

### Document Information Form

Mine Number: C1015/019

File Name: Internal

To: DOGM

From:

Person N/A

Company N/A

Date Sent: FEBRUARY 8, 1982

Explanation:

INSPECTION MEMO TO COAL FILE

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cc:

File in: C1 015, 019, Internal

Refer to:

- Confidential
- Shelf
- Expandable

Date \_\_\_\_\_ For additional information

February 8, 1982

Inspection Memo  
to Coal File:

RE: Utah Power & Light Company  
Wilberg Mine  
ACT/015/018B  
Emery County, Utah

DATE: December 9, 1981  
TIME: 9:15 a.m. - 1:30 p.m.  
WEATHER: Clear and Cold  
COMPANY OFFICIALS: Val Payne and Larry Guymon  
STATE OFFICIALS: David Lof and Ken Wyatt  
ENFORCEMENT ACTION: NOV N81-4-7-2  
NAOC 81-4-5-2

Compliance With Permanent Performance Standards

771 et al Permits

Available at the mine offices was a letter dated December 28, 1977, from the Division of Oil, Gas and Mining issuing final approval conditional upon the Federal Government's approval of the mining plan. In addition, there was a January 23, 1978, letter from the U. S. Geological Survey granting conditional approval of UP&L's underground mining and reclamation plans for the Wilberg Mine.

817.11 Signs and Markers

The mine entrance sign was visible and complete. Perimeter markers were in place and visible as were buffer zone markers.

817.21-.25 Topsoil

There have been no new developments requiring removal of topsoil since enactment of SMCRA in 1977. Therefore, there is no topsoil.

817.41-.52 Hydrologic Balance

During the course of the inspection, inspectors found several areas where the undisturbed drainage systems integrity was not being maintained. The various areas are discussed below.

- A. There was a breach in the berm protecting the undisturbed drainage near the Deer Creek intake portal pad. Due to this breach, any disturbed area runoff coming from the portal pad could enter the undisturbed drainage.

File in:

- Confidential
- Shelf
- Expandable

Refer to Record No 0052 Date \_\_\_\_\_

In C/ 015, 019, Internal

For additional information

INSPECTION MEMO TO COAL FILE

ACT/015/018B

February 8, 1982

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- B. Disturbed area runoff from the Wilberg portal pad was entering the undisturbed drainage ditch which is located along the Class II road between the portal pad and the storage pad, at the toe of the highwall. There are two drop drains into which the disturbed area runoff is supposed to be conveyed. However, the runoff was bypassing the drop drains traveling along the Class II road and eventually into the undisturbed drainage ditch.
- C. Due east of the coal silo, there is an undisturbed drainage inlet structure. At the time of the inspection, coal had been stockpiled east of the silo and was encroaching on the inlet.
- D. East of the coal silo pad and crusher pad, there is supposed to be an undisturbed drainage ditch which runs along the toe of the highwall. At the time of the inspection, there was noncoal waste in the ditch which would not only contaminate but obstruct flow as well. Also, it was evident that any disturbed area runoff from the east side of the coal silo and the crusher would be conveyed into the "undisturbed drainage ditch."

Due to the above-mentioned problems, NOV N81-4-7-2, #1 of 2 was issued:

Nature of the Violation:

Failure to design, construct and maintain overland flow diversions in order to prevent additional contributions of suspended solids to stream flow or runoff outside the permit area. Failure to pass all surface drainage from the disturbed area through a sedimentation pond before leaving the permit area.

Provision of the Regulations, Act or Permit Violated:

- UCA 1953, 40-10-17(2)(j)(ii)(A)
- UCA 1953, 40-10-17(2)(i)(ii)
- UMC 817.41(d)
- UMC 817.42(a)(1)
- UMC 817.43(c)
- UMC 817.45

Portion of the Operation to Which Notice Applies:

- A. Breach in berm protecting undisturbed drainage near Deer Creek intake portal pad.
- B. Undisturbed drainage ditch along Class II road between portal pad and storage pad at toe of highwall.
- C. Undisturbed drainage inlet structure on coal silo pad.
- D. Undisturbed drainage ditch along toe of highwall between coal silo pad and crusher pad.

Remedial Action

- A. Repair
- B., C. and
- D. Develop  
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UMC 817.45.

Portion of the

- A. Downs
- B. Downs

- C. Downslope to the northwest corner of the upper parking lot.
- D. The east side of the undisturbed drainage culvert outlet.

Compliance Action Required:

- A., B. and
- D. Backfill and stabilize the slopes where excessive erosion is taking place.
- C. Backfill and stabilize the rills and construct a berm so that the inlet performs as designed.

Deadline:

Two weeks; no later than December 25, 1981.

At the time of the inspection, sediment pond #1 was approaching its sediment capacity. Mr. Guymon told inspectors that they were planning on cleaning out the sediment but were not sure of how to dispose of the sediment once it was cleaned out of the sediment pond. Upon returning to the Division's offices, the inspector discussed the problem with Sally Kefer, who suggested the possible use of Wilberg's approved waste rock disposal site. She further explained that UP&L would need to conduct a toxicity test on the sediment and submit these data along with a narrative requesting the use of the waste rock disposal site for disposal of the sediment. On January 5, 1982, Mr. Lof phoned Mr. Guymon and conveyed this information to him.

Division inspectors also pointed out during the inspection where the undisturbed drainage in the Right Hand Fork of Grimes Wash was cutting into the berm which separates the undisturbed drainage from the Class III road which accesses the Deer Creek intake portal pad. The erosion was taking place at the point where the road turns to the west to the portals.

