

April 5, 1984

Inspection memo
to Coal File:

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

DATE: February 9, 1984
TIME: 11:00 a.m. - 3:30 p.m.
WEATHER: Sunny and cool
COMPANY OFFICIALS: Allen Childs
STATE OFFICIALS: David Lof
ENFORCEMENT ACTION: None

Compliance With Permanent Performance Standards

UMC 771 et al Permits

The following permits and or approvals were reviewed in the operators mine office during the inspection.

1. A June 17, 1977 letter from State Health approving the septic tank and drain field for the mine operations.
2. A July 19, 1977 letter from the U. S. Geological Survey (USGS) approving the operator's 211 plan. Attached to this approval were 5 conditions.
3. A May 11, 1978 letter from the Division granting tentative approval of the operator's mine plan based upon approval of the 211 plan by the USGS.
4. A U. S. Forest Service special use permit for a pipeline right-of-way. The permit was signed by the Acting Forest Supervisor on August 3, 1981.
5. An August 26, 1983 memorandum decision from the State Engineer granting final approval of the operator's "Application for the Right of Exchange of Water" which changes their water rights permit to reflect the current use.

UMC 817.11 Sign and Markers

Roof bolts with flagging are being maintained along the road side of the operator's newly installed half-round culvert in order to delineate the permit area adjacent to the road. A mine identification sign was posted, the sign contained all pertinent information required by the Division.

UMC 817.21-.25 Topsoil

The topsoil stockpile which is located near the man-way portal, and over the 48 inch undisturbed bypass culvert, showed no signs of having been disturbed and it was properly marked with a topsoil sign.

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UMC 817.41-.52 Hydrologic Balance

On February 2, 1984 the operator received Notice of Violation N84-4-2-1 for failure to mine in accordance with their interim mine plan. The operator had not constructed the inlet to their Cottonwood Creek bypass culvert as approved and after having been asked numerous times to submit as-built plans to the Division, the violation was issued. At the time of this inspection, Mr. Childs gave me the plans for the abatement of the violation. Since the remedial action required that the operator simply submit as-built plans to the Division, the violation was terminated on February 21, 1984, effective February 9, 1984, the date of this inspection.

Mr. Childs showed me a copy of a letter to the Division dated February 2, 1984 from R & M Consultants, Inc. of Murray, Utah. The letter certified that the operators sediment pond had been constructed as per the specifications approved by the division and that density tests of the pond embankment conducted on January 25, 1984 and stability analysis of the pond embankment performed by R & M in November of 1983 indicated no problems with the sediment pond. The letter was signed and certified by Larry Migliaccio, who is a Registered Professional Engineer (RPE) in the State of Utah, holding RPE NO. 3595.

Mr. Childs was able to provide me with sedimentation pond inspection logs through February 6, 1984. According to the February 6, 1984 inspection the sediment pond was in need of being cleaned out and the operator had already contracted a hydraulic excavator to clean the pond. The berm between the road and the half-round culvert was being maintained in good shape. The half-round culvert was still filled with ice, gravel and coal in many areas, the mine yard access point nearest the sediment pond needed to be maintained in order to protect the culvert which the access passes over. The operator simply needed to put more fill over the culvert to keep it from being crushed by heavy truck traffic. The operator still needs to install the remaining 300 feet of half-round culvert at the north end of the permit area, when the ground thaws this spring.

Mr. Childs indicated that the material cleaned out of the sediment pond would be stockpiled near the sediment pond inlet until it dries. Once it dries, it will be used for pad base material in the mine yard.

Through the course of the winter the operator has been stockpiling snow waste material near the sediment pond inlet. This material is stockpiled in the same area where the operator wants to stockpile the materials cleaned out of the sediment pond. Mr. Childs asked, if it would be possible to have the material trucked to a county landfill for disposal, because of the limited area they have to operate within. After getting all the facts I called Joe Helfrich, Division Field Supervisor, and discussed it with him and we decided that it would not be possible for the materials to be disposed of at

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the county landfill due to Division snow removal policy and the possible precedence it could set. I informed Mr. Childs of our decision and I suggested that he move the material to the extreme north end of the mine yard where they have been stockpiling additional snow waste material. They should then berm off the snow disposal area, and install a ditch to convey runoff from this area to the half-round culvert so that the area can drain and not cause ponding in the parking area behind the mine office.

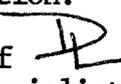
UMC 817.52 Surface and Ground Water Monitoring

Surface water monitoring data was available through January 12, 1984, and ground water monitoring data was available through December of 1983. The laboratory analysis done by Standard Labs did not indicate any problems. However upon looking at the operators water monitoring plan as submitted in their mining and reclamation plan, the operator is supposed to be doing field measurements of pH, conductivity, air and water temperature, and stream flow. Up to this point these parameters have not been measured. In discussing this with Mr. Childs he indicated that he had just recently contacted Standard Laboratories to do the actual sampling for all of their sites and that he would be sure to have them conduct the field measurements. I told Mr. Childs that he should make sure that the field measurements are listed in their water analysis sheets. In addition to the problem with the field measurements not being made I also found that the laboratory had not been analyzing for Total Organic Carbon, nor Nitrate, and that it was questionable whether the Iron and Manganese have been analyzed as Total Dissolved Iron and Total Manganese because the analysis sheets are not specific enough.

The operator currently holds NPDES Permit UT-0023738 issued by EPA on March 23, 1982, which will expire on December 31, 1986. The operator's fourth quarter 1983 monitoring report indicated that there had been no discharge from the sediment pond.

UMC 817.150-.176 Roads

The operator had contacted Hatchco Company of Huntington, Utah and arranged for a water truck to water the county road from State Highway 29 to the mine site as requested during my previous inspection.

David Lof 
Field Specialist

Dl:re

cc: Allen Childs, Natomas
Jodie Merriman, OSM
Joe Helfrich, DOGM
Mary Boucek, DOGM

Statistics:

Vehicle: EX 45428, 569 Miles
Per Diem: 1 person X 3 day 8 hours =\$220.09
Grant: A&E
82850-3