

### Document Information Form

Mine Number: C/007/006

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A

Date Sent: MAY 30, 1984

Explanation:

INSPECTION MEMO TO COAL FILE.

cc:

File in:  
C/ 007 , 006 , Internal

- Refer to:
- Confidential
  - Shelf
  - Expandable

Date \_\_\_\_\_ For additional information

May 30, 1984

Inspection Memo  
to Coal File:

RE: Plateau Mining Company  
Starpoint Mine  
ACT/007/006, Folder #7  
Carbon County, Utah

On April 24 and 25, 1984 a partial inspection was conducted at the above mentioned operation by Division Mine Field Specialists, David Lof, and Tom Wright. They were accompanied on the inspection by Ben Grimes of Plateau Mining Company.

While at the mine office, I asked Mr. Grimes if I could see his sediment pond inspection log. I found that there had been no inspections documented since March 20, 1984. Mr. Grimes said that he had conducted inspections but had failed to write them down in the logbook. I told Mr. Grimes that the logbook should be completed prior to the end of the inspection. On the following day I asked Mr. Grimes if I could see his inspection logbook once again. He had filled it out through April 20, 1984.

The primary and the emergency spillways for Sediment Pond #6 were intact and the sediment level appeared to be within the sediment storage capacity. Some leakage may be occurring from the discharge structures, the area below the discharge point was damp. Vegetation on the sediment pond embankment was quite sparse, however, there was very little erosion on the face of the embankment. I told Mr. Grimes that he should reseed the sediment pond embankment this fall at the same time they seed the area along Diversion Ditch #14.

The topsoil pile adjacent to Sediment Pond #6 was in good condition. A topsoil identification sign was in place on the stockpile.

Mr. Grimes informed me that they were going to start installing the half-round-culvert in Diversion Ditch #14 this week. We walked the entire length of Diversion Ditch #14 from Sediment Pond #6 to the point where Sediment Pond #5 discharges. As we progressed up the diversion I noted that there was an increasing amount of coal fine accumulation in the diversion. These depositions were not evident when I inspected the diversion on October 14, 1983. I also noticed that there had been some additional erosion in the undisturbed diversion channel.

The Sediment Pond #5 discharge pipe was dripping and it was evident that the pond had discharged. We hiked up to the top of the sediment pond embankment from the bottom of the canyon and found that the level of the water in the sediment pond was nearly to the top of the emergency spillway and that a very large sediment delta had formed at the inlet. The delta extended into the pond to a point approximately 100 feet from the emergency discharge structure and was approximately 10 feet high. This indicated that the sediment storage capacity and would not be exceeded.

File in:

- Confidential
- Shelf
- Expandable

Refer to Record No 0019 Date \_\_\_\_\_

In C/ 007, 006, Internal

For additional information

May 30, 1984

Inspection Memo  
to Coal File:

RE: Plateau Mining Company  
Starpoint Mine  
ACT/007/006, Folder #7  
Carbon County, Utah

On April 24 and 25, 1984 a partial inspection was conducted at the above mentioned operation by Division Mine Field Specialists, David Lof, and Tom Wright. They were accompanied on the inspection by Ben Grimes of Plateau Mining Company.

While at the mine office, I asked Mr. Grimes if I could see his sediment pond inspection log. I found that there had been no inspections documented since March 20, 1984. Mr. Grimes said that he had conducted inspections but had failed to write them down in the logbook. I told Mr. Grimes that the logbook should be completed prior to the end of the inspection. On the following day I asked Mr. Grimes if I could see his inspection logbook once again. He had filled it out through April 20, 1984.

The primary and the emergency spillways for Sediment Pond #6 were intact and the sediment level appeared to be within the sediment storage capacity. Some leakage may be occurring from the discharge structures, the area below the discharge point was damp. Vegetation on the sediment pond embankment was quite sparse, however, there was very little erosion on the face of the embankment. I told Mr. Grimes that he should reseed the sediment pond embankment this fall at the same time they seed the area along Diversion Ditch #14.

