

0009



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

INSPECTION REPORT

Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

Partial: Complete: X Exploration:
Inspection Date & Time: 9/15/93: 1:30 pm to 6:00 pm
9/16/93: 8:00 am to 5:00 pm, 9/17/93: 7:30 am to 3:30
Date of Last Inspection: August 23, 1993

Mine Name: Sunnyside Coal Mine County: Carbon Permit Number: ACT/007/007
Permittee and/or Operator's Name: Sunnyside Coal Company (SCC)
Business Address: PO Box 99, Sunnyside, Utah 84539
Type of Mining Activity: Underground X Surface Prep. Plant Other
State Officials(s): Henry Sauer Company Official(s): Gary Gray, Chuck Rempes, Peter Hess
Federal Official(s): None Weather Conditions: Clear and cold,
Existing Acreage: Permitted-14475 Disturbed-310 Regraded-0 Seeded-0 Bonded-310
Increased/Decreased: Permitted- Disturbed- Regraded- Seeded- Bonded-
Status: Exploration/ X Active/ Inactive/ Temporary Cessation/ Bond Forfeiture
Reclamation (Phase I/ Phase II/ Final Bond Release/ Liability Year)

REVIEW OF PERMIT, PERFORMANCE STANDARDS & PERMIT CONDITION REQUIREMENTS

Instructions

- Substantiate the elements on this inspection by checking the appropriate performance standard.
 - For complete inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check N/A.
 - For partial inspections check only the elements evaluated.
- Document any noncompliance situation by referencing the NOV issued at the appropriate performance standard listed below.
- Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
- Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

	EVALUATED	N/A	COMMENTS	NOV/ENF
1. PERMITS, CHANGE, TRANSFER, RENEWAL, SALE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. SIGNS AND MARKERS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. TOPSOIL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. HYDROLOGIC BALANCE:				
a. DIVERSIONS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. SEDIMENT PONDS AND IMPOUNDMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. OTHER SEDIMENT CONTROL MEASURES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. WATER MONITORING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. EFFLUENT LIMITATIONS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. EXPLOSIVES	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. DISPOSAL OF EXCESS SPOIL/FILLS/BENCHES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. COAL MINE WASTE/REFUSE PILES/IMPOUNDMENTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8. NONCOAL WASTE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. PROTECTION OF FISH, WILDLIFE AND RELATED ENVIRONMENTAL VALUES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. SLIDES AND OTHER DAMAGE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. CONTEMPORANEOUS RECLAMATION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. BACKFILLING AND GRADING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. REVEGETATION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. SUBSIDENCE CONTROL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. CESSATION OF OPERATIONS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. ROADS:				
a. CONSTRUCTION/MAINTENANCE/SURFACING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. DRAINAGE CONTROLS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17. OTHER TRANSPORTATION FACILITIES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. SUPPORT FACILITIES/UTILITY INSTALLATIONS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS CHECK (4th Quarter-April, May, June)_____ (date)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. AIR QUALITY PERMIT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. BONDING & INSURANCE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



INSPECTION REPORT

(Continuation sheet)

Page 2 of 6

PERMIT NUMBER: ACT/007/007

DATE OF INSPECTION: 9/15-17/93

(Comments are Numbered to Correspond with Topics Listed Above)

GENERAL COMMENTS

The undersigned inspector was accompanied by Mr. Peter Hess and Mr. Chuck Rempes during the field portion of this complete state inspection. At the beginning of the inspection I presented my state identification and stated my intentions of conducting a complete inspection of the mine site. The inspection included the Sunnyside Cogeneration Association (SCA) permit area.

Because there were a multitude of permitting and enforcement actions currently in the process of resolution, the inspection was directed towards the general maintenance of the site and the collection of refuse and water samples.

1. PERMITS, CHANGE, TRANSFER, RENEWAL, SALE

The following notices of violation (NOV) have been extended until October 22, 1993: N93-32-3-8, 2 of 8 and 8 of 8; N93-32-2-5, 2 of 5. NOV N93-32-4-1 has been extended until October 4, 1993.

Two Federal violation (NOV 93-020-370-005, TV2 , parts 1 and 2) are pending abatement.

Mr. Hugh Klien (DOGM) conducted a complete state inspection of the SCA facility during the month of August, 1993. Numerous violations (N93-40-5-9) were cited during this inspection. The DOGM considers SCC and SCA jointly responsible for compliance within SCA's permit area.

