

Document Information Form

Mine Number: C/007/006

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A

Date Sent: FEBRUARY 24, 1982.

Explanation:

INSPECTION MEMO TO COAL FILE.

cc:

File in: C/007,006, Internal

Refer to:

- Confidential
- Shelf
- Expandable

Date _____ For additional information

February 24, 1982

Inspection Memo
to Coal File:

RE: Plateau Mining Company
Starpoint Mine
ACT/007/006
Carbon County, Utah

DATE: February 17 & 18, 1982
TIME: 1:15 p.m. - 4:00 p.m & 7:30 a.m. - 3:00 p.m., respectively
WEATHER: Clear and Warm
COMPANY OFFICIAL: Mel Coonrod
STATE OFFICIAL: Sandy Pruitt
ENFORCEMENT ACTION: None

Compliance with Permanent Performance Standards

771 et al Permits

PMC was granted final Permanent Program approval on January 27, 1982, to mine in accordance with an OSM approval plus 11 stipulations dated January 21, 1982. PMC submitted a response to the stipulation on February 18, 1982. The reclamation surety bond is in effect but a written acceptance of procedures (as detailed in a letter dated February 8, 1982) for annual readjustment of the bond is still required for adequacy.

Responses to the refuse waste pile stipulations are adequate with the exception of those listed below:

Stipulation 9-22-2

Is being reviewed by DWR.

Stipulation 9-22-3

Deemed inadequate (refer to a letter from Tom Portle dated January 28, 1982).

Stipulation 9-22-4

Deemed inadequate (refer to letter from Lynn Kunzler dated December 8, 1981).

The condition to the variance for the slope of ponds #5 and 8 embankments which was included in the October 1, 1981, approval cannot be met. PMC is arranging for R & M Consultants to conduct a study for justification of a variance for ponds #1, 3 and 5 in response to a letter from Wayne Hedberg dated January 28, 1982.

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In C/ 007, 006, Internal _____
For additional information

Responses to the Seely Canyon Breakout stipulations are adequate with the exception of Stipulation #2 (deadline April 1, 1981 or 30 days prior to breakout) and Stipulation #3 (deadline 30 days from breakout).

An air quality approval order dated August 5, 1981, is conditioned by 11 stipulations. One of which states in part: "3. No visible emissions from any point source shall exceed 20 percent opacity as per Section 4.1.2, Utah Air Conservation Regulation (UACR)." PMC has interpreted this that smoke from open air burning is permitted if within this designation. I contacted Mr. Don Robertson of the Bureau of Air Quality for clarification of this point. He was not aware that trash was being burned in the open at the Plateau Complex. It is not permitted. An incinerator should be constructed for future burning.

NPDES permit #UT-0023736 is to be renewed in February 1982 (proposal publicized January 8, 1982). The proposed permit will allow a daily average of 25 ppm TSS, maximum TSS level of 70 ppm with the exception of a daily maximum of .5 ml/l settleable solids for overflow caused by a storm in excess of the 10-year, 24-hour event (or the equivalent snow melt). An area map dated January 30, 1981, included six ponds and a mine water discharge point (anticipated discharge of 200 gpm on an intermittent basis) to Mud Water Creek. PMC has not discharged from the mine in years. A new sump underground holds 35,000 gallons of water needed in mining. The discharge permit was obtained in case excess water was generated upon access to the graben area (as was encountered by U. S. Fuel).

817.11 Signs and Markers

A mine identification sign is posted at the permit area boundary as required. Perimeter markers are posted. Topsoil is marked. No buffer zone markers are required.

817.21-.25 Topsoil

Topsoil protection has been adequate for some time. There have been no new developments.

817.41-.45 Hydrologic Balance

Drainage control adequacy of the Lion Deck and Starpoint pads was difficult to discern due to snow cover. Snow is removed to the pad perimeters and berms. Drop drain #3 is closely encroached with snow removed from the pad. Due to snow cover, it was impossible to determine if the cement pad and berm constructed from the rock dust tank allowed for adequate protection of the undisturbed drainage from contaminated snow melt. Mr. Coonrod was made aware of this concern and requested to address any problems once apparent. Snow from the stacker pad has been disposed on the berm across the grandfathered road section and will contaminate the drainage below if not removed as requested. Snow removed from the railroad loading pad has been

disposed at the inlet to the major bypass culvert. Removal of this snow and reconstruction of the berm along this drainage is necessary for compliance by the next monthly inspection. PMC has recently obtained a snow blower which should alleviate the snow stockpiling problems. Efforts should be made to direct the snow blowers so that contaminated snow and material scraped off the pad is retained within the disturbed drainage area and will not impede revegetation efforts.

Another snow slide has covered the refuse bin. As most of the snow is relatively unaffected, removal to the adjacent downslope, taking care to segregate the affected snow on the bottom for disposal within the disturbed drainage area, will allow for full use of the bin. Trash is burned and scrap metal stored on either side of the bin now. Waste storage encroaches the containment berms and may be a problem in the future.

