

0001

December 27, 1984

TO: Coal File, Inspection and Enforcement  
FROM: Sandy Pruitt, Mining Field Specialist   
RE: Wilberg Mine, Utah Power and Light Company, ACT/015/019,  
Folder #7, Emery County, Utah

DATE: November 28, 1984, November 29, 1984  
TIME: 8:30 a.m.-4:30 p.m.,  
10:30 a.m. - 1:30 p.m. respectively  
WEATHER: cool, snow showers  
COMPANY OFFICIAL: Larry Guymon  
STATE OFFICIAL: Sandy Pruitt  
FEDERAL OFFICIAL: Frank Attencio  
ENFORCEMENT ACTION: None

COMPLIANCE WITH PERMANENT PERFORMANCE STANDARDS

UMC 771 et al Permits

Utah Power and Light received approval on October 23, 1984 for runoff control plans submitted in abatement to NOV #N84-7-10-1. The plans to repair the Wilberg sediment pond, submitted in abatement to NOV N84-7-7-1, were approved on September 7, 1984.

UMC 817.11 Signs and Markers

There is no mine identification sign upon access to the Cottonwood sites from the top of Cottonwood Canyon. All other signs and markers inspected appeared adequate.

UMC 817.21-.23 Topsoil Protection.

Topsoil protection was apparently inadequately evaluated in the Wilberg Mine permit recently approved by DSM Western Technical Center. There was no topsoil protection measures provided in the permit for the topsoil stockpiles at the Cottonwood site. Prior to this inspection Larry Guymon agreed to install strawbales around the base of the stockpiles to retain any topsoil eroded off the stockpiles from the adjacent sediment pond. According to the permit, any runoff from the soil stockpiles will flow into the sediment pond. Sediment removed from the sediment pond will be disposed of in the waste rock disposal site. This approval subjects Utah Power and Light to enforcement actions for the failure to protect topsoil from loss due to water erosion. If an adequate strawbale barrier is maintained all around the base of each stockpile, enforcement action will not be warranted.

Topsoil removed from the wasterock disposal site below the Wilberg Mine is stored in berms around the waste rock disposal cells. It is

unclear in the permit how or if this operation provides adequate topsoil protection. The berms are constructed from an 18 inch excavation. It is reported in the permit that the viable topsoil layer is within 14 inches below the surface. The mixing of sodic subsoil below that range may degrade the quality of the soil removed. In addition, topsoil stored in the berms that contain waste rock can potentially be contaminated by runoff from the waste rock or contaminated by the waste rock itself. Again OSM's approval of this operation may subject Utah Power and Light to Enforcement Action or to violations for a failure to protect topsoil from loss due to contamination. Due to a concern with topsoil degradation due to mixing with the subsoil layers, surface samples of soil were obtained at various locations in the berms, in a topsoil stockpile for redistribution over cells #1 and #2, and at two baseline sites. One previously undisturbed, the other, a previously disturbed site that was as yet undisturbed within the cell #6 boundaries. These soil samples have yet to be analyzed for a comparison.

#### UMC 817.41-.57 Hydrologic Balance

At the time of this inspection abatement plans for NOV N84-7-10-1 were being implemented. An asphalt berm was under construction along the sediment pond embankments. The culvert at the Y in the truck loadout road was blocked at the time of this inspection. This culvert is designed for conveyance of road drainage. Runoff bypassing the culvert flowed onto the road and back into the road drainage ditch offsite. Since abatement of NOV N84-7-10-1 had not been achieved on the ground yet, disturbed area runoff was still mixing with the road drainage above this point. A sample of the runoff bypassing the culvert was obtained at the blocked culvert inlet and analyzed to contain 32 mg/l per liter oil and grease, 43,280 mg/l total dissolved solids, 7840 mg/l total suspended solids of which 4,760 mg/l were analyzed as total volatile solids, conductivity was measured at 36,500 umhos/cm. These results will be forwarded for the civil penalty assessment of continuing damages resulting from NOV N84-7-10-1.

Runoff control measures at the Cottonwood development appeared functional at the time of this inspection. The southern and northern sediment ponds had been cleaned. The berm along the road ditch was completed inbetween the middle and southern ponds. The middle sediment pond still needs to be cleaned and a low spot along the embankment should be repaired. This was discussed with Larry Guymon who committed to address this situation as soon as possible. The sediment may be frozen in the sediment pond and frozen material should not be used to repair the embankment. Prior to this inspection, the lower diversion had been regraded to the inside for erosion stabilization. Additional erosion control measures are needed in the form of rock checkdams along the inside ditch line. This was discussed and agreed to by Larry Guymon.

