

### Document Information Form

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Date Sent: N/A

**Explanation:**

Areawide Clearinghouse A-95 Review

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# SOUTHEASTERN UTAH ASSOCIATION OF LOCAL GOVERNMENTS

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Chairman  
WILLIAM D. HOWELL  
Executive Director

P. O. Drawer AI • Price, Utah 84501 • Telephone 637-5444

## AREAWIDE CLEARINGHOUSE A-95 REVIEW

140

NOI \_\_\_ Preapp \_\_\_ App \_\_\_ State Plan \_\_\_ State Action  Subdivision \_\_\_ (ASP # \_\_\_\_\_)

Other (indicate) \_\_\_\_\_ SAI Number \_\_\_\_\_

### Applicant (Address, Phone Number):

Division of Oil, Gas and Mining  
344 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

### Federal Funds:

Requested: \_\_\_\_\_

### Title:

007-033

ANDALEX RESOURCES, INC. - WILDCAT LOADOUT FACILITY

- No comment
- See comments below
- No action taken because of insufficient information
- Please send your formal application to us for review. Your attendance is requested

The applicant should forward any written review comments to the funding agency. Any written response to those comments should be forwarded to the State Clearinghouse and also to the funding agency.

### Comments

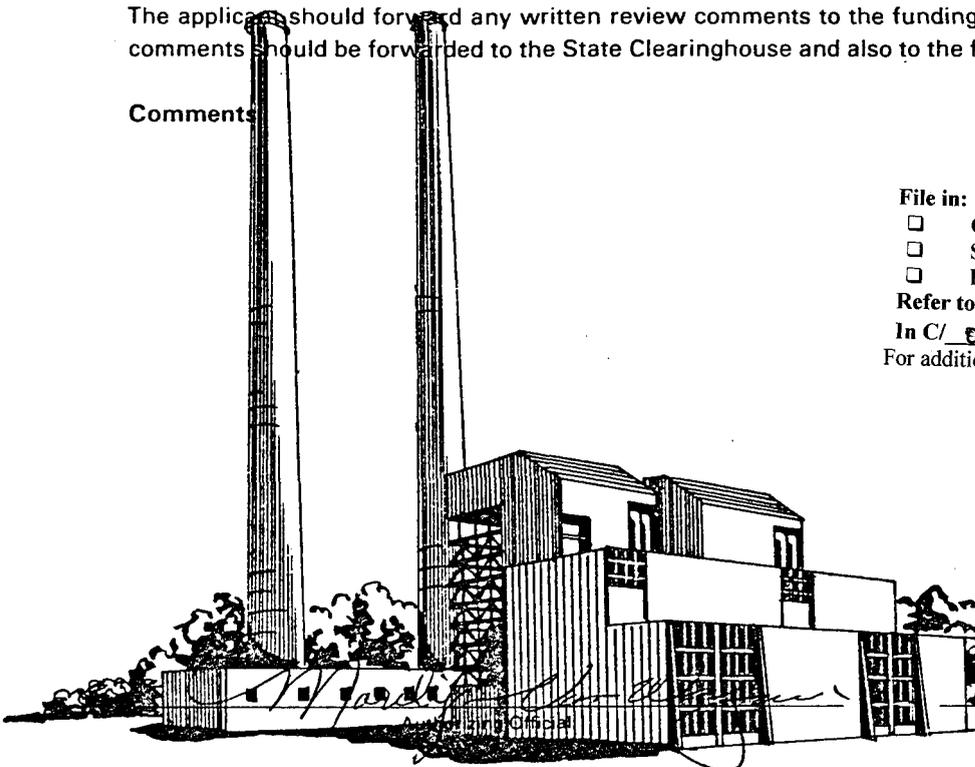
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Refer to Record No. 0012 Date \_\_\_\_\_

In C/ 007, 033, Internal

For additional information



1-29-88

Date

WILDCAT LOADOUT  
THIRD COMPLETENESS REVIEW  
PRO/007/033

Andalex Resources, Inc.  
Carbon County, Utah  
September 26, 1988

UMC 783.16 Surface Water Information - (JRF)

In the February 19, 1988 Initial Completeness Review for the Wildcat Loadout, the Division pointed out that the PAP must include baseline data. Since the Wildcat site monitoring will include sampling of ephemeral flows, the most likely seasons for sampling would normally be spring (snowmelt) and after summer convective storm events. The summer season is over and several events did occur that produced runoff, as noted by Division staff. Please include results from sampling in the PAP.

