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State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Norman H. Bangertter
Governor

Dee C. Hansen
Executive Director

Dianne R. Nielson, Ph.D.
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

August 26, 1992

Mr. Mike Glasson
Andalex Resources, Inc.
P.O. Box 902
Price, Utah 84501

Dear Mr. Glasson:

Re: Deficiencies Relative to Division Order DO-92A, Andalex Resources, Inc.,
Wildcat Loadout Facility, ACT/007/033-DO-92A, Folder #2, Carbon County,
Utah

Enclosed please find deficiencies relative to the above-noted Division Order.
Please respond to these deficiencies by September 28, 1992.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Pamela Grubaugh-Littig'.

Pamela Grubaugh-Littig
Permit Supervisor

jbe
Enclosure
cc/enc: Jesse Kelley
007033.DRD



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August 17, 1992

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Ken Wyatt, Reclamation Hydrologist *KW*

RE: Review of August 3, 1992 Response to Division Order DO-92A, June 16, 1992, Andalex Resources, Wildcat Loadout, ACT\007\033, Folder #3, Carbon County, Utah

SYNOPSIS

On June 16, 1992, the Division issued Division Order #DO-92A to Andalex Resources for permit defects discovered during the June 1992, complete inspection at the Wildcat Loadout. Andalex submitted a response to this Division Order on August 3, 1992, which is the focus of this review.

ANALYSIS

The Division Order consisted of numerous permit deficiencies which required additional information, maps, or certifications as listed below. The permit deficiency is listed below in bold type followed by review of the operator's response.

ITEM # DEFICIENCY

1. **The permanent impoundment design drawing was not certified as required by R645-301-512.24.**
The permanent impoundment design drawing, Plate 18, was certified by Mr. Dan Guy, State of Utah Professional Engineer #4548 on July 23, 1992.
2. **The disturbed area map must be expanded to include the permanent impoundment.**
Plate 1, entitled Wildcat Loadout Surface Facilities as constructed was changed to include the permanent impoundment within the disturbed area. The drawing was also corrected to more accurately reflect the configuration of this impoundment. Plate 2, Wildcat Loadout Surface Facilities Topography (Watershed & Drainage) was also changed to include this impoundment within the disturbed area.

3. **The disturbed area map must be expanded to include the upper portion of ditch UD-1.**
Plate 2, Wildcat Loadout Surface Facilities Topography (Watershed & Drainage) was changed to include the upper portion of Ditch UD-1.

4. **The operator must submit complete plans for the refuse pile, including drawings and cross sections showing present and anticipated configuration of the refuse pile, a description of how it is and will be constructed, and a description of how it will meet the relevant requirements of R645-301-536 including the stability requirement of R645-301-536.110. The plans must be properly certified by a qualified, registered, professional engineer.**
The refuse pile portion of the Division Order was reviewed by Jesse Kelley. According to Mr. Kelley, this portion of the submittal responding to the refuse pile configuration is adequate to define the issued raised in the Division Order. Mr. Dan Guy certified the drawings on July 23, 1992.

The only problem noted in this item is that the text references the refuse pile information in Appendix P page 147-F, whereas the submittal includes this information in Appendix O. The Table of Contents in Volume 1 of the MRP only lists appendices A through N. This discrepancy should be corrected.

5. **All diversions except UD-1 do not have typical cross sections or certified designs. Tables 4-12 and 4-13 which only show minimum cross sectional areas are not adequate. Cross sections must be supplied.**
No cross sections were provided except for one for UD-1 and one generic drawing shown on page 118 and referenced on page 132. It is acceptable to provide diversion design in tabular format provided that sufficient information is provided to define each diversion. Tables IV-12 and IV-13 are incomplete. Additional diversion specific data required for cross section tabulation include:
 - * Channel bottom width
 - * Channel top width
 - * Channel Depth
 - * Flow Depth

The above listed information is required for each diversion listed in tables IV-12 and IV-13. The corresponding text sections concerning diversions need to be corrected to eliminate the statement about maintaining the

minimal cross sectional areas from table IV-12 and IV-13. Some of these statements needing revision are found on pages:

113: 2nd paragraph

123: 2nd paragraph, 4th paragraph, last paragraph

132: 1st paragraph

133: 2nd paragraph

6. **Depiction of BTCA's areas on the disturbed area drainage map for both operation and reclamation phases.**

The permittee must submit a plan stating how all sediment controls will be installed, maintained, and eventually removed following reclamation. This plan will provide a commitment by the permittee to monitor these sediment controls when possible to demonstrate that they will meet all applicable State and Federal effluent limitations.

Page 146 describes six BTCA areas encompassing 7.63 acres or 11.36 percent of the total disturbed area. This further defines the installation and maintenance of these alternative sediment controls.

A commitment is made in the second paragraph on page 146 to monitor these BTCA areas to the extent possible by collecting samples from points of discharge below the strawbales or other sediment controls.

Plate 2: Wildcat Loadout Surface Facilities Topography (Watershed & Drainage) was amended. Terminology referencing Small Area Exemption has been changed to BTCA and the current BTCA areas have been added.

The permittee will provide the total disturbed area that each control treats and provide the 10 year 24 hour storm volume for each treated area. The sum total area of BTCA treatments will not exceed 15 percent of the total disturbed area.

BTCA areas are discussed on page 146 of the operator's submittal. Table IV-15 on page 147 summarizes the hydrology data for the six BTCA areas. The curve number used in generating these data was 90 which is conservative. All of the information requested for this item is present in this submittal.

The text indicates that the total area encompassed in BTCA areas amounts to 11.36 percent of the total disturbed area. These data was checked by digitizing the BTCA areas and the disturbed area from Plate

2. The area contained in BTCA areas is within the 15 percent allowable.
7. **The permittee must submit appropriate designs for the permanent impoundment and supply the certifications for no spillways in compliance with the rules and provide a means for decanting the structure as required under R645-302-742.224.**

This section of the Division Order was directed at the combination of the permanent impoundment and the depression area located between the permanent impoundment and the railroad. The depression has no outlet. Andalex needs to provide some method of de-watering this area should it ever accumulate water. A decanting or pumping system for de-watering is required for this depression area. This was discussed with the operator as reported in the June 2, 1992 inspection report under 4c HYDROLOGIC BALANCE: "The operator agreed to revise the plans for the permanent impoundment and the depression area as these plans do not now adequately show the configuration and decant structures of these areas."

RECOMMENDATION

This submittal cannot be approved until the above listed issues are resolved. These are listed below based on the analysis above.

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|--------|---|
| ITEM 4 | The discrepancies in the text referencing the refuse pile design in Appendix P while the submittal references this information as Appendix O and the Table of Contents in Volume 1 only lists appendices A through N. This discrepancy should be clarified and the Table of Contents should be corrected to include the appropriate refuse pile appendix. |
| ITEM 6 | Additional data is required for cross section tabulation in tables IV-12 and IV-13. This information includes for each diversion, channel bottom width, channel top width, channel depth, and flow depth. This information is required so that a person can define the channel shape from the information listed in the cross section tabulation. |

The corresponding text sections need to be corrected to eliminate the statement about maintaining the minimal cross sectional areas from table IV-12 and IV-13.

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ACT/007/033
August 17, 1992

ITEM 7

Andalex needs to provide a method to de-watering this area should it accumulate water. A method of monitoring for water accumulation and a system for decanting or pumping watering is required for the depression area below the two cell of the permanent impoundment.