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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

May 31, 1988

Mr. William Balaz
General Manager
Kaiser Coal Company
P. O. Box 10
Sunnyside, Utah 84539

Dear Mr. Balaz:

Re: Mid-Term Review Deficiency Comments, Kaiser Coal Company,
Sunnyside Mines, ACT/007/007, Folder 2, Carbon County, Utah

Attached are the Division's Deficiency Comments for the on-going Sunnyside Mid-Term Review. As indicated in the February 8, 1988 correspondence to Charles McGlothlin, the Division requests that Kaiser respond to the attached comments no later than July 1, 1988.

Thank you for your cooperation in this review. Please feel free to contact me or John Whitehead if you should have any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lowell P. Braxton".

Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

JJW/djh
Attachment(s)
cc: Tech. Review Team A
0800R/68



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May 27, 1988

TO: John Whitehead, Permit Supervisor
FROM: Brent Stettler, Reclamation Biologist *Brent*
RE: Mid-term Review, Kaiser Coal Corp., Sunnyside Mine,
ACT/007/007, Folder #2, Carbon County, Utah

UMC 817.103 Backfilling and Grading: Covering Coal and Acid-And
Toxic-Forming Materials -(BAS)

(a) (3) The coarse refuse test plot was set up to evaluate revegetation success under several soil depths, amendments and seeding regimes. Its objective was to demonstrate that the disposal area could be successfully reclaimed without a covering of four feet of borrow material--for which the operator is currently bonded. All treatments failed to revegetate successfully, with the possible exception of the 48-inch covering of borrow material. Results were, however, not conclusive. The test plot design may have biased results. Other factors including lack of precipitation, soil amendments, and site drainage may have hampered success across all treatment. A significant savings in reclamation costs could be realized by the operator through continued research and demonstration of successful reclamation with less than four feet of soil depth.

The Whitmore Canyon test plot demonstrated the potential of slurry and Mancos shale as plant growth mediums. However, the cooler, wetter climate in Whitmore Canyon may not be representative of conditions occurring at or below the mine. If slurry or Mancos shale are intended for use as topsoil substitutes, the operator may benefit by repeating the Whitmore Canyon test plot at the mouth of the canyon.

BS/as
1369R/36



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May 24, 1988

TO: John Whitehead, Permit Supervisor
FROM: Richard V. Smith, Geologist *RVS*
RE: Mid-Term Review, Sunnyside Mines, Kaiser Coal Corporation,
ACT/007/007, Folder #2, Carbon County, Utah

UMC 771.23 Permit Applications - General Requirements for Format and Contents - RVS

(a) In order to avoid confusion and prevent potential enforcement action(s), the Division hereby designates all materials (text and maps) related to the approved Permit Revision Application for the B Canyon area as forming Book 9, Chapter 16 of the approved PAP. The Division requests the operator provide nine copies of a revised Table of Contents that reflect this change for insertion into Books 1 through 9.

UMC 784.20 Subsidence Control Plan - (RVS)

The operator must submit an updated Plate III-3 showing the locations of subsidence monitoring stations that have been installed since permit approval and locations of the remaining proposed subsidence monitoring stations (i.e. Whitmore Canyon, Bear Canyon, Left Fork A Canyon, B Canyon). The operator is reminded that prior to initiating longwall mining in the B Canyon area or further development of the 21st and 22nd Left Panels in the No. 1 Mine, subsidence monitoring stations must be installed and baseline control measurements (elevations) must be completed.

UMC 817.41 Hydrologic Balance: General Requirements - RVS

The revised Mine Sequence Map, dated March 30, 1988 and submitted as part of the Annual Report for 1987, indicates entry development occurred in Section 13 of the B Canyon area during the past year. Accordingly, the operator must initiate drilling of the proposed underground borehole monitoring station in the B Canyon return air entry and proceed with water monitoring as described in the approved B Canyon Permit Revision (see p. 33R). Plate III-3 will require revision to locate the additional underground water monitoring station upon completion of the proposed borehole.

RVS/as
9206R/36



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May 12, 1988

TO: John Whitehead, Permit Supervisor
FROM: Jim Fricke, Reclamation Hydrologist *JF*
RE: Mid-Term Review Sunnyside Mine, Kaiser Coal Corporation,
Sunnyside Mine, ACT/007/007, Folder #2, Carbon County, Utah
UMC 817.42 Hydrologic Balance: Water Quality Standards and
Effluent Limitations-(JRF)

The approved MRP notes seven areas (Plate III-33) that qualify for small area exemption status. During the mid-term review site visit, the Division has identified three additional areas that need to be addressed. Furthermore, the existing seven areas will require maintenance to meet the requirements of UMC 817.42.

Required Maintenance

1. Twin Shafts Area

The silt fence structure should be extended to adequately treat the disturbed area runoff.