UMC 783.19 Vegetation Information - (BAS)

(a) Please include all field data sheets from reference area sampling in the PAP, Appendix I.

Please update page 42, sections 1 and 2.2. Please delete sections 2.4 and 2.5 from page 46. The Division's memo in Appendix I must be deleted, as it relates to a bygone reference area.

UMC 783.20 Fish and Wildlife Resources Information - (BAS)

(a) Division of Wildlife Resources' Fish and Wildlife Plan (page 46, last paragraph) and a description of the Wildlife Enhancement Project stipulated by Bureau of Land Management (pages 47 and 48) should be omitted from Fish and Wildlife Resources information and included in the Fish and Wildlife Plan (pages 129-132).

Page 48, section 2, is still unclear about sources of information for sections 4.0 - 4.5 (pages 48-52) and Appendices E and F. A brief narrative should be provided.

Since prairie dogs have colonized the permit area (page 131), please include the whitetail prairie dog on the animal species list (page 50, Table III-8).

UMC 783.24 Maps: General Requirements - (PGL)

Plate I (received August 15, 1988) has again been revised and the permit area changed. Disturbed and bonded boundaries are still incorrectly portrayed outside the permit area. All disturbed or bonded areas must be included inside the boundaries of the permit area. Revise the permit area and change appropriate maps accordingly.

The applicant must revise and document legal right-of-entry information for diversions UD-1 and UD-2.

UMC 784.13 Reclamation Plan: General Requirements - (BAS)

(b)(5)(ii) The range of values for seeding rates (permanent seed mix, page 83) must be revised. Low end values of the range may be used for both grasses and forbs. The upper end value is recommended for winter fat. Please revise page 79, section 5.1, and page 81, section 5.4, to reflect final seeding rates.

Please delete the statement that BLM revegetation suggestions will be incorporated into the overall plan (page 84, section 5.8).

(b)(5)(iii) Page 71 states that areas which cannot be seeded with a rangeland drill will be hand-seeded and hand-mulched. This conflicts with page 81 which states that hydroseeding and hydromulching will be the alternate seeding method. Please correct this discrepancy. Please provide detail in the PAP on mulch type, rate of application, and tackifier for each seeding method.

(b)(5)(vi) The PAP must include a revegetation monitoring schedule similar to "Revegetation Guidelines for Utah Coal Regulatory Program", Table I. The last paragraph on page 84 and the first paragraph on page 85 must be revised to commit to quantitative sampling of reclamation cover, frequency and woody plant density during years 2, 3, 5, 9 and 10. Productivity must be sampled only during years 9 and 10. The reference area should be sampled during years 9 and 10.

UMC 784.14 Reclamation Plan: Protection of the Hydrologic Balance - (JRF)

(c) The Probable Hydrologic Consequences (PHC) statement does not contain surface water quality and quantity information as required by this regulation. The applicant has not obtained any surface water quality or quantity data. As previously requested, the applicant must commence baseline water monitoring immediately (see UMC 817.52 for specifics).

The PHC presents leachate data and discussion that the data indicates no potential impacts to water quality. However, the PHC does not reference a specific water quality standard to determine no impact. At a minimum, the leachate data should be graphically compared to Utah agricultural water quality standards.

UMC 784.16 Reclamation Plan: Ponds, Impoundments, Banks, Dams and Embankments - (PGL)

(a)(1)(7) Certifications of ponds in Appendix H state that all of the constructed ponds "meet the required performance standards outlined in UMC 817.46." Pond E as constructed, however, is not adequate; proposed design changes are included in the PAP on page 94 and on Plate 6. The certification for Pond E must be revised to accurately reflect its current status.

