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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
Governor
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355 West North Temple
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Salt Lake City, Utah 84180-1203
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January 24, 1992

Mr. Rick Olsen
Soldier Creek Coal Company
P. O. Box I
Price, Utah 84501

Dear Mr. Olsen:

Re: Stipulation Review, Soldier Creek Coal Company, Soldier Canyon Mine,
ACT/007/018, Folder #3, Carbon County, Utah

A technical review has been completed on your response to stipulations attached to the revised Mining and Reclamation Permit issued to Soldier Creek on July 19, 1991. As a result of the review, the Division has determined that there are three stipulations that still need to be addressed. Before the Division can renew your permit we must be sure the previous stipulations have been complied with. Please review the attached technical memo and respond to Stipulation R645-301-536.-(1)-(PWB), R645-301-536.-(2)-(PWB), and R645-301-553.250.-(1)-(PWB) before February 3, 1992.

If you have any questions regarding any of these requirements, please call me or Priscilla Burton at 538-5340.

Sincerely,

A handwritten signature in cursive script that reads "Daron R. Haddock".

Daron R. Haddock
Permit Supervisor

Enclosure

cc: B-Team
PRISSTIP.SC3



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January 24, 1992

TO: Daron Haddock, Permit Supervisor

FROM: Priscilla Burton, Soils Reclamation Specialist 

RE: Compliance with Stipulations, Soldier Canyon Mine, Soldier Creek Coal Co., ACT/007/018. Folder #2, Carbon County, Utah.

SUMMARY

On July 19, 1991, Soldier Creek Coal Company was issued a revised Mining and Reclamation Permit in conjunction with the approval of the surface facilities expansion revision to their existing permit. In a previous memorandum dated August 26, 1991, I reviewed compliance with stipulations itemized as #1, #2, and #17 on Attachment A of the permit. Items #1 and #2 were complied with.

Compliance with some stipulations on the permit was extended to October 11, 1991 to allow for simultaneous inclusion of the information with the permit renewal submittal. This review follows each of these stipulations that I authored. A technical review of the submittal was provided in the Technical Deficiency memo.

ANALYSIS

ITEM #3

Stipulation R645-301-222.200.-(1)-PWB

In the 1992 MRP renewal, due October 11, 1991, the errors in Section 10.6.4 and in 10.6.5 must be corrected as follows; the chart in Section 10.6.4 must provide the correct date of sampling for all soil samples taken on 11/11/88; field note identification of samples taken on 11/11/88 and the identification of soil samples in the narrative (Section 10.6.5) must agree.

Proposal:

A description of the soils is accompanied by analyses of soil samples that have been taken over the years. These results are presented in Table 2.22-1, Table 2.22-2 for the

Central Facilities site, and in Appendix 2-C (Vol 2) and Table 2.24-3 for the topsoil site. Field notes are provided in Vol 5, Appendix 10.

Compliance:

The soil sampling information is presented in an organized fashion. The applicant is in compliance.

ITEM #4

Stipulation R645-301-222.400.-(1)-PWB

SC3 must monitor the reference areas for range condition and submit this information with the permit renewal due October 11, 1991.

Proposal:

The productivity of several range locations (including the reference areas) within the permit area were evaluated by the SCS on 10/30/90 and 10/7/91 and presented in Appendix 3-C (Vol 3).

Compliance:

The requested productivity information was provided and has been reviewed for technical adequacy in a separate document. The applicant is in compliance with this stipulation.

ITEM #5

Stipulation R645-301-231.200.-(1)-PWB

Descriptions of the substitute soil medium in Section 10.2.14, pg.10, of the 1992 MRP renewal due October 11, 1991 must reflect accurate SAR and Sodium Concentration Values.

Proposal:

The analyses of the substitute soil medium derived from the recent surface facilities expansion is displayed in Table 2.24-2. The analysis of the stream channel soils is provided in Illustration 10.2.14-1.

Compliance:

The SAR values reported in this table are accurate. The sodium concentration values are not reported in this table, but are accurately presented in 10.2.14-1. The applicant is in compliance with this stipulation.

ITEM #6

Stipulation R645-301-233.200.-(1)-PWB

A revised Section 10.6.7 must indicate the placement of the portal soils, yard expansion soils and initial stream culvert soils at the top of the backfill, for use as subsoil, pending the results of sampling for hot H₂O soluble Boron, oil and grease, and TCLP tests. This revision must be included in the 1992 permit renewal, due October 11, 1991.

