



STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

February 23, 1982

#0367284

REGISTERED - RETURN RECEIPT REQUESTED

Mr. Paul E. Watson
General Superintendent
U.S. Steel Mining Co., Inc.
P.O. Box 807
East Carbon, Utah 84520

Dear Mr. Watson:

This letter is intended as the Division's response to materials prepared by U.S. Steel in response to NOV #N81-3-24-1. Where appropriate, it identifies needs for additional information under each heading as described by the operator for each area of noncoal storage. It also is intended to transmit the modification notice addressing the abatement time and the content of the remedial action.

Holding Areas and Disposal of Non-coal Waste

The operator states that all non-coal waste will be hauled off-site for disposal in a sanitary landfill "as required". This should be clarified by the operator. It is recommended that either a schedule for removal be drawn up or some statement pertaining to what percentage of the total storage volume, which when occupied, will result in removal of this material. This is intended to eliminate subjectivity in part of the inspectors interpreting when excess materials are being stored or designated on coal storage areas. It would be a benefit to both the operator and to the Division to quantify "as required".

The operator states that "limited" precipitation results in negligible runoff from this area. The Division requires that either: (1) adequate runoff control for this area must be demonstrated or (2) that additional information be provided to document beyond a reasonable doubt that no contaminated runoff could leave this area and enter surface waters or result in effects which might decrease revegetation potential in adjacent areas.

Oil Drums Storage Sites

The main concern here is runoff control. The catch basin which is currently in existence here does not appear to be sized adequately to contain the runoff during a 10-year, 24-hour event. Should runoff leave this area it would flow along the railroad tracks and probably leave the permit area. This

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2. ARTICLE ADDRESSED TO: Paul E. Watson
 U.S. Steel Mining Co., Inc.
 P.O. Box 807
 East Carbon, Utah 84520
 (CONSULT POSTMASTER FOR FEES)

3. ARTICLE DESCRIPTION:
 East Carbon, Utah 84520

REGISTERED NO. _____ CERTIFIED NO. 0367284 INSURED NO. _____

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 SIGNATURE: *Paul E. Watson*
 (Authorized agent)

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P20 0367284
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SENT TO
 Paul E. Watson-U.S. Steel
 STREET AND NO.
 P.O. Box 807
 P.O., STATE AND ZIP CODE
 East Carbon, Utah 84520

POSTAGE	\$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
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SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
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PS Form 3800, Apr. 1976 2/23/82 - ACT/007/012



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POSTAGE WILL BE PAID BY ADDRESSEE
 PENALTY FOR FAILURE TO PREPAY POSTAGE \$300

State of Utah
 Natural Resources & Fish, Game, & Mining
 241 State Office Bldg.
 Salt Lake City, Utah 84103

U.S. MAIL

(Name of Sender)

 (Street or P.O. Box)

 (City, State, and ZIP Code)

must be prevented. The operator states that a berm will be installed along the oil drum storage pad this spring. Is the intent of this berm is to prevent additional runoff from entering this area or is it to confine all runoff from this area and adjacent areas to the storage pad? The operator must demonstrate that sediment control structures in this area are adequate to prevent any runoff from leaving the permit area thus affecting adjacent areas adversely. Because of the nature of the material stored here, the Division is concerned that a negative effect on the future vegetation potential will be observed in these areas if not handled and controlled prudently.

The operator states that oil drum storage sites are not considered permanent. It should be noted that storage over one year is considered by State Health to be permanent. The operator must commit not to store any material here for greater than one year and must indicate how disposal of these materials has been/or will be accomplished, or make provisions with State Health to permit this area as a permanent storage and disposal site.

The operator states that "it should be noted that oil drums located in the material and equipment storage area are held in this area due to the probable use of these drums". Please clarify this statement. It is not altogether clear what the operator means by this.

Material and Equipment Storage Area

The Division has reviewed and discussed the probable need for consolidation of materials stored in this large area pursuant to UMC 817.100 (contemporaneous reclamation).

The operator has provided limited justification for the use of such an expansive area, but has not demonstrated a significant or reasonable attempt to comply with UMC 817.100.

The Division strongly recommends that some attempt(s) be made to consolidate material storage and reclaim disturbed areas wherever and whenever possible, thereby decreasing the total surface affected area(s) and minimizing negative impacts resulting from compaction, contamination, erosion, etc. This could reduce the initial reclamation bond amount assessment and could also have a bearing upon the ultimate bond release time period.

Scrap Metal Storage Area

In this area again, it is felt that additional information must be provided to ensure that no contaminated runoff from this area will reach water courses.

Recovered Wood Material

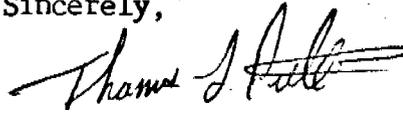
The Division requests that some documentation as to why the operator judges this would not be a problem in terms of surface runoff. Also, please address why some type of sediment control plan for this area has not been initiated.

Mr. Paul E. Watson
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Also, three options are listed as possible uses of this material. Please provide some information as to the progress of your decision making at this point as to which of these three options will be utilized.

As previously mentioned, the notice of modification is enclosed in order that the remedial language and remedial action might be modified and also that the abatement date might be extended. Thank you for your cooperation. If you have any questions, please don't hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas L. Portle", with a long horizontal flourish extending to the right.

THOMAS L. PORTLE
RECLAMATION SOILS SPECIALIST

TLP/te

cc: Tom Emmett, OSM
NOV file



SCOTT M. MATHESON
Governor

OIL, GAS, AND MINING BOARD

GORDON E. HARMSTON
Executive Director,
NATURAL RESOURCES

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DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS, AND MINING
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Salt Lake City, Utah 84116
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Director

Modification of Notice or Order

To the Following Permittee or Operator:

Name 1200110000

Mailing Address P.O. Box 807 East Carbon Utah 84520

State Permit No. A-1007/012

Utah Coal Mining and Reclamation Act, Section 40-10-1 et. seq., Utah Code Annotated (1953):

Notice of Violation No. N _____ Y TV dated _____, 19 _____.

Cessation Order No. C _____ Y TV dated _____, 19 _____.

Violation No. 1 is modified as follows:

The reason for this modification are as follows:

Omit + not ble for consolidation and
current reclamation

Violation No. _____ is modified as follows:

The reasons for this modification are as follows:

Add: Provide additional information addressing
surface runoff control and erosion
+ support claim that such from these
areas will not result in loss of
reclamation potential

Violation No. _____ is modified as follows:

The reasons for this modification are as follows:

Extend to March 16, 1983.

Date of Service _____

Signature of Authorized Representative

Time of Service or Mailing 2/18/82 _____ a.m. _____ p.m.

Thomas L. Parfitt

Name and I.D. No.

Thomas L. Parfitt #3

1:30

V