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March 23, 1979

Mr. Glenn H. Sides  
Chief Engineer  
Western District - Coal  
United States Steel Corp.  
East Carbon, Utah 84520

Re: Wellington Coal Preparation Plant  
Township 15 South, Range 11 East  
Carbon County, Utah  
ACT/007/012

Dear Mr. Sides:

You will recall that Larry Damrau of the U.S. Office of Surface Mining, Tom Suchoski and myself of the Division made an inspection of U.S. Steel's Wellington Coal Preparation plant on January 10 and 11, 1979. At that time we discussed the interim enforcement of the regulations promulgated under Public Law 95-87; and we also discussed the extent to which the Mining and Reclamation Plan and the site itself conforms to the regulations.

Enclosed are copies of the field inspection reports from both the Office of Surface Mining and this Division. In order to bring the site and its Mining and Reclamation Plan into compliance with the interim program regulations, the Mining and Reclamation Plan must be amended and certain work must be completed at the mine site. It is also suggested that you consult the permanent regulatory program regulations as published in the March 13, 1979 "Federal Register." If the plan is amended at this time to conform to the permanent program, as opposed to only the interim program, it will not have to be changed when the permanent program comes into effect for existing mines on federal lands, mid-September, 1979.

The Division recommends the following amendments to the plan and on-site work for the Wellington Preparation Plant to bring the facility and its plan into compliance with the interim program regulations.

1. Add the State permit number, ACT/007/012, to the existing sign at the access to the plant. Also, place appropriate signs at all other access points to the property, 717.12.
2. The submitted plan calls for grading and covering the refuse areas with soil from undisturbed adjacent areas. To do this, a plan for reclamation of these areas is required including location and depth of borrow material, sediment control, soil

tests, reclamation etc. The Division suggests that the plan be amended to delete this concept and attempt to utilize stockpiled soil from future expansion of the waste disposal area to the extent possible. It is doubtful that sufficient material will be available to completely cover the surface. Therefore, revegetation test plots should be initiated on the refuse material to determine what types of vegetation will survive, 717.14 and 717.15

3. Plans for sediment control as well as surface and groundwater must be submitted, 717.17. The Division recommends sediment ponds for the refuse piles, preparation plant area and loading areas. Other sediment control measures such as vegetative filters, straw dikes etc. may be appropriate for other areas. The Division feels that groundwater monitoring is unnecessary except for possibly the drainage into the large ditch north of the tailings pond. Surface water monitoring is required, however. Three necessary sampling sites include the Price River above and below the site and where possible runoff from the railroad loading site and waste pile would enter the river.
4. The final reclamation, regrading and revegetation, of the ditch north of the tailings pond must be included in the plan, 717.14.
5. The performance standards of Section 717.18 do not apply to dams constructed of earth material that contain waste material. However, the regulations do apply to dams constructed wholly or partially of waste material (Judge Flannery's decision of May 3, 1978). It should be noted that the Act's requirements concerning imminent harms still apply, 717.18.
6. The topsoil in areas that will be covered by future waste disposal and tailings operations must be stockpiled and protected unless soil tests show that the material has less revegetation potential than the waste material.

Natural revegetation is not appropriate; the time required for natural succession is too long. Therefore, the plan must be amended so as to include a revegetation plan for all disturbed areas and the initiation of test plots for these areas, 717.20

Again I would like to stress that the above recommendations are for the interim program and that it would be to U.S. Steel's advantage to amend the plan so as to comply with both the interim and final program regulations. The Division herein sets a deadline of July 1, 1979 for the submittal of amendments necessary to bring the plan into compliance with the interim program. Compliance with the final program is required by mid-September, 1979 according to the regulations. Water quality monitoring must begin within the month of April.

Mr. Glenn H. Sides  
March 23, 1979  
Page Two

If you have any questions please feel free to contact either Ron Daniels or myself.

Sincerely,

*K. Michael Thompson*

K. MICHAEL THOMPSON  
ENGINEERING GEOLOGIST

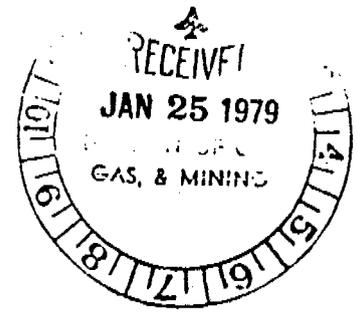
KMT/sp

enc: O.S.M. & Division field  
inspection memos

cc: O.S.M., Denver  
Attn: Larry Damrau

*MAW*  
*TS*  
*TJS*  
*sws*

DATE: 10 January 1979 & 11 January 1979  
TIME: 3:30 PM - 5:30 PM & 1:30 PM - 4:30 PM  
WEATHER: Cold and snowing, snow cover on ground  
COUNTY AND STATE: Carbon County, Utah  
STATE FILE NO: ACT/007/012  
COMPANY OFFICIALS: Bill Kirkwood and Glen Sides  
STATE OFFICIALS: Mike Thompson and Tom Suchoski  
OSM OFFICIAL: Larry Damrau



GENERAL COMMENTS

This initial on-site inspection was conducted at the U. S. Steel Corporation coal processing plant located approximately 2 miles south of Wellington, Utah within the county of Carbon. Coal is processed at this tipple from the U.S. Steel Corporation, Geneva mine located approximately 30 miles east of Wellington within Horse Canyon of the Book Cliffs of Emery County. All of the coal is transported from the mine to the tipple by rail. The tipple facilities include refuse gob piles and slurry impoundment areas. The tipple area is bisected by the Price River, between the tipple itself and the refuse slurry impoundment areas. During the afternoon of 10 January 1979, the areas adjacent to the tipple and the refuse gob piles were inspected. On-site discussions were held with Mr. Bill Kirkwood the mine superintendent. On the afternoon of 11 January 1979, the refuse slurry impoundments were inspected and discussions held with Mr. Glen Sides, Chief Engineer, at the company office building located in East Carbon, Utah.