NOV N92-32-14-1 was vacated by Mr. Lowell P. Braxton on August 24, 1993.

The following records were reviewed: 2nd Quarter Water Monitoring Reports, 2nd Quarter MSHA Weekly Pond Inspection Reports; 2nd Quarter Non-MSHA Pond Inspection Reports; Proof of Insurance Documents; 2nd Quarter UPDES Reports.

2. SIGNS AND MARKERS

The mine identification sign was in place and located at the main entrance to the property. In addition, mine identification signs are in place on the Coarse Refuse Haul Road at the property boundary between SCC and SCA.

New stream buffer zones signs have been placed throughout the stream corridor length.

INSPECTION REPORT

(Continuation sheet)

Page 3 of 6

PERMIT NUMBER: ACT/007/007

DATE OF INSPECTION: 9/15-17/93

4. HYDROLOGIC BALANCE:
a. DIVERSIONS

The culvert inlet for the Coarse Refuse Toe Pond has a slight accumulation of sediments which must be removed.

The drainage ditch on the east side of the Manshaft pad needs to be reestablished.

The berm on the outside of the Whitmore Fan has been reconstructed.

The culvert inlet across the haul road from the lower mine access road is eroding and must be repaired so as to be stable.

The slurry pile diversion ditch on the access road to the clear water pond must be augmented.

c. OTHER SEDIMENT CONTROL MEASURES

The silt fence for the Whitmore Fan BTCA was ripped and nonfunctional when initially observed. The operator repaired the fence prior to the completion of the inspection.

The silt fence above culvert C-5 needs to be repaired. The fence was functional at the time of the inspection.

d. WATER MONITORING

Water samples were collected from three separate locations during the inspection. The locations are as follows: Coarse Refuse Seep (CRS); Coarse Refuse Boundary (CRB); South Embankment of the East Slurry Cell Seep (SEESCS).

The CRS water samples were collected on 9/17/93 at 13:55. Field analyses were concurrently conducted and the results are as follows: Temperature = 79.5 ° F; Conductivity = 5040 umhos/cm; pH = 6.54. Three sample bottles were filled with water from the CRS. One preserved (HNO₃) water bottle was filled with water which was filtered through a 0.45 micrometer filter. The other preserved water bottle was filled with unfiltered water. The third bottle, for general chemical analysis, was similarly not filtered. All three sample bottles were immediately placed in a cooler.

The CRB water samples were collected on 9/17/93 at 14:33. Field analyses were concurrently conducted and the results are as follows: Temperature = 62.0 ° F; Conductivity = 4050 umhos/cm; pH = 7.32. Three sample bottles were filled with water from the CRB. One preserved (HNO₃) water bottle was filled with water which was filtered through a 0.45

INSPECTION REPORT

(Continuation sheet)

Page 4 of 6

PERMIT NUMBER: ACT/007/007

DATE OF INSPECTION: 9/15-17/93

micrometer filter. The other preserved water bottle was filled with unfiltered water. The third bottle, for general chemical analysis, was similarly not filtered. All three sample bottles were immediately placed in a cooler.

The SEESCS water sample was collected on 9/16/93 at approximately 12:30. Field analyses were concurrently conducted and the results are as follows: Temperature = --- ° F; Conductivity > 100,000 umhos/cm; pH = 2.05. One sample bottle was filled with water from the SEESCS. One preserved (HNO₃) water bottle was filled with water which was filtered through a 0.45 micrometer filter. The sample bottle was immediately placed in a cooler. It should be noted that on 9/15/93 I excavated a small portion of the SEESCS area to create a collection zone for the purposes of collecting a water sample.

All sample bottles remained in the cooler until I returned to Salt Lake City. They were then transferred to a refrigerator where they remained until the afternoon of 9/20/93. On 9/20/93 all of the sample bottles were hand delivered to the Utah State Health Lab. Laboratory personnel received the samples at 13:36 on 9/20/93. A copy of the chain of custody document will be available upon request.

Additional field analyses were conducted during the inspection and are as follows:

Location	pH	*Cond.	Temp. °F	Date
CRS	6.4	4,550	-----	9/15/93
CRS	6.5	4,410	75.6	9/16/93
CRB	7.3	3,170	60.0	9/16/93
#Above CRS	8.6	3,160	61.3	9/16/93
SEESCS	2.13	> 100,000	-----	9/15/93
SEESCS	2.37	> 100,000	70.9	9/17/93

* Conductivity in umhos/cm

Seep approximately 100 feet in elevation above the CRS

7. COAL MINE WASTE/REFUSE PILES/IMPOUNDMENTS

The Sacco Flats temporary refuse pile has a roof bolt in place which indicates that all refuse placed to the north of the bolt has been placed there since August 28, 1993.

