

### Document Information Form

Mine Number: C/007/012

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A

Date Sent: JANUARY 4, 1982.

Explanation:

INSPECTION MEMO TO COAL FILE.

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\_\_\_\_\_

cc:

File in: C/007, 012, Internal

Refer to:

- Confidential
- Shelf
- Expandable

Date \_\_\_\_\_ For additional information

January 4, 1982

Inspection Memo  
to Coal File:

RE: U. S. Steel  
Wellington Prep Plant  
ACT/007/012  
Carbon County, Utah

DATE: December 17 and 18, 1981  
TIME: 2:00-4:45 p.m., and 1:00-2:00 p.m.  
WEATHER: Clear and Mild  
COMPANY OFFICIAL: Bill Kirkwood, Barb Filas, Randy Watts  
STATE OFFICIAL: Tom Portle  
ENFORCEMENT ACTION: Issued NOV N81-3-24-1, #1 of 1  
Issued NAOC form

Compliance With Permanent Performance Standards

771 et al Permits

Permitting involved at the Wellington Prep Plant consist basically of MR Form #2 and MR-1. Submittal under the permanent program has been achieved by U. S. Steel and the plan is awaiting review. MSHA approved dikes exist at this facility for the lower refuse, the upper refuse and the clear water pond. Approval numbers of these dikes have been reported in a previous inspection memo (see October 22, 1981, inspection memo). The refuse pile below the plant is also MSHA approved. In consulting with Robert Morgan of the State Engineer's office, it was learned that their office relays heavily on DOGM for inspections of mine slurry ponds. They will not plan on putting these ponds in their inspection schedule nor are they concerned with permitting of these ponds other than to concur with DOGM review. They did, however, determine that water rights are in order.

817.11 Signs and Markers

All required signs were visible, constructed of durable material and properly located.

817.21-.25 Topsoil

As noted in previous memos, no topsoil has been saved from the areas adjacent to the wash plant. Only in areas which have been disturbed in the dragline operation pursuant to constructing the tail tower and roads, associated with this activity has topsoil been saved. Stipulation 12-1-81 is attached to the tentative approval and addresses such items as determining volume of topsoil, chemical and physical analysis of soil and the location of topsoil stockpiles. No information to date has been submitted by U. S. Steel with regard to this stipulation.

File in:

- Confidential
- Shelf
- Expandable

Refer to Record No. 0014 Date \_\_\_\_\_  
In C/ 007, 012, Internal

For additional information

These topsoil stockpiles have been consolidated to a certain extent although unconsolidated piles exist along the Class II roads in the area (see the December 24, 1981, memo with regard to seeding that has been done on the stockpiles).

#### 817.41-.52 Hydrologic Balance

Runoff from the main plant area is treated by a series of sediment ponds, depressions and catch basins. Runoff from the parking lot, office building, storehouse and shop area flows into the plant slurry pond. An outlet structure allows water to pass under the tracks through a culvert into ditches which further conveys it to a series of catch basins which lie between the plant area and the Price River. From visual observation, it is not apparent that ponds have overflowed resulting in runoff entering the Price River. However, until calculations have been done to substantiate this, it cannot be assumed that a 10-year, 24-hour event would not result in partially treated water leaving the permit area. A small catch basin exists to the east of the fuel storage building. This catch basin (along with other catch basins on the site) were put in at the request of Division Inspector Doug Stewart. Its purpose was to prevent runoff from any of these petroleum or lubricant cans from entering a ditch adjacent to the railroad tracks, after which it will be conveyed down along the railroad tracks and eventually into the Price River. It appears that a large event would cause the above to happen given the current design of this catch basin. There are three other catch basins, each function to take road runoff and runoff from storage areas, delay it prior to it being discharged into ditches which eventually lead to the pond to the east of the railroad tracks. This system appears to work fairly well for a small event, but there is no way to assure that system will work in a major precipitation event. Runoff from the coarse refuse pile appears to not leave the permit area since much of the water filters into the refuse pile itself and that which runs off is collected in a swale. The reason for the above statement is that no evidence of any coal fines is detected in this large catchment area. This area visually appears to be large enough to prevent any significant impacts from a runoff event. This remains to be determined attendant to review of the mine plan. A diversion run to the west of the plant in a north/south direction. This diversion empties on the east side of the tracks and conveys water to the pond area previously mentioned between the plant and Price River. Another diversion runs from west to east generally south of the plant and conveys water into the natural drainage. Some erosion problems were noted in this ditch. In response to this problem, the following Notice of Area of Concern form was written:

#### Nature of Concern:

Failure to maintain diversions to minimize erosion and additional contributions of suspended solids outside the permit area.

