009

United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

OFFICE OF THE REGIONAL DIRECTOR

JIM
SEP 0 9 1981

SEP 4 1981

Mr. James W. Smith, Jr.
Coordinator of Mined Land Development
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

Dear Jim:

Enclosed are the apparent completeness reviews (ACR) completed by OSM for six Utah mines: Soldier Creek, Sunnyside, Geneva, Gordon Creek No. 2, King No. 6, and Huntington Canyon #4. Pertinent comments from other concerned Federal agencies have also been provided when available. When additional comments from other agencies are received they will be reviewed and the important issues will be forwarded. Separate transmittals are provided for each ACR.

To facilitate the coordination of this review process, we would like to propose a joint meeting between the technical project officers of OSM and the Division of Oil, Gas and Mining (DOGM) following the State's review of these applications. The meeting could be held in Salt Lake City during mid-September if this would be convenient for your staff.

Please contact Carolyn Zarnekee at (303) 837-5656 if you have any questions or comments on these reviews, or on the proposed meeting with DOGM.

Sincerely,

DONALD A. CRANE

Attachments

0009

ACT/007/007 File & Copy w/ea Attachment

United States Department of the Interior

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Mr. James W. Smith, Jr.
Coordinator of Mined Land Development
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

DIVISION OF
OIL, GAS & MINING

Dear Jim:

Enclosed are the apparent completeness reviews (ACR) completed by OSM for six Utah mines: [redacted], [redacted], [redacted] [redacted] [redacted], and [redacted] Pertinent comments from other concerned Federal agencies have also been provided when available. When additional comments from other agencies are received they will be reviewed and the important issues will be forwarded. Separate transmittals are provided for each ACR.

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Please contact Carolyn Zarnekee at (303) 837-5656 if you have any questions or comments on these reviews, or on the proposed meeting with DOGM.

Sincerely,

DONALD A. CRANE

Attachments

File ACT/007/007 & Copy to Lee & Sally w/cover letter

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SEP 4 1981

JIM

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Mr. James W. Smith, Jr.
Coordinator of Mined Land Development
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

Dear Jim:

My staff has performed an apparent completeness review on Kaiser Steel Corporation's Sunnyside mining and reclamation plan. Based upon OSM's staff review (see attachment), I find the mining and reclamation plan to be incomplete and technically deficient.

The Bureau of Land Management has provided the following comments:

- Define the terms "cover", "frequency", "constancy", and "production" according to their use in the application.

- The identification of the sagebrush subspecies should be supported by explaining the methods used and noting the technical specialist involved. There is considerable confusion that such an identification exists.

- The seeding mixture does not need to include rabbitbrush since it would be introduced by natural means.

Comments from other concerned Federal agencies are not available at this time. However, they will be forwarded when received.

The information provided on hydrology, vegetation, and cultural resources lacks considerable detail. (Collection of the vegetation baseline data is being conducted during the 1981 growing season and will be evaluated upon submission.)

If you have questions or comments on this review, please contact Carolyn Zarnekee at (303) 837-5656.

Sincerely,

DONALD A. CRANE

Attachment

Kaiser Steel Corporation
Sunnyside Mine
Apparent Completeness Review

782.18 Personal Injury and Property Damage Insurance Information

Insurance policy expired 4/1/81. A copy is needed of the new one (p. 27).

783.15 Ground Water Information

The application does not provide information to explain the high arsenic and iron values of the water or explain the effect of these elements on the ground-water system. The applicant should address whether the high arsenic will be toxic, or whether the high iron could cause acid drainage.

Section 7.1.6 does not provide a schedule for implementing the proposed ground-water monitoring plan.

Plate VI-1 identifies 29 springs. The application does not discuss the effect of subsidence on these springs.

783.16 Surface Water Information

As a result of an on-site survey of this mine, a newly constructed sedimentation pond was discovered in Fan Canyon. It is the opinion of the OSM hydrologist, and the two Utah state inspectors who assisted on the tour, that this pond serves no purpose. It does not control surface runoff from disturbed surface areas. The pond has been built in the natural drainage way of the canyon and will be a hindrance to the natural drainage of the valley. According to the Utah inspectors, this sedimentation pond and a newly constructed treatment pond (near the main facility) were recently built without any approval from the State regulatory agency. These two ponds are not mentioned in the mine plan.

783.18 Climatological Information

See 11.3.5 Wind Chapter XI Climatology and Air Quality

The applicant should provide more accurate wind data. Data, such as that which would be presented in a wind rose prepared from on-site measurement, should be included with the plan to describe the average velocity and direction of site winds.

783.19 Vegetation Information

Baseline vegetation data cannot be evaluated since it is being collected in the 1981 growing season. The proposed reference areas should be in at least fair condition or steps taken (i.e., fencing) to improve reference areas to at least fair condition. The predicted vegetation communities for each disturbed area are difficult to discern on Plate III-1.

783.81 Soil Resources Information

- Sampling was done at only four sites. More sampling is needed.

- Throughout Chapter VIII the applicant states that "Topsoil will be handled and protected in accordance with requirements under UMC 817.21 to 817.25." More specific plans are needed as to how the topsoil will be handled, on a site-specific basis.

- Soil series descriptions appear to be Soil Conservation Service (SCS) profile descriptions from the soil survey and not site specific.

- Site-specific soil analysis is needed for future disturbance areas.

