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UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE

Manti-LaSal National Forest
350 East Main Street
Price, Utah 84501

2820

August 13, 1980



Mr. John Hardaway
Office of Surface Mining
2nd Floor, Brooks Towers
1020 15th Street
Denver, Colorado 80202

Dear Mr. Hardaway:

One Forest Service concern for the technical acceptability of the Fugitive Dust Control Plan submitted by Beaver Creek Coal Company for the Huntington Canyon Mine #4 centers around the fishery in Huntington Canyon. A Utah Division of Wildlife Resources report, "Effects of Coal Mining Activities on Aquatic Ecosystems," explains that sustained low levels of sediment and silt may be expected to decrease habitat for macroinvertebrate and plant populations. Lower numbers of macroinvertebrates and plants result in loss of feed available to the fishery.

Mill Fork is within the half mile settling radius of the gravelled road. Mill Fork is also a perennial stream tributary to Huntington Creek. The plan as submitted by Beaver Creek Coal describes watering the gravelled road to decrease an estimated 76 tons/year of particulate emissions from that source.

The plan overlooks present negotiations between the Forest Service and Beaver Creek Coal for a right of way preparatory to the paving of the haul road. In the Environmental Assessment prepared in 1976 for Swisher's reopening of the old Leamaster Mine, a condition of the Forest Service approval was reconstruction of the road in the following manner: "The road will be surfaced first with gravel and then blacktopped when the mine goes into full scale production." Paving the road should adequately reduce emissions.

No mention is made of fugitive dust control measures on coal haulage down Huntington Canyon. In Huntington Canyon, where the speed of traffic increases, a drying effect on top of the haul load is expected, particularly in summer. Under these seasonal conditions, the Forest Service recommends a plan to water the loaded coal trucks to reduce fugitive dust from this source. In



summer, when temperatures and wind velocities are high, attention to spraying the coal storage pile will be necessary to adequately control fugitive dust. "Pockets of accumulated coal have been observed in Huntington Creek below stockpile storage yards by John Livesay, Fisheries Manager, Utah Division of Wildlife Resources," states the aforementioned DWR report.

As far as the Air Monitoring Plan is concerned, we understand that dustfall jars are no longer an acceptable monitoring technique to either the EPA or the Utah State Air Quality Bureau (personal communication, Bernell Cordner). While Beaver Creek Coal's attempt to spare environmental impacts to the Forest is commendable, apparently the data generated will not be accepted by the appropriate regulatory authorities.

Sincerely,

William H. Boley

WILLIAM H. BOLEY
Forest Engineer