

December 10, 1982

Inspection Memo
to Coal File

#7

RE. Kaiser Steel Corporation
Sunnyside Complex
ACT/007/007
Carbon County, Utah

DATE: November 23-24, 1982
 TIME: 7:30 a.m. - 3:30 p.m.; 8:00 a.m. - 11:30 a.m.
 WEATHER: Clear and cold
 COMPANY OFFICIAL: John Heufner
 STATE OFFICIAL: Barton Kale
 FEDERAL OFFICIAL: Jodie Merriman
 ENFORCEMENT ACTION: NAOC 82-6-2-2

Compliance with Permanent Performance Standards771 et al Permits

A letter dated May 11, 1978, from Ron Daniels of the Division, grants tentative approval for the Sunyside mine.

A letter dated October 19, 1982 from the Division grants a variance for crossing Grassy Trail Creek during a 30 day construction period as long as stated pollution controls were in place.

A letter dated November 9, 1982 from State Water Rights grants approval to construct the Manshaft Mine water pond.

817.11 Signs and Markers

The mine entrance sign was visible with all pertinent information listed. Perimeter markers were in evidence around the main mine yard area.

817.21 Topsoil

The topsoil stockpile at the borrow area - along the coarse refuse haul road, now has a complete and adequate berm around it. Seeding will take place in spring to complete its protection against erosions. The berm was completed minutes before the inspectors arrived at the topsoil location.

There is some question as to the adequacy of the interim reclamation procedures taking place under the conveyer belt at Number Two Canyon. The operator claims to have had verbal approval to proceed. The site, a subject of NOV 82-4-3-3, 2 of 3 part A, issued in April of 1982, required the submittal of approved plans to the Division for clean up of the area. Plans were submitted June 1, 1982, but were determined unsatisfactory. New plans were never submitted. On site, stored soil material was placed on the sides of the Number Two Drainage, seeded, and graded-somewhat.

Inspection Memo
ACT/007/007
December 13, 1982
Page Two

Topsoil protection is questionable in this area. Further investigation and research into the situation will determine what enforcement action is warranted.

817.41-.52 Hydrologic Balance

The leak in the Whitmore Canyon mine water discharge pipe was being worked on at the time of the inspection. At this time it is unknown if the leak has been contained. The site will be reinspected next month.

During the inspection, the operator related plans to pipe mine water directly from the Manshaft area into Grassy Trail Creek. This area is a NPDES discharge permit (#001) and water quality monitoring shows no problems from this point but, according to State Health all changes in discharge procedures must be approved by them before implementation. At the time of the inspection plans had not been submitted and the operator was instructed to contact the appropriate state agencies to clarify his responsibilities.

817.45-.46 Hydrologic Balance - Sediment Control and Sediment Ponds

The new pipe carrying mine water discharge will breach the existing berm at the #1 fan area. It was agreed that this area will be reinforced with straw bales to guard against erosion.

Several areas at the Sunnyside Mine were in need of maintenance, as far as sediment controls are concerned. As a result NAOC 82-6-2-2, 1 of 2, was issued and reads as follows:

Nature of Concern:

Inadequate sediment control measures to prevent, to the extent possible, additional contributions of sediment to runoff outside the permit area.

Pertinent Regulation of Permit Condition

UMC 817.45

Portion of Operation to Which Notice Applies

1. Area along chain link fence and Grassy Trail Creek.
2. Berm along Number Two Canyon drainage and storage area.
3. Storage area northwest of the main storage area across bridge, bordering Number Two drainage.

Inspection Memo
ACT/007/007
December 13, 1982
Page Three

4. Storage area at portal area in North Fork of Water Canyon..
5. Crossing at Grassy Trail Creek, at the location of the variance.

Compliance Action Required

Implement maintenance to ensure appropriate sediment controls are designed and constructed to prevent, to the extent possible, additional contribution of sediment outside the permit area.

Deadline

December 17, 1982

In relation to the above mentioned areas, berm maintenance is the primary concern (#'s 1-4). The number five is in relation to the restriction on crossing Grassy Trail Creek as part of the normal operation except within the confines of the variance granted by the Division.

This has been a substantial amount of work done in the sediment pond area at the coarse refuse site. Erosion above the pond has been regraded, the pond has been cleaned out and outslopes stabilized to some degree. There is some question as to the adequacy of the existing pond in both its sizing and stability. As a result, NAOC 82-6-2-2, #2 of 2, was issued which reads as follows:

Nature of Concern:

Design, construction and maintenance of sediment control structures to ensure that structures are adequate to prevent additional contributions of suspended sediments to runoff outside the permit area.

Pertinent Regulations of Permit Condition

UCA 1953 40-10-15 (2)(i)(i)
UMC 817.41 (a)(d)
UMC 817.42 (a)(1)
UMC 817.43 (3)(c)
UMC 817.45

Portion of Operation to Which Notice Applies

Coarse refuse area and associated sediment pond.

Inspection Memo
ACT/007/007
December 13, 1982
Page Four

Compliance Action Required

Submit adequate plans addressing any areas which may be inadequately designed and constructed, to ensure proper conveyance and treatment of disturbed area runoff. Implement the plan upon approval by the Division.

Deadline

December 24, 1982

The operator was questioned about a seep originating below the coarse refuse pile in the drainage. The water is flowing at a rate (to the inspectors estimate) of 5-10 gallons per minute. A bright orange precipitate lined the drainage bottom which prompted a sample to be taken to determine if any toxic levels of pollutants exist and to see if a source can be determined.

The Fan Canyon area is not a currently accessed part of the operation. The site consists of various portals, most of which are blocked and an old vent fan. It was suggested to the operator that due to limited access and lack of recent signs of activity that this area could possibly classify for small area exemption.

817.100 Contemporaneous Reclamation

The Pole Canyon fan has been removed and the access blocked. Access has been restricted for some time and the area appears stable although no formal reclamation has taken place.

Slaughter Canyon is in the process of being reclaimed. The area of disturbance has been graded (all portals covered) and seeded as of last year. The first years growth has done quite well. The road will be reclaimed once the initial reclaimed area has been determined stable. The sediment pond at the base is a matter of concern, and is in need of maintenance due to heavy runoff in the fall. Further investigation will determine if enforcement action is warranted.

817.150-.175 Roads

A culvert at the hairpin bend, on the way to the Manshaft, is in need of cleaning.

Inspection Memo
ACT/007/007
December 13, 1982
Page Five

Additional work in Number Two Canyon has been done to channel water away from the culvert that has been a problem in the past (see Kaiser memo dated November 22, 1982). Water is being channeled away from erosion prone areas by strategically placed water bars.

BARTON KALE
FIELD SPECIALIST

BK/tck

cc: Tom Ehmett, OSM
John Huefner, Kaiser Steel Corporaton
Joe Helfrich, DOGM

Statistics:

See Coastal States Energy Co., Skyline Mine memo dated, December 1, 1982