UMC 784.21 Fish and Wildlife Plan - (BAS)

(a) Please delete paragraph 4, page 130 and paragraph 3, page 131.

On September 13, 1988, personnel of the U.S. Fish and Wildlife Service (USFWS) inspected powerpoles from the substation to the loadout facility. The groundwire on all crossarm-type configurations must be gapped 48 inches below the crossarm. Gaps must be 4 inches across.

Please replace text on page 131, paragraph 1, to describe modifications completed by the applicant.

(b)(3) Please incorporate the Wildlife Enhancement Project narrative on pages 47-48 with that on pages 131-132. The text should be updated to describe additional enhancement of 15 acres in the vicinity of Wildcat Loadout, per Andalex Resources correspondence dated August 5, 1988.

UMC 784.22 Diversions - (JRF)

The PAP does not contain design specifications for interior postmining diversions. This information was requested in the February 12, 1988 Initial Completeness Review and the June 30, 1988 Second Completeness Review (see UMC 817.56). The applicant has failed, for the third time, to submit the requested design specifications. These designs must be included in the PAP. (Refer to 817.56 for more detail.)

Plate 8 lacks topographic detail to ensure that all disturbed area drainage will report to a sedimentation control structure. Please provide necessary topographic detail.

WP+16/1:3

WILDCAT LOADOUT  
TECHNICAL DEFICIENCIES  
PRO/007/033

Andalex Resources, Inc.  
Carbon County, Utah  
September 26, 1988

All surface facilities must be constructed as shown within 30 days of PAP approval.

UMC 800 Bonding - (PGL)

The reclamation cost estimate must include references for equipment and labor costs. A 10 percent contingency factor and 2.3 percent escalation factor must be added to the costs.

Monitoring costs (water, revegetation and erosion) must be itemized in the cost estimate.

UMC 817.22 Soil: Removal - (JSL)

In accordance with the Division's "Guidelines for Management of Topsoil and Overburden", the sampling frequency must consist of one noncomposite sample from each test plot location with individual samples taken at 0 - 15 cm, 15 - 30 cm, and every 30 cm thereafter to the depth of potential removal. In all cases, sampling must be performed and reported by depth intervals. Table 1 of the Guideline indicates the parameters that must be analyzed. Specifically these parameters include: soil color; texture; pH; organic carbon; saturation percentage; alkalinity; electrical conductivity; calcium carbonate percentage; sodium adsorption ratio; soluble potassium, magnesium, calcium, and sodium; total nitrogen; available phosphorous; available water capacity; and percent rock fragments. Suitability limits for evaluating substitute topsoil are listed in Table 2 of the Guidelines.

UMC 817.41 Hydrologic Balance: General Requirements - (JRF)

The applicant has committed to periodically checking diversion ditches for evidence of erosion and implementing repair of the erosion in a timely manner. The commitment as worded will be difficult to enforce; a specific plan is needed. The applicant must commit to erosion pins, installed flush with the ditch floor, on the following:

<u>Ditch ID</u>	<u>Pin Location</u>
D- 2	Near Pond E inlet
D- 3	Bear Pond D inlet
D- 7	Near Pond D inlet
D- 9	Mid-point
D-11	Upper portion of ditch
D-13	Mid-point
D-14	Mid-point
D-17	Upper portion of ditch

Each pin must be located on Plate 2; each pin must be inspected quarterly, and after precipitation events. The Erosion Control plan must be implemented if more than four inches of the pin is above the ditch floor.

The applicant lists conveyor belting as erosion protection. Recent failure (August 13, 1988) of conveyor belting at Pond F inlets and Ditch D-1 demonstrates the futility of belting as erosion protection. Use of conveyor belting is approved only for D-1 on an experimental basis; further failure on D-1 will require implementation of an acceptable erosion control (i.e., riprap, grade control). The PAP must describe the approved use of belting on D-1 and remove conveyor belting from the Erosion Control Plan.

