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PRICE RIVER COAL COMPANY

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File

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**DIVISION OF
OIL, GAS & MINING**

CERTIFIED MAIL NO. 3968392
Return Receipt Requested

Mr. Tom Tetting
Engineering Geologist
Utah State Department of Natural Resources
Division of Oil, Gas, and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Re: Price River Coal Company's Response to DOGM Technical
Analysis and Stipulated Permit of 2/19/82 for Completion
of the Crandall Canyon Surface Facility

Dear Mr. Tetting:

I hope that our detailed responses and commitments, here enclosed,
are satisfactory. Final DOGM approval is, we hope, forthcoming.

Sincerely,

R. L. Wiley
Robert L. Wiley
Environmental Engineer

RLW:ga

Enclosure

PRCC RESPONSE TO DOGM TECHNICAL ANALYSIS
AND STIPULATED PERMIT OF 2/19/82 FOR
COMPLETION OF THE CRANDALL CANYON
SURFACE FACILITY

The following comments and commitments are provided to each of the DOGM stipulations so that approval may be issued to complete the Crandall project. These responses have been developed by the Price River Coal Company management and engineering staff after consultation and negotiation with the following DOGM personnel: J. Feight, R. Daniels, J. Smith, L. Kunzler, S. Keefer, E. Hooper.

Stipulation - 2-19-82-1TT (UMC 817.11)

The applicant must submit a statement to the Division to the effect that all signs; identification, perimeter and otherwise, have been installed and conform specifically to the 817.11 regulations.

- All signs and markers are installed in Crandall Canyon. Perimeter markers are of lathe and flag type construction. We hope this is acceptable during the construction phase.

Stipulation - 2-19-82-2TT (UMC 817.13-.15)

The applicant should submit a statement to the Division that all exploration holes and monitoring wells will be or have been abandoned in accordance with UMC 817.13-.15. (Although never specifically mentioned, the applicant is assumed to be aware of the minimum State and U. S. Geological Survey requirements.)

- Any holes or wells drilled after August of 1977 have been abandoned in accordance with UMC 817.13-.15. Holes drilled and abandoned prior to that date were handled in accordance with USGS requirements.

Stipulation - 2-19-82-3EH (UMC 817.22)

The applicant must indicate the depth and volume of soil to be removed from each area of construction. These figures are needed to ensure enough soil material is available to provide the six inch depth of resoiling proposed by the applicant.

- We feel that topsoil can be removed to a depth of at least six inches in all areas shown to be disturbed on Exhibits 4 and 5, and on the leachfield plans, with the exception of the access road to the site and the upgrading of the access road to the leachfield. We have already stated we will pick up all topsoil available. Where more than six inches of unconsolidated potential growth medium exists (as found during construction), we will collect this material and transport

it off site to either Castle Gate or Willow Creek to be stockpiled and used as non-toxic material for covering of refuse areas or as resoiling materials after satisfactorily completing the requirements of 817.22(e).

Stipulation - 2-19-82-4EH (UMC 817.22)

The applicant must indicate the equipment and methods to be employed in removal from insitu and transporting of topsoil to storage locations.

Stipulation - 2-19-82-6EH (UMC 817.24)

The applicant must provide the equipment and methods employed to ensure that the requirements set forth under UMC 817.24 are achieved.

- Topsoil handling will be accomplished using earth moving equipment most suited to the job, considering the physical limitations of the site.

Stipulation 2-19-82-5EH (UMC 817.23)

The applicant must address the methods of erosion control used to ensure topsoil stockpile protection prior to plant establishment.

- A berm is shown on Exhibit 5 encircling the topsoil pile. We have previously stated that the topsoil will be mulched and seeded once the topsoil is in place.

Stipulation - 2-19-82-7SK (UMC 817.45)

If an NPDES permit is not required, then the operator shall carry out storm discharge monitoring from the two oil separators. Data shall be gathered at least once per 90 day period (assuming an occurrence of run-off). An analysis of the first flush should be carried out with at least one more discharge sample obtained 10 minutes later. Those parameters included in the impact monitoring program shall be applied to this analysis.

- We intend only to use one oil separator. It appears that two were shown on Exhibit 5. This was a minor error. Please note that ACR Response, Attachment 7, discusses only one oil separator for the maintenance shop. The attendant illustration sheet, "Crandall Canyon - Drainage Details", shows the routing through the only oil separator intended. Additionally, further information provided to S. McNeal of Utah Department of Health, Water Quality Section, on 10/27/81, included a short discussion of the single oil separator. This communique was transmitted to S. Keefer of DOGM, via certified mail, on the same day.

