May 14, 1981

Memo to Coal File:

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

DATE:	May 7, 1981
TIME:	11:30 a.m.
WEATHER:	Clear and Cool
COMPANY OFFICIALS:	Dan Hanna and Andrew King
STATE OFFICIALS:	Tom Portle
ENFORCEMENT ACTION:	None

Compliance With Permanent Performance Standards

771.13(3) Continued Operation Under Interim Permits

Permits were available for inspection at the minesite, these included: (a) May 11, 1978, form letter granting temporary interim approval; (b) GS 211 plan (U-082996) approved September 9, 1977.

817.11 Signs and Markers

(a) Signs containing the required information were posted at the mine entrance.

(b) Perimeter markers were not in place. Mr. King and I discussed where perimeter markers should be placed and I informed him that the Division would enforce this as of July 1, 1981.

(c) There were no buffer zone signs in place. These should also be up by July 1, 1981. A letter regarding this and other areas of concern has been sent to the operator.

(d) No blasting was underway.

(e) No topsoil stockpile was present.

817.21 Topsoil

Construction of the sediment pond was initiated on August 25, 1980. This construction was on a pre-Law disturbance. Hence, Trail Mountain did not save topoil from this area. The installation of a 48-inch culvert which will convey natural drainage from a wash west of the disturbed area under the pad and empty into Cottonwood Creek only pre-Law areas will be affected. Because of this, no topsoil will be salvaged.

817.41-.57 Hydrologic Balance

Questions regarding the sizing and embankments stability of the sediment pond have prompted Trail Mountain to submit plans to construct a new pond. This request was denied. Although not addressed in detail in the first draft of Trail Mountain's permit application under the permanent regulatory program, mention is made that detailed plans are forthcoming. The pond has not discharged this spring. It should be noted that there has been little snow melt and precipitation in the spring of 1981. A NPDES permit was obtained in October of 1980. This permit (UT-0023728) expired on December 31, 1980, but was automatically continued as per a letter from Lance C. Vinson on December 30, 1980. No discharge was reported for January to EPA. This was the only NPDES report available. Mr. King was informed that copies of this should be forwarded to the Division.

Trail Mountain has culverts stored on-site and was to begin installing it to convey undisturbed water from the wash west of the disturbed area as soon as possible. This work was initially to have been begun by April 30, 1980. In any event, it is to be done this spring and no later than June 21, 1981. Sizing of the pond may be re-evaluated in light of this diversion of overland flow away from the pond. Also, Mr. King informed me that stability analysis on the bank was being performed and that he awaited the results to determine if, in fact, the bank was stable. He also informed me of a possible plan to culvert the stream and extend the bank over the area on a more gradual slope.

Water quality data has not been submitted to the Division since June of 1980. This includes both the monthly sampling of surface and ground water and the quarterly summaries. However, data through December of 1980 were available on-site. Inspection of this data revealed no violations. In their defense, Trail Mountain said that representatives from Johansen and Tuttle Engineering, Incorporated, were to have forwarded this data as a matter of course and had been in the past. I requested a letter verifying that this was indeed the case from Johansen and Tuttle. This letter was hand-delivered by Mr. King within a week. A letter has been sent to Trail Mountain explaining that in the future they will be responsible, they will need to either check the Division's files to make sure this is the case, or they will need to verify with Johansen and Tuttle that, in fact, data has been submitted to the Division. It was felt that since Trail Mountain was in the process of changing hands and Andrew King had just taken over responsibility, giving them the benefit of the doubt, was warranted in this case.

Inlet and outlet structures to the sediment pond must be corrected prior to the next monthly inspection or a violation will be warranted. Erosion was evident in these areas. Photos were taken of this and it was recommended that riprip or other suitable erosion control devices be implemented in this area.

Another minor problem observed on-site, was a slight breach in berm north of the office/bathhouse. This must be reinforced prior to the next inspection.

817.61-.68 Explosives

Trail Mountain, as previously mentioned, is installing a 48-in diversion culvert. In order to install this culvert, the possibility exists that some blasting may be required. If this proves to be the case, Trail Mountain should comply with all applicable regulations. Particularly, having records available as indicated in 817.68. A letter advising them of this has been sent.

817.74 Disposal of Underground Development Waste and Excess Spoil

Disposal of this waste is currently being done underground. There is no site within their permit area that is designated or used for this type of material.

817.89 Disposal of Noncoal Waste

There were two areas of concern.

1. On the berm that is west of Cottonwood Creek, some timbers that were being stored on-site had been inadvertently allowed to slip down the embankment towards Cottonwood Creek. Mr. King committed to having this problem alleviated prior to the next inspection.

2. In another area, near their conveyor and their storage house, oil drums had been battered and were not being stored in a controlled manner. Some evidence of leakage was in evidence. Apparently, this resulted from work that needed to be done on the conveyor system and this problem was of a temporary nature. Mr. King, again, committed to having this problem alleviated prior to the next monthly inspection.

817.111-.114 Revegetation

All effected areas, downslopes and sediment ponds which are not being utilized, as part of the mining operation, were seeded in November of 1980. This has met with little success. The only area where success of any kind was observed, was on the banks of the sediment pond as they go down Cottonwood Creek and on the top portion of the dike of the pond itself. In these areas, crested wheatgrass had germinated and looked fairly good.

817.121-.126 Subsidence Control

Apparently, there is not on-going subsidence monitoring program at the Trail Mountain Mine. One is being developed as mentioned in the permit application.

THOMAS L. PORTLE TLP
RECLAMATION OFFICER

cc: Tom Ehmett, OSM
Andrew King, Natomas

TLP/btm

Statistics:

Vehicle: #EX 70237--506 miles
Per Diem: One person x two days, 13 hours @ $37.50/day = $85.
Grant: A & E