June 29, 1981

Memo to Coal File:

RE: Trail Mountain
Natomas Coal Company
ACT/015/~~021~~ 009
Emery County, Utah

On June 23, 1981, Division Reclamation Officers, Jean Doutre and Tom Portle visted the Trail Mountain minesite. We were accompanied on this inspection by Andrew King, chief engineer for Trail Mountain. This was a partial inspection, the main objective being to review items which were addressed in a May 14, 1981, letter to Mr. Andrew King.

Trail Mountain had successfully addressed many of the items in the above-mentioned letter, however, there were a couple of inadequacies. Following is a list of the requirements of this letter and Trail Mountain's response:

1. Trail Mountain was to have reinforced the berm in an area north of the office/bathhouse complex. This work had not been done. Mr. King offered to do this work while the inspectors were on-site. I informed him that since the area was very minor an area and there was little risk of environmental harm this type of measure was not required. I did, however, inform him that this work must be done prior to the next inspection.

2. Trail Mountain was requested to clean up spilled oil and relocate oil drums in an orderly fashion. This had been done, oil had been relocated and consolidated and stored in an orderly manner.

3. Remove logs from embankment and slopes to Cottonwood Creek. Trail Mountain had adequately retrieved logs and other material on the embankment and stored them in a more orderly fashion.

4. Riprap inlets to sediment pond or otherwise provide erosion protection. This item had not been adequately addressed, in fact, there was no evidence that Trail Mountain had made any effort to achieve this end. Because of this, the following violation was written:

Violation #81-3-8-1

No. 1 of 1

Nature of Violation:

Failure to maintain sediment control devices to minimize erosion to the extent possible.

Provision of the Regulation, Act or Permit Violated:

UMC 817.45(iii).

Portion of the Violation to Which Notice Applies:

Slopes draining into sediment pond and eroded area above pond which carries drainage into the sediment pond.

Remedial Action Required:

Implement any measures necessary in order to minimize erosion to the extent possible.

Time for Abatement:

Thirty (30) days, no later than 8:00 a.m., July 23, 1981.

Another area where work was required was to implement a 48-inch culvert diverting undisturbed drainage away from the disturbed site into Cottonwood Creek. This had been discussed at the Trail Mountain minesite in a meeting on October 22, 1980. Subsequently, Tom Suchoski had informed Trail Mountain in a letter dated November 25, 1980, that Trail Mountain was to have this done by the end of spring. Subsequent to this and in the letter cited above, I informed them that June 21, being the last day of spring. is the final date which the Division would accept completion of this work. Prior to this deadline, Andrew King informed me by telephone that it was doubtful whether this would be done by the deadline although his contractors insured him it would be. On the date of the inspection, which was two days after the final date, about 1/3 of the culverting work had been done. It should be noted that this was probably the most difficult portion of the work to complete. He requested an extention from the Division in a letter dated June 22, 1981. In light of the delay of the contractor and Mr. Kings diligent efforts to keep the Division informed, including the above-mentioned phone call and a letter dated June 22, 1981, it was the opinion of the inspectors that this additional deadline was warranted.

With regard to the Division requesting that blasting data be furnished in compliance with UMC 817.68, the operator was able to provide records to the inspectors at the time of the inspection, these included the name of the contractor, the location, the date, the time, the weather temperature and wind conditions, the type of material blasted, number of holes used, the thickness and description of burden, diameter of depth, type of explosive use, total weight of explosion, ignition system, type and length of stem, manner of protection used and type and number of delays used. The fire boss who is a certified blasting inspector underground, supervised the inspection.

During the inspection, Mr. King informed Division inspectors that both buffer zone signs and perimeter signs had been ordered and would be on-site prior to the next monthly inspection and in no event implemented prior to July 1, 1981, as required by the Division.

Although acute materials had been obtained to implement a subsidence monitoring plan, there has not been any written material provided to the Division addressing this concern. Mr. King informed me that Mr. Leonard Witkowski of Natomas was working on this in Denver. This matter should be pursued in the next monthly inspection.

On the lower pad immediately south of the parking lot area and along the embankment, Trail Mountain is storing a variety of materials utilized in mining. The company informed inspectors of their plans to lay a small cement pad, approximately 20 feet x 10 feet, to better store these materials. I informed Mr. King that the Division would require the company to supply a narrative and diagrams prior to building this structure. Also discussed on October 22, 1980, was a time schedule for installing a 96-inch culvert to bypass Cottonwood Creek under the access road to the minesite. This matter is also still pending. Andrew King could not give the inspectors any date or timetable regarding this bypass culvert.

Also, still a concern is the sizing of the sediment pond. Yohansen and Tuttle have done a stability analysis to show that the outslope of the pond meets the requirement for a 1.5 stability factor. The pond still does not meet specifications for volume. A benefit from the installation of the 96-inch culvert would be that Trail Mountain would then have more room in which to expand their pond and also to provide a 2:1 slope for the banks of their sediment pond.

Another concern at Trail Mountain minesite, is the utilization and extension of the parking lot north of the office pad/bathhouse complex as an area to store abandoned and unused underground mining equipment. This should be checked to see if in Trail Mountain's interim or permanent mine plan of this area is included in storage areas. If not, Trail Mountain must be required to remove this material or submit additional information to the Division which designates this area as a storage area.

THOMAS L. PORTLE TLP
RECLAMATION OFFICER

cc: Tom Ehmett, OSM
Andrew King, Trail Mountain
Inspection Staff

TLP/btm

Statistics:

See Wilberg memo dated July 1, 1981
Grant: A & E