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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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355 West North Temple
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Salt Lake City, Utah 84180-1203
801-538-5340

April 24, 1992

Mr. Michael W. Galsson
Andalex Resources, Inc.
P. O. Box 902
Price, Utah 84501

Dear Mr. Glasson:

Re: Stipulations of Permit Renewal. Centennial Mine. Anadalex Resources.
ACT/007/019-92B. Folder #2. Carbon County. Utah.

Information was received on 2/28/92 and 3/6/92 with regard to several stipulations placed on Centennial's 1/3/92 permit. A review of this information was unavoidably delayed due to several pending permit renewals and amendments.

The technical staff has presently completed a review of your submittal and found that further detail is required. Specific clarifications which must be made by May 15, 1992 and June 24, 1992 to adequately respond to the stipulations are listed in the attached technical review. If a complete and adequate response to this technical review is not received on or before May 15, 1992 (and June 24, 1992), enforcement action will be taken.

Thank you for your cooperation and timely delivery of the required information. Any questions can be handled by either Priscilla Burton or myself at 538-5340.

Sincerely,

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

Daron Haddock
Permit Supervisor

PB
Enclosure
cc: Insp. Ntbk.

Cov007.019



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TO: Daron Haddock, Permit Supervisor
FROM:  Priscilla Burton, Reclamation Specialist
DATE: April 22, 1992
RE: Response to Stipulations for Permit Renewal. Centennial Mine. Andalex Resources. ACT/007/019-92B. Carbon County. Utah. Folder #2.

SUMMARY:

Information regarding stipulations placed on the Centennial permit renewal was received 2/28/92. The information provided is not complete and requires further clarification. In reviewing the response to the stipulations, I have first presented the stipulations, followed by Centennial's response and an analysis of compliance with the stipulated request. Itemized deficiencies are provided for Centennial's convenience.

TECHNICAL DEFICIENCIES:

R645-301-224. Substitute Topsoil.

Stipulation R645-301-224 (PWB):

On or before February 29, 1992, revise Plate 7 to indicate the location of the substitute topsoil storage, provide the Division with the amount of substitute material located in the storage pile, with copies of the design, implementation and evaluation of test trials, and with the results of analyses performed on the substitute topsoil medium.

Response:

Plate 6 has been revised to show topsoil and substitute topsoil locations. Page 114 has been amended to state the topsoil and substitute topsoil volumes and storage locations. An evaluation of the seeding of the approved seed mix on the substitute topsoil will be undertaken in 1992.

Analysis:

Test trials on the substitute topsoil medium were not described in detail. From the response on page 114 of the MRP, it is assumed that the test entailed seeding of the approved mix on the

substitute soil. No information on soil preparation, amendments and/or mulching has been provided. No analyses of the substitute topsoil were sent.

Topsoil pile J is not labeled on Plate 6. Substitute topsoil areas are designated, but the perimeter of the storage area is difficult to determine on Plate 6.

The revised page 114, submitted 2/28/92, refers the reader to Plate 7 for topsoil testplot locations. This is in error, as the substitute topsoil locations are shown on plate 6 and the test plots are not shown on either Plate 7 or 6.

Deficiencies:

1. On or before May 15, 1992, Centennial must describe the soil preparation, seeding and mulching techniques which accompanied the seeding of the substitute topsoil storage areas.
2. On or before May 15, 1992, Centennial must label topsoil storage area J on Plate 6 and designate the perimeter of the two substitute topsoil storage areas on Plate 6.
3. On or before May 15, 1992, Centennial must provide the Division with analyses of the substitute topsoil material according to the parameters outlined in Table 6 of the "Guidelines for Overburden and Topsoil Management," (DOGM, 1988).
4. On or before May 15, 1992, Centennial must correct the following references to plate 7 on page 114: under the heading "Topsoil Pile Summary, Propsed," and in paragraph 4 under this heading. The corrected citations should read plate 6 instead of plate 7.

230. Operation Plan.

Stipulation R645-301-231.400 (PWB):

On or before February 29, 1992, Plate six will be amended to show the location of topsoil storage area B and the MRP will be amended on page 114 to state the location of topsoil storage area B as well.

