

OGMCOAL - Re: Hiawatha Midterm Response due (Task #3352)

From: Mark Reynolds <mreynolds@etv.net>
To: <OGMCOAL@utah.gov>, Jim Smith <jimdsmith@utah.gov>
Date: 12/16/2009 10:01 AM
Subject: Re: Hiawatha Midterm Response due (Task #3352)
CC: April Abate <aprilabate@utah.gov>, Steve Demczak <stevedemczak@utah.gov>
Attachments: DOGM midterm review Response.pdf

Jim,

Attached is a digital copy of our response to Task ID # 3352. The official signed hard copy is being mailed out today by USPS and you should receive it in 3-5 working days.

Mark

April Abate wrote

Good Morning Mark,

I am sending you this reminder to respond to the Hiawatha midterm deficiency letter that was sent on October 21, 2009. Please note that a response to our deficiencies is due from Hiawatha Coal Company by December 19, 2009.

If you have any questions, concerns or are unable to make that date, please email me and let me know at your earliest convenience.

Thank you.

Regards,
April

April A. Abate
Environmental Scientist II
Division of Oil, Gas and Mining
1594 W. North Temple, Suite 1210
Salt Lake City, Utah 84114-5801
T: 801.538.5214
F: 801.359.3940
M: 801.232.1339

Hiawatha Coal Company

**P.O. Box 1240
Huntington, UT 84528**

**(435) 637-1778
FAX (435) 637-1378**

James D. Smith
Utah Division of Oil, Gas & Mining
1954 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, UT 84114-5801

December 14, 2009

Re: **Midterm Permit Review, Hiawatha Mine, C/007/0011, Task ID #3352**

Dear Mr. Smith:

This letter is in response to your deficiencies letter dated October 21, 2009. Hiawatha Coal Company has addressed each deficiency. The response is attached to this letter.

If you have any questions, please call me at (435) 687-5777.

Sincerely,

Mark Reynolds

Deficiency Response List
Task ID #3352
Midterm Permit Review

R645-301-112.300

This was addressed with our response to Task ID # 3084. Please update your records appropriately.

R645-301-114.100

This was addressed with our response to Task ID # 3084. Please update your records appropriately.

R645-301-121.100, R645-301-112.500, and R645-301-112.600

This was addressed with our response to Task ID # 3084. Please update your records appropriately.

R645-301.331

We feel that no written report is needed. The only areas no longer needed for present and future operations are Slurry Pond 4, Slurry Pond 5 Main Cell, and the associated borrow areas. These areas have been reclaimed and revegetated. A phase I bond release was just approved on these areas, and we have contracted Mnt. Nebo Scientific to perform vegetations studies during the next two years in order to apply for a phase III bond release.

R645.301.528.330 and R645.301.528.33 & 334

As stated in recent inspection reports, all abandoned equipment has been cut into small enough pieces to transport and is currently being hauled off. We estimate there are only two loads remaining. We are trying to remove them, but our efforts are being affected by the adverse weather conditions. The remaining abandoned equipment in the areas in question will be removed once we can get our tractor trailers to it.

During the inspection these drums were not inspected closely, but merely observed while driving past which would make it impossible for the Division to determine their status. At that time a concern was expressed and Mark Reynolds of Hiawatha Coal mentioned that there were no issues and that Pete Hess of the Division had already addressed the situation. Please review the inspection reports from July, August, and September of 2007. You will see it documented that Pete Hess did a detailed inspection of all oil storage areas. There was extensive discussion about hazards and PCB's in particular. All hazardous substances were removed and disposed of at that time.

R645.301-742.200

The silt fences have been removed

R645-301-742.113

Corrective action was taken on the ditch north of Slurry Pond 4 the week after the midterm inspection. The areas were then inspected by Steve Demczak of the Division. It was determined that all corrections would function during a storm event and were adequate. However, it was recommended that additional riprap be placed in a 20-30ft section on the eastern portion of the ditch as documented in his October Inspection Report. The recommended riprap was added. No inspection was made of this area by the Division after this action was taken.

In regards to the catch basin adjacent to Utah Railway's lines: as mentioned during the inspection, a review of the plans will show that this area is not controlled by Hiawatha Coal Company and we are not responsible for it. It is located inside the Utah Railway Right of Way. If the Division would like they can contact Utah Railway and request them to perform maintenance on their catch basin. It should be noted however that to the best of Hiawatha's knowledge, historically no discharges have occurred from this catch basin.

R645-301-860

This was addressed with Task ID # 3364