

### Document Information Form

Mine Number: C/007/004

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A.

Date Sent: OCTOBER 20, 1982

Explanation:

INSPECTION MEMO TO COAL FILE.

cc:

File in:  
C/007, 004, Internal

Refer to:

- Confidential
- Shelf
- Expandable

Date \_\_\_\_\_ For additional information

October 20, 1982

Inspection Memo  
to Coal File

RE: Price River Coal Company  
Price River Complex  
ACT/007/004  
Carbon County, Utah

DATE: October 7, 8 and 13, 1982  
TIME: 1:40 p.m.-5:00 p.m.: 8:30 a.m.-4:15 p.m.:  
9:15 a.m.-5:15 p.m.  
WEATHER: Cool and clear  
COMPANY OFFICIALS: Rob Wiley and John Urbanik  
STATE OFFICIALS: David Lof and John Whitehead  
ENFORCEMENT ACTION: NOV 82-4-12-2 and NAOC 82-4-9-3

Compliance with Permanent Performance Standards

UMC 771 et al Permits

The operator had on file the following permit approvals:

1. A letter dated April 27, 1977 to Ken Hutchinson of the then Braztah Complex from the Division of Oil, Gas and Mining granted interim approval to operate.
2. A letter dated March 2, 1982 from the BLM indicated that Price River Coal Company was not required to obtain a right-of-way for the Crandall Canyon access road at the points where it crosses BLM land.
3. A letter from the Division dated June 30, 1981, referenced the BLM right-of-way approval for the power line to Crandall Canyon.
4. A letter from the U.S.G.S., dated April 27, 1977, gave approval for the 211 interim plan.
5. A letter from the Division dated April 19, 1982, gave final approval to proceed on the Crandall Canyon modification.
6. A letter dated June 7, 1982 from the Division, gave approval for the storage of topsoil and subsoil from Crandall Canyon at Gravel Canyon.

UMC 817.11 Signs and Markers

Complete mine identification signs were posted at the entrance to each portion of the Price River Coal Company complex.

Perimeter markers at the Sow Belly Canyon, Hardscrabble Canyon, and Castlegate Prep Plant facilities, consisted of blue flagging attached to vegetation at various points around the perimeter. Perimeter markers at Crandall Canyon consisted of wooden lathe with survey flagging. Markers at Willow Creek consisted of roofbolts.

File in:  
 Confidential  
 Shelf  
 Expandable  
Refer to Record No. 0015 Date 10-20-82  
In CI 007, 004, Internal  
For additional information

817.21 - .25 Topsoil

A diversion ditch had been installed on the eastern side of the topsoil/subsoil piles at the Gravel Canyon storage site. Mr. Wiley indicated that the eastern slope of the subsoil pile which presently has an approximate 1 to 1 slope would be regraded to a 3 to 1 slope.

Some activity was beginning at the leach field site in Crandall Canyon. The operator had begun to grub the site for rocks and vegetation. Removal and stockpiling of topsoil will be occurring in the very near future for the leach field site. Based on a phone call from Rob Wiley on October 21, 1982 a change in the topsoil stockpiling method has been proposed by PRCC. The proposal would stockpile topsoil along the sides of each trench excavated for the leach field. The topsoil would be replaced and seeded upon installation of the leach field lines.

817.41 - .52 Hydrologic Balance

Hardscrabble Canyon

The west side of the Dog Flat storage pad had old straw bales in place which were in need of maintenance and possible replacement.

The berm separating the undisturbed stream channel from the pad just south of the maintenance trailer had been breached allowing undisturbed drainage to exit the permit area into the undisturbed drainage channel. In addition, disturbed area drainage from the western half of the pad area associated with the number 4 mine, was entering the undisturbed drainage channel. NOV 82-4-12-2, 1 of 2, was issued and reads as follows:

Nature of Violation

Failure to pass all surface drainage from the disturbed area through a sedimentation pond, series of sedimentation ponds, or a treatment facility before leaving the permit area.

Provisions of the Regulation, Act or Permit Violated

UCA, 1953 40-10-18 (2)(i)  
UMC 817.41  
UMC 817.42 (a)(1)  
UMC 817.43 (c)  
UMC 817.45

Portion of the Operation to Which Notice Applies

- Hardscrabble Canyon:
1. Berm adjacent to the primary undisturbed stream channel just south of the maintenance office trailer.
  2. Western half of the pad area associated with the #4 mine.

