



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

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ACT/007/001
 #2

March 1, 1996

TO: File

THRU: Daron Haddock, Permit Supervisor *ORZ*

FROM: Randy Harden, Sr. Reclamation Engineer *RH*

RE: Permit Change ACT/007/001-96A, Response to UDOGM Division Order ACT/007/001-95A, White Oak Mining and Construction Company, Inc., White Oak #1 and #2/Loadout, ACT/007/001, Folder #2, Carbon County, Utah.

SUMMARY

Proposed permit changes to the White Oak Mine were received by the Division on February 28, 1996. These changes were in response to Division Order ACT/007/001-95A which required the operator to submit plans to adequately describe the area used to store and handle spoil materials within the permit area.

Information found in the proposal is not considered adequate to meet the requirements of the Division Order. Copies of certified drawing at the indicated scale must be provided prior to approval. The capacity of the storage area must also be indicated in the plan to ensure that excess spoil materials are not allowed to accumulate within the permit area.

The operator should make the requisite changes to the proposal as necessary and resubmit the proposal as necessary to the meet the abatement requirements of the Division Order.

SPOIL AND WASTE MATERIALS

Analysis:

Coal Mine Waste.

Spoil storage and disposal of spoil materials that are expected to accumulate during mining operations are discussed under "Disturbed Area Spoil Management," in Section O, page 13 of the plan.



The plan indicates that spoils generated within the disturbed area will be taken to the upper pad area east of the wastewater treatment plant. This area has been labeled as "Spoil Management Area" on drawing R645-301-231.300. This area is to be used for the temporary storage and handling of all spoil materials generated within the disturbed area. Spoil materials, for the purpose of this area, have been defined as sediment from sediment ponds, materials from ditches and sediment traps, coal laden soils, and materials gathered from general maintenance and cleanup.

Spoil materials will be temporarily stored within this designated area until such time as they have been analyzed and tested for suitability as fill materials. In the event that such materials are found to be acid or toxic forming, the plan commits to dispose of these materials in accordance with the regulations. After analysis and sufficient time so that the materials are no longer saturated and can suitably used as backfill material, the plan states that this spoil material will be placed in lifts on the cut portion of this area. Backfilling is to be accomplished to the extent shown on Drawing No. R645-301-527, Sheet 12 of the MRP, which is the regrading plan for final reclamation of the mine facilities.

Refer to comments made under the reclamation backfilling and grading requirements for additional comments regarding placement of spoil materials.

The designated area for temporary storage and handling lies within the existing disturbed area and does not alter the surface drainage requirements for sediment control during mining operations. No changes to the operation plan requirements other than those provided on page O-13 are considered necessary for approval.

Findings:

The requirements of this section of the regulations is considered adequate in regard to the proposed permit change for the addition of the "Spoil Management Area."

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Analysis:

Mining Facilities Maps.

A reduced copy of Plate R645-301-231.300 has been provided as part of the proposed amendment. The "Spoil Management Area" is outlined on the drawing.

The revision block on the reduced drawing indicates the addition of the Spoil Management Area to the drawing, but the initials of the PE or other certified person have not

been noted with the revision.

A full-sized copy of the drawing should be provided for incorporation into the plan, which includes sufficient notation for certification of the drawings.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-512; drawing R645-301-231.300, sheet 4 of 4, must be revised and submitted to the Division at the size and indicated scale as presented on the drawing. Notation of the revisions to the plan as they relate to the incorporation of the "Spoil Management Area" should include the date and the initials of a registered professional engineer or other person qualified to certify the drawing.

BACKFILLING AND GRADING

Analysis:

The current reclamation plan, as states on page R-2, that sediment removed over time from local ponds within both the Loadout Facility Area and White Oak Complex areas will be used in the reclamation process as long as the sediment is found to be non-toxic. Further, on page R-8 of the plan, a commitment is made that all spoil and waste materials detected or encountered at the time of reclamation will be placed in suitable locations within the affected area(s) to ensure stability and to prevent leaching. The placement of such materials found during reclamation (if any) will depend upon the location in which the material was encountered, and will be placed in appropriate locations as determined by White Oak and UDOGM.

The existing MRP and the proposed change to the plan are not specific regarding the height of the lifts proposed to be used during backfilling. The nature of the sediment pond material, being initially saturated in some cases, suggests that the lift height should be minimal. It is recommended by the Division that lifts not exceed 1 foot to ensure that all the material being backfilled is dry and that in the event that such material is saturated, the low lift height would allow for additional drying of the material if necessary prior to placement of additional lifts.

Utilization of the "Spoil Management Area" as proposed, does not contradict plans for

reclamation of the surface facilities for White Oak. Measures prescribed in the reclamation plan for backfilling and grading should be followed during any backfilling and grading operation plan during mining operations for the bench area included within the "Spoil Management Area."

However, because the MRP currently is not specific as to the amount of materials which may be derived from routine maintenance of sediment ponds and other surface facilities, the plan should indicate the capacity the "Spoil Management Area." The capacity of the temporary storage area should be determined in order to ensure that excess spoil materials are not allowed to accumulate in the area which could not be utilized in the backfilling and grading operations for reclamation as currently approved.

The capacity of the temporary storage area could be incorporated into the text on page O-13 of the MRP in the Disturbed Area Spoil Management section.

In addition to the placement of the spoils materials within the "Spoil Management Area," the plan also indicates that such materials may also be used elsewhere within the disturbed area for routine maintenance. Such use is considered acceptable by the Division as long as such use is in accordance with backfilling and grading requirements as presently provided for in the mining and reclamation plan, and in accordance with applicable performance standards.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-553; the capacity of the temporary storage area for spoil materials to be placed in the "Spoil Management Area" must be provided in order to ensure that excess spoil materials are not allowed to accumulate within the permit area.

MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS

Analysis:

Reclamation Backfilling and Grading Maps.

The area proposed as the "Spoil Management Area" is currently within the disturbed

area and is incorporated in the backfilling and grading plans as shown on Drawing No. R645-301-527, Sheet 12.

No changes or revisions to the backfilling and grading maps or drawing are necessary to incorporate the "Spoil Management Area" into the reclamation plan.

Findings:

Information regarding this section of the regulations as they pertain to the incorporation of the "Spoil Management Area" into the MRP is considered adequate.

BONDING AND INSURANCE REQUIREMENTS

Analysis:

Determination of Bond Amount.

The addition of the "Spoil Management Area" into the operation and reclamation plan does not significantly affect the amount of bond required. Backfilling and grading of the area is already incorporated into the plans and designs for reclamation backfilling and grading. No change in the quantities or methods used to determine reclamation costs is considered necessary.

Findings:

The proposed amendment to the plan does not require any change in the bond amount.