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**KAISER
COAL**

KAISER COAL CORPORATION
Sunnyside Coal Mines
P.O. Box D
Sunnyside, Utah 84539
Telephone (801) 888-4421

June 11, 1985

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**DIVISION OF OIL
GAS & MINING**

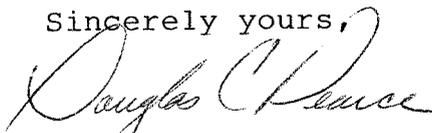
Mr. Lowell P. Braxton
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: Draft Technical Analysis Response
ACT/007/007, Sunnyside Mines
Carbon County, Utah

Dear Mr. Braxton:

Enclosed Please find fourteen (14) copies of the response to the May 21, 1985 draft technical analysis. As stated on the phone June 6, 1985, the response is late because of errors that were found in the permit boundary in two separate areas. Those errors have been changed on all maps and in the text.

Sincerely yours,



Douglas C Pearce
Mine Engineer

Response to Stipulations Document
Kaiser Coal Corporation
Sunnyside Mines
ACT/007/007, Carbon County Utah

Stipulation 782.13-(1)-JW

Response (1)

Chapter II has been updated and corrected to reflect the recent reorganization of Kaiser Steel Corporation.

Stipulation 817.11-(1)-SC

Response (1)

Section 3.3.5.1 has been revised to include descriptions of blasting signs and topsoil stockpile signs.

Stipulation 817.13-.15-(1)-RVS

Response (1)

Plate III-18 has been revised to show a lock box on the sample pipes for water and gas to deny public access.

Stipulation 817.41-(1)-JW

Response (1)

Section 3.5.4.2 has been revised to commit to providing the Division with Hydrologic information and designs to be used in the final reclamation phase.

Stipulation 817.41-(1,2,3)-RVS

Response (1)

The applicant has committed in Section 7.1.6 to provide the Division with specifics of the baseline underground water monitoring plan and a location map showing the 12 monitoring stations. The material will be found in Appendix VII-6 Hydrologic Monitoring Plan.

Response (2)

The applicant has committed in Section 7.1.6 to provide baseline water quantity and quality as requested.

Response (3)

The applicant has committed in Section 7.1.6 to provide ground-water and lithologic data from the drilling program by September 30, 1985. Baseline water quality information will be collected for 2 years for boreholes that encountered water.

Stipulation 817.42-(1,2)-JW

Response (1)

Kaiser Coal Corporation will make application to EPA to add the nine sediment ponds to its NPDES Sampling program. The applicant has committed to sampling the pond discharges, in Section 3.4.3.3, with the surface water operational schedule which includes total settleable solids.

Response (2)

The coarse refuse seep was included as an operational monitoring point (CRB) in Chapter III.

Stipulation 817.43-(1,2,3,4,5,6,7)-JW

Response (1)

Plates III-12 and III-11 have been revised to show the correct drainage area acreages for the upper hillside area and area I.

Response (2)

The SSSF C-3 culvert was changed to incorporate a 48-inch culvert.

Response (3)

The change in Section 3.4.3.2 from "full depth" to "full length".

Response (4)

Specific measures which define erosion in ditches and culvert outlets have been included in Section 3.4.3.3.

Response (5)

Plate III-36 show erosion measures for culvert inlet protection.

Response (6)

Plates III-1 and III-12 have been revised to show the Class I haul road and associated drainage controls. Revised calculations for the M-CV culvert have been submitted in the permit culvert summary.

Response (7)

Kaiser Coal has committed to provide the Division with specific designs, drawings and measures for railcut ditches D-6, D-7, D-8, D-9, D-10 and D-11 in Section 3.4.3.3

Stipulation 817.44-(1)-JW

Response (1)

Kaiser Coal has committed to provide the Division within 90 days of permit approval, revised design calculation for peak flow for all permanent culverts with drainage areas greater than one square mile. All culverts which cannot pass a 100-year, 24 hour precipitation event will be replaced at the end of mine life. The commitment is found in Section 3.4.3.2.

Stipulation 817.45-(1)-JW

Response (1) Plate III-33, Drawing A5-0105 has been revised to show a berm along the outside edge of the pad and a silt fence at the north end.

Stipulation 817.46 (1,2,3)-JW

Response (1)

Kaiser Coal Corporation has committed to submit within 90 days of permit approval accurate, as-built configurations for the Coarse Refuse Toe Pond, Hoist House Pond, Pasture Pond, Old CR Road Pond, Railcut Pond, Lower #2 Canyon Pond. Stability analysis will be performed on all ponds not meeting the required 1v:5h combined upstream and downstream side slopes of embankments. The investigation will include test results showing strength parameters, pore pressures and long-term seepage considerations. The commitment is found in Section 3.4.3.2.

Response (2)

Revised plans for the SSSF Pond have been provided. A commitment to construct within 90 days of permit approval is found in Section 3.4.3.2.

Stipulation 817.47-(1,2,3,4,5)-JW

Response (1)

Plate III-35 was revised to show increase roughness (energy dissipating devices) on the apron devices.

Response (2)

Culvert SSSF C-1 and the Coarse Refuse Toe sediment pond outlet velocity calculations have been corrected.

Response (3)

See UMC 817.43(4) response.

Response (4)

All undisturbed culverts having exit velocities in excess of 5 feet per second will be protected with approved measures. The "Culvert Size and Outlet Protection" summary lists all affected culverts.