OSM apparently did not adequately evaluate the hydrologic characteristics and designs specifications for each of the sedimentation ponds at the Cottonwood Canyon development. The sizing specifications for each sediment pond is not clear in the mine permit. The ponds, particularly the southern pond, are apparently undersized. The structural designs of the sediment ponds, particularly the southern pond, do not meet the performance standards under 817.46. No variances were granted in the Wilberg Mine Permit for noncompliance. This, again, subjects Utah Power and Light to enforcement actions. The appropriateness of these enforcement actions, in light of the apparent deficiencies in the OSM permit review, is being evaluated at the time of this writing.

Sediment pond inspection reports onsite consist of the survey results from each sediment pond and are certified by a registered P.E. Since the design specifications of the Cottonwood ponds is not clear in the approved mine plans these as built survey results should suffice for as-built pond certifications required by UMC 817.46 (r).

The third quarter NPDES discharge reports were submitted October 10, 1984. No compliance problems were detected upon review of these reports. The Wilberg Mine discharge average for the third quarter was 77,272 gallons per day at an average 2.7 hours per day. In the second quarter, the average was 242,189 gallons per day at an average 8.5 hours per day. The first quarter mine discharge average was 169,282 gallons per day at an average 6 hours per day. Surface water monitoring data examined for August 6, September 10, and October 8, 1984 was also in compliance.

#### UMC 817.71-.74 Disposal of Excess Spoil and Underground Development Waste

Cells #3 and #6 were being excavated at the wasterock disposal site. Material removed in excess of the proposed 18 inch excavation at Cell #3 will be utilized for backfilling the sediment ponds at the Wilberg Mine in accordance with abatement plans approved September 7, 1984. Additional topsoil material excavated from Cell #3 was stockpiled for redistribution over Cell #2 and a portion of Cell #1 for contemporaneous reclamation in accordance with the approved plans.

#### UMC 817.101-.103 Backfilling and Grading

The coal rider seams at the Cottonwood development were backfilled and covered to the extent possible in accordance with a stipulation to the Wilberg Mine permit approval. Emery Mining Corp. utilized a D3 tractor dozer and blasting to loosen rock material and cover the rider seams. Mr. Guymon reported that for approximately three weeks manual labor was entailed to cover the rider seams but due to the difficulty no progress was being made. Therefore, small equipment,

a D3 tractor dozer, was utilized. By accessing the rider seams along the lower diversion, no additional land disturbances resulted from this activity. Blasting records were maintained in accordance with UMC 817.68. DOGM technical staff and OSM representatives observed this backfill operation for their determination of the adequacy of this response.

UMC 817.61-.68 Use of Explosives

Explosives were used to cover the coal rider seams at the Cottonwood Development to address a stipulation of the Wilberg Mine Permit on November 7-9, and 12-15, 1984. Mr. Leon A. Rich of Lowdermilk conducted the blasting. Mr. Rich has no certification number since there is no blasting certification program provided by DOGM in accordance with 30 CFR 850. Larry Guymon supervised the operation and provided his firebossing certification for underground blasting. Mr. Guymon reported that there were flagman posted above and below the Cottonwood development, personnel at the Trail Mountain Mine were notified each day that they intended to blast. Warning signals were given to restrict access and notify the flagmen. Approximately one pound of explosives was used for each 2 by 2 inch hole throughout the blasting operation.

UMC 817.121 -.126 Subsidence Control

The U. S. Bureau of Mines has conducted aerial photogrammetric surveys twice a year in the spring and in the fall to monitor for subsidence.

Development mining is underway in fifth right long wall mining under way in sections 6R and 13R. Development near the south fan breakout is underway for the belt entry. Development mining toward the Newberry breakout and construction of a sump is underway in the Blind Canyon seam off the 4E section .

re

cc: Larry Guymon, EMC  
Donna Griffin, OSM  
Joe Helfrich, DOGM  
Mary Boucek, DOGM

Statistics: See Deer Creek Mine Memo dated December 11, 1984  
0032Q-24-27