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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor

Ted Stewart
Executive Director

James W. Carter
Division Director

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340
801-359-3940 (Fax)
801-538-5319 (TDD)

October 1, 1993

TO: File

THROUGH: Daron Haddock, Permit Supervisor

FROM: Steven M. Johnson, Reclamation Specialist SMJ

RE: Mid-term Review, Consolidation Coal Company, Emery Deep Mine, ACT/015/015, Folder #2, Emery County, Utah

SUMMARY:

A mid-term review of the hydrology, Chapter 6, in the Emery Mine Mining and Reclamation Plan (M&RP) was conducted by the Division. The review was technical in nature and concentrated on issues that were discussed in a meeting between representatives of the mine and the Division on September 22, 1993.

ANALYSIS:

R645-301-120 Permit Application Clear and Accurate

Current M&RP:

The following items are included in the M&RP as "proposed":

Section VI.B.2 -- Sediment Control
Pond No. 7 -- Waste Disposal site sediment pond.

Section VI.B.3 -- Alternate Sediment Control
Sediment Basins (4 East Portal) -- The two small proposed sediment ponds at the 4 East Portal site are provided as sediment control for the proposed rock excavation stockpile area.

Section VI.B.4 -- Sediment Control Exemption for Small Areas
4 East Portal Rock Dust Bin Site.
4 East Portal Topsoil Stockpile.
Borrow Area BA-1.

Section VI.B.2, Sediment Control, includes a description of seven ponds, numbered 1 through 7. Section VI.B.3, Alternate Sediment Control, includes a description of Catch Basins in the Mine Yard Area. Appendix VI-7, pages 52A.1 through 52J, and Plates II-1, IV-8 and VI-10 are in the M&RP as designs for and maps locating Pond No. 8.

Analysis:

Pond No. 7 in section VI.B.2, Sediment Basins in section VI.B.3, and 4 East Portal Rock Dust Bin Site, 4 East Portal Topsoil Stockpile, and Borrow Area BA-1 in section VI.B.4 were proposed but have never been built on site. These are no longer necessary in the M&RP.

The Mine Yard Area Catch Basins have been redesign into a sediment pond. This is now Pond No. 8, but the text in sections VI.B.2 and VI.B.3 was not update to show that this change was made.

Deficiencies:

1. All facilities that are proposed but have never been built should be removed from the M&RP to make it clearer and reflect actual existing conditions.

2. Update sections VI.B.2 and VI.B.3 to include the changes made when Pond No. 8 was constructed in the location of the Mine Yard Area Catch Basins.

R645-301-420 Sediment Control Measures.

Current M&RP:

The following areas are listed as small areas exempt from sediment control in section VI.B.4. (Sediment control measures given in the M&RP are listed in parentheses):

1. Borehole Pump No. 3 and Pond Facility (berms);
2. Fire Control Area (vegetation and low relief);
3. Subsoil Stockpile, S-2 (vegetation and berm);
4. Borehole Pump No. 1 (vegetation and low relief);
5. Borehole Pump No. 2 (vegetation and low relief);
6. Vegetation Test Plot (vegetation and low relief); and
7. Topsoil Stockpile, T-3 (vegetation and berm).

Analysis:

An area that is exempt from sediment control must be small and demonstrated to not require siltation structures or alternative sediment control measures, for drainage to meet effluent limitations. There are no plans for the sediment control methods, nor demonstrations of adequate sediment control given in the M&RP.

Deficiencies:

1. The operator should, on a case by case basis, either, demonstrate that no sediment control measures are necessary, or re-classify the area as an alternative sediment control area (ASCA) and include explanations and plans for alternative sediment control measures to be used.

2. All sediment control measures must be designed and plans included in the M&RP that incorporate minimum design criteria.

RECOMMENDATIONS:

In general the M&RP is technically accurate and complete; however, it needs a few modifications for it to reflect current conditions, and meet the requirements of current regulations. First, all necessary changes were not made when Pond No. 8 was added to the M&RP. Second, classifications of areas with flows that do not report to a sediment pond are incorrect. Finally, there are many some items that were proposed at one time but have never been built. These items are now obsolete, and clutter the M&RP needlessly.

Areas included in the M&RP as Small Area Exemptions would be better classified as Alternate Sediment Control Areas under the current regulations. The regulations include an exemption from sediment control, but it is limited to very small areas and the operator must demonstrate that sediment control is not necessary in these areas. Site-specific, alternative sediment control measures must be designed for the control of drainage from disturbed and undisturbed areas for all areas that are not exempt from sediment control and do not report to a sediment pond.