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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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July 18, 1984

Airborne #454779500

Mr. Steve Manger
Office of Surface Mining
Western Technical Center
Brooks Towers
1020 Fifteenth Street
Denver, Colorado 80202

A4

Dear Mr. *Steve Manger*:

RE: Operation and Maintenance Plan Approval for Manshaft Area, Sunyside Mine, Kaiser Steel Corporation, ACT/007/007, Carbon County, Utah

In regards to your request during your telephone conversation with my staff on 7/13/84 to outline the specifics of Kaiser Steel's Operational and Maintenance plan approval, the following information is presented in support of this approval. After close review of UMC 788.12 Permit Revision, section (a)(1), the Division feels that the work to be completed at the Manshaft Area does not meet the requirements set forth in this subsection to qualify the work as a revision. The Division considers that this work qualifies as Operational and Maintenance work.

The three areas of concern are the Manshaft Sediment Pond, Grassy Trail Stream Crossing, and the Twin Shafts Mine Water Discharge Pond.

Manshaft Sediment Pond

The Manshaft area has had questionable sediment control since its beginning. During the era when another individual was environmental engineer with Kaiser Steel Corporation, the Division reviewed several inadequate submittals for sediment pond design. The previous engineer was replaced by Doug Pearce and plans were submitted to the Division by Doug Pearce through the mine permit process. John Whitehead, Division Hydrologist, reviewed these plans (for the sediment pond and the spillway device) on January 4, 1984, and approved these plans on January 9, 1984. The configuration of the existing sediment pond is the same as the proposed sediment pond, except for the installation of an adequate spillway device. Here, the operational need to install this spillway is clearly demonstrated due to the lack of any spillway device.

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Steam Crossing to Manshaft Sediment Pond

In order to obtain access to the Manshaft Sediment Pond, Grassy Trail Creek must be crossed. The following discussion regards this stream crossing:

The Manshaft Sediment Pond is located in an area which is accessible only by crossing Grassy Trail Creek. The applicant has a design for this stream crossing in the permanent program mining and reclamation plan which calls for four 4-foot diameter culverts; instead of using these four culverts, Doug Pearce submitted plans for using one 7.5 foot culvert, 31 feet long on July 5, 1984.

The calculations for the culvert crossing take into account the entire area below Grassy Trail Reservoir and a 25-year, 24-hour peak flow calculation of 22.5 cfs was given for this area. A maximum recorded peak flow out of Grassy Trail Reservoir was given as 100 cfs and this flow was then added to the 22.5 cfs to give a total peak flow of 122.5 cfs to pass the 7.5 foot culvert.

Both of these plans have been examined by Division Hydrologists and are deemed sufficient and adequate to address the regulations.

As a general note, a four foot culvert exists 300 yards upstream of this crossing point and it passed a major flood event in Grassy Trail Creek last year. The Department of Transportation also installed a seven foot culvert 2-1/2 miles downstream. Both of these culverts are smaller than the proposed one.

Minewater Discharge Pond

The next area to be considered is the Manshaft Mine Water Discharge Pond. It is being constructed in a previously disturbed area and therefore does not fall under the requirements of 788.12(a)(1)(iii). The following information outlines what has occurred to date regarding the Mine Water Discharge Pond:

Plans were reviewed by the Division on June 14, 1984 by Tom Munson, Hydrologist. The plans were complete except for some improvement recommendation on the outlet ditch leading to Grassy Trail Creek. This was due to the erosive nature of continuous mine water discharge. Kaiser Steel is committed to these improvements and is in the process of sending the Division a written confirmation (telephone conversation, Doug Pearce, July 11, 1984). The pond will be used to detain mine water for 24 hours to allow settling of suspended solids and retain any oil present before discharging into Grassy Trail Creek. Plans for the pond were submitted to the Division in the Sunnyside MRP and have gone through draft technical analysis without comment. This pond, as well as the stream crossing

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and Manshaft Sediment Pond, are within the bonded area and the permit area. Kaiser asserts, and the Division agrees that the following reasons warrant approval of construction of the mine water discharge pond:

1. The operator previously discharged mine water directly into the creek.
2. The installation will preclude the possibility of exceeding NPDES effluent limitations in Grassy Trail Creek this year.
3. The company has an operational need to bring a \$30,000 centrifugal pump on line at the manshaft.
4. Current mining sequence and pumping systems show a need to bring the Manshaft system on-line.
5. A favorable construction season is presently here.
6. A previously disturbed area will be used for construction.

The Division seeks your concurrence that the reasons for approval of the Twin Shaft Mine Water Discharge Pond, Grassy Trail Stream Crossing, and improvements to the Manshaft Sediment Pond are based on Operational and Maintenance needs existing at the Sunnyside Mine. Further, we seek your concurrence that these needs do not fall under the requirements of UMC 788.12(a)(1) and can therefore be approved.

Please respond to this request at your earliest possible convenience, but no later than July 27, 1984.

Best regards,



Dianne R. Nielson
Director

RWD/tm:grc
88600-7-9

cc: Allen Klein, OSM
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