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ACT/015/015

STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
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4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

February 23, 1982

Mr. Ron Hughes
Consolidation Coal Company
#2 Inverness Drive East
Englewood, Colorado 80112

RE: Snow-Waste Removal and Disposal Recommendations for Utah Coal Operations

Dear Mr. Hughes:

Substantial snowfall accumulations during the past winter months have presented snow removal problems and hindered operational procedures at several coal mines within the State. This problem is predicated due to the lack of available on-site storage space necessary for disposal of the snow and the associated waste materials generated during snow removal operations.

The Division has requested remedial plans to provide adequate disposal and treatment of this excessive snow-waste material and is reviewing each plan on a temporary site-specifc emergency basis.

In an effort to preclude or mitigate the possibility of future "emergency" snow removal problems, the Division is seeking the coal operators' assistance and cooperation in evaluating their present snow-waste removal and disposal methods to determine whether each operator's current procedures are adequate to ensure negligible impact to the hydrologic regime within and/or adjacent to the mining operation.

The present extent of the rules and regulations which pertain to the protection of the hydrologic balance do not provide a specific section which directly addresses those problems which occur as a result of excessive snowfall accumulation.

However, there are performance standards which do address this problem in an indirect way; specifically UMC 817.41, .43, .45 and .46.

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Therefore, until such time as the Office of Surface Mining and/or this Division proposes and adopts new langugage to address this problem directly, the following preliminary guideline criteria have been developed to help the coal operators minimize and/or control potential adverse environmental impacts which may result from the improper disposal and treatment of snow-waste materials.

1. Sedimentation ponds should not be used as a storage or disposal facility for snow. This practice can cause adverse problems during the spring runoff period, by creating an "iceberg effect" thereby increasing the chances of short-circuiting the pond, and negating sufficient detention time to settle out suspended solids.

2. The use of perennial drainages for storage and/or disposal of snow-waste should be avoided.

3. The use of intermittent and ephemeral drainages will be considered on a site-specific basis, assuming appropriate measures are taken to prevent excessive sedimentation to and of the stream channel.

4. Off-site storage may be permitted at an approved site(s) provided sufficient runoff control is incorporated to adequately treat the resultant effluent.

5. On-site storage (i.e., within the disturbed area, or permit area) is the recommended method for proper control and treatment of the excess snow-waste volumes. The preferred location should ensure that effluent from the eventual melting snowpack will pass through the appropriate runoff and sediment control facilities.

6. Irregardless of the methods selected and utilized to address the removal, storage and disposal of snow-waste at a minesite, the operator is held responsible for meeting the applicable State or Federal effluent standards for the receiving streams.

If an operator recognizes that he does have a snow-waste removal and disposal problem and judges that compliance with these recommended standards is beyond his capability, then the Division should be contacted. The Division will make every effort to work with the operator(s) to establish an acceptable and reasonable permanent solution.

If there are any questions or comments, please contact us.

Sincerely,

D. Wayne Hedberg

D. WAYNE HEDBERG
RECLAMATION HYDROLOGIST

DWH/btb