

October 9, 1981

Inspection Memo  
to Coal File:

RE: Blazon Company  
Blazon Mine  
ACT/007/021  
Carbon County, Utah

DATE: September 3, 1981  
TIME: 10:00 a.m. - 4:00 p.m.  
WEATHER: Warm, Clear Skies  
COMPANY OFFICIAL: Kirk Harvey  
STATE OFFICIAL: David Lof

Compliance with Permanent Performance Standards

771 et al Permits

The following approval letters and permits were available on the minesite as required: (A) letter from the Division dated July 3, 1980, granting final approval to Blazon under the Interim Program; (B) letter from the Division dated May 22, 1981, granting approval of Blazon's development waste disposal plan. (Approval was accompanied by 11 stipulations; Stipulations are discussed below); (C) NPDES permit #UT-0023647, the expiration date for the permit was December 31, 1980. Blazon has re-applied and is currently waiting for EPA to process the new permit.

On August 7, 1981, Sandy Pruitt of the Division wrote NOV #N81-2-9-1, for failure to protect stockpiled topsoil as required under UMC 817.23(b) and failure to meet requirements of Stipulation 5-81-10 of the development waste disposal plan approval dated May 22, 1981. The remedial action required was the submittal of plans as required in Stipulation 5-81-10 and the implementation of plans to comply with UMC 817.23 and 817.11(g). The violation was terminated by Sandy Pruitt effective September 4, 1981, the date of service was September 28, 1981. At the time of the inspection, it was evident that the operator had constructed and was maintaining the disposal site in accordance with Stipulations 2-6, and 11. However, it is suggested that during the next inspection that the status of Stipulations 1 and 7 be discussed with the operator.

817.11 Signs and Markers

The mine identification sign is in need of repair so that the ACT number is readable as required in UMC 817.11(b). This was noted as an area of concern and the operator was given a deadline of September 28, 1981.

Perimeter markers were in place and were quite visible. Three buffer zone signs had been posted, however, it was felt that the signs did not clearly demark the buffer zone as required in UMC 817.11(e). Compliance with this regulation was also given a deadline of September 28, 1981.

#### 817.21-.25 Topsoil

Blazon has three topsoil stockpiles. The largest of the three stockpiles is located on the southern edge of the operation. It is protected from erosion by berming and has been revegetated with excellent success. The other two topsoil stockpiles were addressed in NOV #N81-2-9-1 as was discussed earlier in the Permits section. One of the topsoil stockpiles is located next to an undisturbed drainage channel above the disposal site. A berm has been placed around the stockpile and it will be seeded with grasses this fall in order to protect it from erosion. The third topsoil stockpile is located along the Class III access road to the disposal site. The stockpile is located directly below a large conifer. This location protects the stockpile from erosion due to direct rainfall and the stockpile is protected from runoff by means of the road drainage.

#### 817.41-.52 Hydrologic Balance

There were two areas where the inspector expressed concern over the possibility of disturbed area runoff leaving the permit area without being treated. One of the areas was near the northern most stream crossing. The operator indicated that he had plans to regrade this area this fall. However, the inspector felt that it was necessary in the interim to place straw bales in those areas where there was a potential for disturbed area runoff to leave the permit area. The operator was given a deadline of September 28, in order to comply with this request. The other area was the southern most storage pad. The operator was asked to implement some sort of sediment control structure such as an earthen berm or straw bales along the perimeter of this area in order to comply with requirements of UMC 817.42 and 817.45. The operator was given a deadline of October 14, 1981.

In general, Blazon has runoff drainage problems on both the lower and upper pads. The operator was given a deadline of October 14, to re-establish the surface grade, berms and ditches on the lower pad in order to meet design and maintenance requirements of UMC 817.42(a)(1) and 817.45. On the upper pad, the operator is currently working on plans to install a drop drain on the outside edge of the pad between the fan and conveyor portals. This drain will be designed to handle all the runoff from the portal pad. The runoff will be conveyed via a culvert to the lower pad and then through the diversion ditch into the sediment ponds.

Gullying was becoming evident in the southwest corner of the sediment pond. The operator was asked to stabilize and maintain this area in order to comply with requirements under UMC 817.45, 817.46(e) and (s). A deadline of October 14, 1981 was established.

INSPECTION MEMO TO COAL FILE  
ACT/007/022  
October 9, 1981  
Page 3

#### 817.52 Surface and Ground Water Monitoring

Surface water monitoring data through April of 1981, was available for six monitoring stations. The inspector asked to see a map illustrating the position of the six monitoring stations, however, the mine operator was not able to produce such a map due to the fact that he had just recently become employed by the company and, therefore, was not familiar with the entire operation. The operator was informed at that time that during the next inspection, he would be required to produce such a map. Upon returning to the Division offices and reviewing Blazon's mine plan, the inspector found that according to the mine plan, Blazon is only supposed to have three monitoring sites. At this time, the inspector phoned the consulting firm which is collecting Blazon's water quality samples, Vaughn Hansen Associates, and spoke with Tom Suchoski. Mr. Suchoski was able to identify over the phone the locations of the monitoring stations and also promised to send to the Division a copy of the map illustrating Blazon's six monitoring stations.

#### 817.71-.73 Disposal of Underground Development Waste and Excess Spoil and Nonacid and Nontoxic Forming Coal Processing Waste

There were two small areas on Blazon's permit area where underground development waste had not been properly disposed. One was on the mine portal pad between the fan and conveyor portals and the other is near the southern most stream crossing. The operator was asked to properly dispose of all these materials in their approved disposal site in accordance with UMC 817.71 and was given a deadline of October 14, in order to accomplish this.

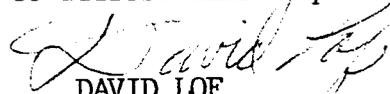
#### 817.89 Disposal of Noncoal Waste

The Clear Creek landfill which Blazon had been using as their noncoal waste disposal site had recently been closed. At the time of inspection, the operator had a small amount of noncoal waste materials stored near the southern most storage pad. The operator indicated that he was in the process of developing plans for proper disposal of this noncoal waste. The inspector asked that these plans be developed and implemented by October 14, 1981.

INSPECTION MEMO TO COAL FILE  
ACT/007/022  
October 9, 1981  
Page 4

817.150-.176 Roads

General drainage and maintenance problems were evident on all roads, especially the Class III roads. Therefore, the operator was asked to rework the roads so that they would meet design and maintenance requirements of UMC 817.153, 817.155, 817.163, 817.165, 817.173(a)(2) and 817.175. The operator was given a deadline of October 14, in order to address this requirement.

  
DAVID LOF  
RECLAMATION OFFICER

cc: Tom Emmett, OSM  
Kirk Harvey, Blazon  
Inspection Staff

DL/btm

Statistics:

Vehicle: #EX 60237--170 miles  
Per Diem: One person X one day, eight hours @ \$37.50/day = \$44.47  
Grant: A & E