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United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
[REDACTED] Brooks Towers
1020-15th Street
DENVER, COLORADO 80202

December 17, 1979

Mr. Ron Daniels
Coordinator of Mined Land Development
Department of Natural Resources
1588 N. West Temple
Salt Lake City, Utah 84116

Dear Mr. Daniels:

Enclosed please find copies of on-site inspection reports. The inspections were conducted within Braztah Complex during the period of September 20th & 21st, 1979.

If you have any questions or problems, please contact this office.

Sincerely,

Murray I. Smith
Chief, Division of Inspection & Enforcement

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DIVISION OF
OIL, GAS & MINING

REGION V ON-SITE INSPECTION REPORT

BRAZTAH CORPORATION
BRAZTAH COMPLEX
P.O. BOX 599
HELPER, UTAH 84526

DATES AND WEATHER: September 20, 1979 - Raining
September 21, 1979 - Clear and Warm

COUNTY AND STATE: Carbon County, Utah

TYPE OF INSPECTION: Biannual

COMPANY OFFICIALS: Boyd Harvey, Laine Adair, Murial Jarrett,
Howard Bressler, Gene Haub, Nick Carter
and Ken B. Hutchinson

STATE OFFICIALS: Jim Smith, Doug Stewart and Joe Helfrich

OSM OFFICIAL: Gary Fritz

MSHA ID NUMBERS: 4201269(#6), 4200096(#6A), 4100165(#3),
4201202(#5)

NOV NUMBERS: 79-5-5-30, 31, 32, and 33

GENERAL COMMENTS

This is an underground mining complex owned by American Electric Power which has a holding company, Franklin Realty, that subleases the mining rights to the Braztah Corporation.

The mines and preparation plant are located in the Castle Gate area around Helper, Utah. The surface areas inspected included the following sites:

- 1) Braztah #6 and #6A Mine (Willow Creek).
(#6 and #6A Mines are inactive.
- 2) Castle Gate Coal Preparation Plant.
- 3) Utah Fuel Portal #1.
- 4) Braztah #3 Mine (Hardscrabble Canyon).
- 5) Braztah #5 Mine (Sowbelly Gulch).

The #5 Mine is located in Sowbelly Gulch, a tributary of Spring Canyon, which is about four miles west-northwest of the city of Helper. Approximately 17 surface acres have been affected in the relatively wide and gentle sloping area that was developed by cutting the east wall of the valley.

The #3 Mine is located in Hardscrabble Canyon which is a tributary to the Price River. The surface facilities are located in a narrow canyon on approximately 22 acres one mile northwest of Helper. An old preparation plant and permanent waste disposal dump, which is also in the area, was gradually phased out as the Castle Valley Spur plant capacity was increased.

The #6A Portal is an inactive mine located in the Willow Creek Valley, approximately one mile northwest of Castle Gate. The #6 Portal is going to be opened in this area but at the present time, the area is only being used for storage and MSHA underground rescue training work. The only activity in the area is a county waste rock removal project. The corporation has granted the State road department the right to remove the waste rock.

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GENERAL COMMENTS (Continued)

An existing portal, Utah Fuel #1, is on the west side of Rte. 55, across from the Castle Gate Preparation Plant. Coal is conveyed through the #5 Mines out the portal into a 150 ton bin crusher combination which then drops the coal onto a belt that carries coal across the freeway to the preparation plant.

The Castle Gate Preparation Plant is located on the east bank of the Price River, about two miles north of Helper. On the 60 acres of disturbed area in this valley, the corporation has a preparation plant, a railroad loadout, and a coal waste dump in Schoolhouse Canyon.

About 4,500 tons per day is being produced from the #5 and #3 mining complex in the seven foot, Castle Gate Seam of coal which is shipped to Illinois, Michigan, and Indiana.

The Corporation had been issued no Notices of Violation for non-compliance from the Division of Oil, Gas, and Mining, prior to my inspection. I have issued violations for the following infractions:

- 1) Failure to pass runoff from the disturbed area through sediment ponds prior to leaving the affected area.
- 2) Failure to have an approved ground and surface water monitoring program.
- 3) Failure to dispose of waste in an approved manner.
- 4) Failure to remove topsoil from an area prior to disturbance.

717.11 GENERAL OBLIGATIONS

The corporation had a copy of their approved 30CFR 211 and State Mining plan available for review at their mine office in Helper. Their Federal Mining plan was approved on April 27, 1977. The State of Utah issued mining permit #ACT-007-004 to the Corporation on April 21, 1977.

The corporation also has a permit to discharge effluent (UT-0023086) from the #3 Mine into the Price River at Castle Gate. The permit was effective September 27, 1977 and expires June 30, 1982. They also have a discharge permit for the water treatment plant at their preparation plant (UT-0023141).

I reviewed most of the corporation's Federal leases. There did not appear to be any stipulations on the leases that the Corporation is not complying with, except the previously mentioned violations.

717.12 Signs and Markers

The active mining areas and the preparation plant have signs displayed at all points of access from public highways.

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717.14 Backfilling and Grading

The Corporation is closing a coal waste dump located on the upstream end of Hardscrabble Canyon. The pile has been rough graded except on the top where a few pieces of old equipment is stored. Water has been diverted around the pile on both sides, but the western diversion needs to be riprapped, regraded, or both. It was eroded and backcut, almost to the top of the pile.

The corporation has not started to resoil the dump with four feet of non-toxic or non-combustible material.

717.15 Disposal of Excess Rock and Earth Materials

The Corporation is dumping refuse in Schoolhouse Canyon from their new preparation plant at Castle Gate. The engineering design for the dump was subcontracted to Golden and Associates on May 2, 1978. The road; the bed of the dump area; and a filter dam for treatment of the runoff from the dump; was built prior to June 12, 1979. The filter dam is designed and constructed to meet MSHA standards.