Proposal:

The application states on page 2-24 that the portal soils, the stream culvert soils and the yard expansion soils will be used at the topsoil of the backfill as subsoil. Prior to this placement, the soils will be sampled according to Table 6 of the "Guidelines for Management of Topsoil and Overburden."

Compliance:

Sampling of the aforementioned soils according to Table 6 of the "Guidelines" will include concentrations of boron, selenium; and percentages of non-sulfate sulfur and calcium carbonate. The applicant is in compliance with these stipulations.

ITEM #7

Stipulation R645-301-242.-(1)-PWB

The permit renewal, due October 11, 1991, must indicate that the disturbance of 5.6 acres will receive at least one foot of cover on all slopes less than 37° during final reclamation.

Proposal:

On page 2-35, the total recent expansion disturbance is listed at 6.4 acres. Reclamation will not occur over the pipeline road, county road or stream channel.

Therefore, the total surface disturbance is reduced by 3.64 acres and amounts to 2.76 acres.

Compliance:

This stipulation has been complied with on page 5-68, where it is indicated that one foot of topsoil will be replaced on the post-SMCRA disturbance of 4.3 acres. (The 2.76 acre figure was increased by additional areas of previous post-SMCRA disturbance.) The applicant is in compliance with this stipulation.

ITEM #8

Stipulation R645-301-242.-(2)-PWB

The permit renewal, due October 11, 1991, must specify the depth of ripping the backfill during final reclamation.

Proposal:

Depth of ripping of the backfill is specified at 1.5 feet on page 2-40 , sec 2-42 of the MRP.

Compliance:

The application is in compliance with this stipulation.

ITEM #9

Stipulation R645-301-244.-(1)-PWB

The permit renewal, due October 11, 1991, must indicate that rills and gullies that form must be reseeded as well as filled and graded.

Proposal:

The application contains this commitment on page 2-45.

Compliance:

The applicant is in compliance with this stipulation.

ITEM #10
Stipulation R645-301-300.-(1)-PWB

Prior to approval, SC3 must incorporate the continuous length of the streambank from MW 2 discharge to the REI storage yard into the reclamation plan and depict the area proposed for riparian revegetation/enhancement on Ex. 10.3.6-1.

Proposal:

Exhibit 5.42-4, Proposed Riparian Reclamation Areas, identifies areas to receive riparian revegetation. Both sides of the length of the streambank from the Mine Water #2 discharge to the outlet of the stream culvert and the northwest streambank from the stream culvert to the parking lot have been incorporated into the reclamation design. A portion of the streambank affected by reclamation of the parking lot, sediment pond and REI/substitute topsoil storage area has also been included.

The approach to reclaiming the riparian areas is further elucidated with Figure 3.41-1, Typical Riparian Revegetation Layout, found on page 3-21 of the MRP.

Compliance:

The applicant is in compliance with this stipulation.

All areas of disturbance have been incorporated into the plan. The Division suggests that rather than three symbols to portray riparian reclamation areas, only one symbol is used. The use of three symbols seems unnecessary as the description in the legend for each symbol does not differ.

ITEM #11
Stipulation R645-301-300.-(2)-PWB

The areas of interim seeding/reclamation efforts and areas receiving permanent revegetation treatment (prior to reclamation) must be specified on the reclamation map (Ex. 10.3.6-1) to be submitted with the permit renewal due October 11, 1991.

Proposal:

Areas of final riparian reclamation are found on Exhibit 5.42-4. Areas of interim

reclamation are shaded on Exhibit 3.7-2 which was submitted on January 8, 1992.

The MRP on page 3.31 indicates that soil stockpiles, temporary road locations and sites of disturbance not in regular use will be revegetated in the interim prior to final reclamation. Methodology for interim reclamation is described under sec 3.41.24 of the MRP. The seed mixture is presented in App 3-E.

Compliance:

The applicant is in compliance with this regulation.

The temporary road location referred to is the County Road 53. Sites of disturbance not in regular use include ASCA#5, the northwest streambank of Soldier Creek opposite the mine office and loadout and may include other areas as development progresses. These areas are specified on Exhibit 3.7-2 and will be reviewed by Paul Baker of the Division for technical adequacy.

ITEM #12

Stipulation R645-301-300.-(3)-PWB

The reclamation timetable chart must be revised to include seedling planting the April following seeding (p.23), due October 11, 1991.