Remedial Action Required

Maintain all surface drainage diversions such that all surface drainage from the disturbed area is passed through a sedimentation pond, series of ponds, or a treatment facility, prior to leaving the permit area.

Time for Abatement

No later than 8:00 a.m. November 8, 1982.

At the south end of the undisturbed drainage culvert under the road going to the #4 mine area, a substantial amount of material from the berm to the west had fallen into the channel. This partially obstructed flow through the culvert, as a result NAOC 82-4-9-3, 2 of 3, was issued as follows:

Nature of Concern

Maintenance of diversions in accordance with UMC 817.43 (c).

Pertinent Regulation or Permit condition.

UCA 40-10-18 (2)(i)  
UMC 817.43 (c)

Portion of Operation to Which Notice Applies

Hardscrabble Canyon: primary stream channel conveying undisturbed drainage at south end of the culvert under road, going to the #4 mine area.

Compliance Action Required

Ensure that the undisturbed stream channel is maintained in accordance with UMC 817.43 (c).

Time for Abatement

No later than 8:00 a.m., November 8, 1982

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On October 13, 1982 inspectors observed abatement action for NAOC 82-4-9-3, 2 of 3 had been undertaken. The undisturbed drainage had been cleared of debris and was operational again. Additionally the operator was undertaking work at the #4 mine to abate part 2 of NOV 82-4-12-2, 1 of 2.

A second area of concern was noted on the berm behind and west of the warehouse building adjacent to the primary undisturbed stream channel. Two areas of this berm were in need of maintenance to prevent the possibility of disturbed area drainage passing into the undisturbed channel. NAOC 82-4-9-3, 1 of 3 was issued as follows:

#### Nature of Concern

Passing all surface drainage from the disturbed area through a treatment facility before leaving the permit area, maintenance of diversions in accordance with 817.43 (c).

#### Pertinent Regulation of Permit Condition

40-10-18 (2) (i)  
UMC 817.42 (a) (1)  
UMC 817.43 (c)  
UMC 817.45

#### Portion of Operation to Which Notice Applies

Hardscrabble Canyon; berm west of the warehouse building adjacent to the primary undisturbed stream channel.

#### Compliance Action Required

Maintain berm such that all surface drainage from the disturbed area is contained on site and passed through a treatment facility.

#### Time for Abatement

No later than 8:00 a.m. November 8, 1982.

The disturbed area drainage from the powder magazine pad was in need of some maintenance to ensure treatment of the drainage prior to entering the undisturbed channel. The operator was advised that some method of treatment such as straw bales would be appropriate.

At the extreme southern end of the permit area, small stilling basins have been installed by the operator to treat runoff from the spring melt which occurred the previous year. The stilling basins were full of sediment at the time of the inspection, and were in need of either being cleaned out or done away with. The operator agreed that maintenance of these would be undertaken before the onset of the winter season.

#### Castle Gate Prep Plant

A berm on the east side of the road to the new stacking tube, which protects the Barn Canyon undisturbed drainage as it is conveyed into the Price River through a double culvert, appeared to have sustained some damage from recent heavy rain storms. Significant ponding on the mine site appeared to have occurred at a low point where the culverts cross under the road. The undisturbed drainage may have been impacted by disturbed area runoff. As a result, NAOC 82-4-9-3, 3 of 3, was issued and reads as follows:

#### Nature of Concern

Design, construction and maintenance of sediment control structures to ensure that structures are adequate to prevent additional contributions of suspended sediments to runoff outside the permit area.

#### Pertinent Regulation, Act or Permit Condition

UCA 1953, 40-10-18 (2)(i)(ii)  
UMC 817.41 (a)(d)  
UMC 817.42 (a)(1)  
UMC 817.43 (c)  
UMC 817.45

#### Portion of Operation to Which Notice Applies

1. Area west of the water treatment plant and north of the clean coal stockpile.
2. Sediment pond 012

#### Compliance Action Required

Submit plans addressing those areas which may be inadequately designed and constructed to ensure proper conveyance and treatment of disturbed area runoff. Implement the plans immediately upon Division approval

#### Time for Abatement

No later than October 27, 1982

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The berm separating the disturbed area from the railroad tracks, north of the railroad loadout and adjacent to the new conveyer belt which is being constructed from the new clean coal pile to the railroad loadout, was not well established. Mr. Wiley noted that this berm would be addressed in the next two to three weeks.

