

# SC<sup>3</sup> SOLDIER CREEK COAL CO.

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Price, Utah 84501 \*

March 8, 1991

**RECEIVED**

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DIVISION OF  
OIL GAS & MINING

Daron R. Haddock  
Permit Supervisor  
Division of Oil, Gas and Mining  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, UT 84180-1203

RE: Coal Fines  
Soldier Creek Coal Company, ACT/007/018  
Carbon County, Utah

Dear Daron:

This letter is in regards to an onsite inspection and a follow-up letter by Priscilla Burton on February 21 and March 1, 1991, respectively. Her concern is with the migration of coal fines to the stream buffer zone. In order for Soldier Creek Coal Company (SC3) to avoid the potential NOV, we had to commit to cleaning up the coal fines. The only problem is that we cannot meet her requirements because of the present ground conditions.

Below, I have listed the concerns expressed by a representative of BMW Industrial Services during his onsite visit (3/6/91) to provide a cost estimate for removing the fines. Also, listed below is SC3's position on how it is providing the BTCA to minimize airborne coal fines with the construction of its new surface facilities and runoff control structures.

1. During BMW's visit to the Soldier Canyon Mine, the representative pointed out several problems that would be encountered if the fines were to be removed under the present wet conditions.
  - a. The safety of his employees would be in jeopardy.
  - b. The slipping and sliding would impact the slopes by creating ruts, tearing out vegetation, tracking up the stream bank, and contributing sediment to the stream flow.
  - c. Loss of soil directly under wet fines that could be minimized if the fines were dry.

The representative's overall recommendation is to wait until ground conditions dry up.

2. SC3 would like to clean the fines shortly after the proposed road drainage control and jersey barriers are installed along the area of concern. SC3 believes that a large portion of the fines are haulage and road drainage related and not just the result of coal fines migrating from the conveyor belt/loadout area.

By allowing SC3 to install its proposed control structures prior to removal of the coal fines, it will allow us to better evaluate the effectiveness of the control structures and remove any additional settling of fines during road construction.

3. SC3's overall facilities expansion will greatly reduce the potential for wind blown coal fines. The following are controls that will help alleviate the coal fines.

1. Coal silos will house the coal
2. Additional coal loadout bin
3. Preparation plant
4. Recycling of coal fines during preparation process and blending with the coal
5. Water spray at all transfer points along the coal conveying facilities
6. Treat county road drainage
7. Water tight jersey barriers to assist in road drainage and help settle coal fines quicker
8. The installation of 910 feet of stream culvert
9. Covering and enclosing all coal handling facilities

The facilities expansion will not only accommodate SC3's increased production levels, but provide the operator with the means to minimize environmental impacts.

The Division must take note that SC3 is acting in good faith to minimize any environmental impact associated with its coal mining activities. Coal fines are and always will be an unavoidable by-product of coal mines, much like carbon monoxide is an unavoidable by-product of motor vehicles. The only thing the operator can do is install facilities like we propose, to minimize the particulate matter.

SC3 will clean the coal fines within the buffer zone during the early part of 1991. SC3 will not, however, clean the coal fines on an annual basis. The fines presently within the buffer zone are a combination of pre-SMACRA and ongoing mining activities. We will monitor the success of our control structures to ensure that we are adequately controlling the coal fines. If any future cleaning of fines is necessary, they will be cleaned when the fines reach a depth of 3-6 inches.

SC3 would appreciate a common sense approach by the Division with regards to coal fines. I hope you agree with our position and are willing to do what is best for both the operator and the environment.

Sincerely,

SOLDIER CREEK COAL COMPANY



Johnny Pappas  
Environmental Coordinator

JP/sm

cc: Priscilla Burton