0021

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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Michael O. Leavitt
Governor

Lowell P. Braxton
Division Director

INSPECTION REPORT

Copy FAM

Partial: XXX Complete:__ Exploration:__
Inspection Date & Time: 11/16/99 / 8:15a.m.-1:00p.m.
Date of Last Inspection: 10/20/99

Mine Name: White Oak #1 & #2 County: Carbon Permit Number: **ACT/007/001**
Permittee and/or Operator's Name: Lodestar Energy, Inc. and subsidiaries
Business Address: Scofield Route, Helper, Utah 84526
Type of Mining Activity: Underground XXX Surface__ Prep. Plant__ Other__
Company Official(s): Vicky Miller
State Officials(s): Peter Hess Federal Official(s): None
Weather Conditions: Clear, Sunny, Cool, 40's
Existing Acreage: Permitted- 3746 Disturbed- 140.2 Regraded- 0 Seeded- 0 Bonded- 140.2
Increased/Decreased: Permitted-___ Disturbed-___ Regraded-___ Seeded-___ Bonded-___
Status: _Exploration/ XXX Active/__Inactive/__Temporary Cessation/__Bond Forfeiture
Reclamation (__Phase I/__Phase II/__Final Bond Release/__ Liability_____Year)

REVIEW OF PERMIT, PERFORMANCE STANDARDS & PERMIT CONDITION REQUIREMENTS

Instructions

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
   a. For complete inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check N/A.
   b. For partial inspections check only the elements evaluated.
2. Document any noncompliance situation by referencing the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

		EVALUATED	N/A	COMMENTS	NOV/ENF
1.	PERMITS, CHANGE, TRANSFER, RENEWAL, SALE	[ ]	[ ]	[ ]	[ ]
2.	SIGNS AND MARKERS	[XX]	[ ]	[XX]	[ ]
3.	TOPSOIL	[XX]	[ ]	[XX]	[ ]
4.	HYDROLOGIC BALANCE:				
a.	DIVERSIONS	[ ]	[ ]	[ ]	[ ]
b.	SEDIMENT PONDS AND IMPOUNDMENTS	[XX]	[ ]	[XX]	[ ]
c.	OTHER SEDIMENT CONTROL MEASURES	[XX]	[ ]	[XX]	[ ]
d.	WATER MONITORING	[ ]	[ ]	[ ]	[ ]
e.	EFFLUENT LIMITATIONS	[ ]	[ ]	[ ]	[ ]
5.	EXPLOSIVES	[ ]	[ ]	[ ]	[ ]
6.	DISPOSAL OF EXCESS SPOIL/FILLS/BENCHES	[ ]	[ ]	[ ]	[ ]
7.	COAL MINE WASTE/REFUSE PILES/IMPOUNDMENTS	[ ]	[ ]	[ ]	[ ]
8.	NONCOAL WASTE	[XX]	[ ]	[XX]	[ ]
9.	PROTECTION OF FISH, WILDLIFE AND RELATED ENVIRONMENTAL VALUES	[ ]	[ ]	[ ]	[ ]
10.	SLIDES AND OTHER DAMAGE	[ ]	[ ]	[ ]	[ ]
11.	CONTEMPORANEOUS RECLAMATION	[ ]	[ ]	[ ]	[ ]
12.	BACKFILLING AND GRADING	[ ]	[ ]	[ ]	[ ]
13.	REVEGETATION	[ ]	[ ]	[ ]	[ ]
14.	SUBSIDENCE CONTROL	[ ]	[ ]	[ ]	[ ]
15.	CESSATION OF OPERATIONS	[ ]	[ ]	[ ]	[ ]
16.	ROADS:				
a.	CONSTRUCTION/MAINTENANCE/SURFACING	[ ]	[ ]	[ ]	[ ]
b.	DRAINAGE CONTROLS	[ ]	[ ]	[ ]	[ ]
17.	OTHER TRANSPORTATION FACILITIES	[ ]	[ ]	[ ]	[ ]
18.	SUPPORT FACILITIES/UTILITY INSTALLATIONS	[XX]	[ ]	[XX]	[ ]
19.	AVS CHECK (4th Quarter-April, May, June)_____(date)	[ ]	[ ]	[ ]	[ ]
20.	AIR QUALITY PERMIT	[ ]	[ ]	[ ]	[ ]
21.	BONDING & INSURANCE	[ ]	[ ]	[ ]	[ ]

