

August 13, 1984

TO: Inspection Memo to Coal File
FROM: David Lof, Mining Field Specialist ^{DL}
RE: June 26, 1984 Partial Inspection of Plateau Mining Company
ACT/007/006, Folder # 7, Carbon County, Utah

On June 26 and 27, 1984 a partial inspection was conducted at the above mentioned mine site. The inspection was conducted by Division Mining Field Specialist, David Lof. He was accompanied by Division Soil Scientist, Tom Portle. On June 26, 1984 they were accompanied by Bob Lauman of Plateau and on June 27, 1984 Mr. Lof was accompanied by Ben Grimes of Plateau.

June 26, 1984

Review of Waste Pile Expansion Area Topsoil/Subsoil Removal Plans

I asked Mr. Portle to accompany me on the inspection so that we could review in the field, the operator's removal of topsoil and subsoil from the waste pile expansion area. We reviewed documents regarding the topsoil in the waste pile expansion area, specifically soils classification and topsoil/subsoil removal depths specified for each soil classification. According to the operator's approved plan there were five soil classes delineated within the waste pile expansion area each having different removal depth requirements.

While reviewing the documentation I came across an October 18, 1982 letter from Empire Engineering and Land Survey of Price, Utah to Mr. Mel Coonrod, who was formally employed by Plateau as their Environmental Coordinator. The operator had hired Empire to survey the waste pile expansion area so that they could determine how much material was being moved by their contractor. According to the October 18, 1982 letter, Empire Engineering calculated that 168,300 cubic yards of topsoil/subsoil had been removed from the waste expansion area. Mr. Lauman and Mr. Grimes, they committed to sending Mr. Portle and I a copy of the cross sections surveyed by Empire. The surveyed cross sections should show us the depths to which topsoil and subsoil was removed in the different soil classification areas.

Inspection of Waste Pile Expansion Area Topsoil/Subsoil Removal

When we went to the waste pile expansion site, we compared the soil classification map to the onsite conditions.

- Soil Class PL1 - Most, if not all, of the material had been removed.
- Soil Class PL2 - This area is mostly undisturbed.
- Soil Class PL3 - No soil material had been salvaged.
- Soil Class PL4 - Most, if not all, of the material had been removed.
- Soil Class PL5 - Most of this area had been disturbed. Some of the topsoil had been removed. Very little subsoil had been removed except for an area bordering Soil Class PL3 and the refuse haul road.

Mr. Lauman did not know why the removal of soil material in PL5 had not been completed. He also indicated that the present subsoil stockpile site was filled to capacity. He said that they would prefer to leave the remaining topsoil/subsoil material in soil class areas PL2, PL3 and PL5 in place until Phase 1 of the refuse pile reclamation takes place. This would enable them to simply remove it and place it on the Phase 1 area of the refuse pile which is required to be reclaimed.

While inspecting the PL5 area we found that vegetation had volunteered in the area where only topsoil had been removed. Some erosion had taken place, this material was displaced to the bottom of the draw against the haul road. It did not appear that any topsoil had been lost at this point in time.

Mr. Lauman was asked to have a trench dug from the small undisturbed island in the PL5 area toward the PL3 area, so that a determination could be made whether or not anymore subsoil needed to be removed in that specific area. This trench was suppose to be dug by the time of my next inspection so that I could make a determination.

According to Mr. Lauman some material from the PL5 area had been used for borrow material. Mr. Portle and I looked at the area from which the material had been borrowed determined that they had used sub-subsoil material. Mr. Lauman indicated that they wanted to be able to use the sub-subsoil for borrow material and that they were running out of borrow material at the Sediment Pond #2 site.

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Mr. Portle and I informed Mr. Lauman that the PL2, PL3, and PL5 area above the refuse haul road should be cordoned off to prevent any additional disturbance of the area prior to topsoil/subsoil removal. Mr Lauman was also told to install strawbales along the toe of the slope on the east side of the PL5 area and to seed the PL5 area in-order to better establish vegetation and control erosion on the site.

Subsoil Stockpile

On June 22, 1984 the Division received a Ten Day Notice (TDN) N84-2-31-2-2. Part 2 of the TDN alleged that the operator had failed to protect the subsoil stockpile and that there were signs of cows having grazed on the revegetated subsoil stockpile in an area which is not actually managed nor designated for grazing or pasture land.

