0041

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

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

March 8, 1989

TO: Susan Linner, Permit Supervisor

FROM: Mike DeWeese, Reclamation Hydrologist MD

RE: TDN Responses, U.S. Fuel Company, Hiawatha Mine Complex, ACT/007/011-(F), Folder #2, Carbon County, Utah

SYNOPSIS:

The operator's response submittal has been reviewed regarding the issues addressed in the Division's January 13, 1989 deficiency document. The submittal is not determined to be technically adequate at this time.

ANALYSIS:

The operator has identified ten areas as small area exemptions including individual descriptions of alternate sediment control measures utilized and area acreages. The small area exemptions comprise 9.44 acres (approximately 3%) of the total permitted 278.7 disturbed acres. These areas have been identified on appropriate contour drawings. The operator has demonstrated, with the exception of the lower rail yard basins, that these areas meet the requirements of UMC 817.42.

Coal screening and crushing equipment has been installed at the lower rail yard area since the operator's first submittal review. Subsequent site inspections by Division personnel have revealed that physical watershed parameters used in calculating the design storm water yield were not accurate in the original submittal. Specifically, the operator used a curve number of 60 in the calculations for the area below the lower rail yard which is representative of a predominately undisturbed condition. Inspections have shown this area to be in a completely disturbed condition with coal material covering essentially the entire area. Therefore the Division feels a curve number of 74 is more applicable to the expected site conditions. Submitted volume calculations of the southern basin near the bypass culvert indicate that it contains adequate capacity to contain the expected runoff from the 10 year - 24 hour storm. However, Division calculations have shown the northern basin below the loadout area contains approximately half the needed capacity to contain the design storm. The operator must therefore address this issue by one of the following means:

1. Submit documented information demonstrating that the northern basin has historically met the effluent performance standards, or;

2. Submit plans to install an additional sediment basin or basins which would collect the runoff from the loadout area, or;

3. Submit designs for a series of sediment traps which would effectively treat the loadout area runoff and incorporate the discharge point of these structures into the existing monitoring plan, thereby assuring compliance with effluent performance standards.

Design calculations for diversions in the South Fork yard, the Middle Fork yard, and the Upper Rail Yard have been submitted. Erosion control structures have been previously installed in some diversions (personnel communication, Bob Eccli, January 25, 1989) but are not documented. This information is necessary to accurately evaluate the submitted diversion designs. Snow cover has prohibited determination of the location or specifications of these structures during site inspections to date. The operator has committed to conducting surveys of the existing diversion control structures as soon as weather permits. This issue will remain outstanding until the necessary information has been submitted.

RECOMMENDATIONS:

The Division recommends that the submitted MRP amendment be denied approval until such time as the aforementioned design information has been fully submitted and evaluated.

BT98/11-12