

Document Information Form

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To: DOGM

From:

Person N/A

Company N/A.

Date Sent: MAY 3, 1984

Explanation:

INSPECTION MEMO TO COAL FILE.

cc:

File in: C/007, 004, Internal

- Refer to:
- Confidential
- Shelf
- Expandable

Date _____ For additional information

May 3, 1984

Inspection Memo
to Coal file:

RE: Price River Coal Complex
Price River Coal Company
ACT/007/004, Folder #7
Carbon County, Utah

An OSM/DOGM joint inspection of the above mentioned complex was conducted on April 16, 1984. Tom Wright and Sandy Pruitt, Division of Oil, Gas and Mining (DOGM) accompanied Donna Griffin and Frank Atencio, Office of Surface Mining (OSM) in follow up to TDN #X84-2-81-3. Walt Swain, Dave Maxwell and Don Minges of the OSM Western Tech Center, were also on site to review on the ground compliance conditions in facilitating their review of the mine permit application. DOGM Technical staff was represented by Sue Linner and Tom Portle. Rob Wiley and Ken Hutchinson Price River Coal Company (PRCC) accompanied all of the above on a tour of Sowbelly Canyon, Hardscrabble Canyon, and the Castlegate facility.

Sowbelly Canyon

Donna Griffin and Frank Atencio took rough measurements of Sediment Ponds 003, 004 and 005 with a tape measure for their evaluation of the state response to TDN #1 (X84-2-81-3). The water level in Pond 003 was within one foot of the overflow pipe. There was no evidence of overflow into Pond 004. OSM discovered a breach in the middle of the east bank of Pond 005 which appeared to overflow onto the material storage area (small exemption area).

OSM also inspected the entire length of the undisturbed drainage diversions for berm breaches and obstructions. Two low spots in the berm, a section beside the diesel tanks and just above there by some spools, were detected and pointed out to Rob Wiley to be repaired. All runoff control measures were adequate, having been recently established. Except strawbales were improperly secured in the drainage ditches below the small exemption area at the guard shack. Price River Coal Company (PRCC) had placed dirt over the upstream face of the bales. This method probably contributes more sediment than it treats. PRCC should consider using gravel instead of dirt to secure the bales and provide additional treatment.

Although the strawbales mentioned above were subject to NOV #1 of 1, N84-2-5-1 and had been replaced as required, a stockpile of snow-residue, sediment and old strawbales was still located below the inlet to Pond 005. Additionally, PRCC had not yet demonstrated that the small area exemption was still warranted although effluent limitations were not met at the discharge point. Therefore the NOV could not be terminated as a result of this inspection. Due to PRCC's misunderstanding of the required abatement action (refer to letter dated April 20, 1984) the abatement deadline for this NOV was extended until May 14, 1984.

Hardscrabble Canyon

Donna and Frank took rough measurements of Pond 0 undisturbed drainage diversions were inspected. The the junction of the undisturbed area drainage diversi and north of the #4 Mine Yard was totally obstructed. Rob Wiley who later arranged for the obstruction to b afternoon so that no enforcement action was warranted.

File in:

- Confidential
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Refer to Record No 0010 Date 5-3-84
In C/ 007, 004, Internal
For additional information _____

May 3, 1984

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to Coal file:

RE: Price River Coal Complex
Price River Coal Company
ACT/007/004, Folder #7
Carbon County, Utah

An OSM/DOGM joint inspection of the above mentioned complex was conducted on April 16, 1984. Tom Wright and Sandy Pruitt, Division of Oil, Gas and Mining (DOGM) accompanied Donna Griffin and Frank Atencio, Office of Surface Mining (OSM) in follow up to TDN #X84-2-81-3. Walt Swain, Dave Maxwell and Don Minges of the OSM Western Tech Center, were also on site to review on the ground compliance conditions in facilitating their review of the mine permit application. DOGM Technical staff was represented by Sue Linner and Tom Portle. Rob Wiley and Ken Hutchinson Price River Coal Company (PRCC) accompanied all of the above on a tour of Sowbelly Canyon, Hardscrabble Canyon, and the Castlegate facility.

