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**KAISER
STEEL**

KAISER STEEL CORPORATION
SUNNYSIDE COAL MINES
SUNNYSIDE, UTAH 84539
TELEPHONE 801-888-4421

June 23, 1981

File ACT/007/007
Copy to New file

RECEIVED
JUN 25 1981

Mr. Ron Daniels
Department of Natural Resources
Division of Oil, Gas & Mining
1588 W. North Temple
Salt Lake City, Utah 84116

DIVISION OF
OIL, GAS & MINING

Dear Ron:

Kaiser Steel Corporation would like to comment on Violation #81-1-3-5 received from the June 17, 1981 inspection of our mine site by Joe Helfrich.

#1. The top soil stockpile is "B" horizon, or less, soil and shows no evidence of either wind or water deterioration. The pile is being used continually even though intermittent. It measures approximately 190' long, 85' wide, and 24' high which is only enough material to cover 3 acres 2' deep. We therefore question if this relatively small "topsoil" pile warrants a violation. Regarding seeding, this procedure ought to be put off until late fall.

#2. This violation cites 2 supposed pond infractions, both being in the Icelander drainage system. One pond was constructed in the natural drainage channel at the confluence of lower Water and Fan Canyons to reduce any sediments that may run off from those two branches. This dam was removed and area dressed by 9:30 A.M. June 22, 1981 which displaced a flock of chukars and a family of morning doves using it as a water source. The second pond lies in the SE⁴ NW⁴ of Section 7, T15S, R14E, SLB& M titled the South Berm Outslope Pond with plans and calculations being sent to your office in February 1980. This pond location was chosen after consideration of the natural steep slopes. There evidently is a difficulty in that surface runoff must pass over disturbed ground, then undisturbed ground before getting to the sedimentation pond. Since the slopes are so steep there is no other reasonable solution. Steve McNeil, State Health Department, will be at the mine site June 24, 1981 to review all our sedimentation and settling ponds.

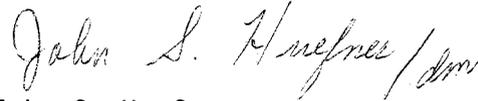
#3. All surface drainage from unreclaimed disturbed sites does presently pass through sediment control facilities and/or sediment ponds. There may be small areas of undisturbed soil being traversed before the pond(s) and perhaps this is the problem. We feel this violation is unjustified and appeal it.

#4. Plans and submittal information will be forthcoming on the Mine Water Discharge Pond. This pond was installed to try and improve the mine water effluent going into Grassy Trail Creek and in response to Dr. Winget's special study. We need a better definition and/or classification of "impoundment" because ponds, basins and reservoirs are treated differently.

#5. We appeal this violation on failure to maintain our Class III roads. Our roads are used infrequently being only once a day by a small pickup just to check and maintain the mine ventilation fans or vent portals, and therefore ought to be exempt from UMC 817.170b and 817.175a. The existing roads are not heavily rutted and we feel the sediment loading from the roads is minimal. We request that this violation be vacated.

Sincerely,

KAISER STEEL CORPORATION

A handwritten signature in cursive script that reads "John S. Huefner / dm".

John S. Huefner
Mine Engineer

JSH:dm

CC: Denise Dragoo
Joe Taylor

SED POND

DISTURBED

UNDIST.

DISTURBED



KSC

ACT/007/007

23 JUNE '81 / JSH

SO SLOPE OF SLURRY
& DISP. AREA.

NOV # 81-1-3-5

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