At the time of this inspection, there were no cattle on the mine site. We inspected the stockpile for evidence of damage to the subsoil and its associated vegetation. We found that there had been very little disturbance to the subsoil stockpile and that the amount of grazing which may have taken place was insignificant. It was apparent that the number of animals which had occupied the area was very limited, as was the amount of time which they were there, therefore, no damage was caused to the vegetation or the subsoil stockpile.

Mr. Lauman indicated that the reason the cattle were in the area was because the rancher was in the process of moving them from their spring range to their summer range on top of the mountain. The amount of time that the cattle were actually on the mine site was very limited. In any event the operator had completed nearly half of the fencing work needed to enclose the subsoil stockpile.

Considering the facts surrounding the subsoil stockpile area and grazing I did not feel that a Notice of Violation was warranted. A response to the TDN was sent to the Office of Surface Mining on June 29, 1984.

Refuse Pile and Revegetation Test Plots

We inspected the north side of the refuse pile, the plots on the west end were doing very well. The vegetative cover was good and there was a good plant species diversity i.e., Agropyron, Fescue, clover, Penstemon, vetch and Sitanion. As we walked east across the test plots the vegetation became progressively poorer. In the far east vegetation test plots we found that the plots were heavily vegetated with annuals particularly Bromus tectorum, and that there was very little species diversity.

Lion Deck

The operator had completed the concrete berm and associated diversion to the drop drain at the east end of the Lion Deck as shown in the as-built plans submitted to the Division on June 15, 1984.

The Lion Deck pad was properly graded along the edge of the fill to ensure adequate drainage.

NO. 1 Mine Road

The operator had riprapped the diversion along the Class II road to the No.1 Mine and they graded the road. The operator still needed to reinstall water bars along the road.

June 27, 1984

TDN N84-2-31-2-1

The first part of the afore mentioned TDN was issued for an alleged failure of the operator to resolve Special Stipulation #10 which was attached to the operators January 21, 1982 final approval, issued by the Office of Surface Mining.

Mr. Grimes told me that the information requested by the Division regarding Special Stipulation # 10 was being typed that day and that it would be mailed directly from their Steamboat Springs, Colorado office to the Division on the following day, June 28, 1984. In addition, Mr. Grimes stated that they were in the process of compiling the information at the time the TDN was received.

In reviewing the Special Stipulation, and the correspondence which went back and forth between the operator and the Division regarding the Special Stipulations, I came to the following conclusions:

1. The operator had responded in a timely manner to all other requests for information regarding the Special Stipulations where deadlines had been given.
2. There was no deadline established in the Divisions December 9, 1983 letter requesting the additional information.
3. There was no environmental harm occurring nor was there any about to occur.
4. The operator was in the process of gathering and submitting the information for the remaining two stipulations.

Based on these findings I did not feel that a Notice of Violation was warranted. These findings were presented to the Office of

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Surface Mining in the Divisions TDN response letter dated June 29, 1984.

No. 1 Mine Road

The operator had partially cleaned the sediment basin along the No. 1 Mine road. I asked Mr. Grimes to have the work completed prior to my next monthly inspection.

Undisturbed Diversion #14

Undisturbed Diversion #14 had been the subject of Notice of Violation N83-4-14-1, issued to the operator on October 17, 1983. The abatement plans for this NOV required that the operator line the undisturbed diversion with half-round culvert. The operator had recently completed the installation of the culvert.

While constructing the half-round culvert the operator at the same time widened the access road to Sediment Pond #6 which parallels Diversion #14. The amount of additional disturbance was minimal and the downslopes of the road will be reseeded this fall. It was necessary for the operator to widen the road so that they could have adequate access to Sediment Pond #6. In order to control erosion on the roadway the operator constructed water bars approximately every 30 feet along the roadway.

Preparation Plant Discharge

Mr. Grimes informed me that it looked as though they were not going to meet the July 10, 1984 abatement deadline for NOV N84-4-7-6, # 2 of 6. The NOV had been issued for failure to mine in accordance with an approved plan and required the operator to submit plans which would allow them to discharge from the preparation plant in a controlled manner. Mr. Grimes explained to me the work which had been completed to date on the plans and asked if he could meet with myself and Wayne Hedberg on July 10, 1984. I told him that that would be possible and that he should present us with all of the information they had regarding the plans which were being developed and an outline of their future course of action.

re

cc: Jodie Merriman
Ben Grimes
Joe Helfrich
Tom Portle

Statistics:

Vehicle: EX 70531, 333 miles
Per Diem 1 person X 1 day, 7.5 hours = \$56.33
Grant: A&E
94460-36-40