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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

Norman H. Bangerter

Governor

Dee C. Hansen

Executive Director

Dianne R. Nielson, Ph.D.

Division Director

355 West North Temple

3 Triad Center, Suite 350

Salt Lake City, Utah 84180-1203

801-538-5340

March 14, 1989

Mr. Bob Eccli  
U.S. Fuel Company  
Hiawatha, Utah 84527

Dear Mr. Eccli:

Re: Deficiency Review, Amendment, TDN Responses, U.S. Fuel Company,  
Hiawatha Complex, ACT/007/011-88(F), Folder #2, Carbon County,  
Utah

The Division has completed review of your company's submittal received February 16, 1989. The plans were reviewed by Mike DeWeese, Reclamation Hydrologist of the Division's technical staff.

The submittal has been found adequate to address TDN 88-2-116-3 regarding small area exemptions. Deficiencies still exist in the submittal regarding diversion design and the impoundments in the lower rail yard. Please address the deficiencies as delineated in the attached technical memo by April 10, 1988.

If you have any questions, please call Mike DeWeese or me.

Sincerely,

  
Susan C. Linner  
Reclamation Biologist/  
Permit Supervisor

c1  
Attachment  
cc: J. Helfrich  
L. Kunzler  
M. DeWeese  
BT45/188



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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.