Sowbelly Canyon

Donna Griffin and Frank Atencio took rough measurements of Sediment Ponds 003, 004 and 005 with a tape measure for their evaluation of the state response to TDN #1 (X84-2-81-3). The water level in Pond 003 was within one foot of the overflow pipe. There was no evidence of overflow into Pond 004. OSM discovered a breach in the middle of the east bank of Pond 005 which appeared to overflow onto the material storage area (small exemption area).

OSM also inspected the entire length of the undisturbed drainage diversions for berm breaches and obstructions. Two low spots in the berm, a section beside the diesel tanks and just above there by some spools, were detected and pointed out to Rob Wiley to be repaired. All runoff control measures were adequate, having been recently established. Except strawbales were improperly secured in the drainage ditches below the small exemption area at the guard shack. Price River Coal Company (PRCC) had placed dirt over the upstream face of the bales. This method probably contributes more sediment than it treats. PRCC should consider using gravel instead of dirt to secure the bales and provide additional treatment.

Although the strawbales mentioned above were subject to NOV #1 of 1, N84-2-5-1 and had been replaced as required, a stockpile of snow-residue, sediment and old strawbales was still located below the inlet to Pond 005. Additionally, PRCC had not yet demonstrated that the small area exemption was still warranted although effluent limitations were not met at the discharge point. Therefore the NOV could not be terminated as a result of this inspection. Due to PRCC's misunderstanding of the required abatement action (refer to letter dated April 20, 1984) the abatement deadline for this NOV was extended until May 14, 1984.

Hardscrabble Canyon

Donna and Frank took rough measurements of Pond 006 also and the undisturbed drainage diversions were inspected. The cross culvert inlet at the junction of the undisturbed area drainage diversions south of Goose Island and north of the #4 Mine Yard was totally obstructed. This was pointed out to Rob Wiley who later arranged for the obstruction to be cleared by that afternoon so that no enforcement action was warranted.

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The unstable slope across the undisturbed drainage diversion along the south side of the #4 Mine loadout was pointed out to Walt Swain for his consideration in how it might affect final reclamation plans. The drainage out of the culvert across the slide area is not conveyed along the conveyor belt attached to the outlet as intended to minimize erosion. The undisturbed area drainage was ponding in the diversion directly below here and appeared to infiltrate due to improper grade. Just beyond this point in the diversion PRCC had placed 6 inch plus riprap in the ditch to stabilize erosion as required for the abatement of NOV #3 of 7, (N84-2-2-7). To complete the abatement of NOV #3, PRCC had removed all snow-residue and other obstructions from the entire undisturbed drainage diversion. NOV #3 of 7 was terminated effectively April 16, 1984.

To address an unquantified concern for diesel contamination of undisturbed drainage flowing along the section of the diversion located beside the diesel storage/maintenance shed, PRCC committed to construct a berm around the saturated zone at the base of the shed. Following this inspection, Rob Wiley reported that this berm had been constructed by April 17, 1984.

During the inspection Donna Griffin expressed some concern on the compliance of the coal processing waste embankment at Pond 008. Upon review of section UMC 817.91-.93, it appears to me that the embankment of Pond 008 is in compliance. UMC 817.92(b) requires that the diversions designed to divert drainage from the upstream area away from Pond 008 shall also be designed to carry the peak runoff from a 100 year-24 hour precipitation event. I was unable to locate any design standards for this section of the diversion ditch. UMC 817.49(e) requires that the embankments and diversion ditches be graded, fertilized, seeded and mulched to provide erosion control by revegetation. There is no erosion on this embankment at this time. The applicability of these sections and the compliance requirements should be looked into further.

Walt Swain accompanied DOGM and OSM inspectors in the examination of sediment control measures provided below the #3 Mine portal and parking lot in response to TDN #3 (X84-2-81-3). The strawbales and catch basins had been recently maintained in anticipation of this inspection. In maintenance it appeared that PRCC simply placed new bales on top, or in front of, the older strawbales buried in the sediment. The sediment in the ditch, along with the pile of dirt insulating the water tank, and the pile of dirt located by the entrance to the #3 Mine pad are all sources of additional sediment in excess of that determined in the designs. DOGM had reviewed the small area exemption variance earlier in response to TDN #3 and has required PRCC to submit plans for a sedimentation pond in place of the strawbales (Refer to letter to Rob Wiley, dated April 5, 1984).

