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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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December 16, 1993

TO: File

THRU: Daron Haddock, Permit Supervisor
Joe Helfreich, Inspection and Enforcement Supervisor

FROM: Sharon Falvey, Senior Reclamation Hydrologist *SJF*

RE: NOV 93-38-1-3, Abatement Submittal II, Received December 15, 1993 October, Soldier Creek Coal Company, Soldier Canyon Mine, ACT/007/018, Folder #2, and Folder #5, Carbon County, Utah

SUMMARY

The Operator was issued Violation N93-38-1-3 on September 22, 1993 and received an extension on November 4, 1993 allowing all abatement measures to be submitted by 5:00 p.m. on December 8, 1993 and, requiring the operator to obtain Division approval for the amendment by December 22, 1993. The extension was based on the operators request for more time and the time remaining before the end of the 90 day abatement period.

The Operator's initial abatement plan was received on October 22, 1993 (Prior to the October 25, 1993 abatement date). The operator was sent a deficiency letter dated October 28, 1993 with accompanying deficiency document dated October 26, 1993. The operator contacted the Division on December 8, 1993, by telephone, requesting an additional couple of days. The operator was granted until December 10th, in a phone conversation with Daron Haddock. This abatement, was FAXed to the Division on December 10, 1993 and the hard copy was received on December 13, 1993. On December 15, I discussed deficiencies noted in this review during a partial inspection. This memo provides the completed review and identifies existing deficiencies.

TECHNICAL REVIEW:

Violation 1 of 3

Previous Analysis/Deficiency Synopsis:

Limits for width and grade were not retained on road cross-section certification. The drainage design from the portal access road must be presented and certified.

Response:

Exhibit 7.32-1 was changed to correctly show that there are no ditches adjacent to the road leading to the new portals. Drainage from this area reports to the sediment pond via a cobble lined ditch adjacent to the county road.

The operator states the runoff from Watershed 13 A reports a 0.62 cfs to this road. If concentrated in a one foot drainage channel this would be 4.14 fps. Runoff from this area is not concentrated therefore, erosion is not a problem.



Analysis:

The operator still does not have provided limits of width and grade on the certified road cross sections.

The operator's approach to describing drainage from the portal access road is reasonable. However, the operator has not provided a means for insertion of this information into their plan. The information should be submitted with the usual design information such as slope, CN, Manning's n and reference to watershed runoff calculations. In addition, the operator should check the existing plan for replacement of the previous road drainage design. The operator should show the direction of flow in that area. The road designs must be accompanied with a certification. Reference to the location of designs, supplied for the culverts to which the road drainage reports, should be clearly noted.

Deficiency:

1. The operator is required to provide the limits for width and grade on certified road cross sections.
2. The operator should provide design information such as slope, CN, Manning's n and reference to watershed runoff calculations, for the portal access road. These designs should be submitted for insertion into the plan. These designs must be certified. Reference to the location of designs, supplied for the culverts to which the road drainage reports, should be clearly noted. The existing plan may still contain a description of the previous road design which should be removed.

Violation 2 of 3

Previous Analysis/Deficiency Synopsis:

According to the topographic lines on Exhibit 7.32-1 there is an additional drainage ditch on the north east side of the road. The operator does not identify or discuss the drainage for this ditch.

The berm associated with the road above the fan is not identified or designed. The designs presented should use minimum and maximum slope, and minimum design dimensions.

Response:

There is not an additional drainage ditch on the north east side of the No. one fan road. This area is covered with rock and is approximately the same grade as the road.

Minimum and maximum flow calculations are included for the asphalt berm, asphalt ditch, and gravel berm. These results will be incorporated as Appendix 7J. The area above the fan is a storage area and not a drainage channel therefore berm or ditch calculations are not required. Refer to exhibit 7.32-1.

Analysis:

Any existing berm or drainage ditch calculations are required for all disturbed sites. If ditches and berms do exist at the site they should be designed.

The operator has provided design calculations which show the berms and ditches to be adequately designed. Runoff volume was not verified and is assumed to be correct based on previous approval.

The operator did not provide a scale for the design of the structures. The operator should provide scale for the existing structures. The basis for scale would verify whether the operator has adequate distance to meet the flow top width to retain the flow within the structure. On the basis of the runoff contour map Exhibit 7.32-1 the operator appears to have adequate distance. These top widths may be field verified.

Deficiency:

None.

Violation 3 of 3

Previous Analysis/Deficiency Synopsis:

Electrical lines lead from the substation to an area outside the permit boundary and across the stream ending near the portal headwall. The operator must include the power lines which are used for coal mining and reclamation operations within their permit boundary and identify the area affected by the operations. The operator should also make sure the reclamation plans consider the identified power lines.

Response:

Chapter 5-33 a, requests an exemption from sediment control under R645-742.240 for the power lines. All non Utah Power and Light transmission lines are located within the permit boundary. Reclamation of the power lines was previously addressed and is located in on page 5-77 of the MRP.

Analysis:

If the operator wishes to pursue the exempt area the operator must provide a demonstration that sediment control measures are not necessary. However, the operator can show that the area has used BTCA in preventing contributions of runoff off the disturbed area through the following:

- a. The operator may define the size of the small disturbance based on the runoff volume for the 10 year-24 hour event. The design should provide parameters representative of the site condition and, use a determined maximum size disturbance showing that runoff for the sites of a specified size or smaller is insignificant. (e.g. will not effect downstream area due to changes in runoff characteristics and, flow velocity does not have erosive properties).
- b. Minimizing disturbed areas can be demonstrated by discussing the maximum extent of the disturbance for the structure.
- c. Minimizing erosion is demonstrated by describing the structure in the area, and describing retention of vegetation around the disturbed area.
- d. A commitment to provide specific sediment control measures should the vegetative or disturbed area conditions change could be identified.

Deficiency:

1. The operator must demonstrate that sediment control measures are not necessary or provide a design of BTCA for alternate sediment control measures.

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RECOMMENDATION:

The operator should be able to address the requested deficiencies and obtain approval for the amendment from Division by the abatement date December 22, 1993. It should be noted that Part 2 of 3 should be considered terminated at this time.

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