The dump will cover 23 acres. An additional 17 acres of drainage area above the dump is also a part of the drainage controlled by the impoundment.

One 20 foot lift of preparation waste is deposited in the dump, and another lift is almost finished. The top bench is about 120 feet wide, at the widest point, and 500 feet long.

The bottom lift outslope at the downstream end of the refuse pile was 78 feet long with an angle of repose of about 25 degrees. A 15 foot bench was pushed back from this outslope to the next lift. The second lift reclined 26 degrees and was 100 feet long.

The refuse is brought from the preparation plant with trucks; end dumped, backbladed, and compacted with a bulldozer. Vegetation was being removed around the perimeter of the pile as it was being raised. Diversion ditches were on both sides of the dump so drainage is being diverted around the refuse into the filter dam impoundment area.

I asked Murial Jarrett and Gene Haub if the subcontractor saved topsoil or a substitute resoiling material to distribute over the refuse after the dump was completed. They said that the company did not save any soil for redistribution. Violation #2 of 79-5-5-33 was issued for failure to remove, segregate or stockpile topsoil on selected overburden material for redistribution on the area that was disturbed.

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717.15 Disposal of Excess Rock and Earth Materials (Continued)

The Corporation also was not able to provide evidence that refuse disposal was approved by the Division of Oil, Gas, and Mining and the Office of Surface Mining. Violation #5, NOV #79-5-5-33, was issued to the Corporation because they did not have approval for the disposal of waste at this site from these regulatory agencies.

717.17 Protection of the Hydrologic System

The average annual rainfall in this Castle Gate area is about 8 to 10 inches. Drainage from parts or all of the affected area, in certain cases, flows to three perennial streams, the Price River and its tributaries, Willow Creek and Spring Canyon Creek.

The drainage control for the #3 and #5 Mines and the Castle Gate Complex was inadequate, so a Notice of Violation was written for each area.

Violation #1 of NOV #79-5-5-30 was issued for failure to pass surface drainage from the disturbed area through a sediment pond or ponds at the Castle Gate Preparation Plant.

There is one pond located below a part of the crusher facility which catches runoff from a small portion of the area but it drains into the Price River when it overflows. The pond was covered with coal dust and is undersized so it does not allow all of the coal fines to drop out prior to discharging. Drainage from most of the areas is channeled under and along the railroad tracks and allowed to go into the Price River at the railroad bridge. The Barr Canyon drainage, which had trash construction in it, drains under the access road and flows into the river through a double 60 inch culvert. A four foot culvert north of the conveyor system empties untreated drainage from the disturbed area into the river. Coal fines, several inches thick, were in the outwash from the discharge. Water from a steam cleaning system which is located next to their water treatment plant also flows into a diversion that empties into the river less than 500 feet away.

Drainage from the eastern side of the #5 Mine in Sowbelly Canyon was not being passed through a sediment pond. Violation #1 of NOV 79-5-5-30 was issued for this infraction. There was an old sediment pond on the lower end of the canyon that evidently collects drainage from most of the western part of the affected area. The corporation does not have a discharge permit for this structure. It was not discharging during my inspection, so a violation was not issued for the infraction. However, if the pond is going to be used and it discharges, the corporation must have a permit.

Drainage from the disturbed area at the #3 Mine in Hardscrabble Canyon was not being passed through a sediment pond prior to leaving the site. Violation #1, NOV #79-5-5-31 was issued for this infraction. Failure to

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717.17 Protection of the Hydrologic System (Continued)

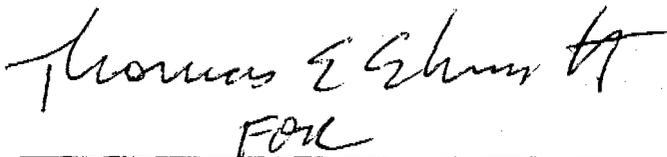
have drainage control for the #1 portal facilities or the #3 drop end of the belt line was included in this violation. Untreated coal fines from the #1 portal conveyor area were observed outside the permit area within the natural drainage which flows to the Price River.

I asked Jim Smith and Mr. Hutchinson about a discharge from a springhouse overflow system that is a part of the mining operations. Water from a spring was piped into a pumphouse, treated with chlorine and then pumped to the mines. When water was not needed at the mine, an overflow valve drained water out of the springhouse into a dry wash next to the building. The question arose as to whether a discharge permit was needed for that overflow. We could not settle the issue on the site or at their office so I let it go until I could discuss it with my supervisor. We have decided that a discharge permit will not be needed since the water being discharged is not being treated with chemicals or does not come in contact with any contaminants from the mining operation.

Surface and ground-water was being monitored by a consulting company. The plan for the monitoring procedure and application thereof was approved when it was submitted as an update to the Corporations original 30 CFR 211 mining plan. The Division of Oil, Gas, and Mining has not approved the plan. I issued a violation for each of the mines for this infraction. On the advice of counsel, I later combined the violations to apply to the mining complex instead of the separate operations. Approval by the Federal agency may not meet the requirements of the State Regulatory agency. The Corporation disagrees with my violation, but I am going to let it stand unless the State agency grants approval for the monitoring.

717.20 Topsoil Handling and Revegetation

A new air shaft and escape portal is planned and has been approved for the left fork of Sowbelly Canyon. A road in the bottom of the drainage has been improved to provide easier access, but the actual construction at the site has not started. Topsoil has not been removed from the portal facility for redistribution when the mining operation has been completed.



GARY FRITZ
RECLAMATION SPECIALIST