

August 17, 1981

Inspection Memo
to Coal File:

#7

RE: Co-op Mining Company
Bear Creek Canyon Portal
ACT/015/025
Emery County, Utah

DATE: July 28 and 29, 1981
TIME: 3:00-6:00 p.m., on 7/28; 8:30-11:00 a.m., on 7/29
WEATHER: Warm and Partly Cloudy
COMPANY OFFICIALS: Wendell Owen, Bill Stoddard and Dennis White
STATE OFFICIALS: Sandy Pruitt and David Lof
ENFORCEMENT ACTION: 81-2-7-2

Compliance with Permanent Performance Standards

771 et al Permits

On March 12, 1980, a list of six stipulations were sent to Co-op Mining Company by the Division. These stipulations were agreed upon by Co-op on March 31, 1980. These stipulations are to be met before the Division can grant approval of any mining activity at the Bear Creek Canyon portal. On March 20, 1981, an interim regulatory final approval letter was issued to Co-op Mining Company allowing them to complete the six stipulations agreed upon. This State letter of approval was available on the minesite at the time of inspection.

The status of the six stipulations at the time of the inspection was as follows:

1. No mining had occurred at the time of the inspection.
2. Class I road status: the road leading from the Huntington Canyon Highway to the coal loadout pad had not been completed. Class II road status: both the road leading from the lower pad to the portal area and the road leading from the lower pad to the receiver bin pad have been partially completed. Both roads require more grading and berm work.
3. The 60-inch culvert where the Class I road crosses Bear Creek was in place and properly riprapped. The culvert inlet did not have a trash rack. Inspectors noticed that the culvert was damaged at the inlet end allowing water to short-circuit the culvert, this was brought to the attention of the operator (see letter to Bill Stoddard dated August 17, 1981). The 18-inch culvert has been completed. The upper end of the 18-inch culvert has been riprapped and trash racks have been implemented since the time of the last inspection.

4. A berm has been placed around the perimeter of the portal pad in order to control runoff from the disturbed area. However, at the time, no berms or other appropriate diversion structures have been implemented in order to divert undisturbed area runoff from the pad. Mine water discharge from the existing portal has been diverted.
5. The proposed fuel storage facility has not been completed. Co-op is currently using a 500 gallon tank truck to refuel their construction equipment. As was suggested by Joe Helfrich during an earlier inspection, the truck has been surrounded on three sides by a dirt berm and on the fourth side by straw bales to contain any possible spillage.

817.11 Signs and Markers

The mine entrance sign was in place and information complete. Perimeter markers had been installed along the perimeter of the disturbed area. In order to make these perimeter markers more visible, Co-op committed to flagging the markers. It was determined that buffer zone signs are not necessary at Bear Creek. Topsoil markers were in place and visible on all four topsoil stockpiles.

817.21-.25 Topsoil

Topsoil has been removed at Bear Creek and placed in four separate stockpile areas. At the time of the inspection, small berms were being placed around each stockpile to convey away overland flow and to protect the stockpiles from water erosion. No seeding or other revegetation methods have been implemented on the stockpiles to date. At the time of the inspection, the possibility was discussed of consolidating the topsoil stockpiles. By doing so, the topsoil could be protected from wind and water erosion better and the protective measures more easily maintained. The operator was informed that if he wished to implement such a project, it would be necessary for him to develop plans and submit them to the Division for approval.

817.41-.52 Hydrologic Balance

As was discussed earlier in Section 771 et al, Permits, concerning compliance with stipulations, a berm has been placed along the perimeter of the mine portal disturbed area to control runoff. Eventually the portal pad will be graded so as to drain runoff from the disturbed area into the underground workings. The stipulation also calls for the placement of revegetated berms or other appropriate diversion structures on the mine portal pad to convey undisturbed area runoff away from the pad. At the time of the inspection, no diversion structures had been constructed. With the exception of the mine portal pad, runoff from the disturbed area is passed through the sediment pond before it leaves the permit area.