Response:

Topsoil storage area B has been absorbed by topsoil pile J (shown on Plate 6, but not labeled as J). The plan describes five topsoil storage areas on page 114: A, C, F, G, J.

Analysis:

Page 3
ACT/007/019
4/22/92

Centennial will be in compliance when item #2 in R645-301-224, above, is taken care of.

232.200. Where the topsoil is of insufficient quantity...

Stipulation R645-301-232.200 (PWB):

On or before February 29, 1992, provide the Division with the location of the substitute topsoil and place a sign on the storage area so that it will be protected.

Response:

Page 114 of the MRP indicates that the substitute topsoil is located in a pad in the area of the shop and APEX truck loadout. The material "was once designated as substitute topsoil." Signs have been placed at the site of each substitute pile location to mark the area and provide a measure of protection.

Analysis:

The substitute material was apparently designated as substitute medium and then a shop building and load out were constructed on top of them. No analyses were submitted to document the suitability of the material for substitute topsoil.

Because construction of a shop and loadout on the substitute material has already occurred. The only protection that can be afforded the substitute topsoil medium is careful watch by inspectors and mine personnel to avoid oil and coal contamination, and compaction by equipment and stored supplies. The posting of signs and the placement of the area on Plate 6 will aid in this protection.

Deficiencies:

Please see item #2 and #3 under R645-301-224 above.

120. Permit Application Format and Contents.

Stipulation R645-301-122 (PWB):

On or before February 29, provide the Division with an update to page 193, providing a clear and concise plan for the treatment of oil and fuel contaminated soils and include a notarized copy of the Spill Prevention Control and Countermeasure plan as an appendix to the MRP.

Applicant's Proposal:

A copy of the SPCC plan is referred to on page 192A and included in Appendix P. The SPCC plan states that control of oil spills will be provided by the present ditches and sediment ponds which are sized to hold the flow. On page 193 of the plan, an operational countermeasure for the spillage of fuel and oil on to soil is adherence to the local requirements for the treatment of oil and fuel contaminated soils.

Treatment during final reclamation of oil and fuel soaked soils is discussed on page 192-A where Centennial commits to utilizing the best technology available at the time of final reclamation for treatment of the material. Treated material will be used as fill during grading. If no treatment is possible, the material will be taken to a State and EPA approved landfill.

Analysis:

A notarized copy of the SPCC plan was requested, but review of the 40 CFR Part 112 indicates that certification by a registered professional engineer is required.

Concise operational plans for the treatment of oil and fuel contaminated soils as required by the locality and as indicated on page 192 were not provided.

Deficiencies:

1. On or before May 15, 1992, Centennial must provide the Division with an update to page 193, providing a clear and concise plan for the operational treatment of oil and fuel contaminated soils.
2. On or before May 15, 1992, Centennial must have the copy of the Spill Prevention Control and Countermeasure plan (Appendix P) certified by a Registered, Professional Engineer.

528.350. Acid-forming and toxic-forming materials

Stipulation R645-301-528.350 (PWB):

On or before February 29, 1992, update Appendix E to include sampling of the roof and floor of the Centennial seam and include recent sampling of roof and floor from active mine locations for all four seams.

Page 5
ACT/007/019
4/22/92

Response:

Page 43 of the MRP states that roof and floor samples will be provided in Appendix E for all seams mined. Page 192 of the MRP states that mid-seams and roof and floor of all four coal seams will be analyzed on an annual basis in conjunction with the Graves Lease. Page 192 further details the analyses which will be performed according to the "Guidelines for Overburden and Topsoil Management." The MRP states that the parameters to be evaluated will

"prove pH, Electrical Conductivity, saturation percentage, particle size analysis, soluble Ca, Mg and Na, Sodium Adsorption Ratio, selenium, Total N, Nitrate-N, Boron, Maximum Acid Potential, Neutralization potential, organic carbon, exchangeable sodium, available water capacity, and rock fragments. These parameters will be measured by acceptable methods at a qualified commercial testing laboratory," pg 192, ACT/007/019, MRP

The following updates to Appendix E were provided:

Roof and floor analyses of Aberdeen, Gilson, Lower Sunnyside (Apex), and Centennial seams provided maximum acid potential. No other information on toxicity or alkalinity was provided.