The topsoil pile adjacent to Sediment Pond #6 was in good condition. A topsoil identification sign was in place on the stockpile.

Mr. Grimes informed me that they were going to start installing the half-round-culvert in Diversion Ditch #14 this week. We walked the entire length of Diversion Ditch #14 from Sediment Pond #6 to the point where Sediment Pond #5 discharges. As we progressed up the diversion I noted that there was an increasing amount of coal fine accumulation in the diversion. These depositions were not evident when I inspected the diversion on October 14, 1983. I also noticed that there had been some additional erosion in the undisturbed diversion channel.

The Sediment Pond #5 discharge pipe was dripping and it was evident that the pond had discharged. We hiked up to the top of the sediment pond embankment from the bottom of the canyon and found that the level of the water in the sediment pond was nearly to the top of the emergency spillway and that a very large sediment delta had formed at the inlet to the pond. The delta extended into the pond to a point approximately 20 to 30 feet away from the emergency discharge structure and was approximately the same height as the emergency spillway. This indicated that the sediment pond was grossly passed its sediment storage capacity and would not be able to contain the 10 year, 24

INSPECTION MEMO TO COAL FILE  
ACT/007/006  
May 30, 1984  
Page 2

hour event.

Mr. Grimes said that the pond had been full for approximately two to three weeks and that there had been a continuous flow into the pond, the flow varying with temperature. He continued to say that the pond had been discharging from the emergency spillway on and off depending upon the amount of flow going into the pond. He said, that he had not decanted the pond because there had not been enough settling time due to the continuous inflow.

The following information regarding Sediment Pond # 5 was found in the operators sediment pond inspection report on April 25, 1984. On March 30, 1984 the water level was 1.5 feet below the primary spillway. On April 5, 1984 the water level was 1 foot below the primary spillway. On April 12, 1984, the water level was near the emergency spillway level. On April 20, 1984 the water was discharging from the emergency spillway.

At the time of the inspection there were two sources contributing runoff to the sediment pond. Disturbed area runoff from Diversion Ditch #7 was flowing into the pond at approximately 25 to 30 gallons per minute(gpm). A sample was taken of this inflow for analysis by State Health Laboratories. The water analysis indicated a TSS level of 5010 mg/l (Volatile TSS of 694 mg/l) and a TDS of 1748 mg/l. The other inflow was apparently from runoff coming across the coal refuse pile expansion area, where the old slurry pond had been located and was flowing at approximately 75 to 90 gpm. Water analysis indicated a TSS of 63,305 mg/l (Volatile TSS of 55,970 mg/l) and TDS of 858 mg/l. At the same time the samples were taken of the two inflows a grab sample was taken from the surface of Sediment Pond #5 near the emergency and primary spillways. The water analysis of the grab sample indicated a TSS of 165 mg/l (Volatile TSS of 142 mg/l) and a TDS of 1022 mg/l.

I asked Mr. Grimes if he knew where the runoff coming across the refuse pile expansion area was coming from and he told me that he did not know. At that time we drove back toward the lower mine office area where we found a 12 inch pipe discharging slurry water evidently from the preparation plant. Mr. Grimes said that he had not been aware of the pipe and the discharge from the preparation plant. We then spoke to Danny Price who is the Surface Superintendent, he said that it was backwash water from the preparation plant and estimated the discharge at approximately 2000 gallons every other day or so. From the time the sediment pond was first looked at that day until the discharge point was found, two to three hours had passed, at both times the discharge rate was approximately the same. Assuming a constant flow rate of 75 gpm for 2 hours that would mean at least 9000 gallons were discharged during that time period. Through further discussions with Mr. Price I found out that the operator has no means of monitoring how much water is discharged from the preparation plant. Following my discussions with Mr. Price, I told Mr. Grimes that there should not be anymore discharge from the preparation plant to Sediment Pond #5.

