

Document Information Form

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Refer to:

- Confidential
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Date _____ For additional information

INITIAL COMPLETENESS REVIEW
Andalex Resources
Wildcat Loadout
PRO/007/033

February 12, 1988

UMC 771.25 Permit Fees-(BAS)

The PAP must be accompanied by a fee of \$5.00, payable to the Division of Oil, Gas and Mining. Evidence of payment must be included as part of the PAP. The \$5.00 fee paid by check #2168 on November 21, 1985 will not satisfy the permit fee requirement for the current submission.

UMC 782.14 Compliance Information-(WM)

The listing of violations needs to be revised. Violations are itemized and listed in Appendix A, but recent violations are not included. The recent violation information is provided by individual NOV documents/inspection reports, but the copies are not legible. Therefore, the required information for recent violations as described in paragraph 771.14 should be added to Appendix A.

UMC 782.18 Personal Injury and Property Damage Insurance Information-(PGL)

The Certificate of Insurance in Appendix A is for Tower Resources, Incorporated, not Andalex Resources, Incorporated. A certificate of liability insurance for Andalex Resources, Inc., must be provided in the PAP as required by UMC 800.60.

UMC 783.15 Ground Water Information-(JRF)

The applicant has suggested that ground water does not exist on the permit area. Several test holes were drilled for geotechnical purposes and the applicant's consultant recommended that the boreholes be monitored for groundwater occurrence. Data from the monitoring program should be submitted.

UMC 783.16 Surface Water Information-(JRF)

(a) The application must contain the location, elevation, use and geologic occurrence of the spring in Garly Canyon.

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(b)(1) The application does not contain baseline water quality and quantity information. At least one year of baseline data must be presented in the MRP, and an additional year of baseline data must be collected before entering the operational phase of monitoring (DOGM Water Monitoring Guidelines, 1986).

UMC 783.19 Vegetation Information-(BAS)

(a) The applicant must provide quantitative data derived from vegetation sampling on the reference area. These data should include species composition and frequency, percent cover and shrub density. Enclosed is a copy of "Vegetation Information Guidelines for Permanent Program Submissions for Coal Mines" to assist in preparation and submission of vegetation information.

The total acreage of land disturbed by the loadout facility was omitted from page 23, section 2.3 (see UMC 783.24[e]).

UMC 783.20 Fish and Wildlife Resources Information-(BAS)

(a) The Division of Wildlife Resources (UDWR) publication entitled "Fish and Wildlife Resource Information" (page 92-102) and the BLM environmental assessment (Appendix F, Part 2) should be introduced with regard to authorship, dates, and purpose of each publication.

UMC 783.21 Soil Resource Information-(DD)

(3) A soil profile description must be provided for each soil type identified on the permit area.

(b) The applicant must provide a topsoil mass balance and soil quality data to determine if substitute topsoil will be required during reclamation to achieve the revegetation requirements (see UMC 817.21 and 817.116).

UMC 783.22 Land-Use Information-(WM)

Excerpts from the Centennial PAP appear to have been used for portions of the Wildcat application. Many portions of the Land Use permitting section are clearly not applicable to Wildcat. This may confuse other readers during the public comment period. Please modify this section to assure unrelated narrative not pertaining to the Wildcat permit area land use is deleted.

Additionally, the statement at the top of page 117 "During and after completion of loading operations, the land will continue to be used for grazing and hunting" infers that grazing and hunting will occur during operations. Please clarify the land use of the permit area during operations and after reclamation.

UMC 783.24 Maps: General Requirements-(PGL)

(a) A surface and subsurface ownership map must be provided, separate from the surface facilities map (Plate 1). This map must provide the boundaries of lands and names of present owners of record, included in and contiguous to, the permit area.

(b) The surface and subsurface ownership map must show the boundary where the applicant has the legal right to enter.

(d) The applicant must show the location of all the buildings within 1,000 feet of the proposed permit area, with identification of the current use of the building, i.e., BCCC warehouse.

(e) The proposed permit area on Plate 1 must include all of the area disturbed by the operation. In this case, the permit area should include the entire BLM lease, the access road (BLM-ROW U-52065), the truck turn-around, and areas impacted by coal fines deposition. Page 23 must state the number of disturbed acres.

