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State of Utah

DEPARTMENT OF NATURAL RESOURCES
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Michael O. Leavitt
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Lowell P. Braxton
Division Director

June 24, 1998

TO: File

THRU:  Joe Helfrich, Permit Supervisor

FROM:  Priscilla Burton, Soils Reclamation Specialist

RE: Response to Division Order 97A, Hiawatha Coal Company, Hiawatha Complex, ACT/007/011-97A, File #2, Carbon County, Utah

SUMMARY:

Robert Davidson requested the following information from Hiawatha Coal Company in regards to Division Order 97A:

1. a table providing information on soil borrow areas;
2. a table providing information on all areas to receive borrow soil;
3. updated As-Built drawings for slurry ponds, reclaimed preparation plant areas and associated borrow areas;
4. a table providing information on location and handling of all miscellaneous coal and coal waste materials;
5. a timeline for reclamation of Pond 5 and 5a, and Soil Borrow Area "A".

In response, Hiawatha Coal Co. has provided a timeline for the reclamation of Ponds 5 and 5A and Borrow Area "A"; made a request for an extension of time to further complete the response to the first two items listed above concerning tables of information on soil volumes; agreed to provide As-Built drawings of slurry pond 5 after reclamation is completed.

This submittal does not respond to a portion of the third and the fourth items above: As-Built of Slurry Pond 4 and the reclaimed preparation plant areas and associated Borrow Areas; and the request for identification and handling of all miscellaneous coal and coal waste materials.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

Hiawatha Coal Co. has requested an extension of time (until July 30, 1998) to consolidate MRP information into table format. To reiterate Mr. Davidson's original requests:

R645-301-232.720, R645-240, R645-300-133.710, and R645-301-120:

- *Consolidate MRP information concerning all soil borrow areas into one table delineating locations, affected acreage, borrow depths, and volumes. Correlate and reference each borrow area with each respective reclamation area.*
- *Consolidate MRP information concerning all areas receiving soil borrow into one table that delineates locations, receiving acreage, soil placement depths, and volumes. Correlate and reference each reclamation area with each respective soil borrow area.*

Under this same regulatory heading, Mr. Davidson also made the following requests:

- *Provide updated As-Built for:
(1) Pond #4 and Borrow Area "F",
(2) Pond 5, Pond 5A, and Borrow Area "A", and
(3) lower reclaimed area in the Prep Plant and associated borrow area.
Updated As-Built should contain current status for both reclaimed areas and borrow areas with their affected acreage, depth of soil removal and placement, and resulting volumes in a concise and consolidated table format. Format should allow comparison of volumes of soil removed from borrow areas to amount of soil fill in each reclaimed areas. One of the questions that needs to be addressed is if enough soil remains in Borrow Area "A" to finish reclamation of Pond 5 and 5A.*

Hiawatha Coal Co. has indicated that the remaining 18.18 acres of Pond 5 will be reclaimed this field season and a survey of remaining volumes in Borrow area A will be conducted to determine whether adequate material remains to reclaim Pond 5A. Pond 5A is still in use. Table V-7 included with this submittal indicates that Pond 5A reclamation will occur in four or five years after final cessation of operations.

Table V-7 indicates that Pond 4 reclamation has been completed. Hiawatha Coal Co. should be able to provide As-Built drawings for Pond 4 and the reclaimed area in the Prep Plant and the associated borrow areas as requested.

Findings:

The Division should certainly grant more time to provide the requested information as consolidation of information into concise tables will save the Division much time in analysis. The Division maintains that Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-542, -301-731 provide the authority for the As-Built drawings requested for Pond 4, Pond 5, and the reclaimed portion of the Preparation Plant. Where reclamation has been completed, these drawings should be provided with the July submittal.

DISPOSAL OF COAL MINE WASTE

Regulatory Reference: 30 CFR Sec.784.23 ; R645-301-542.730

Analysis:

To facilitate this review, I have copied Mr. Davidson's original requests under Division Order 97A below:

R645-100-430, R645-301-512.230, R645-301-536, R645-301-553.250, and R645-301-542.730:

- *Identify all miscellaneous coal and coal waste materials and there locations. These areas include, but are not limited to, all stray coal piles, wind blown coal fines, coal waste piles, and downcast coal materials that lay outside the slurry ponds and refuse piles (e.g., areas of concern are the upper rail yard, areas within the Prep Plant, and areas of windblown fines outside the slurry piles).*
- *Consolidate MRP information regarding all miscellaneous coal and coal waste material areas into a table that identifies each area, location, affected acreage and reclamation plans.*
- *Consolidate all miscellaneous coal and coal waste material to minimize soil resource borrow.*
- *Table and MRP text should explain and discuss how these materials will be removed or left in place to ensure that final disposal will be suitable for operations, reclamation and post-mining land use.*

Three areas that are affected by coal fines have been identified and shown on Exhibits II-4 and V-9C. These areas are near State Highway 122 by Slurry Ponds 4 and 5. As described in Chapter 5, page 56, these areas will have coal fines removed. The coal fines will be added to Slurry Pond 5A which is still in use. No areas of miscellaneous coal and coal waste were noted in the railyard or preparation plant as the Division had expected. However, the plan states that if additional areas identified by the Division or Hiawatha Coal Co., they will be vacuumed or

otherwise removed from the soil.

The Reclamation Time table (V-7) indicates that coal fine impacted areas east and south of Slurry Pond 4 and Slurry Pond 5 will be mitigated and other coal fine impacted areas will be reseeded this field season.

Findings:

Hiawatha Coal Company has identified two areas of coal fine accumulation and has provided plans for clean-up and disposal. The amount of material to be removed and added to Pond 5A was not disclosed.

Page three of the letter accompanying this submittal identifies another area of coal contamination as the cemetery. The volume of material to be placed in Pond 5A was not disclosed. Other areas within the railyard and preparation plant were not identified, as expected by the Division. A Division representative should walk the site to locate additional coal fines, if any, that could be consolidated into Pond 5.

Hiawatha Coal Company did not provide a response with this submittal to the following request:

- *Consolidate MRP information regarding all miscellaneous coal and coal waste material areas into a table that identifies each area, location, affected acreage and reclamation plans.*

The information requested is pertinent to the reclamation which will occur this fall. Hiawatha Coal Co. should include this requested information in its upcoming July submittal.

RECLAMATION TIME TABLE

Regulatory Reference: 30 CFR Sec.784.23 ; R645-301-542.100

Analysis:

A reclamation timetable has been submitted and labeled Table V-7. This shows the general progression of reclamation. The immediate tasks are reclamation of slurry pond 5 and of the coal-fine impacted areas outside of slurry pond 4 and 5. No further reclamation is planned until cessation of operations.

In requesting this timeline information, The Division was attempting to ascertain whether Borrow Area "A" would require interim reclamation as the entire site has been exposed to weather until such time as Pond 5A is reclaimed. This timeline would indicate that Borrow Area A should receive interim reclamation treatments.

Findings:

The information requested was received. The information provided indicates that interim reclamation should occur in Borrow Area A after reclamation of Pond 5 this field season. Interim reclamation of Borrow Area "A" should be included in Table V-7.

cc: Robert Davidson

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