INSPECTION MEMO TO COAL FILE  
ACT/007/006  
May 30, 1984  
Page 3

On the following day I returned to the mine site at about 12:00 noon. I drove immediately to the discharge point and found that the operator was again discharging from the preparation plant at about the same rate as the day before. I then drove over to Sediment Pond #5 to check to see if it was discharging through the emergency spillway, it was not at that time. Shortly after my arrival at Sediment Pond # 5 Mr. Grimes met me at the sediment pond, he indicated that he had told Mr. Price that there was not suppose to be anymore discharge from the preparation plant.

We drove back to the lower mine office and talked with Mr. Price, he said, that he was not aware that they were still discharging from the plant and that we should talk to Ralph Mosman, who is a Surface Foreman. In speaking with Mr. Mosman, he said that there had been an overflow from the froth flotation cell and that a small amount of water had been discharged. I asked Mr. Mosman how much water they normally discharge from the preparation plant and he said that it varies a great deal depending upon the conditions of the coal and the specifications which the washed coal must meet according to their contracts.

Since the operator did not have approval to discharge from the preparation plant and the discharge had caused Sediment Pond #5 to come into noncompliance, Notice of Violation N84-4-7-6, # 2 of 6 was issued, it reads as follows:

Nature of the Violation

Failure to mine in accordance with an approved mine plan. Failure to conduct surface coal mining operations so as to prevent additional contributions of suspended solids to stream flow or runoff outside the permit area.

Provision of the Regulation, Act or Permit Violated

UCA 40-10-22(1)(c)  
UMC 771.19  
UCA 40-10-18 (2)(i)(ii)  
UMC 817.45

Portion of the Operation to which Notice Applies

Discharge from the preparation plant to Sediment Pond #5.

Remedial Action Required

- A. Stop discharging from the preparation plant until approved by the Division.
- B. Pump water out of Sediment Pond # 5 down to the level of the dewatering device spillway and dispose of the water into Sediment

Ponds #'s 4, 6 and 7. However, none of these ponds should be filled beyond the level of their respective dewatering device spillways.

- C. Submit to the Division complete and adequate plans detailing how the discharge of water from the preparation plant will be controlled so that it meets the requirements of the act and the regulations.
- D. Clean sediment out of Sediment Pond #5.

Time for Abatement

- A. Immediately
- B. April 27, 1984
- C. May 10, 1984
- D. May 10, 1984

The violation was issued to the operator on April 25, 1984. Following a discussion of the violation with the operator, I agreed that the operator could construct a small sump at the discharge point to contain any discharge from the preparation plant, so that the operator could continue to operate. It was further stipulated that the operator could not allow the sump to discharge, there had to be full containment of all discharge from the preparation plant, and that if it became evident that the sump may discharge they would have to shut down.

We walked the entire length of the disturbed area runoff diversion located on the south side of the refuse pile, from Sediment Pond # 5 to Sediment Trap #9, there were no apparent problems.

Sediment Trap # 9 was fairly clean.

Sediment Pond #7 was dry and there were no apparent problems with the structure.

The sediment level in Sediment Pond #4 appeared to be drawing close to 60% of the design sediment storage capacity. I told Mr. Grimes that this pond should probably be cleaned out this year.

I discussed with Mr. Grimes the possibility of installing another piezometer in the Sediment Pond #4 embankment on the north side of the manhole as close to the natural slope as possible. He said that they would try to install another piezometer. There was a small wet area in the side hill downstream from Sediment Pond #4 approximately 100 feet. There were no wet areas on the north side of the pond embankment like last year, however, the sediment pond level was also lower.

INSPECTION MEMO TO COAL FILE

May 30, 1984

ACT/007/006

Page 5

The operator still needs to finish the lining of the diversion from the sediment pond discharge point to the undisturbed stream channel below.

The operator has installed conveyor belting as a liner for the stream crossing for the Class III road to Sediment Pond #4. There was some question as to the adequacy of the stream crossing to handle anticipated flows for this drainage. I asked Mr. Grimes to submit plans within 30 days.