UMC 783.25 Cross-Sections, Maps and Plans-(PGL)

(a) and (b) The locations and elevations of the water monitoring stations and geotechnical drill holes must be shown (and identified) on a certified map.

(e) On page 23, the applicant referred to levelling the portal which alludes to previous mining. Please clarify. If there was previous mining, please locate on an appropriate map.

(g) The location of any natural drains and/or irrigation ditches must be shown for the adjacent areas on a certified map.

(k) The topography is difficult to decipher on Plate 2; no scale is given. An easily distinguishable Plate 2 must be submitted with the proper scale.

All of the above requests must be certified maps.

UMC 783.27 Prime Farmland Investigation-(DD)

The applicant must have the Soil Conservation Service (SCS) make a negative finding that prime farmlands exist on the site or clearly explain why prime farmland does not exist, according to the criteria under 783.27(b)(1), (2), (3), (4) or (5).

UMC 784.11 Operation Plan: General Requirements-(PGL)

(b) A narrative explaining the maintenance and removal of all of the Wildcat facilities should be given, including but not limited to: impoundments (sedimentation ponds), coal handling, storage, cleaning and transportation areas, and noncoal waste disposal areas.

UMC 784.12 Operation Plan: Existing Structures-(PGL)

(a) PAP must include the following information for existing structures:

- (1) Drawings or photographs of existing structures.
- (2) Approximate dates when construction was initiated and completed.
- (3) A description of how the existing structures meet relevant performance standards.
- (4) A description of their current condition.

(a)(1) In "Timetable of Major Reclamation Steps" (page 29-30), the first two paragraphs appear to apply to another operation. Please delete. The timetable must commit to the performance standards of UMC 817.100 and 817.113. (These relate to contemporaneous reclamation and timely revegetation.)

(b)(1) Chapter III, E-2 on page 29 needs to include a detailed timetable for the completion of each major step in the reclamation plan.

(b)(2) Appendix D - "Reclamation Bond Estimate" - must include a detailed estimate of the costs to reclaim the site. This reclamation cost estimate must include unit costs (with references) to substantiate quantities of material to be moved or removed during reclamation.

(b)(3) The plan for backfilling and grading must include quantities of earth materials to be moved that will be included in the bond estimate. The final contour configuration (Plate 9) must show where the cross-sections are located on Plate 10.

Plate 2, also used for the backfilling and grading section, does not indicate the cross section locations and is difficult to decipher because of too much information on the map. (This plate also needs a scale and distinguishable contour lines.) A separate backfilling and grading map must be submitted.

(b)(4) The reclamation plan must address how topsoil was removed and stored and how it will be redistributed (see UMC 817.21).

(b)(5)(ii) The applicant must commit to a specific seed mix, based on reference area vegetation sampling, postmining land use, and input from responsible government agencies. In general, the Division recommends between 4-8 species per life form (shrubs, forbs, grasses) in a mixture at a 50-80 PLS/Ft² rate of application. Considering the area's status as critical valued big game winter range, emphasis should be given to shrub re-establishment (see UMC 817.97[d][9]).

(b)(5)(iv) The type of mulch, rate of application and method of anchoring must be specified, as required by UMC 817.114.

(b)(5)(vi) Reference area(s) must be approved by the Division, permanently staked, and included on a plate in the PAP. Based on the description of pre-development vegetation in the BLM environmental assessment (Appendix F), and Plate 9 entitled "Final Reclamation Contours and Revegetation", only a sagebrush-grassland reference area will be required. Upon request, the Division biologist will meet with Andalex for approval of a reference area.

The applicant must specify the measures proposed to determine revegetation success in accordance with UMC 817.116. The PAP must include a revegetation monitoring plan, as provided by UMC 817.116(c)(2). The Division publication entitled "Revegetation Guidelines for Utah Coal Regulatory Program" is enclosed to help complete the revegetation plan in compliance with UMC 817.111.

(b)(5)(vii) A soil testing plan for the evaluation of the results of topsoil handling and reclamation procedures related to revegetation must be included in the plan. This can incorporate the requirements of UMC 817.21(5) and UMC 817.103(a)(1).