Effluent characteristics analyzed shall be those required by our NPDES permit and for as long as we operate under such a permit. The oil separator and other water handling structures have been approved for construction by UDH as of 1/25/82.

We will commit to a separate monitoring program for parking lot and oil separator storm runoff for a try out period of one year, four times per year. The monitoring period will begin when the final site is completed. A final site surface configuration map is being prepared and will be available to you within the 60 day specified limit.

Stipulation - 2-19-82-8SK (UMC 817.46)

The applicant must submit detailed design specifications addressing UMC 817.46(j-u), as applicable, to assure the stable construction and operation of Pond 016.

Stipulation - 2-19-82-9SK (UMC 817.47)

A plan must be submitted to the Division and approved at least 60 days prior to construction; the applicant must provide:

Detailed design specifications for the constructed spillway on Pond 016. Include the design for point of discharge.

- We will remove the discharge pipe, delete the numerical designation of 016 from our NPDES permit and construct a combination berm and excavated settlement/evaporation basin at the location of the originally proposed topsoil pond.

Stipulation - 2-19-82-10SK (UMC 817.47)

The applicant must provide:

Designs indicating stormwater routing for upper and lower pad through oil separators.

- This information will be included on the final site surface configuration mapping mentioned in SK-7 above.

The additional flow/design information requested by S.K. on 4/5/82, concerning the oil separator, will be provided within the stated time period.

Stipulation - 2-19-82-11SK (UMC 817.54)

The applicant must describe adjacent water uses which may be impacted by the shaft excavation and determine a means for supplying water if interruption, contamination or diminution occurs.

- There are no adjacent water uses which could be impacted by shaft construction. All local water uses are related to water sources which are tapped at points far above Crandall Canyon; i.e., Scofield Reservoir, which is transmitted via Price River and the Price City springs, which are piped from their mountain source to Price City Water Plant.

Stipulation - 2-19-82-12SK (UMC 817.56)

Price River Coal Company must submit an adequate discussion on measures to renovate the permanent Crandall Creek stream channel diversion at the time of final reclamation.

- The stream channel diversion is permanent. Reclamation is discussed in Attachment 10 of the 7/81 ACR Response. The referenced discussion was developed after an intensive telephone discussion with Wayne Hedburg of DOGM about reclamation requirement on ephemeral channels in July of 1981.

See Exhibit 9 showing reclamation configuration. Any remaining structures (culverts, etc.) will be put in good order as part of the reclamation effort.

Stipulation - 2-19-82-13MR (UMC 817.89)

The applicant must obtain a letter from appropriate landfill authorities showing approval to dispose of trash at the landfill.

- There is no requirement in this regulation for written permission from landfill authorities. As stated in the ACR Response, we contract with a licensed garbage hauler who must have dumping permission to be licensed. We have used this method for at least 5 years. Our garbage hauler is Carbon-Emery Disposal Company. We sign a brief contract at the beginning of each year which requires that they pick up on schedule or as needed and haul to an approved landfill.

Stipulation - 2-19-82-14MR (UMC 817.89)

Is the area where the oil and etc., stored in tanks covered by the application's SSCP plan?

- That is SPCC (Spill Prevention Control and Countermeasure) Plan, we presume? We do not yet have an SPCC Plan for a tank that does not yet exist. When it does, we will, of course, have an SPCC Plan for it.

Stipulation - 2-19-82-15MR (UMC 817.99)

Should a slide occur within the permit area, the applicant would be required to notify the Division and comply with any remedial measures required by the Division.

- We can commit to this stipulation.

Stipulation - 2-19-82-16MR (UMC 817.131)

The applicant must address Section 817.131 and comply with this regulation should temporary abandonment of the Crandall Canyon facility be initiated.

- We will comply with the requirements of this regulation in the event of a temporary abandonment.

Stipulation - 2-19-82-17MR (UMC 817.150-.176)

The applicant must submit a letter from the Utah Division of Transportation stating their approval of plans for the new intersection at Utah State Route 6 and the Crandall Canyon access road.

- We could not possible modify a State Road without UDOT approval. A copy of UDOT approval for the designs for our new intersection was hand delivered to L. Kunzler on 4/5/82.