UMC 817.42 Hydrologic Balance: Water Quality Standards and Effluent Limitations - (JRF)

The boundary of Small Area Exemption (SAE) 1 is not clear. The applicant must address sediment control for SAE 1 and SAE 4.

The PAP (page 87) identifies 9.71 acres as the total SAE while Plate 2 depicts 13.76 acres. Please clarify.

UMC 817.43 Hydrologic Balance: Diversions and Conveyance of Overland Flow, Shallow Ground Water Flow, and Ephemeral Streams - (JRF)

As mentioned in the two previous ICR's, Diversion UD-1 does not appear feasible. Plate 2 is not accurate; a recent field inspection (September 8, 1988) of the proposed ditch extension indicates that the ditch should be lengthened by 600 to 800 feet. To prevent further delay in approving UD-1, the Division requires the following design information:

1. Longitudinal profile of the entire diversion.
2. A certified valley cross section at the point of diversion.
3. Construction timetable.

4. Letter of land use from BLM or include diversion in right-of-way.
5. Erosion protection for the 7 percent slope area near Pond F.

Complete operational and reclamation erosion control designs must be submitted.

The following problems must be addressed for Diversion UD-2:

1. It must be included in the permit area.
2. Five culverts on this diversion must be identified.
3. A construction/maintenance agreement with Beaver Creek Coal Company covering UD-2 must be in the PAP.
4. Discrepancy in drainage area measurements must be corrected.

The PAP identifies 2.3 acres while DOGM measurements indicate 44.5 acres. A map showing the UD-2 drainage area measurements must be included. Diversion calculations must be modified to include the total drainage area.

Diversions UD-3 and UD-4 have inadequate riprap specifications at the design velocity. The riprap will not be stable. Please increase the median stone diameter to accommodate design velocities. Submit complete riprap plans with acceptable, referenced methodologies. Riprap gradation and depth of placement is required for all locations.

Diversions D-10 and D-11a drainage boundaries conflict with the topography.

The capacity of D-13 is inadequate. The Diversion will not contain the design event.

The recently constructed ditch (August 1988) in Pond B drainage area must be identified on Plate 2. The PAP must contain all design details for this diversion.

Culverts C-6, C-7a, C-10, C-11 and C-24 will require additional headwater protection. Culvert C-9b will require outlet protection. The applicant must determine if Culvert C-4b flow is controlled by inlet or outlet conditions. The culvert appears to measure 400 feet long on Plate 2; please verify. A trash rack must be installed on the inlet.

The two access road culverts must be identified and included in culvert discussion of the PAP.

UMC 817.46 Hydrologic Balance: Sedimentation Ponds - (PGL)

Pond E will be reclaimed during Phase I reclamation and disturbed area drainage will be routed to Pond D. Pond D is not adequate to contain the required volumes for drainages D and E (required volume equals 1.431 ac.-ft.; Pond D volume only equals 0.880 ac.-ft.). Please revise accordingly.

Inlets to Pond F (Plate 7) must be grouted riprap because other erosion control practices have failed. (See inspection reports dated August 15 and September 8, 1988.) Please provide revised Plate 7 to depict grouted riprap inlets.

UMC 817.47 Hydrologic Balance: Discharge Structures - (PGL)

The typical sediment pond outlet protection scheme shown on page 114 lacks width dimension. Please provide this information in the PAP.

UMC 817.48 Hydrologic Balance: Acid-Forming and Toxic-Forming Materials - (JSL)

Data received August 29, 1988 is not adequate or complete. In accordance with the Division's "Guidelines for Management of Topsoil and Overburden", boney material and coal must be analyzed for parameters listed in Table 6. Parameters not analyzed to date include selenium, nitrate-nitrogen and total-nitrogen.

