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August 7, 1997

TO: File

THRU: Daron Haddock, Permit Supervisor *DH*

FROM: Sharon Falvey, Senior Reclamation Hydrologist *SF*

RE: Wellington Proposed Modular Coal Fines Wash Plant 7/22/97, Nevada Electric Investment Company, Wellington Preparation Plant, ACT/007/012 97-D#2, Folder #2, Carbon County, Utah

SUMMARY:

The Permittee submitted this amendment to construct a Modular Coal Fines Wash Plant at the Wellington Preparation Plant adjacent to the coarse slurry and fine slurry impoundments. An initial submittal was received on June 30, 1997. This submittal replaces the June 30 submittal and, responds to issues identified in the July 17, 1997 technical analysis completed by this writer

The proposed construction site is in an area leased from EARTHCO by Covol Technologies. There are no proposed operations beyond construction and there are no reclamation changes beyond removal of the buildings proposed with this amendment.

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION

Regulatory Reference: 30 CFR Sec. 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

Analysis:

Surface Water Resource Maps

Exhibit 712a, submitted with this amendment, shows the location of the proposed Tailings Water Line and a supply well. The supply well, located near the river pump house, is constructed within the Price River water table. A pump will be installed in the well; however, no pumping from the well is proposed with this amendment. Water rights associated with this source must be identified and approved prior to using this source. No disturbance is proposed to occur associated with the pump placement.

Contour Maps

Existing contour information for the proposed wash plant is provided on Sheet 712a.

Findings:

The amendment meets the minimum requirements for these sections.

HYDROLOGIC INFORMATION

Surface Water Resources

Water Rights

The application does not provide a description of which water rights are being leased from EARTHCO by Covol. The water right number, the timing of use, and the type of use needs to be described. This submittal is adequate at this time because, no water is proposed to be used in association with this amendment.

Probable Hydrologic Consequences

The PHC discussions on Hydrocarbon Products and the Spill Prevention and Control Plan are considered applicable as the proposed facilities are indicated in this section. The permittee committed to construct concrete containment pads for hydrocarbon products. This will provide for minimizing potential impact to ground and surface water quality.

Water Monitoring

No changes to the operation plan are proposed. Monitoring will continue under the presently approved plan.

Findings:

This amendment meets the minimum requirements for this section.

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: R645-301-742.300.

Diversions

No diversions were provided with the proposed amendment. The proposal suggest that the runoff will be controlled by grading. The site will be graded to drain to the existing slurry cells. Although, no design calculations were presented to demonstrate that erosion or runoff will be controlled by grading. The permittee's submittal is adequate to complete construction because the proposed grading plan assumes runoff from the site will be sheet flow and will not be concentrated (phone conversation with Karla Knopp, sub-contracted hydrologist for JBR).

The drainage that will reach the pad area, up-gradient of the modular wash plant site, and flow across the disturbed area was not provided in the plan. A calculation to determine if a significant peak run off would result from the drainage area that would flow over this site and continue over the face of the refuse pile should be conducted for the 100-year 6-hour design event (R645-301-746.212). Where drainage flows over material that is not part of the refuse pile the design requirements are for the 10-year, 6-hour precipitation event.

The permittee meets minimum requirements because the proposed grading plan assumes runoff from the site will be sheet flow and will not be concentrated. Should concentrated flows develop the permittee could potentially be cited in violation of the R645 regulatory requirements. The potential for environmental harm is minimal because the capacity and location of the existing slurry impoundments would retain any erosive flows.

Sediment control measures.

Based on the small size of the additional area to be disturbed the amount of additional runoff that may reach the slurry cells would be negligible. Future designs may need to be adjusted as the refuse is removed and areas are reclaimed. Calculations may need to be provided if storage capacity changes when the proposed operations plan is developed.

Other erosion control methods include berms to retain runoff and slope ravel. Interim vegetation and slope matting will be placed on the steep fill slopes associated with the steep slopes and column pad east of the main pad areas.

In regard to construction activities, a commitment is provided that no construction will take place within 100 feet on either side of the Price River. Signs will be placed to at the edge of the 100 foot buffer zone.

According to discussions with Daron Haddock, Permit Supervisor UDOGM, the power poles owned and controlled by Utah Power and Light would not be considered under purview of the R645 regulatory requirements. All privately owned, operated or constructed power poles will fall under the R645 regulatory requirements. Tim Thompson, JBR consultant representing Covol indicated to me while in a phone conversation that all of the power poles are owned and controlled by Utah Power and Light. Discussion and documentation of ownership and control of these structures needs to be presented to confirm responsibility and regulatory requirement.

Findings:

The assuming concentrated flows from the wash plant and over the refuse pile do not occur, the amendment meets the minimum requirements of this section. The permittee should provide the following to be submitted as a condition of the permit in accordance with:

R645-301-740, Provide as-built design information including but not limited to; delineating watershed areas draining from above over the wash plant site; showing peak flows or lack of flow to demonstrate erosion and runoff according to

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R645-301-746.212 or R645-301-742.300, as applicable,
will be controlled by grading.

Recommendations:

It is recommended that construction be allowed to commence with a stipulation that the outstanding requirement, R645-301-740 presented above be attached as a condition of approval. It is believed that the information lacking regarding this regulation will not result in any environmental harm.

Additional clarification of power pole construction is necessary. All privately owned, operated or constructed power poles associated with the mine operation will fall under the R645 regulatory requirements and would need an exemption or temporary sediment control measures. In a phone conversation with Tim Thompson, JBR consultant representing Covol, it was indicated that all of the power poles are owned and controlled by Utah Power and Light. Discussion and documentation of ownership and control of these structures needs to be presented to confirm responsibility and regulatory requirement.

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cc: Paul Baker
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