

March 20, 1983

Inspection Memo
to Coal File:

#7

RE: Co-op Mining Company
Bear Canyon Mine
ACT/015/025
Folder No.7
Emery County, Utah

DATE: March 8, 9 and 10, 1983
TIME: 12:30 P.M - 4:45 P.M., 9:15 A.M. - 11:30 A.M., 9:30 A.M.
- 10:30 A.M. respectively
COMPANY OFFICIALS: Randy Crebs and Scott Nordness (Viking Engineering
Services), Bill Stoddard (Co-op Mining Company)
STATE OFFICIAL: John Whitehead
ENFORCEMENT ACTION: N83-5-5-3

Compliance with Permanent Performance Standards

771 et al Permits

The following approvals and permits were available at the minesite:

1. A letter dated March 20, 1981 from Jim Smith granted interim approval for the Bear Canyon operation.
2. A letter dated October 8, 1982 from Ron Daniels of the Division granted approval to begin construction activity at the scale location. This approval was granted with the following stipulations: (1) Topsoil will be removed to a depth of 18 inches and stockpiled prior to any activity. (2) A catch basin, berms, and any other measures necessary to adequately control runoff will be installed after the topsoil is removed and stockpiled; and, (3) plans to modify the interim permit will be submitted by October 18, 1982.

The operator has removed topsoil and stockpiled it on the eastern side of the road adjacent to the scale area. The second and third stipulations have not been adequately addressed by the operator.

3. The operator apparently does not have a subsidence control plan. The latest ACR response indicates that the operator feels there is no reusable resource land residing above the lease area and thus no subsidence control plan has been submitted.
4. No information was available on a raptor survey to determine the adequacy of protection measures for raptor electrocution hazards from power poles.

5. A letter from the United Bank of Murray Utah indicated an escrow deposit of \$13,556.84 for an interim bond for both the Bear Canyon and Trail Canyon operations. Additionally, Mr. Owen had written a note which indicated that a bond in the amount of \$47,165.00 was posted in August of 1980 for the Bear Canyon operation. This could not be verified at the time of the inspection.

817.11 Signs and Markers

The mine identification sign at the entrance to the mine was still temporarily leaned up against a piece of machinery near the entrance to the minesite.

Perimeter markers were determined to be adequate during the previous inspection.

817.21 - .25 Topsoil

The topsoil pile which was created as a result of the construction activity for the scale area is located north and slightly east of the scale site. This stockpile is not protected pursuant to the requirements of UMC 817.23. On the northern side of the stockpile a small natural drainage will be cutting into and eroding the north side of the pile during summer precipitation events. Additionally, no topsoil stockpile sign could be observed during the inspection.

The topsoil pile west of the coal stockpile pad was continuing to be impacted by depositon of coal fines. The operator had made some attempt to divert the undisturbed drainage channel from cutting through this topsoil stockpile which was the subject of NOV N82-5-2-10, 5 of 10. The configuration of the slope upon which this topsoil stockpile is placed makes adequate protection measures difficult to achieve.

Additionally, of the six topsoil piles which currently are a part of the Bear Canyon operation, five are inadequately protected. As a result NOV N83-5-5-3, 1 of 3 was issued. The operator was cited for failure to adequately protect topsoil for the entire operation. The remedial action required by April 9, 1983 was to submit to the Division complete and adequate plans for topsoil storage, protection, and/or obtaining alternate supplies of topsoil. The operator was required to commit in writing to definite time frames for implementation of these plans upon Division approval. It was discussed that one option might be to consolidate all topsoil stockpiles at Bear Canyon to a single location which would be favorable to adequate protection and storage of topsoil.

817.41 - .51 Hydrologic Balance

The operator had performed additional work on the primary inlet to the catch basin located south of the scale area. The inlet appeared to be

INSPECTION MEMO TO COAL FILE

ACT/015/025

March 20, 1983

Page 3

functioning properly at the time of the inspection. However it was noted that as the water flowed into the catch basin there was no detention time. Water was flowing through the western embankment of the catch basin and directly into the creek. A closer examination revealed that the embankment contained large boulders and rock material as well as vegetative matter such as roots and wood. This allowed a porous situation to exist in the embankment. As a result, the operator was cited in N83-5-3-3, 2 of 3 for failure to design and construct sediment control measures which prevent to the extent possible additional contributions of sediment to stream flow or runoff outside the permit area. The remedial action required by April 9, 1983 was to submit complete and adequate plans for construction of sediment control measures for the scale area. Additionally, the operator was required to commit in writing to definite time frames for implementation of the plans upon Division approval.