The bend in diversion ditch #12 needs to be lined with energy dissipators to minimize additional contributions of sediment from the unconsolidated material in the ditch that has sluffed off either side. Mr. Coonrod proposed a series of catchment dikes for mitigation. The area can be easily accessed along a branch of the old tram road but work cannot be initiated until the snow melts. Maintenance of diversion ditch #11 is feasible now as the area is accessible. Pad drainage should be retained from the undisturbed drainage with reconstruction of a berm and grade work. The ditch along the Class III road to the pad should be cleaned of sloughage from the highwall for direct conveyance to the drop drain. Stabilization of the eroded highwall is required for compliance with UMC 817.45 and feasible for the minimization of ditch maintenance.

In general, ditch maintenance is necessary for all of the lower area drainages.

817.52 Monitoring

Water monitoring data for the last quarter in 1981 was incomplete because of inaccessibility in all areas due to snow in November and December. The access road to the Mud Water Creek sample points 5-1 and 28-1 was washed out and PMC plans to request that the sites be removed from the monitoring program. The drainage may be affected by the Mud Water portal and mine water discharge (when necessary) in addition to several mine developments in the area. The last samples from Mud Water Creek contained high levels of iron.

	<u>Site 5-1</u>		<u>Site 28-1</u>	
	Iron (dissolved)	Iron (total)	Iron (dissolved)	Iron (total)
July 17, 1981	.05 ppm	.11 ppm	14.85 ppm	138.5 ppm
August 22, 1981	14.5 ppm	145.6 ppm	No Sample	

817.81-.93 Coal Processing Waste

PMC has informed DOGM that work on the refuse expansion was to start as of December 12, 1981. To date, only the diversion ditch has been staked.

817.89 Disposal of Noncoal Waste

Disposal of scrap metal and waste around the snow covered refuse bin should be controlled to prevent placement of waste on berms and outside of the disturbed drainage area. Conveyor belt temporarily placed around the stack tube should be disposed of properly.

An undetermined volume of used oil is being stored in a cement bin under the shop near the railroad loadout. Mr. Coonrod informed the inspector that a contractor hauls the used oil off-site in 50 gallon drums and that the bin is most likely used for temporary storage between hauls (the haulage frequency was unknown). This noncoal waste storage site is not designated in the mining and reclamation plan. The design of the storage bin should be provided to insure that leachate or surface runoff are not sources of pollution and fire is prevented for compliance with UMC 817.89(a).

817.97 Protection of Fish, Wildlife and Related Environmental Values

Several raptor surveys and power pole inspections were conducted by PMC, DWR and Fish & Wildlife in 1981. Twenty poles do not meet the REA design requirements. Pole modifications have been designed but PMC is awaiting on a policy decision by DOGM, as these poles may not be hazardous due to their proximity to the steep canyon walls.

Results of the study on deer migration across conveyors conducted by DWR for the Plateau and Eureka mines were published on November 30, 1981. The average clearance under PMC's conveyor is 26 inches. Sixty percent of the conveyor has a clearance greater than 23 inches. Although DWR concluded that the conveyor did not present a barrier, PMC excavated several deer crossings to a three foot clearance. DWR has requested that snow be kept clear from the conveyor area to insure the minimum clearance.

817.111-.117 Revegetation

No ponderosa pine were planted along the access road due to the operator's misunderstanding that PMC was required to address the criteria of UMC 817.112 for the use of introduced species. According to Lynn Kunzler, PMC was given approval to plant the ponderosa pine but was to address several requirements before they could use a seed mix that included introduced species (which was requested at the same time).

817.121-.126 Subsidence Control

Aerial surveys were conducted on June 22, 1981, and September 14, 1981. No new fractures were discovered. Subsidence occurs only in areas of the shallower old works. Results of the June 22, 1981, survey address several Forest Service concerns.

1. No evidence of erosion in the fractures.
2. No unstable areas resulting from subsidence.
3. No evidence of surface drainage impacts.
4. No surface structures within the subsidence areas.
5. No apparent damage to Forest Service roads.
6. No evidence of a change in recharge.
7. No adverse effect on hydrology.
8. A limited effect on vegetation is due to sloughage from the fractures and should regenerate quickly. Deer use transverse tension cracks for traversing the steep slopes. Burrowers use the fractures in rock outcrops. Due to the steepness of the area, land-use is limited.

817.150-.176 Roads

Ditch maintenance is necessary now. The Class II access road will need to be reconstructed as a result of excessive settling. Pond #2 will not be constructed until the repaired road is stable and the borrow area is no longer needed.


SANDY PRUITT
RECLAMATION OFFICER

cc: Tom Ehmett, OSM
Mel Coonrod, Plateau Mining Company
Inspection Staff

SP/btb

Statistics:

See Pinnacle Mine memo dated February 23, 1982
Grant: I & E