Although the company is mining Federal coal under an approved U.S.G.S. plan for leases No.s SL-046612 and SL-066145, the federal plans cover only the Geneva mine site area and not the Wellington tipple. The Wellington tipple area does have an approved mining and reclamation plan issued by the State Regulatory Authority. The refuse disposal areas are approved under MSHA mine No. 42-00099, with two approved refuse piles and two approved refuse impoundments.

COMPLIANCE WITH INTERIM REGULATIONS

717.11 General Obligations

The mining and reclamation plan approved by the State Regulatory Authority prior to the enactment of PL 95-87 and promulgated.

Rules and Regulations concerned with the interim programs does not address specific aspects required in the federal regulation. Specific aspects required to be addressed and absent in the present plans, were discussed with Mr. Glen Sides on the afternoon of 11 January 1979. Modifications of the present mining and reclamation plan to bring it into compliance with OSM regulations should be submitted to the State Regulatory Authority with 7 (seven) copies to the OSM regional office in Denver, Colorado. These aspects are reiterated below.

Signs and Markers

The mine and permit identification sign observed at the access point to the tippie area from the public road was found acceptable except for the lack of the identification number of the current state mining and reclamation plan. The number ACT/007/012 should be placed on the sign. Adequate spaces for placement exists on the present sign.

Mine and permit identification signs should be placed at the point of access to the refuse impoundments north of the Price River.

## 717.14 &amp; 717.15

Backfilling and Grading and Disposal of excess materials

The approved State reclamation plan calls for grading and covering of the refuse areas with soil native to the immediate areas. The extent of cover to be replaced, the chemical and physical characteristics of that cover, where the cover material will be obtained, the final graded slopes of the area, the equipment and procedures to be utilized and times of such reclamation operation should be addressed.

717.17 Protection of the Hydrologic System

No surface water or underground water monitoring plan exists for this processing plant area. Plans for surface water monitoring, diversions and conveyance of overland flow away from disturbed areas, sediment controls measures and ground water monitoring in accordance with this section of the rules and regulations should be submitted.

Construction designs, maintenance operations and reclamation operations planned for the access and haulroads, railroads and other transportation facilities should be submitted.

717.18 Dams Constructed of or Impounding Waste Material

Design, location, construction, operation, maintenance, modification and abandonment/reclamation plans proposed for present and future dams constructed of or impounding waste material should be submitted.

717.20 Topsoil Handling and Revegetation

Topsoil removal, segregation, stockpiling and protection from wind and water erosion plans should be submitted.

Revegetation operation, species to be planted and times proposed for such operation should be submitted.

COMMENTS

During the discussion with Mr. Glen Sides, he made it quite clear that the Wellington Processing Plant exhibited unique environmental factors which he believed exempted the company from compliance with certain requirements of 30 CFR regulations or substantiated variances from certain requirements. I expressed the concept to him that the rules and regulations do enable variances from specific parts of the 30 CFR standards but that approval of such requests would require receipt of data confirming the applicability of the allowed variance and proposed operation to be conducted in lieu of those set forth in the 30 CFR Standards. Until the time that the regulatory authority grants such variance, the requirements of the 30 CFR regulation are expected to be met.



LARRY DAMRAU  
RECLAMATION SPECIALIST

January 16, 1979

FILE

Memo to File:

Re: United States Steel  
Wellington Preparation Plant  
ACT/007/012

The Wellington Preparation Plant, operated by United States Steel was inspected on January 10, 1979 by Larry Damrau of the Office of Surface Mining with Tom Suchoski and Mike Thompson of the Division. Mr. Bill Kirkwood accompanied the regulatory personnel.

The tailings pond area was walked on the following day and Mr. Glen Sides was contacted at the East Carbon City.

Obvious problems occurring at the plant site include the following:

- a. Runoff and sediment control - Runoff occurring above the site is diverted away from the plant area by ditches. This was done in the past to protect the plant. The railroad loading area and waste pile adjacent to the plant probably have the greatest potential for sediment production. Runoff from these two areas is not treated. However, no visual evidence of sediment production in excess of that from the surrounding undisturbed areas was found in previous inspections by the Division.
- b. Topsoil - The topsoil in areas that will be covered by future waste disposal and tailings operations must be stockpiled and protected unless soil tests show that the material has less revegetation potential than the waste material.
- c. Revegetation - The unapproved plan states that topsoil will be brought in to cover the waste and tailings. Natural revegetation will be utilized. The borrowing of soil from undisturbed areas to cover the waste and tailings is inappropriate as is relying on natural revegetation. The plan should delete the concept of borrowing topsoil except in the areas of waste and tailings disposal. Revegetation test plots need to be established to determine the best seed mixture and soil amendments for the waste and tailings material.
- d. Regrading - The ditch north of the tailings pond must be reclaimed upon termination of operations.
- e. Water Monitoring - Groundwater monitoring is probably unnecessary. Monitoring of the Price River is necessary above and below the site. An additional monitoring site is necessary where possible runoff from the railroad loading site and waste pile would enter the river. Mr. Sides contends that runoff does not leave the disturbed area, therefore sediment ponds are unnecessary. The monitoring program would determine if Mr. Side's contention is correct.

K. MICHAEL THOMPSON  
ENGINEERING GEOLOGIST

/sp  
cc: O.S.M., Denver

*KMF*