2. Number 2 Canyon Fan

Modify Plate III-33(2) to reflect the field conditions. The silt fence and berm should be changed to the straw bale and berm combination.

3. Water Canyon Portals

Presently undisturbed area runoff enters a portal on the north side of Water Canyon. Corrective action must be taken to prevent undisturbed runoff from entering the portal.

A concrete bridge connects the portals on the north and south side of Water Canyon. Sediment deposition under the bridge has reduced freeboard by 95 percent. The operator must demonstrate that the bridge will pass the 10-year, 24-hour runoff event.

The silt fence structures should be keyed into the berms at least 1.5 feet.

A section of road berm needs to be installed, and several washouts on the refuse pile will require preventive maintenance.

4. Pole Canyon

Plate III-33(4) denotes a berm and silt fence combination for alternative sediment controls. The silt fence structure should be installed and the berm repaired.

5. Whitmore Fan

A section of the berm (near the fan) requires maintenance and Plate III-33(5) should be modified to reflect the ditch section. Alternative sediment control must be provided at the vegetated area northeast of the fan pad.

6. Number 2 Mine Fan

Undisturbed area runoff has recently eroded the substation pad. The operator has initiated remedial action; the Division requires alternative sediment control downgradient of the gullies. Plate III-33(6) should be modified to reflect the final field disposition for this area.

7. Number 1 Mine Outcrop Fan

The rock gabion should be reconstructed to meet the dimensions shown on Plate III-33(7). The silt fence should be installed.

8. Borrow Areas

The two borrow areas east of the East Slurry Cell must be addressed for adequate sediment control. Presently, one silt fence structure provides sediment control for the two areas and undisturbed runoff. The Division recommends construction of a sediment pond at the silt fence location or diversion of the undisturbed runoff and an additional silt fence structure located between the two borrow areas.

9. Substation in Whitmore Canyon

The substation located east of the East Carbon Water Treatment Facility should be included in the small area exemption discussion. A map delineating extent and sediment control must be submitted.

Page 3
Memo to J. Whitehead
ACT/007/007
May 12, 1988

The MRP should be modified to include the additional small area exemptions; appropriate text and map modifications are required.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds-(JRF)

The abandoned Coarse Refuse Toe Pond should be reclaimed. The discharge structure should be removed, the pond and ditch backfilled, and slopes revegetated. Sediment control must be provided during and after reclamation. The reclaimed pond should be included in the mine plan small area exemption discussion.

djh
0798R/43-45



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May 16, 1988

TO: John Whitehead, Permit Supervisor

FROM: Pamela Grubaugh-Littig, Reclamation Engineer *pd*

RE: Mid-Term Review and Site Visit Report, Kaiser Coal Corporation, Sunnyside Mine, ACT/007/007, Folder #2, Carbon County, Utah

The mid-term review site visit was conducted on May 11, 1988, at the Sunnyside Mine. John Whitehead, Jim Fricke and Pamela Grubaugh-Littig represented DOGM, and Barry Crosley represented Kaiser Coal Corporation.

The surface facilities map was checked versus on-the-ground activity. The recently built coarse refuse toe sediment pond needs to be correctly portrayed on the surface facilities map.

The soil borrow area for reclamation (Area 7) was noted. The TA stated that this soil borrow will be used to reclaim the coarse refuse, slurry ponds, and coal seams in the portal areas. This soil area, however, is proposed for transfer to Sunnyside Fuel Corporation. Kaiser will need to find a new soil borrow area (or document there is enough soil borrow in the permit area) when this soil is transferred to Sunnyside Fuel Corporation.

MID-TERM REVIEW

UMC 783.24 Maps: General Requirements-(PGL)

(a) Due to the sale of part of the Kaiser Sunnyside approved permit area to Sunnyside Fuel Corporation and contingent upon transfer of that area to Sunnyside Fuel Corporation, Kaiser must update the surface ownership maps to reflect the owners of record contiguous to the permit area.

UMC 784.13 Reclamation Plan: General Requirements-(PGL)

(b)(2) The detailed cost estimate should include the costs of culvert removal.

John Whitehead
ACT/007/007
9075R/53-54

(b)(3) The topsoil plan should be revised for adequacy of amounts of topsoil if the "soil borrow area" (638,650 cy) is transferred to Sunnyside Fuel Corporation.

UMC 784.23 Operation Plan: Maps and Plans-(PGL)

The surface facilities map must be updated to reflect the site as it currently exists. The symbols to indicate the facilities on the surface facilities map must be accurate.

The narrative on page 3-81, section 3.3.1, should be corrected. The sentence "Kaiser Coal Corporation originally leased the No. 2 Mine from Utah Fuel Company in 1942" seems incorrect. Kaiser Coal Corporation was not in existence then; it should read Kaiser Steel. Please revise.

djh
9075/53-54