(b)(7) A description of the measures employed to insure that all materials (acid-forming, toxic-forming, or constituting a fire hazard) are disposed of properly must be included in the PAP. Page 29 states "all which could burn would be small in quantity and consist of mine trash." Please quantify "small".

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

(b)(1) Berms must be installed and shown on appropriate maps for all topsoil storage piles that do not drain to a sediment pond. Division personnel have observed several disturbed areas at ponds A and B that do not drain to the ponds. The sediment control plan should address these areas.

(c) The application does not contain a determination of the probable hydrologic consequences (PHC) of the surface facility. The Division requires that the applicant perform a leachate analysis on the materials stored on site. The analysis should include all surface-water baseline parameters. The PHC should incorporate information derived from the leachate tests. A plan should be submitted to perform an annual leachate test to monitor potential toxic materials.

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

(a)(1)(7) The applicant must demonstrate that the plans for the sedimentation ponds (A to F) were prepared by, or under the direction of, a certified professional engineer. Plate 3-7 simply certifies that the drawings represent the ponds as constructed. The certification must attest that these ponds were constructed as designed. The certified designs should be submitted.

(a)(1)(iv) The portal mentioned on page 23 alludes to abandoned underground workings. Therefore, a survey describing the possible effect from subsidence should be included in the PAP.

(b)(1) The drainage areas as shown on Plate 2 are not correct. These areas must be re-evaluated and therefore, a re-evaluation of the sedimentation pond adequacy must be done (UMC 817.46[b][3]). The drainage area designations conflict with topographic contours. Please rectify.

The applicant must state if the sedimentation ponds will be retained as permanent water impoundments. If so, the PAP must address the requirements of UMC 817.49.

UMC 784.18 Relocation or Use of Public Roads-(PGL)

The road narrative (page 24) is confusing. The applicant designates the Consumer's Road (139) as a Class I road and states that it will be constantly maintained, but does not mention by whom. If the road is maintained by Andalex Resources, Inc., the Class I road could be considered part of the Wildcat Loadout permit area (see Public Road Determination, attached). The public road designations must be clearly explained in the PAP.

UMC 784.21 Fish and Wildlife Plan-(BAS)

(a)(1) Please provide a thorough introduction to Appendix F, Part 1, as it relates to wildlife mitigation work completed by the applicant. The introduction should address the circumstances of the mitigation effort.

(b) The applicant must specifically list which of the recommended Fish and Wildlife mitigation measures proposed by UDWR (page 103-113) will be followed.

Andalex shall commit to correct known hazards to big game within the permit area, in the event that mortalities occur due to fence entanglements, drownings, deer/vehicle collisions, etc.

The fish and wildlife plan should include a statement of commitment to satisfy UMC 817.97(b), (d)(7), and (d)(8) (regarding the reporting of threatened and endangered species, use of persistent pesticides, and suppression of fire).

The PAP must indicate if the powerline design change recommended by the U.S. Fish and Wildlife Service (Appendix A) was implemented. If not, please justify.

UMC 784.22 Diversions-(JRF)

The application must contain a detailed description, with appropriate maps and cross-sections, to ensure the protection of the surface water drainage during and after mining. The description should include runoff calculations, velocity calculations, diversion capacity calculations, and standard engineering energy dissipator designs for the following areas:

1. All interior ditches.
2. All sediment pond outlets, from the spillway to the natural channel.
3. The undisturbed diversion west of Topsoil Pile E, including the dike west of the railroad tracks.
4. The diversion north of the scale house.
5. Undisturbed area diversions encompassing the coal storage area west and north of the railroad tracks.

The application must contain permanent reclamation designs for the channel west of the coal storage area.

An erosion control plan and installation timetable is required for all interior ditches. The plan must include standard engineering designs and drawings that will be implemented within 30 days of erosion detection.

All diversion designs must incorporate specifics required in UMC 817.43, parts (c) and (f)(1-5).