817.52 Surface and Ground Water Monitoring

Available at the mine offices was a letter from EPA dated November 23, 1981, renewing NPDES permit #UT-0022896 with a new expiration date of June 30, 1986. There are three discharge points which are included in this permit, they are: 001, mine discharge; 002, Cottonwood portal; and 003, the sediment pond. The only surface water monitoring data available at the mine offices for Wilberg was the annual report for 1979. According to UP&L's hydrologic monitoring plan for Deer Creek and Wilberg mines, which was approved October 10, 1979, all that is required of UP&L is to summarize all flow data and water quality information gathered, at the end of each year. However, upon returning to the Division, inspectors found that due to the fact that the monitoring plan was approved under the interim program, the operator must submit monitoring data in accordance with interim regulation MC 715.17(b)(1)(v) which provides for a regular report of all measurements to the regulatory authority within 60 days of sample collection unless violations of permit

conditions occur, in which case the regulatory authority shall be notified immediately after receipt of analytical results by the permittee. The 60-day reporting period is further documented and explained to UP&L in a letter dated September 24, 1979, from Ron Daniels. Due to the fact that water monitoring records were not available to the regulatory authority at the minesite nor in the Division offices as required in the interim regulations under which the hydrologic monitoring plan was approved, NOV N82-4-1-1 was written. It reads as follows:

Nature of Violation:

Failure to report water monitoring data to the regulatory authority and have said data available to Division representatives upon request at the mine offices.

Provisions of the Regulations, Act or Permit Violated:

UMC 817.52(b)(1)(iii)  
Revised Interim 717.17(b)(1)(v)  
UCA 1953, 40-10-19(1)

Portion of the Operation to Which Notice Applies:

Surface water monitoring data for Church, Deer Creek and Wilberg mines.

Remedial Action Required:

Submit water monitoring data as required under the interim regulatory program until regulatory authority specifies otherwise, and have said data on-site and available to Division representatives upon request.

Time for Abatement:

Seven (7) days; required data must be received by the Division no later than 5:00 p.m., January 29, 1982.

Note: This violation was issued to Chris Shingleton, Director of Services for UP&L, on January 22, 1982.

817.71-.73 Disposal of Underground Development Waste and Excess Spoil and Nonacid and Nontoxic-forming Coal Processing Waste

UP&L has received approval, with stipulations, from the Division for the Des-Bee-Dove and Wilberg mines waste rock disposal plans. The approval letter was dated September 28, 1981, and addressed to Mr. M. Heward. The operator has not yet complied with the stipulations which accompany the approval, therefore, they are not yet utilizing the waste rock disposal site. At the time of the inspection, there was a small pile of waste rock being stored on the coal silo pad.

817.89 Disposal of Noncoal Waste

The operator has a noncoal waste disposal bin located on the north end of the material storage pad. Noncoal waste from this bin is hauled to the dump at UP&L's Hunter Plant. During the inspection, noncoal waste was found in the undisturbed drainage ditch which runs along the Class II road southwest of the material storage yard and the upper parking pad, and in the undisturbed drainage ditch which runs along the highwall west of the coal silo and crusher. Noncoal waste was also found on the eastern end of the coal silo pad and stored immediately north of sediment pond #1. Due to these noncoal waste handling problems, NOV N81-4-7-2, #2 of 2 was written:

Nature of the Violation:

Failure to place and store noncoal waste in a controlled manner in a designated portion of the permit area and to ensure that noncoal waste does not degrade surface water.

Provision of the Regulation, Act or Permit Violated:

UMC 817.89(a).

Portion of the Operation to Which Notice Applies:

Entire permit area, especially undisturbed runoff drainage system.

Remedial Action Required:

- A. (1) place all noncoal waste in the designated noncoal waste disposal area and/or (2) submit plans to the Division for an additional noncoal waste storage site.
- B. Removal all noncoal waste from the undisturbed drainages.

Time for Abatement:

- A. Two weeks, no later than December 25, 1981.
- B. Two weeks, no later than December 25, 1981.

817.100 Contemporaneous Reclamation

The old fan access road is no longer used. Reclamation of this road was discussed during two previous inspections (May 12, 1981, and September 4, 1981), however, no plans had ever been submitted to the Division for reclamation of the road. Therefore, Division inspector issued NAOC 81-4-5-2, #2 of 2 which reads as follows:

Nature of the Concern:

Reclamation of land disturbed by surface operations as contemporaneously, as practicable, with mining operations.

Pertinent Regulation of Permit Condition:

UMC 817.100.

Portion of Operation to Which Notice Applies:

The old fan access road.

Compliance Action Required:

- A. Develop and submit complete and adequate plans to the Division detailing the reclamation of the road.
- B. Implement above-mentioned plans immediately upon Division approval.

Deadline:

- A. Thirty (30) days, no later than January 11, 1982.

Note: Plans were submitted on January 19, 1982, and are currently being reviewed by the Division.

817.121-.126 Subsidence Control

According to Mr. Guymon, UP&L has a grid of survey points set up on East Mountain. These survey points are surveyed once a year in conjunction with U. S. Geological Survey.

817.150-.176 Roads

The road is generally in good condition with exception of those problems concerning drop drains and undisturbed ditches as discussed in the Hydrologic Balance section.

DAVID LOF  
RECLAMATION OFFICER

cc: Tom Ehmett, OSM  
Larry Guymon, Emery Mining Company  
Inspection Staff

DL/btb

Statistics:

See Church Mine memo dated January 5, 1982.  
Grant: A & E