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

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April 5, 2001

TO: Internal File

THRU: Jim D. Smith, Reclamation Specialist, Team Lead *JD's*

FROM: Stephen J. Demczak, Reclamation Specialist *SM for SJD*

RE: Abandoned Equipment, Canyon Fuel Company, LLC., Skyline Mine, C/007/005-AM01A

SUMMARY:

The proposed changes to Skyline Mine were received on March 6, 2001. The pan line will be removed from the coalface to gain access to the roof supports (shields). The permittee would like to abandon the longwall pan line underground. These pan lines would be left in crosscuts and entries in panel 8-left A longwall. Once longwall panel 8-left B is mined out, it would be almost impossible to gain access to this equipment.

These pan lines are constructed of only steel and contain no fluids or grease of any type; therefore, no combustible material will be left behind.

TECHINICAL ANALYSIS:

OPERATION PLAN

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining facilities maps

The permittee has requested to leave a complete set of longwall pan lines underground in crosscuts and entries that are located in the 8 left-A panel. The permittee has shown the location of the final abandonment of this equipment on a map titled Mine 3 Level 2 &3 ABANDONED

TECHNICAL MEMO

MINING EQUIPMENT LOCATIONS on drawing 2.3.6-2. This map is P.E. certified by Douglas E. Johnson with certification number 160554-2202 from the State of Utah.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

Analysis:

Disposal of noncoal waste

The longwall pan line is constructed of 100 percent steel material. It contains no greases, lubricants, flammable liquids, or other combustible materials. The majority of the pan line has never been painted. What portion of the pan line that was painted has been worn off due to years of underground service.

The final disposal is in crosscuts and entries in the 8 left-A longwall panel, which is within the permit area. There will be no combustible materials, or wind-borne waste associated with leaving mining equipment underground.

The pan line will not be left near or in refuse piles or impoundment structures, nor will the final disposal be located within eight feet of any coal outcrop or coal storage area.

Since, the pan line is constructed of steel there will be no hazardous waste being left underground. The RCRA regulation does not apply. However, the permittee has stated on page 2-50 "Periodically due to difficult recovery conditions or roof collapse, mining equipment is abandoned underground. Prior to leaving equipment underground, hazardous material and lubricating fluids are drained when possible". These sentences may not comply with 40 CFR Part 261 and should be withdrawn from this amendment.

Findings:

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-528.334, the permittee must remove the sentences on page 2-50 stating, "Periodically due to difficult recovery conditions or roof collapse, mining equipment is abandoned underground. Prior to leaving equipment underground, hazardous material and lubricating fluids are drained when possible".

RECOMMENDATION:

Prior to approval, the permittee must comply with the requirements of R645-301-528.334. The permittee must remove the two sentences on page 2-50 in the text from the amendment as outlined above.