

April 23, 1984

Inspection Memo  
To Coal File:

RE: Natomas Trail Mountain Coal Company  
Trail Mountain Coal Mine  
ACT/015/009, Folder #7  
Emery County, Utah

On April 13, 1984, a partial inspection was conducted at the above mentioned mine site by Division, Field Specialists, David Lof and Tom Wright. We were accompanied during the field tour portion of the inspection by Bob Downard of Natomas. Following the inspection, problems and questions which came up during the inspection were discussed with Allen Childs of Natomas.

The snow waste material and underground development waste stored at the extreme north end of the mine yard was almost completely melted and dried out. Runoff from the undisturbed area above this area and runoff from precipitation which contacts the top of the pile flows down toward the parking area on the north side of the mine warehouse/office. Some of the runoff has ponded near the berm above the 96 inch culvert inlet. I told Mr. Downard to establish a ditch to the disturbed area runoff diversion which conveys runoff to the sediment pond. Precipitation which contacts the side slopes on the east side of the stockpiled material goes down to small depressions between the downslope and berm protecting Cottonwood Creek. The small depressions provide adequate sediment control for the small area, however, they are marginal. Following the inspection I told Mr. Childs not to stockpile anymore materials in this area. He said that they would not, and that they were planning to use some of the material to face up the slopes in the parking area behind the mine office and as pad base material.

The operator has a water tank overflow pipe which discharges into the disturbed area runoff diversion to the sediment pond. The pipe is small in diameter and discharges infrequently. However, it has caused some erosion in the disturbed area runoff diversion. I asked Mr. Downard to put a 90° elbow on the overflow pipe to dissipate some of the energy from the overflow.

We inspected the topsoil stockpile which is located on top of the 48 inch undisturbed bypass culvert. There were no signs of erosion on the stockpile, however, I asked Mr. Downard to install strawbales at the base of the topsoil stockpile. I told him that when the strawbales are set in place that they should be inset a minimum of three inches and staked in place.

INSPECTION MEMO TO coal file  
ACT/015/009  
April 23, 1984  
page 2

A mine identification sign for the Cottonwood Portal area, operated by Utah Power and Light (UP&L), is located on the west side of the county road several hundred feet below the Trail Mountain Mine. The placement of the sign in this manner could potentially mislead the public, and does not provide proper identification for the Cottonwood portal area. During one of my January partial inspections conducted at the mine site, Val Payne of Emery Mining Corporation was at the Cottonwood Portal site. At that time I informed him of the need to have the sign moved so that it would properly identify the Cottonwood portal area and he said that it would be taken care of. Upon return to the Division offices, I spoke to Ken Wyatt who is the inspector for the Cottonwood Portal area and I notified him of the problem.

The crossings into the mine yard from the county road were in need of some minor maintenance.

During my March 14, 1984 inspection, I found that the operator had just installed a new corrugated metal pipe (cmp) riser for the dewatering device because it had been damaged this past winter by ice. At that time they still needed to cut the riser off to the correct height and install the anti-vortex collar. At that time I discussed with Mr. Downard the possibility of replacing the cmp with a rolled pipe of the exact same size in order to try and alleviate the problem of the ice damaging the riser. Since my inspection the operator decided not to install the rolled metal pipe in place of the cmp riser. At the time of my inspection I found that the dewatering device riser still had not been cut off to the proper height and that the operator had stuck a 50 gallon drum over the top of the cmp evidently to serve as an "oil skimmer." Because the operator had not cut the cmp riser to the proper height the operator could not insure that the required theoretical detention time would be maintained if their sediment pond became filled with runoff. In addition they would not be able to provide adequate storage volume for the 10 year, 24 hour precipitation event and lesser events because they cannot decant an adequate amount of runoff from the pond to provide the storage volume needed. Because of this and the fact that the operator had 30 days since my last inspection in order to cut the riser to the proper height Notice of Violation N84-4-6-3, # 2 of 3 was issued on April 18, 1984, it reads as follows:

#### Nature of the Violation

Failure to maintain the approved watering device for the sediment pond to insure that the required theoretical detention time can be maintained and to provide adequate storage volume for the 10 year, 24 hour precipitation event and lesser events.

#### Provisions of the Regulations, Act or Permit Violated

UMC 817.46(d)  
UMC 817.46 (g)

INSPECTION MEMO TO coal file  
ACT/015/009  
April 23, 1984  
page 3

Portion of the Operation to Which Notice Applies

The dewatering device for the sediment pond.

Remedial Action Required

Maintain the dewatering device in accordance with the approved plan.

Time for Abatement

April 25, 1984. 5:00 p.m.

