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U. S. Department of Labor

Mine Safety and Health Administration
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April 25, 1984

Mr. Allen D. Klein
Center Administrator
Office of Surface Mining
Reclamation and Enforcement
Brooks Towers
1020 15th Street
Denver, Colorado 80202

JIM

MAY 03 1984

Dear Mr. Klein:

On April 5, 1984, Mr. Louis Hamm of your office contacted Monty Christo of the Denver Safety and Health Technology Center to inform him that additional information concerning the "Mining and Reclamation Plan" for the Trail Mountain Mine (UT-0017) had been received. The permit application was reviewed the following morning by Mr. Christo and the pertinent sections copied for MSHA's files.

The application as amended by the information logged on April 1, 1984, at your office is sufficient to document that no significant safety hazards to mine employees will be created by the proposed water diversion into the Trail Mountain Mine. Thus, MSHA will concur with OSM's approval of the diversion under Utah regulation UMC 817.55.

MSHA's concurrence is based on the following permit documentation and information:

1. Section 7-14 pages 1-3 "Discussion of Water Distribution at Trail Mountain Mine Site, Emery County, Utah."
2. Figure 3-7 "Typical Underground Water System" 7/81 DRN:AK
3. Figure 7-19 Dated 3/31/84.
4. Figure 7-14 "Main Mine Sump" Revision Date 3/12/84.
5. Figure 7-14A "Cross-sections of Mains and Sump Areas" Dated 3/31/84.

The above listed documentation describes the location and capacity of the present main sump; it limits the quantity of water stored to 200,000 gallons and a maximum depth behind the barrier lowest in elevation to 2 feet of water; it describes the method of maintaining the reservoir quantity and recording of "in and out flows;" and, it commits to eliminating the existing

sump entirely when a new sump is constructed at a specified location. The permit does not described the future sump, sump capacity, barrier or dike design or sump/water operating plan which will be implemented; nor does the permit specify when the new sump will be in place.

MSHA recommends that OSM require an addendum to the permit application providing sufficient detail to verify that the new sump will not pose an in mine safety hazard before it is filled. The requested addendum need not delay the approval of the present system, but it should be added to the permit and reviewed by MSHA if MSHA's concurrence is to apply to the altered system. The addendum should, at a minimum, include the structural design drawings and design criteria for the dikes; the amount and working levels of water stored behind the dikes; the method of controlling in and out flows to the sump; the route the stored water would flow if the dikes failed or overtopped; and the frequency of dike and sump examination by the mine operators.

Whether the addendum would be received by OSM or by Utah at some later date is not known at this time. MSHA remains available to review the addendum when submitted in either case and requests notification through this office when the addendum is received.

Sincerely,



D. K. Walker
Chief, Safety and Health Technology center