Crandall Canyon

The OSM/DOGM technical staff visited the Crandall Canyon mine site for an on sight examination of the subsoil proposed by Walt Swain for use as a

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substitute material in final reclamation. Once on site, it became apparent that the soil buried by the shaft waste rock, used as fill around the #1 shaft area may not be retrievable. It is contended that by placing an impervious cover over the fill and then paving the warehouse pad, PRCC may provide adequate protection to the subsoil substitute material in place.

The warehouse pad had been regraded since the last inspection and repair of the section of the Hilfaker wall at the low spot at the west end of the pad had been completed. Another section of the Hilfaker wall just west of this point along the Propane storage pad is bulging out and needs to be repaired. Crandall Creek was flowing very muddy.

No work had been initiated to complete the embankment of Sediment Pond 015 except the discharge pipe had been disassembled. Rob Wiley has mentioned that the designs of the pond embankment indicate that it has been completed. These designs have not been provided to DOGM.

Castlegate Preparation Plant

This facility was only briefly inspected. In response to TDN #2 (X84-2-81-3), the Barn Canyon diversion was examined. Donna Griffin was not overly concerned with the improper gradient in the diversion channel as it formed a surge basin which had not caused any problems yet. DOGM has requested that PRCC place riprap along the outslope of the material storage pad to minimize erosion if the surge basin flooded over (refer to April 5, 1984 letter to Rob Wiley). Boulders scattered over the outslope of the pad already provide some riprap protection but more riprap cover over the slope was deemed necessary. PRCC is to submit plans indicating the size and placement of riprap on the outslope no later than May 14, 1984.

PRCC committed to install the berm around the thickner overflow basin to prevent runoff from entering the basin and to completely retain all plant discharges from the sediment control structures.

The disturbed area runoff diversions were all well maintained at the time of this inspection. PRCC submitted ditch designs for a two year reoccurring storm on March 27, 1984, (amended April 20, 1984), as required by NOV #2, of (N84-2-2-7). It therefore appears that NOV #2 is abated but a followup inspection will be conducted to insure on the ground compliance with these designs. DOGM has requested that PRCC size all disturbed area runoff diversions for a ten year, 24 hour storm. This new requirement is not applicable to NOV #2 of 7.

OSM examined the decant system in Sediment Pond 012B. Of concern is the design level of maximum sediment volume relative to the level of the decant pipe. PRCC has been requested to submit detailed designs of the sediment pond decant system (refer to the OSM letter to Rob Wiley dated April 26, 1984).

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Outstanding Violations

NOV #2 of 7 (N84-2-2-7), issued for inadequate disturbed area diversion ditch sizing at the Castlegate Preparation Plant, was abated effective March 27, 1984 but has not been terminated by DOGM yet pending a field inspection.

NOV #7 of 7 (N84-2-2-7), requiring completion of Sediment Pond 015, has a new abatement deadline of May 14, 1984. Rob Wiley has reported that another extension may be necessary due to weather and muddy conditions. May 29, 1984 is the 90th day and final deadline.

NOV #1 of 1 (N84-2-5-1) issued for the failure to meet effluent limitations in discharge from the small exemption area in Sowbelly Canyon has a new abatement deadline of May 14, 1984.

NOV #1 of 2 (N84-2-6-2) issued for inadequate detention time provided by a Sediment Pond 007, has been vacated because UMC 817.46 (c) is suspended.

NOV #2 of 2 (N84-2-6-2), requiring the installation of emergency spillways in Sediment Ponds 007 and 008, has an abatement deadline of May 14, 1984.

Sandy Pruitt 
Mining Field Specialist

DL:re

cc: Jodie Merriman, OSM
Walt Swain, OSM, Denver
Joe Helfrich, DOGM
Sue Linner, DOGM
Tom Wright, DOGM
Tom Portle, DOGM

Statistics:

Vehicle No.: EX45428, 268 miles
Per Diem: 0
Grant: A&E
86960