Bear Creek has a problem with excessive erosion and gullyng on the downslope from the receiver bin pad to their truck loadout pad. The operator explained that a drop drain would be installed during the construction of the lump coal receiver bin to convey the disturbed drainage off the receiver bin pad in a controlled manner.

817.52 Surface and Ground Water Monitoring

Co-op Mining Company obtained a NPDES permit, #UT-0023612, on November 19, 1980. The permit expired on December 31, 1980. Co-op had in their possession a letter from Larry Vincent of the EPA granting an extension according to the conditions of the expired permit since Co-op had made timely application.

Surface water monitoring data were available for months January through June of 1981. These data were inspected and there were no violations evident.

817.61 Use of Explosives

Co-op was found to be negligent in terms of the performance standards concerning records of blasting operations. Because of this, Violation #2 of 2 was written:

Nature of the Violation

Failure to keep records of blasting operation that would be available for inspection by the Division and the public on request.

Provision of the Regulations, Act or Permit Violated

UMC 817.68.

Portion of the Operation to Which Notice Applies

Face up at fan entry.

Remedial Action Required

Keep records of each blast containing the data required under UMC 817.68. Retain records for at least three years that are available for inspection by the Division and the public upon request.

Time for Abatement

Immediately, no later than July 31, 1981.

It was felt that the lack of blasting data obstructed the ability of Division inspectors to determine location, date and time of blast, thereby the purpose of blasting, whether it was for mining or compliance purposes.

817.121-.126 Subsidence Control

Co-op Mining Company does not have a subsidence monitoring plan. The company indicates that because of the remoteness of location, lack of historical sites, public buildings or private dwellings, they feel that it is not needed. Also, in support of this, they indicate the nature of the rock material and the overburden distance and thickness. In their permanent program, they petition the Division to exempt them from a subsidence requirement based on these facts.

817.150-.176 Roads

The status of the Class I and Class II roads is discussed in Section 771 et al Permits, of this memo.

During the inspection, the need for riprap below the culvert outlet near the junction of the middle and upper pad access roads was discussed with the operator. The operator indicated that the riprap would be in place before the next inspection.

Utah Power & Light was on-site at the time of the inspection for the purpose of installing utilities to the minesite. Co-op constructed several Class III roads to provide access for power pole installation. Co-op had not submitted any plans to the Division adequately addressing design, maintenance and restoration of these Class III roads. Of concern to the inspectors was the lack of any type of drainage control or erosion prevention measures. Particularly on a road which was constructed across an ephemeral drainage channel. Because of this, Violation #1 of 2 was written:

Nature of the Violation

Failure to design and construct Class III roads to control or minimize erosion and siltation and to prevent alteration or relocation in natural channel drainage ways.

Provision of the Regulations, Act or Permit Violated

UMC 817.170(a) and (b), UMC 817.171(c), UMC 817.173, UMC 817.43(c) and 40-10-18(2)(i)(ii), Utah Code Annotated 1953.

Portion of the Operation to Which Notice Applies

Newly constructed roads for power pole installations.

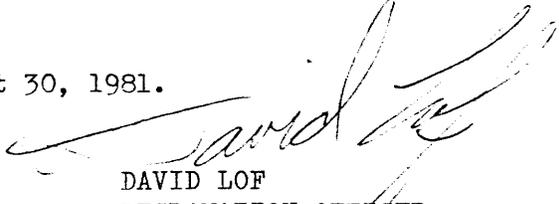
Remedial Action Required

Submit plans to the Division that are complete and adequately addressed to design, maintenance and restoration requirements of UMC 817.43, 817.45, 817.170-.176. Implement plans immediately upon approval.

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Time for Abatement

Thirty (30) days, no later than August 30, 1981.



DAVID LOF
RECLAMATION OFFICER

cc: Tom Ehmett, OSM
Wendell Owen
Carl E. Kingston
Inspection Staff

DL/btm

Statistics:

Vehicle: #EX 68805--701 miles
Per Diem: Two persons x 3 days 11 hours @ \$37.50/day = \$234.88
Grant: A & E