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(Comments are Numbered to Correspond with Topics Listed Above)

2. SIGNS AND MARKERS

Many of the disturbed area perimeter markers at the site are very difficult to distinguish. Some are damaged, but most are oxidized and difficult to distinguish in the surrounding vegetation. It was suggested that the markers be repainted a bright glossy color. Also, the entire disturbed area perimeter needs to be checked for adequacy of perimeter markers.

3. TOPSOIL

The topsoil pile NNW of the loadout bath house facility has a silt fence around the base of the slopes. The fabric is in very poor condition. The pile itself appears to be very well vegetated. It was suggested to Ms. Miller that either the fabric be replaced or the fence be removed after an evaluation and endorsement to do so is received from a UDNR/OGM biologist.

4a. HYDROLOGIC BALANCE: DIVERSIONS

The loadout area was inspected this day to ascertain as to whether or not the permittee had repaired items addressed in the October inspection report. The following items were noted.

1) A mound has been built up on the SE corner of the coal stockpile which will direct any pile runoff into Ditch D-16A. As noted in the October inspection report, stockpile runoff was previously reporting to the sediment pond via another route. Same has cut significant erosion gullies in the north bank of UPDES pond 003A. The gullies have been repaired since the October inspection.
2) Ditch D-16B has been redefined; a catch basin with a few pieces of riprap has been started, but same needs more work for completion.
3) Ditch D-8 has been redefined.
4) Culvert C-15-24 has had two 4-inch and two 1-inch electrical conduits running through it. Ms. Miller is working with an EarthFax hydrologist/engineer to determine if the culvert still has sufficient flow carry capacity to handle the design storm. It was also determined that this culvert has existed this way for many years. In consideration of the fact that same is in such close proximity to railroad tracks, it was suggested to Ms. Miller, that if the culvert does not have sufficient flow capacity remaining to meet the design storm requirements, that some of the flow be redirected to other diversions. It does not appear to be rational at this point to require the permittee to remove the electrical conduits from the culvert.
5) Ditch D-5B has been redefined. The plunge pool at the discharge end of culvert C-7-24 needs to have the riprap restored. It was suggested that same be grouted to hold it in place.
6) According to Ms. Miller, based on information provided by Mr. Maurice Turpin, surface foreman, the half-round culvert located on the ESE corner of the truck dump basin has been in place for many years and is very necessary for the handling of snow melt runoff. Ms. Miller is working through EarthFax to determine flow calculations and intends to update the surface drainage plan to include this culvert.
7) As observed today, the permittee is in the process of building up the road along the inside guard rail about the truck dump basin. This should force drainage across the road into ditch D-7B, which will make the surface drainage system in this area function as designed. Once these flows are redirected, the erosion gullies on the in-slope of the

truck dump basin can be repaired. It was suggested that a couple of berms be installed to help force runoff into ditch D-7B as quickly as possible. The installation of same may interfere with truck traffic flow, and it was suggested that Mr. Turpin OK the installation of same prior to doing so.

Several new diversion items were noted this day:

