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File Copy U.S. Steel Wellington Prep Plant

ACT/007/012

PAUL E. WATSON
GENERAL SUPERINTENDENT

U.S. Steel Mining Co., Inc.
a Subsidiary of United States Steel Corporation

P. O. BOX 807
EAST CARBON, UTAH 84520
801 / 888-4431

December 30, 1981

RECEIVED
JAN 07 1982
DIVISION OF
OIL, GAS & MINING

Mr. Ronald W. Daniels
Division of Oil, Gas and Mining
4241 State Office Building
Salt Lake City, Utah 84114

Re: Violation No. N 81-3-24-1
Wellington Coal Cleaning Plant

Dear Mr. Daniels:

On December 17, 1981 Mr. Thomas Portle conducted an inspection of the Wellington Coal Cleaning Plant. On December 18, 1981, violation No. N 81-3-24-1 was issued for: "Failure to dispose of, place and store non-coal waste in a controlled manner in a designated portion of the permit area or in an approved landfill". The violation as written is not clear as to the intent of the inspector or the violation. We take exception to the classification of some of the material as non-coal waste by the inspector as follows:

1. Recyclable Metal

Recyclable metal is accumulated over a long period of time and shipped to a scrap metal dealer or to the United States Steel Corporation steel plant at Orem, Utah for consumption at that location. This recyclable metal consists of two principal types - various pieces of carbon steel and stainless steel. We do not consider this material as waste. This material is in designated locations which have been used since the plant began operation. Both carbon steel and stainless steel from the storage piles are sometimes used for plant repairs.

2. Oil Drums

The oil drums are not considered or classified as waste by the operator. The oil drums referenced by the inspector are in the location designated by the operator. The oil drums near the oil house are retained for accumulation of waste oil or for return to vendors. Other drums are accumulated in the material storage area for future miscellaneous future uses. Surplus drums are added to the recyclable metal storage pile.

3. Material and Equipment

Various materials and pieces of equipment are stored at the plant site, in locations readily accessible by the operator. This material and equipment is not considered waste by the operator and is used for plant repairs and operation. The operators plans do not include consolidation of this material.

4. Other Waste

The operator plans to dispose of this waste in the county operated landfill. The regulations do not designate a time table for offsite disposal of this material. It appears that the regulations leave to the operator the frequency of hauling from the site.

All storage areas discussed above are within the permit area.

Webster's Dictionary defines waste as "discarded, as worthless, defective, or of no use". UMC 817.89 defines non-coal waste as "grease, lubricants, paints, flammable liquids, garbage, abandoned mining machinery, timber and other combustables". We do not consider the materials discussed under items 1, 2 and 3 above as meeting either of these definitions. It is the operator's opinion that no plan is required for these materials under the regulations.

It should be pointed out that the operation plan for the Wellington Coal Cleaning Plant has been submitted to the Division for approximately 10 months with no communication as to the adequacy or completeness of this plan. If any plan is required, it seems to us that it would be more appropriate for it to be discussed as part of the operation and reclamation plan.

Immediately following the site inspection the inspector did not mention any problems with the operation of the coal cleaning plant. The following day the inspector issued the subject violation and a Notice of Area of Concern. On several occasions in the past, we have requested that inspectors discuss any problems during the site inspection on site. I wish at this time to protest the continuing practice of writing violations one or two days following the site visit. We feel it would be more productive to discuss any problems in the field during the site inspection to insure that both parties fully understand the areas of concern.

Sincerely,

Paul E. Watson

Paul E. Watson

cc: V. R. Watts
B. L. Kirkwood
B. Gardner
F. Boinsky
Environmental Contact File

To Jim
JIM
OCT 28 1981
File ACT/007/012
~~Copy to~~ Ev & Wayne & Sandy

U. S. Steel Mining Co., Inc.
a Subsidiary of United States Steel Corporation
WESTERN DISTRICT
P. O. BOX 807
EAST CARBON, UTAH 84520
801 / 888-4431

October 26, 1981

Mr. Ronald W. Daniels
Division of Oil, Gas and Mining
1588 West North Temple
Salt Lake City, Utah 84116

RECEIVED
OCT 27 1981
DIVISION OF
OIL, GAS & MINING

Re: Sauerman Drag Scraper - Upper Refuse Pond
Wellington Coal Cleaning Plant
ACT/007/012 - Carbon County, Utah

Dear Mr. Daniels:

U. S. Steel Mining Company is currently operating a Sauerman Drag Scraper in the Upper Refuse Pond at the Wellington Coal Cleaning Plant. The scraper was installed after the Plant Operation and Reclamation Plan was submitted. The proposed additional disturbance from the scraper operation is about 16 acres, shown on attached drawing number E9-3381.

Approximate head and tail tower locations are shown on drawing number E9-3341 of the original submittal. As material is removed from the pond area, both the head and tail locations will be moved northerly along the eastern and western banks. All potential tower locations on the western bank and north dike are on currently disturbed refuse disposal areas. Some tower locations on the eastern bank will be newly disturbed sites.

The following plan is proposed for the disturbance and reclamation of newly affected areas required for scraper operation.

1. Topsoil

   1.1 The A soil horizon (or a minimum of the upper six inches) will be stripped from newly affected areas. How much?

   1.2 Topsoil will be stockpiled in the designated locations. Area ok?

   1.3 Stockpiles will be seeded to minimize erosion and unnecessary compaction. what mix?

Route map to Ev.
Ev, get w/ others & review
Please prepare response. Thx, Jim

1.4 Appropriate markers will be placed on all topsoil stockpiles.

2. Site Preparation

2.1 Additional fill material required for site preparation will be taken from a designated borrow area. where?

3. Protection of the Hydrologic System

3.1 All runoff from disturbed areas will flow into the Upper Refuse Pond.

4. Air Resources Protection

4.1 Fine refuse is in excess of 25 percent average moisture when removed from the pond. Little or no fugitive dust is generated by the scraper operation.

5. Backfilling and Grading

5.1 Newly disturbed areas will be restored to their approximate original contour when no longer required for scraper operation.

5.2 Available topsoil will be spread over the affected areas.

5.3 No coal, acid or toxic forming materials will be covered under this plan. ?

6. Revegetation

6.1 All disturbed areas will be revegetated according to the methods described in the permanent plan.

6.2 Success of revegetation will be measured according to the methods described in the permanent plan.

This proposal is submitted as a supplement to the permanent plan.

It is anticipated that the Lower Refuse Pond will be cleaned in a similar manner. Operation and reclamation plans for the Lower Pond will be submitted prior to any disturbance.

Sincerely,

Paul E. Watson

Paul E. Watson

Attach