Response (5)

All culvert outlet protection measures will be installed within 180 days of permit approval.

Stipulation 817.49-(1)-JW

Response (1)

Kaiser Coal Corporation will, within 120 days of permit approval, rebuild the embankments of the Twinshaft mine water pond with at least 2:1 side slopes on both inside and outside slopes.

Stipulation 817.50-(1)-RVS

Response (1)

Section 3.4.3.1 has been revised to address unplanned discharges from mine portals.

Stipulation 817.52-(1,2,3)-RVS and JW

Response (1)

Operational ground water monitoring plans are discussed in Section 7.1.6. There, Kaiser Coal Corporation commits to giving the division a plan for operational ground water monitoring within 30 days of permit approval.

Response (2)

Totalizing flow meters are presently installed on all mine water discharge lines. This is mentioned in Section 7.1.3.1 and other places in the permit application.

Response (3)

A commitment is made in Section 3.4.3.3 to monitor surface water flows which meets the Divisions requirements.

Stipulation 817.56-(1)-JW

Response (1)

A commitment to renovate the Whitmore Dam is found in Section 3.5.3.3.

Stipulation 817.61-.68-(1,2,)-RVS

Response (1)

Documentation that verifies compliance with MSHA explosive regulation does not exist. If Kaiser Coal Corporation was not in compliance, MSHA would cite Kaiser and prohibit further use of explosives until compliance was achieved.

Response (2)

Blasting will occur as needed in the surface operations. Section 3.3.5.4 has been revised to address the specific requirements of UMC 817.62, 817.65, 817.67 and 817.68.

Stipulation 817.71-.74-(1,1)-PGL

Response (1)

The percent of mine voids to be filled with underground development waste and excess spoil is discussed in Section 3.4.9.1 (d).

Stipulation 817.81-.85-(1,2,3)-PGL

Response (1)

Plate III-5 Refuse Area with stamp and signature of a registered professional engineer has been included for Division Review.

Response (2)

Section 3.4.9.1 has been changed to commit to inspections of the coarse refuse disposal by a qualified registered engineer.

Response (3)

Section 3.4.9.1 has been changed to show a commitment to providing information on 90% of maximum dry density for the coarse refuse material. In place information is found on the Rollins, Brown and Gunnell drill logs in Appendix III-5.

Stipulation 817.91-.93-(1,2,3)-PGL

Response (1)

Drawing III-37 East and West Slurry Cells has been submitted for Division review.

Response (2)

Section 3.4.9.1 has been changed to show a commitment not to use the West Slurry Cell as an impoundment until the coarse refuse pile level reaches the level of the west side dike.

Response (3)

Evaporation as shown by Table XI-5 is 3.4 times the maximum annual precipitation shown in Table XI-1. All water received over a ten year period would evaporate during that time. Section 3.4.9.1 has been changed to show this fact.

Stipulation 817.101-(1,2,3)-EH

Response (1)

Table III-3 has been revised to provide a specific explanation why each road or portion of road will remain after reclamation.

Response (2)

Kaiser Coal Corporation has committed to provide within 120 days of permit approval a geotechnical analysis of slope stability for the Twin shafts reclaimed area. The commitment is found in Section 3.5.4.2.

Response (3)

Plates III-20 through III-23 have been redrawn to more clearly depict highwalls. All highwalls shown will be regraded.

Stipulation 817.103-(1)-EH

Response (1)

Plate III-23 and soil availability figures for Borrow area I have been corrected.

Stipulation 817.121-.126-(1,2)-RVS

Response (1)

A commitment to provide a subsidence monitoring plan within 30 days of permit approval, for inclusion in the permit is found in Section 3.4.8. The plan will include the number of and installation schedule for subsidence monuments in Whitmore Canyon.

Response (2)

Plates III-38 Castle Gate Sandstone Cross-Section show the thickness of the Castle Gate Sandstone beneath and adjacent to Grassytrail Creek. Reference to this Plate is made in Section 3.4.8.

Stipulation 817.150-.156-(1)-PGL

Response (1)

The class one haul road plans are not as yet approved. Plans will be placed in Appendix III-11 within 30 days of permit approval. Section 3.2.10 shows this commitment.

Stipulation 817.160-.166-(1,2,3,4,5,6)-PGL

Response (1)

Table III-3 has been changed to indicate the length of roads which will be reclaimed.

Response (2)

Table III-3 has been changed to indicate the justification for retention of each road.

Response (3)

Plate III-1 has been changed to indicate if the roads are reclaimed, being reclaimed, or to be reclaimed.

Response (4)

Section 3.2.10 has been changed to show maintenance to performance standards.

Response (5)

Table III-2 and III-3 describe the Coarse Refuse Toe road. Plate III-1 shows the road location.

Response (6)

A right of way from the BLM for the Water Canyon Road was not found in company records. Application for right of way will be submitted within 60 days of permit approval. The road is also not within the permit area. All maps, legal descriptions and text will be changed to show the road within the permit

area. The Fan Canyon road also needs permit boundary changes and right-of-way applications. State, Federal and private lands are involved. Applications for right-of-ways will be submitted within 60 days of permit approval.

Stipulation 817.180-(1)-PGL

Response (1)

Section 3.2.10 has been changed to show a commitment to maintain and restore the transportation facilities area.

Stipulation 817.181-(1)-PGL

Response (1)

Section 3.2 has been changed to show a commitment to maintain and restore the support facilities.