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

Scott M. Matheson, Governor  
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June 3, 1982

Mr. Charles J. Jahne  
Environmental Engineer  
Sharon Steel Corporation  
19th Floor, University Club Building  
136 East South Temple  
Salt Lake City, Utah 84111

RE: Current Status of Stipulations  
King VI Development Area  
Hiawatha Complex  
ACT/007/011  
Carbon County, Utah

Dear Mr. Jahne:

This letter is a follow-up to the meeting held in our office May 24, 1982 concerning Sharon Steel's responses to Stipulations 7-81-1 through 7-81-16. I will address the current status of each stipulation in numerical order, summarizing our understanding from the meeting:

Stipulation 7-81-1 (A-E)

The Division considers your response to this stipulation as adequate. Preliminary review of the materials submitted raises some concerns regarding statistical comparison (t-tests) of reference areas with affected areas. An on-site visit by Division personnel will be necessary this summer to assess the reference areas first-hand.

Stipulation 7-81-2\*

In the Division's preliminary review of the general mine plan and the response to Stipulation 7-81-2, deficiencies have been noted, with particular regards to requirements for the reclamation plan (UMC 784.13). A timely resolution of reclamation and revegetation plan deficiencies will be in the best interest of Sharon Steel Corporation and should expedite future permit approvals. It is our understanding that Sharon Steel is currently in the

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process of formulating an acceptable reclamation plan for the South Fork area (King VI) with the aid of Bio/West, Inc. The Division is readily available to provide assistance wherever possible in the formulation of these plans and looks forward to working with Sharon Steel Corporation and their consultant in resolving this issue.

Stipulation 7-81-3\*

The applicant has not provided adequate justification at the present time to leave the haul/access road up South Fork Canyon at the termination of mining operations. Therefore, the Division will require total reclamation of the road upon cessation of operations.

However, the applicant may present a postmining land-use for continued use of this road at a later date, which may be approvable to the regulatory authority at that time. This continued use will likely require that all applicable consents and/or requests from the local community or those individuals who will assume direct responsibility for the use, maintenance and ultimate reclamation be provided.

Stipulation 7-81-4

The Division of Wildlife Resources (DWR) granted approval of the conveyor construction plans, which have been submitted to DOGM, on September 3, 1981. This stipulation has been responded to adequately.

Stipulation 7-81-5

A warning was issued during May 1981, by Sandy Pruitt, Reclamation Officer, regarding the implementation of the as-built designs for undisturbed drainage structures above the King VI loadout. It is our understanding that Sharon Steel Corporation is in the process of implementing these protective measures and that the work should be completed by May 28, 1982.

Stipulation 7-81-6

Southeastern Utah Health District approved the new sewage system on August 5, 1981, and the permit was submitted November 20, 1981. This stipulation has been responded to adequately.

Stipulation 7-81-7\*

The Division requests that Sharon Steel Corporation submit the final as-built embankment slope grades if (or when) the haul road construction has been completed in order to assess compliance with UMC 817.152(c) and (d) and 817.162(c) and (d). If slope grades are steeper than those specified for cuts and embankments, Sharon Steel Corporation should provide the Division with a stability analysis certified by a qualified professional engineer demonstrating a static safety factor of at least 1.5.

Stipulation 7-III-8

Culverts have been installed as required and this stipulation has been responded to adequately.

Stipulation 7-III-9\*

Topsoil questions are still in the process of being resolved at this time. Sharon Steel Corporation provided the Division with soil analysis data from several locations in the King VI area but several issues remain in question. The Division will work with Sharon Steel Corporation and their consultant in determining which soil tests are needed from the potential borrow area as well as soil analysis of core samples from buried material which will be treated over time to assess its potential for reclamation use.

Stipulation 7-III-10

Plans for uncoal waste disposal were submitted August 13, 1981, and an addendum to these plans was received during November 1981. Approval of the plan has been granted, conditional upon compliance with UMC 817.72(b)(1)(iv). This stipulation has been responded to adequately.

Stipulation 7-III-11\*

The final portal sealing designs as submitted for all five (5) of the portals associated with the King VI Mine area are not in compliance with UMC 817.15.

Drawing #7 (Portal Sealing Design) depicts typical cross-sectional designs for the closure of the five portals.

The generalized designs for sealing of portals 4 and 5 with concrete blocks will comply with UMC 817.15 and 30 CFR 75.1711, providing there is no build-up of hydraulic head behind the seals. However, the backfilling design as depicted for portals 1, 2 and 3 is not in accordance with the requirements of this regulation. A minimum of 25 feet of incombustible material should be backfilled in such openings, in lieu of other methods such as concrete blocks, bricks or tile. The current drawings do not exhibit complete backfilling to this extent.

The applicant will need to resubmit designs which demonstrate compliance with UMC 817.15 for portals 1-3 before this stipulation is adequately addressed.

Stipulation 7-III-12\*

Maps and drawings with corresponding narrative descriptions regarding postmining topographic cross-sections and regrading plan for the diversions above King VI truck loadout, as well as an explanation for the upper sections of the conveyor route and King VI Mine yard, are still being worked on by Sharon Steel and should be forthcoming sometime during the second week of June.

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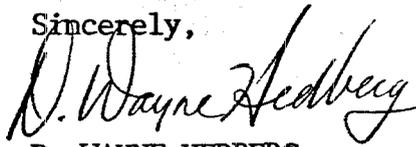
Stipulation 7-81-13 through 7-81-16

These stipulations have been responded to adequately.

NAOC #1 of 2 (82-2-5-2), also discussed during the meeting, requires the submittal of plans by May 31, 1982, for reconstruction of the King VI loadout sediment pond. These plans should be implemented only following DOGM review and approval, which the Division will try to expedite as much as possible.

If you have any comments or problems with our interpretation of the meeting's outcome or the status of stipulations as summarized above, please contact us at your earliest convenience.

Sincerely,



D. WAYNE HEDBERG  
RECLAMATION HYDROLOGIST

cc: Richard Daves, OSM  
Tom Portle, DOGM  
Mary Boucek, DOGM  
Jim Smith, DOGM  
Sandy Pruitt, DOGM  
Tammy Balkenbush, DOGM

DWH/MB:btb