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STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

June 1, 1982

Handwritten: A-1/007/007

#P 324 741 394
REGISTERED RETURN RECEIPT REQUESTED

Mr. Brett Harvey
Mining Superintendent
Kaiser Steel Corporation
Western Coal Operations
Sunnyside, Utah 84539

RE: Final Compliance Measures
Regarding Memo to Coal File
dated February 9, 1982

Dear Mr. Harvey:

In view of the many misunderstandings pursuant to the above-mentioned memo, the Division is allowing Kaiser Steel Corporation 30 days from date of receipt of this letter to address and/or come into compliance with the 10 areas described in the memo. The Division has spent approximately one year in trying to achieve compliance with the areas mentioned in the memo. Our staff feels that the amount of time spent in trying to resolve the problems with the Sunnyside operation has been an exceptional demonstration of flexibility within the confines of the regulations. To avoid any unnecessary enforcement actions, your cooperation in the matter is greatly appreciated. I have enclosed a copy of the February 9, 1982, memo for your convenience.

Sincerely,

Handwritten signature of Joseph C. Helfrich
JOSEPH C. HELFRICH
FIELD SUPERVISOR

Enclosure

cc: Wayne Hedberg, DOGM
Inspection Staff
Lynn Huntsman, Kaiser Steel
John Huefner, Kaiser Steel

JCH/btb

INT

February 9, 1982

Memo to Coal File:

RE: Kaiser Steel Corporation
ACT/007/007
Carbon County, Utah

The above mentioned operation was given a partial inspection on December 4, 1981, by Joe Helfrich and Wayne Hedberg from the Division. They were accompanied by John Huefner, Engineer for Kaiser Steel Corporation. The main purpose of the trip was to discuss hydrologic problems associated with the slurry ponds, coarse and fine refuse areas, and borrow areas. The following suggestions and recommendations were made:

1. Isolate and/or reclaim all areas located between the slurry ponds and tipple that are presently not being used for mining activities.
2. Remove and properly dispose of all slurry ditch material currently stockpiled along side the ditch.
3. Consolidate and/or remove all unnecessary waste piles (ie., coke-breeze, slurry, etc.) interspersed on the undisturbed areas and then reclaim those areas.
4. Eliminate and reclaim one of the two access roads currently traversing the undisturbed area. It may not be necessary to have two roads in effect to serve the same function when one may suffice.
5. Establish runoff control below the active slurry pond and old slurry pond area and from the downslopes along the west side of the slurry ponds. Runoff control should also be established for the disturbed area activities (ie., Sunnydale slurry stockpiles) located just northwest of the old slurry pond area and the newly proposed refuse haul road location.
6. Repair the sediment pond located adjacent to the railroad addit in the drainage bottom below the current refuse disposal site. This pond is currently ineffectual in that it is full of sediment and "short-circuiting". Design details and calculations for this pond should be submitted pursuant to UMC 817.46 if not included as part of Kaiser Steel's permanent program MRP permit application.

7. That portion of the access road located below the small railroad storage shed, which is utilized for occasional access to the USGS gaging station on Grassy Trail Creek should be reclaimed and vehicular access prohibited.
8. Concerning the status of the "Icelander" sediment pond located above the sanitary landfill. Assuming the pond is within Kaiser's permit area, the Division will require submittal of detailed design plans for said structure which show compliance with UMC 817.42 and 817.46, if the pond is to remain as requested by Kaiser Steel.

If the as-built structure will not comply with these performance standards, then a variance must be obtained from the Division. Prior to the issuance of a variance, the applicant must provide explicit supportive documentation to enable the Division ample justification to grant a variance to the mandated regulations.

At the time of the on-site inspection, the impoundment was not functioning effectively. The inflow into the pond was not effectively dropping its sediment load as the outlet exhibited evidence of sediment laden effluent and excessive erosion along the lower toe of the pond. This was directly effecting the detention time and allowing inflow to exit without adequate loss of sediment load.

One possible alternative to reconstruction or removal of the structure (if not in compliance), would be to propose an acceptable plan which would ensure that inflow equals outflow and that flow velocities through the impoundment would not be erosive thereby negating additional contributions of sediment to the downstream receiving waters.

9. Remove and reclaim the runoff ditch/berm which currently traverses the reclaimed undisturbed area (crested-wheat field). It is currently creating an erosional problem at its discharge end, due to excessive exit velocity. It did not appear, upon visual field inspection, that this structure was necessary to provide adequate runoff and erosion control in this area.
10. The Division strongly suggests that Kaiser Steel make a diligent effort to contemporaneously reclaim all those disturbed areas which are not explicitly necessary to promote efficient operation of Kaiser's mining activities. This would allow the company to effectively "carve-out" certain portions of their total surface disturbances and consequently have a direct effect on the computation and/or reduction of their reclamation bond (depending upon revegetation success).

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February 9, 1982
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NEW ACTIVITY

Kaiser Steel has proposed a new access road to the coarse refuse area located below the slurry ponds. The access road will run parallel to the existing slurry ponds along the north side of the disturbed area. Implementation of the road will alter drainage patterns in that area. Mr. Huefner should include the proposed road in his plans for isolating areas to be reclaimed and establishing drainage patterns associated with the areas along the north side of the slurry ponds between the tipple and the toe of the slurry ponds.


JOSEPH C. HELFRICH
FIELD SUPERVISOR

JCH/te

cc: Tom Emmett, OSM

Statistics:

Vehicle: EX66841

Miles: 302