Data received indicates an acid production potential from coal material (Acid Base Potential (ABP) of -8.56 ton/1000 tons material). The calculated ABP was determined by using percent total sulfur. It is unlikely that all of the sulfur would be able to oxidize. A more accurate ABP would be derived from the percent nonsulfate-sulfur (% pyritic-S and % organic-S analysis of coal material). Please provide nonsulfate-sulfur analysis.

An acid- or toxic-forming material finding cannot be made by the Division until the requested information has been submitted and reviewed.

UMC 817.49 Permanent and Temporary Impoundments - (PGL)

The PAP describes a permanent impoundment (pages 105 and 108). The PAP must contain all necessary information to demonstrate that a permanent impoundment can be authorized by the Division according to requirements of this section.

UMC 817.52 Hydrologic Balance: Surface and Ground Water Monitoring - (JRF)

The Division's "Water Monitoring Guidelines" (mailed to Andalex Resources February 18, 1986) request one year of baseline data collected prior to PAP submission. October 13, 1986, the applicant was notified to submit a Permit Application. The PAP must contain baseline water monitoring data. The February 12, 1988 ICR (see UMC 783.16) requested baseline water quality data. Andalex Resources has failed to pursue a water monitoring program. Baseline sampling must begin immediately as follows:

Baseline monitoring will consist of eight samples analyzed for the baseline chemical parameters on Table IV-10 (four per annum, collected quarterly during precipitation events). An accurate log must be maintained to verify precipitation events.

Plate 2 must show water monitoring station locations as referenced in the PAP.

Dissolved oxygen should be deleted from the field parameter list on Table IV-10.

Annual leachate analysis on all materials stored on-site must be performed. A leachate sampling plan and parameter list is required. The leachate analysis in Appendix J must contain zinc.

UMC 817.56 Hydrologic Balance: Postmining Rehabilitation of Sedimentation Ponds, Diversions - (JRF)

The Division has requested detailed postmining reclamation plans in two previous ICR documents. The applicant has failed for the third time to submit complete and accurate plans. The following must be provided:

1. Identification of all postmining diversions.
2. Supporting calculations, peak flow, velocity, capacity, configuration, slope, and erosion protection for each diversion.

3. Correction of several disturbed areas on Plate 8 which do not appear to flow to a sediment pond.
4. Correction of drainage boundaries.
5. Sediment control for the two reclaimed access roads.
6. Discussion of final reclamation of UD-5.

Plate 10 must show diversions; match points for Plate 10 and 14 are required.

The PAP must discuss reclamation of all sediment ponds, i.e., disposal of contaminated material and recontouring of the pond. A longitudinal profile of each reclaimed pond is required.

UMC 817.81-.88 Coal Processing Waste Banks - (PGL)

Coal processing waste is produced at this loadout; therefore all of this section must be addressed.

UMC 817.89 Disposal of Noncoal Wastes - (PGL)

The applicant must remove the phrase "no special measures are required" with reference to non-coal wastes in Chapter IV, page 129. The applicant must commit to this regulation, i.e., "noncoal wastes will be placed and stored in a controlled manner in a designated position of the permit area." Dumpsters are acceptable; their location must be noted on Plate I.

UMC 817.99 Slides and Other Damage - (PGL)

Although this area is generally gently sloping, it cannot be stated that there will be "no" slides. A commitment to this regulation must be included in the PAP.

UMC 817.106 Regrading or Stabilizing Rills and Gullies - (PGL)

Please revise commitment to stabilize rills and gullies (page 78) to include the statement that: "when rills or gullies deeper than nine inches form in areas that have been regraded or topsoiled, the rills and gullies will be filled, graded or otherwise stabilized and the area reseeded or replanted. Rills and gullies of lesser size will be stabilized and the area reseeded or replanted if the rills or gullies are disruptive to the approved postmining land use or result in additional erosion and sedimentation."

UMC 817.180 Other Transportation Facilities - (PGL)

The PAP must describe how transportation facilities will be maintained.

UMC 817.181 Support Facilities and Utility Installations - (PGL)

The PAP must describe how support facilities and utility installations will be maintained.