1) The half-round culvert which is an extension of undisturbed diversion UDD-1needs cleaning as soil and rocks have sloughed in from the adjacent cut-slope. The flow path here also needs redefinition as the intended flow path is not the path being followed. Flows have also jumped the ditch on the other side of the well pump shack, running down the outslope.
2) Culvert C-2-18 has had a brattice cloth tube attached to its outlet to serve as erosion protection. A riprapped channel lies directly below the "elephant's trunk". The trunk appears to be blocked with rocks and sediment buildup. It was suggested that the "trunk" be removed, and the riprap repaired and grouted in place. The discharge end of the channel or tube terminates in a ditch which is at right angle to the flow path of the tube. Some sort of energy dissipater (plunge pool) should be implemented here such that the water can make this turn without eroding the diversion.
3) The inlet ditch to culvert C-2-18 should be redefined as flows appear to be circumnavigating the straw bales which have been installed.
4) Electrical substation S-3 is in a location where essentially no drainage control has been implemented. Sheet flow from the adjacent cut bank reports directly through the substation, then exits on the SSW corner. Erosion was observed here. It was suggested that drainage control be implemented here, and that the erosion be repaired. Flows report to ditch D-3.
5) A previous permittee has installed "elephant trunks" on two undisturbed bypass culverts, which route drainage under the Mine site primary haul road; these are C-24-24 and C-25-36. In a previous technical analysis prepared by the UDNR/OGM, concerns have been raised about the functioning of these tubes. Severe erosion is evident where the tubes are in place; rocks, sediment and debris appear to be building in them. At Ms. Vicki Miller's request, suggestions were offered as to how to effectively remove the elephant trunks such that the culverts can function in an uninhibited fashion.

    1) At culvert C-24-24, it was recommended that the elephant's trunk be removed. Then the 24-inch elbow would be removed, and 3.5 to 4 feet of the 24-inch straight culvert be cut off. The elbow would then be reattached. This would place the discharging flow right in the rip rapped channel. The riprap should be repaired where it is in disarray, and then this channel should be dry grouted.
    2) At culvert C-25-36, it was recommended that the elephant's trunk be removed and black plastic 36-inch flexible culvert be reinstalled in the same channel. The galvanized end portion of this culvert appears to be leaking, as there are two ice flows coming out from the bottom of same. This culvert should be inspected for leaks and be repaired if necessary.

    It will be necessary for approval to be obtained before the replacement of these "elephant trunks" can occur. It should be noted that if these "trunks" will not function as was their intent, a blocked diversion constitutes a compliance issue.

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Also, if any work is to be done in this area, the incredibly steep slopes will require that any workmen involved must use safety belts and tie off lines.

Ms. Miller inquired as to my thoughts relative to a snow storage area for the loadout area. Past practice has been to store snow in the area reporting to pond 003A. It was suggested that the large flat area ENE of pond 002A be sloped such that any runoff will report to ditch D-5B and thence to pond 002A. The area currently has noncoal waste (damaged galvanized overcasts) and employee parking on it.

4c. OTHER SEDIMENT CONTROL MEASURES

A silt fence, in poor repair, was observed at the toe of the outslope of the area shown as ASCA 1 on Map R645-301-731.720a, VALCAM sediment control facilities. The fence is not in the same location as that shown on the aforementioned map. The slope is well vegetated. It was suggested that the dilapidated fence be removed.

It has been a previous practice at the site to install straw bales in many of the ditches to trap sediment rather than allow the sediment to report to the sediment ponds. The rationalization here is that the ponds will require fewer cleanings this way. It seems that the cost of maintaining these straw bales may be more than cleaning the ponds regularly. Also, there are numerous bare cut slopes about the site. The permittee may want to consider vegetating or shot-creteing these slopes to reduce sediment buildup in the ponds. If the bales are part of the approved sediment control plan, they must be maintained. If they are not, it is suggested that they be re-evaluated for effectiveness.

8. NONCOAL WASTE

The accumulation of outdated machine parts, and damaged items of one type or another and a general lack of order of usable items at the Mine and loadout site are typical for a site this old. However, it would behoove the new permittee to clean up and get rid of any junk which is considered unusable.

18. SUPPORT FACILITIES/UTILITY INSTALLATIONS

Substation S-3 has two transformers which are leaking cooling oil. The transformers have no PCB tags on them. Some oil has made its way onto the ground surface. As noted above, sheet flow from the cut bank runs through the substation area thence to ditch D-3.

Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas, and Mining.

Copy of this Report:

Mailed to: David Miller/Vicky Miller (White Oak/EarthFax) Henry Austin (OSM)
Given to: Pam Grubaugh-Littig (DOGM) Filed to: Price Field Office
Date: November 19, 1999

Inspector's Signature: Peter Hess #46
Peter Hess