



State of Utah  
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October 25, 1999

To: File

Thru: Pamela Grubaugh-Littig, Permit Supervisor  
 Daron Haddock, Permit Supervisor

From: Peter Hess, Reclamation Specialist III PH

RE: Resource Recovery from School House Canyon Refuse Pile, Plateau Mining Corporation, Willow Creek Mine, ACT/007/038-99E, Folder #2, Carbon County, Utah

**SUMMARY:**

The permittee has previously proposed permitting action which would allow them to scalp BTU resources from the School House Canyon refuse storage facility for blending purposes to enhance the ash fusion temperature requirement for a major coal supply contract. This technical analysis has been prepared in response to the permittee, who submitted a deficiency response to the Price Field Office on October 19, 1999.

**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**HANDLING AND DISPOSAL OF COAL AND COAL MINE WASTE**

Regulatory Reference: R645-301-528

**Analysis:**

The applicant has submitted a revised Map 18B, Willow Creek Mine Surface Facilities Map, which depicts two storage areas for the 30-40,000 tons of material which will be stored in the preparation plant area for blending purposes throughout the winter months. Area 80 exists directly west of the prep plant's bath house/warehouse building. Area 92 is 300 feet SE of the crusher building, adjacent to conveyor SC-5.

Map 18B also depicts a BTU resource recovery reclaim hopper/feeder/conveyor on the pad immediately NE of the raw coal reclaim tunnel.

**Findings:**

The deficiencies aired in the September 14, 1999 technical analysis have been adequately addressed.

**COAL MINE WASTE**

Regulatory Reference: R645-301-536

**Analysis:**

The material stored in School House Canyon is a combination of coal processing waste and mine development waste. The efficiency of the heavy media wash plant at Willow Creek is the determining factor relative to the percentage of lower BTU coal which is shipped to School House with the wash plant reject. This is the same material which is being reclaimed as part of the proposed "BTU resource recovery" project. It will not be argued in this TA as to whether this material is "coal" or "coal mine waste". The fact remains that it was originally shipped to School House for final disposal in a refuse disposal facility. Hence, the reclaimed material is still considered by this individual to be coal mine waste, and same must meet certain performance standards for storing of same.

The applicants proposal commits to storing the 30-40,000 tons of reclaimed material in the two areas referenced above in a fashion that ensures stability; two foot lifts will be compacted, and slopes will be maintained at 1.5 to 1. Pile height will be limited to a maximum of twenty feet, and have positive drainage.

Material which will be stored adjacent to the hopper/feeder/reclaim belt immediately NE of the raw coal reclaim tunnel (Area #103 on Map 18B) will be stored on a short term basis for immediate blending purposes. Hence, compaction, slope maintenance, and positive drainage requirements need not be maintained. The material will be stored at this location only in the same fashion as coal.

**Findings:**

The commitments which the applicant has made to maintain performance standards relative to compaction, slope maintenance, maximum pile height, and positive drainage on the

Resource Recovery  
ACT/007/038-99E  
October 25, 1999  
Page 3

long term temporary refuse storage piles are felt to be adequate to meet the requirements and intent of the R645 rules. The applicant is committed to preventing any potential environmental or safety hazards relative to these piles.

## **REFUSE PILE SURFACE RUNOFF**

Regulatory Reference: R645-301-746.212

### **Analysis:**

The September 14, 1999 technical analysis prepared by this individual indicated that the applicant needed to show that ponds 011A and 012A were adequate to handle the possibility of receiving additional sediment loading from the proposed temporary refuse piles at locations 80 and 92 on Map 18B, Willow Creek Surface Facilities. Rethinking of this issue has determined that any additional loading that takes places will merely, more than likely, increase the cleaning frequency of these ponds.

### **Findings:**

Additional sediment loading from the temporary waste rock storage piles will be minimal. The applicant does not need to resize the ponds to determine if they are adequate to handle any additional sediment laden runoff.

## **CONCLUSIONS AND RECOMMENDATIONS**

The applicants October 19, 1999 deficiency response adequately addresses all concerns which were aired in the September 14, 1999 technical analysis.

It is recommended that the October 19, 1999 submittal, which is a complete, revised updated version of ACT/007/038-99E be approved as submitted.

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