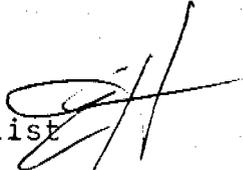


0016

January 3, 1986

TO: Coal File

FROM: Everett Hooper, Reclamation Soils Specialist 

RE: November 11, 1985 Abatement Plans for Notice of Violation N85-8-17-1, Beaver Creek Coal Company, Gordon Creek #2 and #7 Mines, ACT/007/016, #7 and Gordon Creek #3 and #6 Mines, INA/007/017, #7, Carbon County, Utah

Beaver Creek Coal Company (BCCC) submitted plans for abatement of a Notice of Violation (NOV) received for failure to conduct surface mining activities in compliance with term and condition of the permit. The violation was written for removing sediment from the #2 Mine sediment pond and disposing of the material at #3 and #6 Mines. The plans submitted for abatement of NOV N85-8-17-1 are not adequate at this time for the following reasons:

1. The sediment analysis presented by BCCC indicates moderate to high levels of soluble salts (ECe) in three of the five sample sites (8.0, 8.8 and 11.5 mmhos/cm). Further, one sample has what seems to be a high level of manganese (1,800 ppm). Both soluble salts and manganese are at levels that pose potential toxicity to vegetation.
2. The site for disposal of a portion of the sediment is located on an area of a high percent of coal fines that may have to be removed before final reclamation. At the present time, the Division is awaiting calculation on the amount of coal fines present in this area.

It is recommended that:

- A. An alternative site must be found for the disposal of the sediment located on the coal fines area.
- B. Additional samples must be taken to see if the high level of manganese is typical of the sediment. A soil scientist from the Division must be present during sampling.
- C. The sediment must be covered by four feet of nontoxic soil to eliminate the possibility of plant roots coming in contact with the high levels of ECe and manganese.

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UMC 817.103 Backfilling and Grading: Covering Coal and Acid-  
and Toxic-forming Materials - EH

The applicant has not adequately addressed this section.

btb

cc: John Whitehead  
Tom Wright  
9255R-15 & 16