

December 14, 1983

Inspection Memo  
to Coal File:

RE: Natomas Trail Mountain  
Coal Company  
Trail Mountain Coal Mine  
ACT/015/009, Folder No. 7  
Emery County, Utah

DATE: August 11, 1983

TIME: 11:30 a.m. - 3:00 p.m.

WEATHER: Warm and partly cloudy

COMPANY OFFICIALS: Bob Downey

STATE OFFICIALS: David Lof

ENFORCEMENT ACTION: Notice of Violation N83-4-10-1

Compliance With Permanent Performance Standards

UMC 771 et al Permits

A July 19, 1977 letter from the USGS granting approval of the operator's 211 mine plan for Federal Lease U-082996 was available in the operator's mine office.

During the installation of the 66 inch Cottonwood Creek bypass culvert, the operator found that they were deficit fill material to backfill the bypass culvert. At that time the operator requested that Division personnel visit the mine site to look at a previously disturbed area which they were proposing to use as a borrow area. During the visit, made by Steve Cox, Ev Hooper, and Dave Darby of the Division, verbal approval was given to the operator to use the area. At the time of my inspection the operator had no approved plans for the borrow area nor had they received a written approval to use the area. During an August 22, 1983 telephone conversation with Mr. Allen Childs of Natomas, I requested that the operator submit complete and adequate plans to the Division on the borrow area no later than September 5, 1983.

UMC 817.11 Signs & Markers

The mine identification sign had been moved down to the mine perimeter boundary near the sediment pond as requested during the previous monthly inspection.

Several more buffer zone signs had been posted along Cottonwood Creek, from the office building to the northern boundary of the permitted disturbed area.

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#### UMC 817.21 -.25 Topsoil

The operator had a small amount of topsoil stored and protected near the inlet to the 48 inch undisturbed drainage bypass culvert on the west side of the mine yard. It was evident the topsoil was properly protected from water erosion and that some germination was taking place.

#### UMC 871.41-.52 Hydrological Balance

At the time of the inspection the operator was in the process of completing the installation of the bypass culvert in Cottonwood Creek. All of the culvert had been installed and they were completing the backfilling of the north end of the culvert. The headwall for the inlet of the culvert had been poured, and the contractor had constructed the wing walls for the inlet structure out of two foot + riprap. The contractor had done a very good job of constructing the wing walls, however, there was a problem in that the plans called for concrete wing walls. Since it was apparent that the wing walls would adequately meet the design specifications, I asked the operator to submit plans to modify the approved plan.

During the June inspection, the operator was asked to block off the east side of the Cotton Creek stream crossing to the powerpole access road and provide sediment controls on the west side. At the time of this inspection the stream crossing had been blocked off on the east side, however, no sediment controls had been provided on the west side.

The operator had riprapped the haul road embankment and southeast corner of the sediment pond embankment as requested during the June inspection, in order to control some erosion which had become noticeable on these embankments.

#### UMC 817.52 Surface and Ground Water Monitoring

The operator currently holds NPDES Permit # UT-0023728 issued by EPA on March 23, 1982. It will expire on December 31, 1986. NPDES monitoring reports were available through the second quarter of 1983, the reports indicated that there had not been a discharge from the sediment pond.

According to the operator they are conducting their surface water monitoring program in accordance with the plan contained within their mine permit application. Surface water monitoring data was available through the second quarter of 1983, the data did not indicate any problems. While reviewing the operators hydrologic monitoring data which is submitted to the Division, I found that no surface water monitoring data had been submitted to the Division since June of 1982. During my August 22, 1983 telephone conversation with Mr. Childs, I informed him that copies of all

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surface water monitoring data since June of 1982 should be submitted to the Division.

UMC 817.61 Use of Explosives

During my July inspection I reminded the operator of the need to maintain current blasting records of those blasting activities which take place during the construction of the stream channel bypass culvert. At the time of my inspection there were no blasting records available, because of this, Notice of Violation N83-4-10-1 was issued. It reads as follows:

Nature of Violation

Failure to record all pertinent information concerning surface blasting activities in accordance with UMC 817.68.

Provisions of the Regulations, Act, or Permit Violated

UCA 40-10-17 (2)(o)(ii)  
UMC 817.68

Portion of the Operation to which Notice Applies

Blasting records.

Remedial Action Required

Adequately document recent blasting activities to comply with UMC 817.68.

Time for Abatement

One week from the date of receipt of this notice.

The violation was issued on August 15, 1983 from the Division. On August 29, 1983 I received a response from Mr. Childs which indicated that the records of all blasting activities had been kept at the mine site, that since he was not available to conduct the inspection with me the blasting records were not available. The blasting records were submitted with this letter and a review of the blasting records indicated that they were incomplete. On September 7, 1983, I sent Mr. Childs a letter requesting the additional information and requiring it to be submitted within one week from the date of the receipt of my letter.

UMC 817.71-.73 Disposal of Underground Development Waste and Excess Spoil and Nonacid and Nontoxic-forming Coal Processing Waste.

The underground development waste which had been stored adjacent to the operators sediment pond was used as fill material to backfill over the

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Cottonwood Creek bypass culvert.

UMC 817.100 Contemporaneous Reclamation

During the June inspection, I discussed with the operator the need to contemporaneously reclaim the extreme south end of the portal pad road, and the access road which extends from the sediment pond embankment in a south-westerly direction since these areas are no longer needed. At the time of this inspection, the operator had not submitted plans to the Division for the contemporaneous reclamation of these areas. During my August 22, 1983 telephone conversation with Mr. Childs, I requested that plans for the reclamation of this area be submitted to the Division within 30 days (September 21, 1983).



DAVID LOF  
FIELD SPECIALIST

DL:re

cc: Jodie Merriman, OSM  
Joe Helfrich, DOGM  
Allen Childs, Natomas Trail Mountain Coal

Statistics:

Vehicle: Ex 49611-445 miles  
Per Diem: 1 person X 1 day, 13 hours = \$70.23  
Grant: A&E