783.27 Prime Farmland Investigation

Applicant has asked for a negative determination, based on steep slopes and rocky surfaces and the lack of historical use as cropland. A letter from the SCS to confirm these determinations is needed (Sec. 8.4).

784.13 Reclamation Plan: General Requirements

- The specific timing of reclamation associated with the contemporaneous reclamation activities under 3.5.1 is unclear.

- It is stated that the upslopes of the ventilation shafts in Pole Canyon (3.5.1.(c)) are stable. What evidence supports this?

- Additional revegetation will be done in the spring of 1981 (3.5.1.(e)). Why is this necessary? Was the original a failure?

- Anticipated roads will be left to provide access (3.5.3.2(d)). No details have been provided concerning this action.

- Species are listed which may be used in revegetation (3.5.5.2). There is no committment as to the species which will be used and their seeding rates. Will all areas receive the same seed mix? Bonding calculations only consider 200 acres for grass seeds, 157 for tree and shrubs, 178.5 for mulch and fertilizer. It is unclear how these acreages relate to the proposed revegetation plan.

- The reclamation plan under Section 3.5 is not entirely consistent with that mentioned under 9.7. Confusion exists between different sources regarding soil and seedbed preparation (3.5.5.1, 9.7(b), 9.7(e)), irrigation (3.5.5.4, 9.7(f)), and mulching (3.5.5.3, 3.5.7.(d), 9.7(f)). There is insufficient detail on irrigation, if it is to be used, in regard to timing, rate, and water quality. Does the reclamation proposed under 3.5.1 and 3.5.3.2 follow these procedures?

- Reference areas have been proposed. It is unclear how each will be used as a standard of success. How will diversity be evaluated?

- Revegetated areas exist on the mine site. Data from these areas would greatly help in the determination of the feasibility of the proposed revegetation methods in meeting the proposed success standards.

784.13(b)(2) Detailed Bond Estimate

- Proposed bond for life of mine is $740,000 (400 acres of disturbance) and for permit term is $29,540 (p. 28). The bond is inadequate to reclaim the area, based on the following deficiencies:

- The application uses salvage value to cover the cost of facility removal. Salvage value cannot be allowed because the regulatory authority may not have first lien on properties (p. 3.5.7).

- The value of the equipment should be reassessed and the calculations provided. Computed labor rates are based on 1978 UMWA contract and should be based on 1981 costs.

- Final volumes are not provided.

- The costs to seal the portals are lacking.

784.13(b) Backfilling and Grading

Cross sections and interim and postmining contour maps are not provided in the application.

784.19 Underground Development Waste

1. The geotechnical report or stability study is not included in the permit application.

2. The application says that according to BLM Environmental Analysis Record (dated 11/23/75) and Sulfur form analysis, the waste was found to be non-toxic. This should be substantiated.

3. The application does not provide detailed plans about the coarse refuse disposal areas (D-2a and D-2b). The information should include geotechnical reports on waste material and foundation material properties, slope stability studies, and should demonstrate that a long-term static safety factor of 1.5 can be maintained.

784.24 Transportation Facilities

Drawings showing profiles and typical cross sections of all roads used in the permit must be submitted and must be certified by a Registered Professional Engineer (Ref. UMC 817.150 through UMC 817.181).

784.26 Air Pollution Control Plan

3.4.7 Protection of Air Quality
The application does not identify all potential emissions sources at the project. A quantitative estimate of the emissions from each source is lacking. Control measures planned for each source should be explained, and an estimate of their effectiveness should be provided. A total estimate of the amount of emissions from the mine can be determined from this information and included in the plan.

3.4.7.3 Air Quality Monitoring Plan
The application does not provide a Utah Department of Health waiver of air quality monitoring. Any emissions permits or emission permit applications must be included with the plan.

822.11 Alluvial Valley Floors

The applicant has made a negative determination for alluvial valley floors (AVF's) because the area of concern is upland and associated with an alluvial fan, and the mine has been in operation for 80 years without any recorded impact to agriculture. Historical documentation of this reocrd is required.

Socioeconomics

While the following is not required for inclusion in the mining and reclamation plan, the information listed would aid in preparing an environmental assessment in compliance with the National Environmental Policy Act.

1. Exact number of new employees associated with proposed mine plan, for construction and operation, by year, for the life of the mine.

2. Any information available concerning the place of residence of existing employees.

3. Any actual or planned company assistance provided to local communities for housing, parks, road construction, etc.

4. Any data the company can provide concerning tax revenues contributed to the local communities.

Cultural Resources

A single cultural resource report (Nielson et al., 1981) submitted as part of the mine plan application was reviewed and found to be deficient in the following areas.

1. The exact portions surveyed of the sections identified on page 5 should be identified, e.g., to the 1/4, 1/4, 1/4, 1/4 section.

2. The maps provided, although excellent, should have the townships annotated.

3. Pages 13 and 15 are the same. Clarify.

4. The photographs do not provide clear details of the area.

5. The historical review and survey of historic values of the lease area (p. 52) conducted by the Preservation Research Section of the Division of State History should be provided to OSM.

6. Is the Sunnyside Historic District a district (numerous sites) or one large site with many "components" (locations)? The report preparer may be confused about the definition of a District. The report portrays the District as a site. Is Sunnyside an official Historic District? If what is identified as a District is only a large site, then consideration should be given to a non-contiguous district with all historical resources included. Proper documentation must be provided for a district nomination or determination.

7. There is some confusion about the authors' use of the term "components." In this report "component" seems to mean "location." Clarify this terminology.