Diversion #16, on the north side of the refuse pile, was blocked where the trucks cross over to get to the area where they have been loading with coal from the refuse area coal stockpile. Mr. Grimes said that they had put in a small (approximately 8 inch) steel pipe at the crossing. The pipe had become blocked at both ends by coal falling from the trucks. Proper maintenance of this diversion had been discussed with Mr. Grimes during two previous inspections, January 30, 1984 and March 28, 1984 at which time I told Mr. Grimes that they may have to maintain the diversion on a daily basis to insure proper drainage. Because the diversion was not properly maintained at the time of this inspection and the operator received two prior warnings, Notice of Violation N84-4-7-6, # 1 of 6 was issued. It reads as follows:

Nature of the Violation

Failure to mine in accordance with an approved mine plan.

Provisions of the Regulations, Act or Permit Violated

UCA 40-10-22 (1)(c)  
UMC 771.19

Portion of the Operation to which Notice Applies

The diversion ditch on the north side of the refuse pile which drains into Sediment Trap #9.

Remedial Action Required

Maintain the diversion in accordance with the approved plan.

Time for Abatement

April 30, 1984.

The violation was given to the operator on April 25, 1984. On the afternoon of April 27, 1984 Mr. Grimes called, Division Field Supervisor, Joe Helfrich and informed him that the diversion ditch had been cleaned out and a culvert installed. He also said that plans regarding the sizing of the culvert would be forth coming.

The Class II road between Sediment Trap #5 and the #1 Mine portal pad, and

INSPECTION MEMO TO COAL FILE  
ACT/007/006  
May 30, 1984  
Page 6

the associated road side ditch, were in much the same condition that they were during my March 28, 1984 complete inspection. During that inspection I found excessive erosion on the road surface and some of the runoff bypassing the sediment trap and ponding in the hairpin curve near the sediment trap and then continuing down Diversion Ditch #7 to Sediment Pond #5. During the March inspection I discussed with Frank Smaila the need to regrade the Class II road, reestablish old water bars and install additional water bars. Because of the operator's failure to maintain the Class II road Notice of Violation N84-4-7-6, #4 of 6 was issued. It reads as follows:

Nature of the Violation

Failure to mine in accordance with an approved mine plan.  
Failure to construct and maintain Class II roads to minimize erosion.

Provisions of the Regulations, Act or Permit Violated.

UCA 40-10-22(1)(c)  
UMC 771.19  
UMC 817.45  
UMC 817.160(a)  
UMC 817.163  
UMC 817.165

Portion of the Operation to Which Notice Applies

Class II road between Sediment Trap #5 and the #1 Mine portal pad, and the associated road side ditch referred to as Diversion Ditch 6A on Plate 1A "Surface Water and Sedimentation Control Facilities Map".

Remedial Action Required

- A. Maintain the diversion ditch in accordance with the approved mine plan.
- B. Grade the road and maintain existing water bars.
- C. Submit drainage control plans for the road to the Division.

Time for Abatement

- A. May 3, 1984, 5:00 p.m.
- B. May 3, 1984, 5:00 p.m.
- C. May 10, 1984, Plans must be received by the Division.

The Notice was served the operator on April 25, 1984. On the afternoon of April 27, 1984 Mr. Grimes called Mr. Helfrich informing him that the diversion

INSPECTION MEMO TO COAL FILE  
ACT/007/006  
May 30, 1984  
Page 7

ditch had been cleaned, the existing water bars reestablished, and additional water bars installed.

We inspected the Class II road up to the old #2 Mine portals and found that the berm along the east side of the road had not been repaired since the last inspection. At the time of this inspection, there was runoff coming down the road which goes on top of Starpoint and the Castle Valley ridge, then ponding on the road and passing through a breach in the berm onto the downslope causing severe erosion. Therefore, Notice of Violation N84-4-7-6, # 5 of 6 was issued , it reads as follows:

Nature of the Violation

Failure to maintain sediment control measures to minimize erosion to the extent possible. Failure to construct and maintain Class II roads to minimize erosion.

Provisions, Regulations, Acts or Permits Violated.

