



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

May 2, 1995

Keith Zobell
Utah Fuel Company
P. O. Box 719
Helper, Utah 84526

Re: ASCA/Exempt Area Deficiencies, Coastal States Energy Corp., Skyline Mine,
ACT/007/005-94H, Folder #3, Carbon County, Utah

Dear Mr. Zobell:

The Division has completed a review of your December 6, 1994 plans for permit amendment that dealt with Alternate Sediment Control Areas and Small Area Exemptions. There was some delay in the review because we were waiting to finalize a Division Directive on this important subject and did not want to complete the review until that process was finished. The Directive was finalized on April 19, 1995, and we have now completed the review of your amendment.

For the most part your amendment is considered complete but there is some additional information that must be provided before the amendment can be accepted and approved. The enclosed Technical memo discusses the items that must be supplied. Please review it and provide the necessary input data by June 2, 1995.

If you have any questions please call me or Steven Johnson.

Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

enclosure

cc: P. Grubaugh-Littig
S. Johnson
ascalet.sky





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April 27, 1995

TO: Daron Haddock, Permit Supervisor

FROM: Steven M. Johnson, Reclamation Hydrologist 

RE: Draft Review, ASCA/Exempt areas, Skyline Mine, Utah Fuel Company, ACT/007/005-94H, Working File, Carbon County, Utah

SYNOPSIS

Utah Fuel submitted an amendment to the Skyline Mining and Reclamation Plan (MRP) in December 1994. The amendment proposed modifications to the sediment control plan for a few smaller areas. The Division held the amendment without review for a few months contingent on the final draft of Directive Tech-003A. The Division Director signed the directive on April 19, 1995. The amendment was then reviewed considering the policy clarified in that directive.

ANALYSIS

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: R645-301-730, 740, 750

Analysis:

Sediment control measures. 732. 742

Three pages in this amendment are dedicated to typical designs of silt fence and straw bale installation as sediment control. These designs are certified by a professional engineer. These drawings are intended for insertion to Volume 5, Section 20.

Utah Fuel modified Section 3.2.12, Areas Not Reporting to Sedimentation Ponds, Exempt Areas and Special Exempt areas. Alternate sediment control areas (ASCAs) are also included and modified in this section. The specific changes to this section are outlined below.

Area 1 is sized at 0.19 acres and is classified as an exempt area. A SedCad analysis



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has been run on the area to show that it qualifies as such. Vegetation has been reestablished on the area in a cover of grass, forbs, and trees. The SedCad analysis shows that there would be no runoff resulting from the 10-year, 24-hour storm event from 0.04 acres with a curve number of 64. There are no diagrams that show how the area was divided and no explanation about why 0.04 acres was used rather than the full 0.19 acres that the site includes. No explanation was given about how the curve number was derived.

Area 4, North Fork of Eccles Creek, is 1.0 acres in size and is classified as an alternate sediment control area. It is shown on Map No. 3.2.1-1. It has a sediment control measure of straw bales and/or silt fences.

Areas 5, 6 and 14 are paved areas of 0.18, 0.07 and 0.31 acres, respectively, which are classified as exempt areas.

Area 12 is an alternate sediment control area of 0.01 acres. It is shown on Map No. 3.2.3-3b.

Area 12a is the roadway to the well house and South Fork Area. It is mainly covered with large rock and is 0.03 acres in size. No definition is given to its status as exempt or ASCA.

Area 15 is just north of the truck dump, shown on Map No. 3.2.1-3. It is an ASCA, treated by straw bales and/or silt fence.

Area 17 is south of the RLO sediment pond. It is located on Map No. 3.2.1-3 and is 0.35 acres in size. It is an ASCA treated by pavement and straw bales. Area 17a is next to the RLO sediment pond, shown on Map No. 3.2.1-3. It is 0.15 acres and classified as an exempt area because it is the outslope of the sediment pond.

Area 18 is next to the RLO structure, shown on Map 3.2.1-3. The area is 0.1 acres and classified as an exempt area because it is entirely paved. Area 19 is also located adjacent to the RLO structure, and shown on Map 3.2.1-3. It is 0.1 acres in size and classified as an ASCA. The treatment for this area is gravel and straw bales and/or silt fence.

Areas 20, 21 and 22 are listed as exempt areas, entirely covered with pavement. Area 20 is also treated by straw bale. These areas can be considered as roads. Area 24 is the road to the Scofield Waste Rock site. It is classified as a road.

Area 24a is 0.1 acres next to the Scofield Waste Rock site road. It is classified as an exempt area. A SedCad model has been run and is included in Volume 5, Section 21 to demonstrate this area's suitability as an exempt area. Data included in the SedCad analysis includes a composite soil sample size distribution, an area of 0.05 acres, and a curve number 64.

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Under these parameters the SedCad returns a discharge of zero and therefore no sediment production. The analysis does not include justification for the curve number used or the area size one-half of the total area.

Area 31 and 32 are topsoil piles located in the South Fork of Eccles Creek. The respective land areas are not given in the text. SedCad demonstrations run on these areas are included in Volume 5, Section 21 to show the suitability as exempt areas. The SedCad analyses includes input data of soil particle size distribution, Areas of 0.01 and 0.005 (and/or 0.004) acre, respectively, and curve numbers of 80 for both sites. The analyses do not include justification for the curve number.

Findings:

The operator has submitted typical designs, which in concert with the mapping of alternate sediment control measures, fulfills the requirements of design sediment control measures in R645-301-742.

The operator has not submitted ample information to demonstrate that areas 1, 24a, 31 and 32 should be exempt from sediment control measures. The demonstration provided does not include data that is justified and the analysis is made by analyzing areas that are smaller than the total areas involved.

Areas 5, 6, 12a, 14 18, 20, 21, 22, and 24 satisfy the regulation as areas exempt from sediment control because they are small and/or they are road, out slopes of sediment ponds or entirely covered with pavement.

RECOMMENDATION

This amendment should not be approved because the demonstrations for small area exemptions from sediment control are not complete. Utah Fuel must supply justification for the land areas, curve numbers and other input data used in the demonstration model.

SKYSAE.SJ