

*orig mine file
cc L. Bradford*



United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

APR 2 1985
APR 23 1985

*ACT/015/009
#3*

RECEIVED

APR 26 1985

DIVISION OF OIL
GAS & MINING

Dianne Nielson, Director
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Dr. Nielson:

The Office of Surface Mining (OSM), Western Technical Center has reviewed Trail Mountain Coal Company's letter of April 2, 1985, concerning transport of coal waste material to an approved landfill. Trail Mountain Coal Company's proposal to transport the coal waste for disposal is not consistent with the requirements of UMC 817.71 through 817.81 which specify that such material shall be deposited in approved areas within a permit area. Therefore, in order to comply with Special Condition Number 2 of their permit, a new proposal for coal waste disposal must be submitted in compliance with UMC 817.71 through 817.81. We recommend that Trail Mountain's schedule for compliance with Special Condition No. 2 be extended to June 24, 1985, in order to comply with the requirements of this letter.

Your office has the lead in conducting follow-up tracking of permit conditions on Federal mines in Utah, and the responsibility for monitoring and assisting Trail Mountain Coal Company to comply with the issues of this letter. If you have any questions of the OSM staff, please call Louis Hamm at (303) 844-5656 or Walter Swain at (303) 844-3806.

Sincerely,

Richard E. Dawes
for Allen D. Klein
Administrator
Western Technical Center

cc: Robert Hagen, OSM - Albuquerque Field Office
Allen Childs, Trail Mountain Coal Company



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Attachment A
Special Conditions

Condition No. 1

DOVE

The applicant must handle the on-site spoil materials to achieve the following:

- A. All materials exceeding electroconductivity values of 16 mmhos/cm shall be placed under a minimum of two feet of less saline suitable topsoil substitute materials.
- B. The surface six inches of suitable topsoil substitute material shall not exceed electroconductivity values of eight mmhos/cm.
- C. The proposed test plots shall include a revegetation trial incorporating topsoil substitute materials having electroconductivity values approximating these limits. Specifically, the surface six inches shall have a uniform EC value of eight, plus or minus one mmho/cm, and the underlying 18 inches shall have a uniform EC value of 16, plus or minus 2 mmhos/cm.

The applicant shall provide a plan to the regulatory authority within 60 days of permit issuance to sample the regraded surface for the purpose of confirming that the salinity values cited above have not been exceeded.

Condition No. 2

Within 60 days of permit approval the operator shall submit to MSHA a plan for disposal of coal wastes underground as proposed in the permit application, and shall implement the plan upon approval by MSHA. Disposal will take place only in the fee coal areas of the mine.

Condition No. 3

NA AT THIS TIME

Before any site redisturbance takes place, the applicant must conduct a survey, under supervision of the regulatory authority, of the areas to be redisturbed. The survey shall identify and record locations of individuals and populations of Hedysarum occidentale var. canone (canyon sweet-vetch). If canyon sweet-vetch is found in the portions of the permit area to be redisturbed, the mine operators must develop a mitigation plan for regulatory authority approval before redisturbance takes place.

unearthed and removed to conform to the final contours and fill volumes available. Cut and fill volumes are discussed later in this appendix.

Coal Waste Piles

The coal waste piles near the tippie (see Map C) will be trucked to an approved county landfill. This material will be loaded into a 30' end-dump truck by a backhoe/loader and transported to the county landfill. Upon removal of these coal piles, a small amount of this material will be placed at the toe of the highwall and removed. This technique will also be implemented at the tippie and coal load-out facilities.

*John
this was our
original submittal
to O.S.M.*

Sediment Pond

The sediment pond that presently exists will be removed. Initially, the water of this pond will be completely evaporate. The Sediment Pond will remain until the contour trenches are in place. (refer to Page 31, figure 1). The remaining sediments will also be loaded into a 30' end-dump truck by the backhoe/front-end loader and hauled to the county landfill. It should be noted that sediment pond removal and culvert removal will be conducted during low run-off periods.

The riprap material will be placed aside with the front blade of a crawler dozer and used later for stream-bank reclamation. The area will then be smoothed, graded and later covered by material to be used for growing media.

unearthed and removed to conform to the final contours and fill volumes available. Cut and fill volumes are discussed later in this appendix.

Coal Waste Piles

The coal waste piles near the tippie (see Map C) will be trucked to an approved county landfill. This material will be loaded into a 30' end-dump truck by a backhoe/loader and transported to the county landfill. Upon removal of these coal piles, a small amount of this material would remain. Therefore, subsequent to pile removal, the ground surface will be scraped and the remaining material will be placed at the toe of the highwall and covered by at least 4 feet of fill material. This technique will also be implemented on the surface material surrounding the tippie and coal load-out facilities.

Sediment Pond

The sediment pond that presently exists on the property will also be reclaimed. Initially, the water of this pond will be allowed to completely evaporate. The Sediment Pond will remain until the contour trenches are in place. (refer to Page 31, figure 1). The remaining sediments will also be loaded into a 30' end-dump truck by the backhoe/front-end loader and hauled to the county landfill. It should be noted that sediment pond removal and culvert removal will be conducted during low run-off periods.

The riprap material will be placed aside with the front blade of a crawler dozer and used later for stream-bank reclamation. The area will then be smoothed, graded and later covered by material to be used for growing media.

The low-profile Jeffery equipment mentioned in the reclamation plan is permissible for in-mine use and is MSHA approved. (see Figure 1).



Figure 1

As stated in Appendix 9, it is not feasible for the existing sediment pond to remain in its present position for post-mine reclamation procedures. Therefore, sealing of the portals subsequent to reclamation of the sediment pond is still recommended.

The present sedimentation pond is located on fill material of the Trail Mountain Coal Mine. Since it is located on fill material (material that will be moved during reclamation), it is not feasible for the existing pond to remain for sediment control during post-mining operations because the proposed reclaimed ground level is somewhat lower. The coal company has thus opted to seek alternative means of erosion and sediment control during the reclamation responsibility period. Therefore, as described in Appendix 9, other methods of sediment control are proposed. In a meeting with a State of Utah Hydrologist, (David Darby - DOGM, November 23, 1983), it was generally agreed that contour trenching would be one feasible alternative to sediment control. The trenches were designed to meet peak flow conditions and to allow for annual sedimentation. To further insure erosion and sediment control, the following techniques will also be implemented: 1) decrease natural slope angle, 2) erosion control mat, 3) land imprinting, and 4) establishment of fast growing plant species (see Appendix 9). The Sediment Pond will remain until the contour trenches are in place. (refer to Page 31, figure 1).