation depth prior to backfilling and grading operation; topsoil redistribution depth; and volume of topsoil required and available for each area of disturbance.

Page 3
Technical Deficiencies
5-Year Permit Renewal
Valley Camp Coal Company
ACT/007/001

The applicant refers to hydromulching all disturbed areas (p. 74 R614-301-300 Biology). On page 75 of the same section the applicant describes varying mulching techniques in relation to the slope gradient. The applicant must clarify this discrepancy.

UMC 817.48 Backfilling and Grading: Covering Coal and Acid and Toxic-forming Materials - (HS)

R614-301-553.300

The operator refers to disposing of waste (i.e. coal, excess spoil, asphalt, exposed coal seams, underground development waste, acid and/or toxic-forming materials etc.) in a controlled manner to prevent combustion, ensure stability and prevent environmental degradation after reclamation. The applicant must specify the procedures and techniques employed to dispose of said material (i.e. commit to cover with four feet of suitable material or other approved method which have been adequately demonstrated). Additionally, disposal locations, must be tentatively identified or procedures employed to identify the most suitable location for disposal must be specified.

UMC 783.14 Geology Description R614-301-620 & 624.220

(1)(iii) and (2)(iii)

The operator must commit to regularly sample roof, floor and midseam material for acid- and/or toxic forming potential. The applicant's commitment must include sampling frequency and location, specific parameters and methodology of analysis. In addition the plan must commit to conduct monitoring on an annual basis or more, if the general location of the mining operations change and this change results in a modification to the quality of the roof, floor and mid-seam.

Additionally, verbage regarding previously collected data found in Volume I, Section R614-301-623.100 must be consistent and accurate. The data found in Table R614-301-623.100a must be clearly identified as to its source (coal, roof and floor material, soil, etc.), sample site location and laboratory methodologies utilized. Statements regarding the presence or absence of acid and toxic-forming materials must be substantiated and verified.

UMC 783.21: Soil Resource Information - R614-301-223

- a. The Carbon Area Soil Survey (Soils Conservation Service) is now published and publicly available. The survey encompasses the entire Valcam Loadout Facility (VLF) permit area and portions of the Belina Mine Complex and haul road. Therefore soil descriptions located in the Permit Application Package (PAP) must be correlated to the National Cooperative Soil Survey for the Carbon area.

Additionally, the operator eludes to the fact that the soil survey for the Valley camp PAP was based on baseline data and surveys done for the Skyline Mine PAP. This must be clearly stated within the PAP.

UMC 785.19 Underground Coal Mining Activities on Areas or Adjacent to Areas Including Alluvial Valley Floors In the Arid or Semi-Arid Areas of Utah R616-301-31.100-300

The applicant must submit at a minimum, the following information to demonstrate the probable existence and extent of an alluvial valley floor.

c(1)(i)

Adequate geologic information necessary to define the clast characteristics and the sedimentary pattern of Unconsolidated Stream Laid Deposits adjacent to and within the Valcam Loadout Facility permit area.

(c)(1)(ii & iii)

The PAP must incorporate a map that clearly delineate currently or historically flood irrigated areas (i.e. shows diversion structures, headgates, impoundments). Areas with various types of agriculture activities (pasture lands, improved pasture, undeveloped rangeland, etc.) must be mapped and accompanied by measurements of vegetation in terms of productivity and type. These maps must encompass both the Valcam Loadout Facility permit area and adjacent areas.

Page 5
Technical Deficiencies
5-Year Permit Renewal
Valley Camp Coal Company
ACT/007/001

(c)(1)(iv)

The applicant must provide documentation that the area adjacent to and within the Valcam Loadout Facility permit area are, or are not, subirrigated, based on ground water monitoring and soil moisture data.

(c)(1)(v)

The applicant must provide documentation that areas identified are, or are not, flood irrigable, based on streamflow, water quality, water yield, and topographic characteristics.

(c)(1)(vi)

Provide a series of aerial photographs, to include infrared imagery at a time of year to show any late summer and fall differences between upland and valley floor vegetative growth and a scale adequate for reconnaissance identification of areas that may be alluvial valley floor.

c1
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