An access road leaving the disturbed area and entering the railroad right-of-way just north of the railroad loadout, posed a potential situation where disturbed area runoff could leave the site untreated. This area will need to be addressed by maintenance of a swale or some device to prevent disturbed area drainage from leaving the permit area untreated.

Directly north of the truck loadout dump, some erosion was occurring on the west facing downslope. The operator agreed to address this situation with rip rap.

Northeast of the truck loadout the berm separating the disturbed area from the undisturbed drainage coming out of the coal refuse pile, was in need of maintenance in one area. Mr. Wiley indicated that he would address the situation prior to the next monthly inspection.

#### Crandall Canyon

Construction activity was just beginning on the leach field site at Crandall Canyon. Some grubbing of the site had begun to remove rocks and vegetation prior to removal of topsoil. No undisturbed diversion on the hill slope above the site had been installed at the time of the inspection. This was pointed out to Mr. Wiley and he agreed that this would be addressed prior to further construction activities taking place in this area.

The water tank site at the upper end of the canyon had been constructed and was nearly to the proper grade. Mr. Wiley indicated that a well would be drilled adjacent to the site. He also indicated that an application had been filed with the Water Rights Division to exchange 35 shares of Scofield water rights which Price River Coal Company owns, for the new well.

A diversion ditch designed to convey the muck water from the #1 shaft to the lower sediment pond, was not properly maintained at the time of the inspection. Several areas were observed where muck water had spilled over into the undisturbed drainage channel. Additionally, a three inch plastic pipe was in place two feet below the top of the berm in a position which could drain the disturbed area runoff into the undisturbed drainage stream channel. Underground development waste from the #1 shaft was also spilling over the berm and into the undisturbed drainage channel. A berm establishing the undisturbed diversion ditch southeast of the #1 shaft hoist house had also been breached allowing a small portion of pad area to drain into the undisturbed diversion. NOV 82-4-12-2, 2 of 2, was issued and reads as follows:

Nature of the Violation

Failure to maintain diversions in accordance with UMC 817.43, such that:

1. Diversion ditches operate as intended and according to plans submitted and approved by the Division.
2. Contribution of suspended solids to stream flow and runoff outside the permit area is prevented.

Provisions of the Regulations, Act, or Permit Violation

UCA, 1953 40-10-18(i)(ii)  
UMC 771.19  
UMC 817.43 (c)(f)  
UMC 817.45

Portion of the Operation to Which Notice Applies

Crandall Canyon:

1. Diversion ditch north of the #1 shaft carrying muck water from the #1 shaft to the lower sediment pond.
2. Undisturbed diversion ditch southeast of the hoist house for the #1 shaft.

Remedial Action Required

Maintain surface drainage diversions such that:

1. Contributions of suspended solids to stream flow and runoff outside the permit area is prevented.
2. Diversion ditches operate as intended and according to plans submitted and approved by the Division.
3. Remove underground development waste from the south slope of the undisturbed stream channel just north of the #1 shaft exploration site.

Time for Abatement

No later than 8:00 a.m. November 15, 1982.

The disturbed drainage diversion ditch for the #1 shaft muck water from a point where it crosses the road to the new sediment pond near the #2 shaft had been established and was flowing properly into the new sediment pond. Mr. Wiley stated that the lower end of this diversion ditch had been lined with bentonite.

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A temporary method for conveyance of undisturbed drainage from the north face of the undisturbed area adjacent to the eastern most end of the mine site had been established. It consisted of a conveyer belt lined channel. Plans for a permanent method of addressing this drainage situation should be forthcoming from the operator with sufficient lead time to allow Division approval and incorporation into next springs construction activity.

The berm separating the disturbed site from the undisturbed drainage just south and slightly west of the #2 shaft site was in need of some maintenance to preserve separation of the undisturbed and disturbed areas. The operator agreed to address the situation prior to the onset of winter season.

#### Utah Fuels #1

The settling pond #010 had apparently received significant amounts of precipitation in the recent days preceeding the inspection. Coal material had flowed from the pond eastward but was contained by straw bales at the disturbed area perimeter boundary. Mr. Wiley indicated that he had submitted plans for an undisturbed diversion ditch on the west side of the Utah Fuels #1 perimeter site to limit the amount of drainage coming on site.

