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

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March 30, 1998

TO: File

THRU: Daron Haddock, Permit Supervisor 

THRU: Joe Helfrich, Permit Supervisor 

FROM: Mike Suflita, Reclamation Hydrologist 

RE: Sediment Removal, Sediment Pond #004A, White Oak Mining & Construction, White Oak Mine #1, ACT/007/001-97B, File #2, Carbon County, Utah

SUMMARY

On September 2, 1997 White Oak submitted an MRP amendment to clean their sediment pond and pump the sediment as a slurry to dispose of the material underground in the lower and now inactive mine. Included in the package was a copy of their letter to MSHA. In past years the sediment was removed from the pond using a dragline and then spread on the pad area above the pond to dry. This year the weather was too wet and they started too late in the year.

The Division issued a Technical Analysis on September 26, 1997 with several discrepancies. Among them was a series of requirements from the Forest Service. The Operator responded with several letters and results from testing the sediment in the pond. The project was deferred since it was unclear whether the Forest Service would approve the proposed actions. Also, the Operator was considering other options for the sediment disposal and verbally indicated no action was required until they decided.

On March 26, 1998 the Division received a letter from the Forest Service indicating approval of the proposed sediment disposal underground and thus this TA is being written. This TA is concerned with the hydrologic aspects of the proposed actions.

TECHNICAL ANALYSIS:

OPERATION PLAN

Discharges

Regulatory Reference: R645-301-731.510

Analysis:

This submittal consists of three letters, two of which are addressed to Division employees

and one addressed, "To Whom It May Concern". These are dated September 9, 1997 and November 3 and 12, 1997. In addition, there are laboratory testing results dated September 16, 1997 and October 15 and 24, 1997. There is also an MSHA letter dated September 18, 1997. Included are two labeled Attachments, A - Results of Chemical Analysis and B - MSHA Letter, and an additional Section 9, Spoil Management Area.

Although the C2 form is filled in, there is no indication where in the MRP these submittals are to be inserted. From an administrative standpoint this can **not** be considered a complete and clear submittal that is suitable for insertion into the Mining and Reclamation Plan. Given the status of the MRP, a suggested approach would be to put these materials in an appendix at the end of Chapter 7, Hydrology.

The discrepancies called out in the September, 26, 1997 TA appear to have been satisfied. These include:

- A. An explanation of discharge elevations and drainage areas.
- B. Sediment sampling and laboratory analysis to meet Forest Service and Division requirements.
- C. MSHA Approval Letter.

This is a one-time exception to the Operators normal method of sediment disposal, there is a relatively small volume of sediment, and substantial testing (TCLP) of the sediment shows no hazardous waste. The areas to which the slurry water will drain are not expected to suffer material damage, and no public hazards appear to exist. There is minimal disturbance to the hydrologic balance and no water quality effluent standards appear to be violated. The rates and quantities are defined and MSHA approval has been granted.

Findings:

The submittal is not acceptable in it's present form. It must be resubmitted in a form that is complete, comprehensive, and understandable. It must also show clearly where in the MRP it is to be inserted.

The requirements of R645-301-731.510 have been meet and, once the proposed change is resubmitted, Division approval can be issued.

RECOMMENDATION:

Prior to approval, the proposed modification must be resubmitted as described above.