The contributing drainage areas on Plate 2 are confusing. It is not apparent how runoff will be directed to culverts and diversions. For example, drainage area C shows overland flow going diagonal to contour lines. South of Culvert C7 flow paths (ditches?) drain in opposite directions without any explanation. The diversion plan must be clarified.

UMC 784.23 Operation Plan: Maps and Plans-(PGL)

(b)(2) The area of land that is affected must be included in the proposed permit area. The proposed permit area must include the BLM lease area, the truck loop, and the road to the facilities (ROW-52065). A new permit area map must be submitted with a corrected permit area.

(b)(3) A "bonded area" map must be submitted for inclusion in the PAP.

(b)(13) Plate 9 does not show any sedimentation ponds remaining as permanent structures.. However, it is not clear whether or not the ponds are temporary or permanent in the text. (See UMC 784.16[b][1]).

UMC 784.24 Transportation Facilities-(PGL)

A detailed description of each road in the permit area is required. The road widths, road gradients, and culvert locations must be given. The truck loop road is a Class I road and must meet all of the requirements of UMC 817.150-.156.

UMC 784.26 Air Pollution Control Plan-(WM)

A copy of the January 23, 1987, environmental health approval order should be added as an appendix. A letter dated August 31, 1987, in Appendix A, which alludes to the approval order, is not satisfactory.

TECHNICAL DEFICIENCIES

UMC 817.13-.15 Casing and Sealing of Exposed Underground Openings-(WM)

The "NA" statement in the PAP suggests there are no openings that require sealing. Eight test holes have been drilled and are shown in Appendix C. The PAP must address if any of these have been sealed. If any of the holes have not been sealed, the PAP must address how the requirements of this regulation will be met.

UMC 817.21 Topsoil-General-(DD)

The applicant must provide a detailed plan addressing all requirements under UMC 817.21 - .25. This plan shall include:

(1) Chemical and physical analyses of stockpiled topsoil must be accomplished to ensure reclamation suitability. This will consist of one representative sample from each stockpile except stockpiles C and E where two samples are required. Parameters that must be analyzed are at a minimum pH, Ec, saturation percent, texture, organic C, SAR, Total N, available P, percent CaCO₃, Selenium and Boron.

(2) A description of how soil was salvaged and removed is needed. Topsoil substitutes should be discussed in a topsoil mass balance table.

(3) A plan to protect stockpiled topsoil from wind and water erosion, unnecessary compaction and contaminants is also needed (see UMC 817.95).

(4) A plan for topsoil redistribution that clearly depicts areas to be topsoiled and depths of topsoil to be redistributed must be discussed.

(5) A soil amendments plan must be included, if appropriate (based on soil tests).

UMC 817.46 Sedimentation Ponds-(PGL)

(b)(1) Sediment pond drainage areas must reflect topographic or mechanical divides. Plate 2 denotes drainage areas that conflict with the topography. These areas must be redrawn to show realistic drainage areas that reflect topographic drainage areas. Calculations must be redone for the sedimentation ponds to show adequacy (see UMC 784.16[b](1)).

(c) A theoretical detention time must be demonstrated for all ponds with supporting calculations.

(h) The physical devices (a measuring rod or survey) used to measure the sediment level must be included in the PAP.

(r) Certification of the design of sedimentation ponds and construction inspection should be included in the PAP (see UMC 784.16[a][1][7]).

(t) A commitment to inspect the ponds four times yearly must be included in the PAP.

(u) The timing for the removal of sedimentation ponds (if they are removed) must be stated in the PAP.

UMC 817.47 Discharge Structures-(PGL)

The culverts are the discharge structures from the sedimentation ponds. Headwater calculations for each culvert must be included in the PAP. The outlet protection plan must be explained, (i.e., riprap). The outlet protection plan must include a typical drawing of the filter blanket, size of riprap, length and width of protection and a commitment to implement the plan within 30 days of erosion detection (see UMC 784.22).

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

The PAP must provide data to identify if acid-forming or toxic-forming materials exist on site. Data will consist of samples from bony and rock materials, from coal processing, and from pad materials that are high in organic carbon. Analysis for toxic and acid-forming materials must include the following parameters: pH, Ec, SAR, Se, B, Acid-Base potential, percent organic carbon, saturation percent and texture. If toxic or acid-forming materials occur, a plan must be developed to ensure that drainage from these materials will not be detrimental to vegetation or adversely affect surface and ground waters.