#### Pertinent Regulation or Permit Condition Violated:

UMC 817.43, UMC 817.45(iii).

Portion of Operation to Which Notice Applies:

Areas where backcutting is occurring in diversion ditches.

Compliance Action Required:

Stabilize ditches to prevent further backcutting and reduce erosion.

Deadline:

January 22, 1982.

Runoff from areas near the coarse refuse pond generally flows into the ponds. It appears that runoff runoff situation in this area is controlled and that control is adequate. This remains to be verified during the review process.

817.52 Surface and Ground Water Monitoring

No NPDES permit has been obtained to date by U. S. Steel for the Wellington facility. In the past, the operator has maintained that no discharge is likely to occur on the facility. This statement will need to be reaffirmed during the review process by a Division hydrologist pursuant to the permanent program. Surface water data has been taken; data from September and October was observed. The October data looked fine, the September data the TSS was ranging between 2544 and 3588 ppm. It was attributed by the operator to a precipitation event.

817.71-.73 Disposal of Underground Development Waste and Excess Spoil and Nonacid and Nontoxic-forming Coal Processing Waste

An MSHA approved disposal site exists on the permit area to handle all waste generated by the processing plant. In addition, much material that results from underground processes is screened. This material is similarly deposited in this approved site.

817.81-.93 Coal Processing Waste

Wellington Preparation Plant's sole purpose is to process coal from the Horse Canyon Mine and from the Somerset Mine in Colorado. The condition of the waste pile is very stable and no signs of erosion or sediment were evident. Hydrology concerns have been previously addressed in this memo.

817.89 Disposal of Noncoal Waste

In the past and on several occasions, inspectors have toured the Wellington Prep Plant facility and made comments as to the general nature of the company's practices of eliminating noncoal waste. It has been suggested on these occasions that this material be consolidated and further that areas that are now used for storage of this material having been duly vacated should be reclaimed pursuant to 817.100, Contemporaneous Reclamation. The operator has failed to take any measures to adequately address these requests. As a result of this, Notice of Violation #81-3-24-1, #1 of 1 was written:

Nature of Violation:

Failure to dispose of, place and store noncoal waste in a controlled manner in a designated portion of the permit area or in an approved landfill.

Provision of the Regulation, Act or Permit Violated:

UMC 817.89(a)(b).

Portion of Operation to Which Notice Applies:

1. Storage sites for garbage refuse and scrap metal east of fuel storage building;
2. Oil drum storage site to the southeast coal cleaning plant, all of the storage sites materials described in 817.89(a).

Remedial Action Required:

Submit plans in which a scheme including the storage locations, runoff and leachate protection from the storage location, material consolidation and time tables for removal, consolidation, and contemporaneous reclamation of unused storage area are addressed.

Time for Abatement:

January 18, 1982.

817.100 Contemporaneous Reclamation

As mentioned above in 817.89, no contemporaneous reclamation has occurred on this site, and many areas which are currently being used for storage of various materials associated with the plant, after consolidation will be available for contemporaneous reclamation.

INSPECTION MEMO TO COAL FILE

ACT/007/012

January 4, 1982

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817.150-.176 Roads

The access road to plant appeared to be well maintained. There is no sign of any blockage of culverts or any problem with the function of any sediment control facilities. No obvious signs of erosion were present.

THOMAS L. PORTLE <sup>TLP</sup>  
RECLAMATION SOILS SPECIALIST

cc: Tom Ehmett, OSM  
Randy Watts, U. S. Steel  
Inspection Staff

TLP/btb

Statistics:

Vehicle: #PI 1885.1--391 miles

Per Diem: 1 person X 2 days, 9.5 hours = \$86.56

Grant: A & E