Analysis:

There are two separate issues to be discussed.

First, recent sampling of the roof and floor of the Centennial seam was not submitted. During a complete inspection at the mine site 4/21/92, the issue was discussed. The operator was not familiar with this commitment in the plan. The inspector (Paul Baker) determined that a violation existed for failure to follow the approved plan with regard to sampling in the Graves Lease. Notice of Violation 92-41-2-1 was issued.

The second issue is that results of the annual sampling of the roof and floor of all seams in the current mining area must be included in Appendix E as committed to on page 43 of the MRP. Acid, toxic, and alkalinity information should be analyzed according to Table 6 of the "Guidelines for Overburden and Topsoil Management," (DOGM, 1988). The necessary parameters to be measured are acid forming potential, neutralization potential, soluble Ca, Na, and Mg; calculated SAR using the soluble salt values in meq/L, pH, EC, hot water soluble Boron, hot water soluble Selenium, and texture.

The requirements for sampling the roof and floor material so intensively resulted from a highly acidic sample from the Lower Sunnyside Floor and the SAR values reported for the Gilson and Aberdeen roof samples. All of these baseline samples were taken in February 1981 and analyzed by Camp Dresser and McKee Inc of Wheatridge, Colorado.

Deficiency:

1. Centennial must provide the results of recent sampling of the roof and floor and coal-seam as outlined on page 43 of the MRP. Analyses of acid forming potential, neutralization potential, soluble cations (Na, Ca & Mg), calculated SAR, pH, EC, hot water soluble Boron and Selenium and texture for the roof and floor of the Aberdeen, Gilson, and Lower Sunnyside seams must be included in Appendix E of the MRP on or before June 24, 1992.

528.340. Underground Development Waste.

Stipulation R645-301-536.300 to 320 (PWB):

On or before February 29, 1992, provide the Division with copies of the analyses as requested by H. Sauer in correspondence dated 11/22/91, and provide an appendix to the ACT/007/019 plan which summarizes the operation and reclamation plan for the waste stored at Wild Cat.

Response:

Pages 191 and 192 of the MRP discuss the disposal of underground development waste. Rock which is associated with lump coal is being taken to the applicant's WildCat Loadout (ACT/007/033). Copies of a 24 hour leach sample of the boney and coal waste at Wild Cat Loadout was submitted. The waste was analyzed using EPA methodology for acidity, alkalinity, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver.

A discussion of the reclamation plan for the waste at the Wild Cat Loadout is provided in Appendix Q.

Analysis:

The contents of Appendix Q must be referred to on pages 191 and 192 in the ACT/007/019 MRP, so that there is no confusion of the topic and location. As requested, the reclamation plan for Wild Cat Loadout specifies the bonding for coal waste reclamation and

Page 7
ACT/007/019
4/22/92

the details of reclamation of the waste.

The choice of parameters for analysis does not follow the Division guidelines. The information provided was reviewed by H Sauer and found inadequate. Further information on sampling of the Wild Cat Loadout waste rock can be obtained by review of the sampling plan and analyses received in response to NOV 92-32-1-2, issued 1/28/92. Because the Wild Cat Loadout receives waste from several mines, the sampling conducted for compliance with NOV92-32-1-2 will not shed any light on the waste produced by Centennial. Therefore, the inclusion of these analyses into the Centennial plan would not serve any purpose. Therefore, this requirement should be deleted from the stipulation. The roof and floor analyses requested in R645-301-528.350 will provide the necessary characterization.

Deficiencies:

1. On or before May 15, 1992, Centennial must provide a reference to the contents of Appendix Q within the narrative on page 191 or 192, to eliminate confusion over the topic and location of the reclamation plan described in Appendix Q.

RECOMMENDATIONS:

The Division has received an incomplete response to the stipulations placed on the permit in Attachment A, 1/3/92. Details which remain outstanding must be received by the Division by May 15, 1992. If information received on May 15, 1992 is inadequate, then enforcement action should be taken.

cc: Insp Ntbk

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