Proposal:

The reclamation timetable is provided on page 3-15 of the MRP. April planting of seedlings the year following reclamation is indicated.

Compliance:

The applicant is in compliance with this stipulation.

ITEM #17

Stipulation R645-301-536.-(1)-(PWB)

- (1) SC3 must designate a temporary storage area in the plan and on a map prior to storing any waste rock material on the surface within thirty (30) days.**

Proposal:

Present plans (page 5-45 and 5-46) call for the storage of coal processing waste and excess spoil on the surface over an area outlined on Exhibit 5-21-1a, until the waste rock storage site is operational.

A response to this stipulation was reviewed on August 26, 1991 in a review document. At that time, the concept of uncontained storage of waste from coal processing on the surface was not acceptable. The approved amendment to the MRP was to utilize a 350 T storage bin.

Compliance:

The applicant must revise Exhibit 5-21-1a and the narrative to indicate that a maximum of 1000 yd³ of underground development waste and/or excess spoil will be stored on the operations pad. The plan must commit to removing the stored waste rock/spoil from the operations pad when the waste-rock storage site becomes operational. At that time, a small area can be designated at the mine facilities for the storage of approximately 100 Tons of mine waste to be used in conjunction with the 300 T truck bin which will accept refuse from the refuse conveyor belt (page 5-31).

Prior to approval the narrative on pages 5-45 and 5-46 must be revised to delete references to coal mine waste on the surface and the legend on Exhibit 5-21-1a must be revised to delete the storage of coal mine waste on the surface.

ITEM #17

Stipulation R645-301-536.-(2)-(PWB)

- (2) SC3 must design a sampling program for temporarily stored waste and permanently stored waste to be included in the Mining and Reclamation Plan within thirty (30) days.**

Proposal:

The application proposes sampling of coal mine waste and excess spoil temporarily stored for longer than three months on the surface. The waste will be analyzed according to Division "Guidelines," Table 6. The Division will be notified of any acid/toxic materials immediately and at least annually otherwise.

Compliance:

A plan for sampling of waste-rock stored on the surface was presented in response to this stipulation on August 19, 1991. A review followed on August 26, 1991. At that time, the Division requested that the narrative must be rewritten to indicate submittal of sampling information (date of sampling, location of sampling, and analytical results) on a quarterly basis.

The present plan is not adequate. It appears that there will be no storage of waste unless it is stored temporarily on the surface for longer than three months. There must be some provision for the sampling of waste hauled directly to the waste rock site to enable adequate characterization of waste-rock and mine-waste percolate and identification of acid/toxic material. A sampling program might be based on tonnages hauled or on a quarterly basis. If the material was stored temporarily on the surface, than this analysis would suffice for that quarter's analysis or for volume (tonnage) of material.

The application is not in compliance, however enough information was provided for the presently approved activity. Information requested concerning the sampling of permanent waste-rock will be reviewed during the technical deficiency review of that revision to the plan.

ITEM #18

Stipulation R645-301-536.-(2)-(PWB)

Ninety (90) days prior to stockpiling waste material on the surface, the location for temporary storage of coal mine waste and the maximum amount to be temporarily stored will be designated in a mine plan revision of Section 10.2.6.

Proposal:

The MRP does indicate the storage of coal mine waste on the surface as written on pages 5-45 and 5-46 and indicated on Exhibit 5-21-1a. The maximum amount of coal mine waste to be stored on the surface from portal roadway grading is 1000 yd³.

Compliance:

The applicant is not in compliance with this stipulation.

The Division anticipates that the waste generated by portal grading will fall under the category of excess disposal and development waste, not coal processing waste. **Prior to permit approval please make the correction in the narrative.**

ITEM #22

Stipulation R645-301-553.250.-(1)-PWB

SC3 must commit, in the Mining and Reclamation Plan, to covering all acid/toxic and coal material during final reclamation with four feet non-combustible and non-toxic material by October 11, 1991.

Proposal:

The application commits to covering refuse with two feet of cover material (page 2-42). No acid/toxic material is expected.

Compliance:

The applicant is not in compliance with this stipulation. No commitment for covering material determined to be acid/toxic material was found. **Prior to approval, the permit must contain this commitment.**

CONCLUSIONS

There remain several outstanding stipulations on the existing Soldier Creek Coal Company permit which must be complied with prior to approval of the new mining and reclamation permit, in particular, Item #17 (1), #18 and #22 must be addressed.