When we looked at the outlet for the sediment pond discharge pipe, we found that the sediment pond was discharging at a rate of approximately .09 gpm. During a closer examination of the the discharge pipe we found that ice had formed in the pipe. The block of ice in the pipe extended up the pipe for at least 6 feet and blocked approximately 2/3's of the pipe. At that point we inspected the operators emergency spillway and found that the leakage was apparently due to the operator's dewatering device structure. Leakage from the structure had been noted during my July 12, 1983 inspection and the operator had tried to fix the leak at that time. Apparently during the fall, or winter, the dewatering device had started to leak again and the leakage caused the buildup of ice within the discharge pipe. Samples of the sediment pond discharge and of Cottonwood Creek, above the point at which the sediment pond discharges into the creek, were taken and are being analyzed by State Health Laboratories to determine whether or not the operator was meeting effluent limitations. I asked Mr. Downard if he had been aware of the ice in the discharge pipe. He said that he had not. I asked him to have the ice removed from the pipe. If an emergency discharge of the sediment pond had occurred it is possible that the ice would have blocked the discharge from the sediment pond and causes the runoff to overtop the sediment pond embankment.

Upon returning to the operators mine office I asked Mr. Childs if I could see his sediment pond inspection reports to see if any mention had been made of leakage from the sediment ponds dewatering device, the discharge from the sediment pond, or the ice inside the discharge pipe. Mr. Childs gave me his sediment pond inspection notebook where I found that there had been no entries since March 9, 1984. Mr. Childs said that he had not done an inspection since that time, but that other individuals had been at the sediment pond during the work being performed on the dewatering device. Because the operator had failed to conduct sediment pond inspections, and record the results of these inspections Notice of Violation N84-4-6-3, # 3 of 3 was issued on April 18, 1984. It reads as follows:

Nature of the Violation

Failure to examine the sediment pond for structural weakness, erosion and other hazardous conditions. And to promptly record the results of such examinations in accordance with 30 CFR 77.216-3

INSPECTION MEMO TO coal file  
ACT/015/009  
April 23, 1984  
page 4

Provision of the Regulation, Act or Permit Violated

UMC 817.46 (t)

Portion of the Operation to which Notice Applies

The sediment pond.

Remedial Action Required

Conduct sediment pond inspections in accordance with UMC817.46 (t) (inspections must be conducted and recorded on a weekly basis).

Time for Abatement

April 23, 1984

During my February 9, 1984 complete inspection, Mr Childs showed me a copy of a letter dated February 2, 1984 from R & M Consultants, Inc. of Murray, Utah to the Division . The letter stated, "We have inspected the above facility and find that it has been constructed as per the specifications presented on figure 7-13, dated September 15, 1981, prepared by Vaughn Hansen Associates, with the exception of design changes previously approved and on file with the Utah Department of Oil, Gas and Mining. Field inspection was performed on January 25, 1984 and included density testing at the pond embankment." The letter was signed by Larry Migliaccio, Registered Professional Engineer, State of Utah #3595. Upon returning to the Division offices after my inspection and reviewing Figure 7-13 in order to look at the design specifications for the operators dewatering device, I found that the emergency spillway had not been constructed according to the approved plans.

The designs show that a 60 inch diameter by 24 inch cylinder of cmp was to be welded to the top of the 48 inch emergency spillway riser to serve as an anti-vortex device and oil skimmer, and a slotted piece of steel plate was to be welded to the top of the cylinder to serve as a trash rack. The operator has not installed the oil and grease skimmer , but has welded a piece of steel plate over the top of the 48 inch cmp spillway riser and cut holes in the riser several inches down from the top so that the sediment pond can discharge. It is highly doubtful that the holes cut in the riser provide adequate surface area so that the runoff from a 25 year, 24 hour precipitation event could safely be discharged from the sediment pond. Also, the present construction of the pond would not prevent oil and grease from being discharged. Because of the facts outlined above, Notice of Violation N84-4-6-3, # 1 of 3 was issued on April 18, 1984. It reads as follows:

INSPECTION MEMO TO coal file  
ACT/015/009  
April 23, 1984  
page 5

Nature of the Violation

Failure to mine in accordance with an approved interim mine permit.  
Failure to provide an adequate combination of principal and emergency spillways to discharge safely the runoff from a 25 year, 24 hour precipitation event.

Provision of the Regulation, Act or Permit Violated

UMC 771.19  
UMC 817.46 (i)

Portion of the Operation to Which Notice Applies

The emergency spillway for the sediment pond.

Remedial Action Required

Reconstruct the emergency spillway to meet the approved design specifications.

Time for Abatement

April 25, 1984, 5:00 p.m.



David Lof  
Mining Field Specialist

DL:re

cc: Jodie Merriman, OSM  
Allen Childs, Diamond Shamrock  
Joe Helfrich, DOGM  
Tom Wright, DOGM  
Mary Boucek, DOGM

Statistics:

Vehicle: EX45421 - 408 miles  
Per Diem: 1 person X 2 days = \$92.08  
Grant: A&E  
85280