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United States Department of the Interior

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Mr. Ronald W. Daniels
Coordinator of Mined Land Development
Utah Department of Natural Resources
Division of Oil, Gas, and Mining
1588 West North Temple
Salt Lake City, UT 84116

RE: UT00001 - Wilburg Mine

Dear Mr. Daniels:

We have reviewed the material forwarded with your letter of July 27, 1978 and wish to provide you with the following observations:

1. The map supplied is not adequate to thoroughly evaluate all facets of the proposed drainage plan such as drainage area, runoff, capacity, and flow characteristics of the diversion and conduit system.
2. While the concept of diverting some runoff from cut and fill slopes along the roads and around the sedimentation ponds is acceptable, we are concerned that the fresh cut and fill slopes may not be adequately stabilized with vegetation or other means. We recommend that any flow crossing these extremities of the disturbed area and not directed to a sedimentation pond be monitored in terms of total suspended solids to provide a comparison with similar flows over undisturbed lands. This monitoring should be continued for a period that provides statistically-significant data. The continued diversion of water away from the sedimentation pond should be contingent upon the total suspended solids (TSS), concentrations of untreated runoff from the disturbed area being the same (statistically and in the judgment of water quality staff) as concentrations of TSS in similar, but undisturbed, areas.
3. We are not able to evaluate compliance of the plan with the provisions of 30 CFR 715.17(d) which provides environmental protection performance standards for diversions of streams. The drop culverts are shown in the map as collecting water from a defined drainage channel (as opposed to overland flow). The initial regulatory program notes the importance

of maintaining the natural hydrologic equilibrium to the degree necessary to minimize additional contributions of suspended solids both on site and off site. It is likely that additional stabilizing measures such as those noted in the 30 CFR 715.17(f) or riprap, are necessary downstream of the sedimentation pond discharges and temporary discharges from the diversions.

4. The method of monitoring the quality and amount of any discharges from the sedimentation ponds should be incorporated in the plan and should provide for adequate evaluations of the effectiveness of the proposed water pollution control measures. The method of measuring sediment buildup, sediment removal, and disposition of sediment should be described.
5. The engineering analysis provided with your letter appears generally accurate and to be a good-faith effort to conform to the pertinent regulations. However, the discussion of natural levels of suspended solids does not directly bear on the question of whether the area is disturbed and whether the runoff must pass through a sedimentation pond. It is, none the less, a good indicator of baseline conditions.

We appreciate this opportunity to provide technical assistance.

Sincerely yours,



Donald A. Crane
Regional Director
OSM - Region V