UMC 817.49 Permanent and Temporary Impoundments-(PGL)

(See UMC 784.16[b][1].)

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

Ground Water

Upon submission of the data required in UMC 783.15, the Division may determine that the ground-water monitoring may not be required at this site. However, leachate tests on all materials stored at the site will be required (see UMC 784.14[c]).

Surface Water

The surface water monitoring plan should adopt the following:

1. Eight samples (four per annum) must be collected to complete baseline sampling.
2. Samples should be collected during precipitation events.
3. All water quality data, including NPDES reports, must be submitted to the Division within 30 days of the end of each quarter.
4. Reclamation monitoring will follow the same frequency as the operational monitoring schedule.

UMC 817.56 Hydrologic Balance: Postmining Rehabilitation of Sediment Ponds, Impoundments, and Treatment Facilities-(JRF)

The final reclamation plan is inadequate. All undisturbed area channels must be reclaimed to premining configurations. The undisturbed area channels, west of the railroad tracks, must be reclaimed to the configurations noted on the USGS Standardville Quadrangle.

Detailed design plans must be submitted for the reclaimed disturbed area hydrology. The applicant intends to redirect disturbed area diversions during reclamation; a plan must be submitted show how this will be accomplished. The applicant must submit reclamation designs for drainage along the west side of the railroad tracks and pond F. During the first phase of reclamation ponds B and E will be removed, and runoff will be directed to ponds A and C. The applicant must address the modified sediment control plan. Ponds A and C must be able to accommodate the additional runoff.

UMC 817.71 Disposal of Underground Development and Excess Spoil and Non-Acid and Non Toxic-Forming Coal Processing-(PGL)

The applicant must demonstrate that the coal processing waste (bony material and rock) is non-acid and non toxic-forming. If there are acid or toxic-forming materials, a plan for disposal of this material must be developed.

UMC 817.89 Disposal of Non Coal Waste--(PGL)

Section III-B-10.4 (Non Coal Waste) referred to "see above", but no information existed in this regard. Please address this regulation.

UMC 817.95 Air Resources Protection--(WM)

Observations of the Wildcat site indicate wind-blown coal fines are a problem. Prevailing winds from the west have resulted in areas east of the permit area being contaminated with coal fines.

The PAP must include measures to protect and mitigate against off-site coal contamination.

UMC 817.100 Contemporaneous Reclamation--(WM)

No proposal addressing this regulation was found in the PAP. The PAP must address the requirements of this regulation.

UMC 817.103 Backfilling and Grading: Covering Coal and Acid- and Toxic-Forming Materials--(DD)

(1) The applicant must provide a plan to ensure that during reclamation all acid forming, toxic forming, and materials constituting a fire hazard are neutralized, treated or buried to prevent water pollution, sustained combustion, or be adverse to plants. This plan shall include a sampling scheme, parameters to be analyzed as outlined in UMC 817.48, and methods used to treat or bury these materials to prevent water pollution or be adverse to plants.

UMC 817.106 Regrading or Stabilizing Rills and Gullies

The applicant must include a commitment to this regulation.

UMC 817.131 Cessation of Operations (Temporary)--(WM)

No proposal addressing this regulation was found in the PAP. The PAP must address the requirements of this regulation.

UMC 817.132 Cessation of Operations (Permanent)--(WM)

No proposal addressing this regulation was found in the PAP. The PAP must address the requirements of this regulation.

UMC 817.150-.156 Roads: Class I-(PGL)

It is unclear which sections of the Class I road are included in the permit area. This designation must be clarified in the narrative and on appropriate plates. The road design and conformance to performance standards must be demonstrated in the PAP (UMC 817.152). A commitment by the applicant to maintain the Class I road should be clearly stated (see page 24). The reclamation of the road must be included in the narrative in the PAP.

UMC 817.160-.166 Roads: Class II-(PGL)

The gravel (Class II) roads mentioned on page 25 should address all of the regulations for Class II roads.

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