#### Sow Belly Canyon

The culvert conveying the undisturbed drainage from the magazine tributary under the main road, had been extended on the outlet side to address the erosion on the downslope as requested in the previous inspection.

The undisturbed drainage ditch near the powder magazines which had been filled with gravel had been cleaned out as requested in the previous inspection.

The inlet to pond 004 had been rip rapped with cinder block and had been adequately addressed as requested in the previous inspection.

The berm separating the undisturbed drainage from the disturbed site on the west side of the warehouse #5 had two places where disturbed area runoff might leave the permit area. Mr. Wiley agreed to address these two areas.

#### 817.52 Surface and Ground Water Monitoring

Price River Coal Company has three NPDES permits. The first one, UT 0023486, was issued September 29, 1977 and expired June 30, 1982. It allowed for discharge from the Castlegate facilities into the Price River. The second permit UT 0023141 issued October 11, 1977 also expired on June 30, 1982. This permit named the Price River as the receiving waters. A third permit, UT 0023272 issued April 30, 1979 expired June 30, 1982, allowed the new Pearlless mine works to discharge into the Price River.

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A letter from EPA dated May 27, 1982 allowed continuation of the three permits named above based on timely application by Price River Coal Company for a new permit. Based on an EPA letter dated August 17, 1982, it appeared that the new permit would be issued shortly. The new permit would combine all three of the previous permits into one permit.

Surface and ground water monitoring data was available from the operator only through February 15, 1982. The operator indicated that the contractor, Vaughn Hansen and Assoc. was extremely slow in returning the results of water monitoring data. Upon returning to the office inspectors were able to locate the current water data from the Price River Coal Company showing water monitoring results through the month of June 1982. Water monitoring data and results should be available to Division inspectors on site regardless of whether the information is submitted to the Division offices.

#### 817.89 Disposal of Non-coal Waste

At the Hardscrabble Canyon site on the road to the Dog Flat area, approximately eight fifty gallon barrels containing an unknown substance were residing outside the disturbed area berm directly on the bank of the undisturbed stream channel. Mr. Wiley was requested to remove the barrels and place them in an appropriate location for storage.

At Crandall Canyon the undisturbed drainage diversion ditch west of the #1 shaft exploration site, and also west of the electrical substation near the #1 shaft hoist house, which was the subject of NOV 82-4-9-1, had been cleaned in part by the operator. A large wooden spool that was partially obstructing the drainage to the diversion ditch had been removed. However, at the time of the inspection, new material had again been placed in the ditch. A quantity of plastic sheet-like material was residing in the ditch at the time of the inspection. Mr. Wiley removed the material during the inspection.

At the Willow Creek site approximately ten barrels, nine of which were empty, and one which contained an unknown material, were located on the undisturbed side of the diversion ditch separating the disturbed site from the undisturbed area adjacent to it. Mr. Wiley agreed to move these barrels and place them within the disturbed area.

#### 818.97 Protection of Fish, Wildlife and Related Environmental Values

A letter dated October 9, 1981 from the U.S. Fish and Wildlife Service indicated that a survey of the power poles in the Price River Coal Complex had been completed in August of 1981. None of the poles on the Price River Coal Complex were recommended for modification to achieve protection of raptors from electrocution.

817.111 -.117 Revegetation

Numerous areas within the Price River Coal Complex are slated for revegetation this fall. The following is a partial list of some of the areas slated for revegetation.

1. The topsoil pile at the intersection of the Crandall Canyon access road and State Highway 6.
2. Several areas along the Crandall Canyon access road corridor.
3. Topsoil and subsoil stockpiles in Gravel Canyon.
4. Other areas in Hardscrabble and Sowbelly Canyons may be seeded if time permits this fall.

817.150-.176 Roads

The Class II road leading from the upper pad development in Crandall Canyon up to the leach field was under construction to achieve drainage controls necessary pursuant to UMC 817.163. One cross culvert had been installed at the upper end of the road. Additional drainage control structures should be implemented prior to the close of construction this fall to assure compliance with UMC 817.163.

*John Whitehead*  
JOHN WHITEHEAD  
FIELD SPECIALIST

JJW/tck

cc: Tom Ehmett, OSM  
Rob Wiley, Price River Coal Company  
John Urbanik, Price River Coal Company  
Inspection Staff

Statistics:

Vehicle: EX #5424 - 564 miles  
Per diem: 2 persons X 2 days - 1.5 hours = \$121.56  
Grant: A & E