

0015



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter

Governor

Dee C. Hansen

Executive Director

Dianne R. Nielson, Ph.D.

Division Director

355 West North Temple

3 Triad Center, Suite 350

Salt Lake City, Utah 84180-1203

801-538-5340

April 20, 1992

Mr. Jon Passic
Castle Valley Resources
P. O. Box 766
Wellington, Utah 84542

Dear Mr. Passic:

Re: Approval to Reconstruct Area of Erosional Gullies at MSHA Refuse Site ID 1211-UT-09-0099-05, Castle Valley Resources, Wellington Preparation Plant, ACT 007/012, Folder #3, Carbon County, Utah

The amendment submitted to the Division on April 6, 1992 does not address all of the concerns and regulations applicable to refuse piles. The proposed berm is not approved at this time due to lack of detail and design. However, the Operator is approved for construction on the refuse pile to provide for re-stabilization of the gullies.

During construction you should be aware that you must meet the requirements of MSHA, 30 CFR 77.214 and 30 CFR 77.215 as required by R645-301-513.400, and applicable portions of R645-301-536, and provide an inspection report promptly following construction, as required by R645-301-514.140,

The proposed amendment is not approved for insertion into the MRP at this point. Numerous deficiencies exist including failure to demonstrate adequate drainage control. The operator will need to re-address the deficiencies identified in the attached technical analysis.

Please note that construction must take place as soon as possible, but no later than May 20, 1992. If there are any questions, or some problem in completing the construction by this date, please contact Sharon Falvey or myself by May 4, 1992. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daron Haddock', written over a horizontal line.

Daron Haddock
Permit Supervisor

cc: S. Falvey

CVERUFUS.APR



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

April 16, 1992

TO: Daron Haddock, Permit Supervisor
FROM: Sharon Falvey, Reclamation Specialist
RE: NOV N92-38-1-1 Proposed Refuse Abatement Amendment,
Castle Valley Resources, Wellington Preparation Plant,
ACT 007/012, Folder #2, Carbon County, UT.

Summary:

The Wellington Pond Coarse Refuse Pile has existed at the Wellington site from 1983 to the present. The gullies that are existing were present at the site before Castle Valley Resources (CVR) acquired the permit.

On Tuesday March 3, 1992 in a phone conversation with Gregory Poole representative for CVR, methods to addressing the amendment abatement for the violation were discussed. The following is a summary of the items discussed.

1. Method of repairing gullies.
2. Mapping the extent of the coarse refuse pile.
3. Drainage of run off from the refuse pile and drainage surrounding the refuse pile.
4. Prevention of ponding on the Refuse pile.
5. MSHA history.

On March 4, 1992 the Division granted extension of the abatement to April 5, 1992.

On Tuesday, March 31, 1992 a meeting with Patrick Collins MT. NIEBO, Wayne Western DOGM, and myself, was conducted to discuss the amendment to abate the NOV. Patrick Collins indicated there is little available information in existing files, and the extent of the project was too large to address in the confines of the NOV amendment. I indicated the amendment could focus on the following to meet the intention of the violation.

1. Drainage and stabilization of the refuse pile.
2. The need to have a certified Professional Engineer during construction, and meet engineering requirements.
3. MSHA application, history, and any refuse construction information should be included.

Analysis

R645(614)-301-746-200

Proposal:

The operator proposes to fill gullies with coarse slurry at the top and toe of the slope. Regrading with a dozer to reshape and decrease the angle of slope.

The operator has proposed a 18" berm be placed at the top of the slope to confirm the assumptions discussed. The assumption is that the causes of de-stabilization on the refuse pile is not from natural precipitation. The following reasons for the assumption were cited. One, the texture of the slurry material encourages rapid infiltration. Two, the watershed collection area is relatively small and in an arid environment. Three, freezing pipeline and slurry spills have occurred in the past and appear to be the cause of the gullies.

The operator has provided a draft permit area and facilities map, E9-3341, indicating the location of the refuse pile. Little information was found at the Price MSHA office in regards to construction. The MSHA office in Denver was contacted to acquire information related to the refuse piles. This information is being sent to CVR.

Analysis

The operator states that the watershed area is relatively small but provides no description of acreage. The operator has not provided any computations demonstrating the runoff in the area is insignificant. No supporting information is presented showing the refuse material encourages rapid infiltration. Rapid infiltration may cause de-stabilization by changing pore pressures in the refuse pile. The design event required to determine if surface drainage is required on the refuse is the 100 year-6 hour event per R645-301-746-212.

Although the slurry pipeline may have spilled in the area in the past due to freezing the operator has not demonstrated that runoff from the pile would not occur. Additionally, the area referred to in the attached letter indicates the freezing pipe and spill problems occurred in the area under the pipe bridge east of the Price River pg. 2 of letter, not at the refuse pile. Maps indicating the location of the slurry pipes should be correlated to areas of de-stabilization.

The operator proposes to place an 18" berm along the top of the slope to prevent further erosion. No design justification, mapping locations are included. The requirement of the regulation is to provide drainage ditches for water conveyance, since ponding on structures by definition is considered an impoundment, the operator must demonstrate that the berm proposed for runoff control will not pond water.

The operator indicates that none of the previous permit maps have outlined the area of the refuse pile specifically. The previous volume contained a map of the permit area. Map E93341 included the existing and proposed extent of the refuse pile.

Deficiencies

1. Provide detailed drainage ditch designs based on the runoff calculation, or demonstrate with certified design calculations that no runoff ditches are necessary per R645-301-746-212.
2. Provide construction and engineering details of the proposed berm construction include map location, address ponding and grading of the surface of the refuse pile.
3. Submit information gathered from MSHA to the Division.

Recommendation

The operator has not provided details of design for the repair of the refuse pile. I, assumed the operator would provide adequate information to complete construction repairs following the submittal. Since the submittal is not adequate, I suggest the Division allow for site construction, and have the operator provide the certified inspection to the Division following construction. The operator must re-submit information addressing the outlined deficiencies.