INSPECTION REPORT

(Continuation sheet)

Page 5 of 6

PERMIT NUMBER: ACT/007/007

DATE OF INSPECTION: 9/15-17/93

NOV 93-32-5-2, part 2 of 2 was written for "Failure to maintain diversion structures". The portion of the operation to which the violation applies is the Coarse Refuse Pile (CRP) 100 yr.-6 hr. drainage system. At the beginning of the inspection the rip-rap energy dissipators at the south end of each terrace were not in place. The operator was able to place rip-rap these locations prior to the end of the inspection. The ditch on the south end of the CRP which runs parallel with the slope and is designed to receive drainage from each terrace was not maintained as designed. The third and fourth (from the bottom) terraces obscured the ditch on the south end of the pile. This effectively created a situation where drainage flowing to the south on the fourth terrace would flow onto the third terrace and all the drainage above the fourth terrace would not be able to enter the ditch on the south end of the pile.

NOV 93-32-5-2, part 1 of 2 was written for "Failure to place, in a controlled manner, and/or treat acid-forming material. Failure to place coal mine waste in an approved disposal facility". The portion of the operations to which the violation applies is the Old Coarse Refuse Pile Haul Road. At three separate locations on the outslope of the Old Coarse Refuse Pile Haul Road refuse samples were collected from the top 12". One sample of a hardpan encountered at the interface between the refuse and soil was collected. Each sample was passed through a Mesch # 10 sieve, saturated with deionized water, analyzed for pH, filtered through a 0.45 micrometer filter and the saturated extract analyzed for electrical conductivity (E.C.). The results are as follows:

Refuse Sample #1: pH = 3.41; E.C. = 4.65 mmhos/cm
Refuse Sample #2: pH = 2.01; E.C. = 9.66 mmhos/cm
Refuse/ Soil Interface #2A: pH = 3.76; E.C. = 3.5 mmhos/cm
Refuse Sample #3: pH = 2.35; E.C. = 4.46 mmhos/cm

It should be noted that the saturated condition of the soil/refuse sample should be maintained for preferably 24 hours but at least 4 hours (ASA Mono No. 9 page 169). The pH and E.C. of the samples were determined immediately after saturation procedures were followed.

Based on the information provided above the noted enforcement action was taken.

9. PROTECTION OF FISH, WILDLIFE AND RELATED ENVIRONMENTAL VALUES

The section of Grassy Trail Creek below the confluence with No. Canyon 2 was observed. The bottom sediments appeared to be free of coal fine and possibly the combination of organically complexed flocculated colloids mentioned in my June, 1992 inspection report. The majority of the deposition mentioned above was removed by the flash flood in July 1992. Some stream gravels were turned over and approximately 5-10 macroinvertebrates were noted under each rock.

INSPECTION REPORT

(Continuation sheet)

Page 6 of 6

PERMIT NUMBER: ACT/007/007

DATE OF INSPECTION: 9/15-17/93

SCC attempted to vacuum some of the coal fines adjacent to Grassy Trail Creek below the train loadout. Mr. Hess informed me that alternating layers of coal and "soil" were encountered during the vacuuming. The treatment resulted in little visual variation from the untreated areas. The operator should explore other clean up options.

16. ROADS:

a. CONSTRUCTION/MAINTENANCE/SURFACING

The permittee submitted road cross-sections as a means of abating NOV N93-32-3-8, 7 of 8. During this inspection the following cross-section were field verified: E;M;D;. No glaring errors were observed. Therefore, the aforementioned NOV was terminated.

b. DRAINAGE CONTROLS

The drainage ditch adjacent to the Twin Shaft Road had a portion of the ditch filled in by cattle traffic. This section of the ditch must be reestablished.

A portion of the No. 2 Canyon Road ditch was obscured for approximately 100 feet. The operator was instructed to reestablish the ditch.

Copy of this Report:

Mailed to: Bernie Freeman (OSM), Gary Gray (SCC)

Given to: Joe Helfrich (DOGM)

Inspector's Signature: Henry Sauer

#32 Date: 10/1/93