UMC 817.45  
UMC 817.160(a)  
UMC 817.165 (b)

Portion of the Operation to which Notice Applies

The berm along the east side of the Class II road up to the old #2 Mine portals.

Remedial Action Required

Repair the berm and grade the road in order to prevent ponding of water on the road surface.

Time for Abatement

April 27, 1984.

The notice was served the operator on April 25, 1984 and on April 27, Mr.Grimes told Mr. Helfrich that the berm had been repaired and that the runoff had been properly diverted.

We continued on the Class II road from the #1 Mine portal pad to the noncoal waste trash bin area. Along the road there are two 14 inch downspouts which are suppose to drain the road surface. Water was ponding on the road surface in the area of both of these downspouts, with the water being as deep as 6 inches. The water was heavily sediment laden and some water was leaving the road surface via the downspouts at approximately 5 gpm or slightly less. Because the operator had failed to maintain the road surface to prevent ponding and minimize erosion Notice of Violation N84-4-7-6, #6 of 6 was

issued, it reads as follows:

Nature of the Violation

Failure to maintain Class II roads in such a manner as to prevent ponding of water on the road surface, minimize erosion and siltation, and not contribute additional suspended solids to stream flow or runoff outside the permit area.

Provision of the Regulations, Act or Permit Violated

UMC 817.160(a) and (b)  
UMC 817.162 (d)(10)  
UMC 817.163 (a)  
UMC 817.165

Portion of the Operation to which Notice Applies

Class II road between the #1 Mine portal pad and noncoal waste trash bin area, specifically the areas adjacent to the 14 inch downspouts.

Remedial Action Required

Maintain the road in such a manner as to prevent erosion of the road surface and ponding of water on the road.

Time for Abatement

May 10, 1984

The operator was served the Notice on April 25, 1984. On April 27, Mr. Grimes told Mr. Helfrich that snow drifts and frozen ground were making the grading work on the road almost impossible, but that they would continue to work on the road.

On September 19, 1983, the Division granted approval of the operators trash bin area plans which were submitted on July 13, 1983. Stipulation 7-22-83-2 (DWH) required that the operator provide an adequate sediment filtering system at the inlet to the existing downspout in order to comply with the requirements of UMC 817.45. At the time of the inspection I found that the straw filter which the operator had installed in front of the inlet was completely filled with sediment and that runoff was bypassing the filtering system at approximately 20 - 25 gpm. Furthermore, it was obvious that this runoff would not meet State and Federal effluent limitations. Results from the water sample analysis done by State Health Laboratories indicated a TSS of 13,490 ~~13,400~~ mg/l. Because the operator had failed to maintain the sediment control structure Notice of Violation N84-4-7-6, #3 of 6 was issued, it reads as follows:

Nature of the Violation

Failure to conduct surface coal mining operations so as to prevent

INSPECTION MEMO TO COAL FILE  
ACT/007/006  
May 30, 1984  
Page 9

additional contributions of suspended solids to stream flow outside the permit area. Failure to maintain sediment control measures in order to meet applicable State and Federal effluent limitations.

Provisions of the Regulations, Act or Permit Violated

UCA 40-10-18(2)(i)(ii)

UMC 817.45

Portion of the Operation to Which Notice Applies

Sediment controls for noncoal waste trash bin area.

Remedial Action Required.

Maintain sediment filtering system and inlet area of drop drain to insure compliance with UMC 817.45.

Time for Abatement

April 27, 1984, 5 p.m.

The violation was served on April 25, 1984, Mr. Grimes informed Mr. Helfrich on April 27, 1984 that the sediment had been cleaned away from the downspout and a new strawfilter had been installed.

David Lof   
Mining Field Specialist

DL:re

cc: Jodie Merriman, OSM  
Ben Grimes, Plateau  
Joe Helfrich, DOGM  
Tom Wright, DOGM

Statistics:

Vehicle: EX49711, 203 miles  
EX45421, 177 miles  
Per Diem: 1 person x 1 day, 14 hours = \$70.33  
Grant: A&E  
90710