During the inspection it was noted that an undisturbed drainage culvert passing underneath the disturbed drainage culvert adjacent to the bathhouse pad had been clogged with earth material on the outlet side. The operator was advised to clean out this culvert outlet.

The primary sediment pond was inspected and numerous concerns were pointed out to the operator. As a result, NAOC 83-5-1-2, 1 of 2 was issued. The NAOC noted the nature of concern as the sediment storage capacity, the adequacy of the primary spillway device, the protection of discharge points from erosion, the protection of the emergency spillway from downcutting during flow periods, and quarterly inspections for stability and function of the pond. The required compliance action was to submit complete and adequate documentation to demonstrate the above noted concerns are addressed and/or submit complete and adequate plans to modify the pond to bring it into compliance. The operator was required to include and commit to time frames for implementing any new plans needed to modify the pond upon Division approval. The abatement deadline is April 9, 1983.

During the inspection Mr. Stoddard indicated that Co-op Mining Company intends to culvert additional sections of Bear Canyon Creek adjacent to the present culvert which resides just north of the scale area. Mr. Stoddard was advised that this activity would need to be properly permitted. The time frames for permitting on culverting of the stream will necessitate submitting plans now to obtain approval to install culverting during the upcoming construction season.

In examining the Bear Canyon stream channel it was noted that just north of the scale area and just south of the present culvert which allows the road crossing above the scales, a large quantity of boulders and earthen material had been pushed into the creek creating a partial obstruction of the stream course. The water was flowing underneath and around the material. As a result, NOV N83-5-3-3, 3 of 3 was issued for failure to conduct underground coal mining activities so as to minimize changes to the hydrologic balance and failure to minimize to the extent possible additional contributions of sediment to stream flow. The remedial action required by April 9, 1983 was to remove the rocks, boulders, soil and other material from the stream channel or to submit complete and adequate plans to adequately mitigate this situation.

INSPECTION MEMO TO COAL FILE

ACT/015/025

March 20, 1983

Page 4

If plans are submitted the operator was advised to commit in writing to definite time frames for implementation of the approved plans.

The coal had been cleaned from the undisturbed diversion ditch which runs adjacent to the crushing pad. This action partially abates NOV N83-5-2-2, 2 of 2. Part B of the abatement action for this NOV was to prevent mine water effluent from being conveyed in the ditch to the undisturbed drainage culvert inlet. The operator had undertaken the abatement to prevent the mine water effluent from being conveyed in this ditch. No plans as required in Part C of the abatement action for this violation had been submitted. Due to partial compliance, the operator was given an extension to submit the plans until March 24, 1983.

An additional concern noted was a small seep flowing from the highwall slightly above the coal stockpile above the crushing plant. A portion of the water from the seep was flowing into the undisturbed diversion ditch. A smaller portion of this seep was also flowing through the coal stockpile at the crushing pad and had been routed from the disturbed area back into the undisturbed ditch near the crushing plant. The water both in and out of the undisturbed diversion was heavily inundated with coal fines.

The drainage system for the upper area of the minesite which includes the portal and the road to the substation was unclear during the time of the inspection. In discussing this situation with Mr. Stoddard it appeared that no formal plans had been undertaken and committed to in terms of drainage of undisturbed and disturbed area in the upper parts of the minesite. As a result NAOC 83-5-1-2, 2 of 2 was issued. The nature of the concern was the adequacy of diversions to convey disturbed area drainage to a sediment control device. The compliance action required was to submit complete and adequate plans to convey disturbed area runoff to a sedimentation control device. To be included in these plans are written commitments to definite time frames for implementation upon approval by the Division. The deadline for abatement is April 9, 1983.

Significant ponding was observed on the portal pad area. The operator noted that most of this ponding was a result of the ice melting from the lower reaches of the portal entry. The ice had accumulated from mine water effluent flowing during the winter months. It was pointed out to the operator that stability of this pad could be a problem if ponding persisted.

The road from the portal area down to the rest of the minesite was walked during the inspection to examine cross culverts and drainage structures installed on this road. Two cross culverts were noted and it was pointed out to the operator that both inlets and outlets would be needed to be rip-rapped. Additionally, one area on this access road had a substantial amount of ponding which would require an additional cross culvert to be installed to insure stability of the road.

At the intersection of the road to the crushing facility and the main access road, rills from erosion were forming. This matter was pointed out to the operator for corrective action.

The undisturbed diversion culvert which passes underneath the southern end of the coal stockpile pad was partially obstructed at the outflow point as it enters Bear Creek. The operator was advised that this would need to be cleaned out and rip-rapped to insure free drainage of the culvert.

817.52 Surface and Groundwater Monitoring

The NPDES permit UT-0023612 issued March 22, 1982 and expiring on December 31, 1986 covers both the Bear Canyon and Trail Canyon operations. This permit names Bear Canyon and Trail Canyon Creeks as receiving waters.

A Division directive noted in a March 5, 1981 letter from Ron Daniels of the Division indicates the surface and groundwater monitoring plan for the Bear Canyon and Trail Canyon operations. The surface water monitoring schedule indicates that monthly samples will be taken above and below the operation. The groundwater monitoring plan indicates 2 springs which will be sampled twice a year at high and low flow situations. No flow was indicated as an unacceptable report to the Division unless circumstances describing the situation were properly documented. Water data for October of 82, November of 82, December of 82, January of 83 and February of 83 was reviewed. The information contained in the water data was inadequate in several respects. In the October 1982 report the groundwater information did not indicate a flow rate for the two springs sampled. The November, December, January and February data reported a no flow situation. A zerox copy of a photograph indicating what the operator alleged was a no flow situation was provided as documentation.

There is some question as to the accuracy of the operators' report of "no flow" given that on December 14, 1982 John Whitehead and Joe Helfrich did observe flow in Bear Creek under the snowcap and on January 25, 1983 samples were taken of the Trail Canyon Creek below the minesite. Additionally, although the operator indicated "no flow" there was no indication whether this situation existed above and below the minesite and whether samples could have been taken at least below the minesite as required.

817.89 Disposal of Non-Coal Waste

The non-coal waste which had been deposited on the uppermost pad area which was the subject of NOV N82-5-2-10, 1 of 10 had been removed to completely abate this violation. The violation was terminated as of March 10, 1983.

The shuttle cars which were the subject of NOV N82-5-2-10, 2, 4, and 8 of 10 had been moved onto the permit area adjacent to the scale area. Mr. Owen had committed to a six week removal period to properly dispose of this

material classified in the non-coal waste category. As of the date of this inspection none of the shuttle cars had been moved from the temporary storage location. This matter was discussed with Mr. Stoddard during the inspection.

817.97 Protection of Fish and Wildlife and Related Environmental Values

Co-op Mining Company failed to respond to the February 26, 1982 and March 8, 1982 directives concerning power pole safety for raptor electrocution hazards. Neither plans to modify existing poles nor requests for a survey by the Fish and Wildlife Service were received from Co-op Mining Company.

During the inspection, power pole configurations at the Bear Canyon operation appeared to be potentially suspect for electrocution hazard. As a result, a survey will be conducted in the future by the Fish and Wildlife Service. Should power pole configurations prove to be in violation of accepted standards, notice of violations should be forthcoming.

817.99 Slide and Other Damage

Just below the portal pad area, a small slide had occurred onto the access road. This may have been a result of the ponding which was occurring on the portal pad area. The operator was advised that adequate drainage of the portal pad area may reduce the potential for future sloughing of the material.

817.100 Contemporaneous Reclamation

The area disturbed by power pole installation just south and west of the coal stockpile pad was inspected. This was one of the areas which was the subject of NOV N82-1-5-1 issued in June of 1982. At the time of the inspection it could not be determined if in fact compliance measures for N82-1-5-1 had been completely and adequately undertaken by the operator. No indication of any seedling emergence was observable. This matter will be determined in the next partial inspection.

817.121 - .126 Subsidence Control

As far as could be determined the operator does not have a subsidence monitoring plan for the Bear Canyon lease area. During the inspection it was noted that there is a grazing access road originating adjacent to the portal.

INSPECTION MEMO TO COAL FILE
ACT/015/025
March 20, 1983
Page 7

Apparently there is reusable resource land above the lease area which may be a factor in determining the need for a subsidence control plan.

John J. Whitehead
JOHN J. WHITEHEAD
FIELD SPECIALIST

JJW/lm

cc: Bill Stoddard, Co-op
Scott Nordness, Viking Engineering Services
Ev Hooper, DOGM
Joe Helfrich, DOGM
Tom Ehmett, OSM

Statistics:

Vehicle: EX #5424 - 487 miles
Per Diem: 1 person x 2 day, 7 1/2 hours = \$96.31
Grant: A & E