

January 22, 1985

TO: Coal File, Inspection and Enforcement  
FROM: David Lof, Mining Field Specialist *DL*  
RE: Genwal Coal Company, Crandall Canyon Mine, ACT/015/032  
Folder #7, Emery County, Utah

DATE: December 13, 1984  
TIME: 1:30 p.m. to 5:15 p.m.  
WEATHER: mostly clear and cold  
COMPANY OFFICIALS: Bill Wollen  
STATE OFFICIALS: David Lof  
ENFORCEMENT ACTION: none

Compliance With Permanent Performance Standards

UMC 771 et al Permits

The following permit-related information was reviewed and discussed with the operator:

1. The operator received conditional approval from the Office of Surface Mining for their permanent permit on November 24, 1982. Attached to the permit were 17 stipulations.
2. A December 13, 1982 letter from the Division granting the operator conditional permit approval.
3. A May 12, 1983 letter from the Division granting the operator final approval and issuing a permit to commence coal mining operations.
4. A September 10, 1984 letter from the Division approving the operator's design modification for the sediment pond emergency spillway. There are two stipulations attached to the approval, one of which required the operator to obtain U. S. Forest Service (U.S.F.S.) concurrence on the plans. In a letter dated October 12, 1984, the operator informed the Division that they were submitting additional information to the U.S.F.S. regarding the emergency spillway design modification.
5. A U.S.F.S. Special Use Permit for 1.5 acres adjacent to the southeast corner of the Federal coal lease area, for the purpose of constructing portions of the sediment pond and portal area.

6. On August 27, 1984, the Division received a copy of a letter to the operator from the Bureau of Land Management, requiring the operator to prepare and submit to the Division, plans for installing a truck scale and gate at the mine site. To my knowledge, the operator has not submitted said plans to the Division at this time, however, the operator has discussed the installation of the truck scale and gate with the U.S.F.S.

UMC 817.11 Signs and Markers

The operator has a mine identification sign posted near the junction of the forest development road with State Highway 31, on the bridge which crosses Huntington Creek. Buffer zone markers have been installed. Top soil markers are posted on the topsoil stockpiles.

UMC 817.21-.25 Topsoil

The topsoil stockpiles located along the forest development road were covered with several inches of snow. There had not been any apparent disturbance of the topsoil stockpile by the operator's snow removal practices.

UMC 817.41-.51 Hydrologic Balance

Notice of Violation N84-4-14-1

This NOV was issued on October 2, 1984 for the operator's failure to construct their sediment pond principal spillway in accordance with their approved permit. The remedial action required the operator to reconstruct the principal spillway to comply with Drawing #G01-C-021, Revision #4, entitled, "Sediment Pond Details" by November 16, 1984 at 5:00 p.m.

On November 14, 1984, I conducted an inspection at the mine site to follow up on the violation and found that the operator had not completed the abatement of the violation. On November 15, 1984, I stopped at the operator's Huntington, Utah mine office and discussed with Charles Gent, those items which the operator needed to address in order to abate the violation by November 16. At that time, Mr. Gent assured me that they would complete the requirements by the 16th. On November 19, 1984, Mr. Gent called to inform me that he had completed the work required for abatement of the NOV by 1:00 p.m. on November 16, 1984.

At the time of this inspection, there was approximately 18 inches of snow in the sediment pond area. I could see that the operator had installed the trash racks as required and cut off the single perforation dewatering device's oil skimmer to its proper height.

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The NOV was subsequently terminated on December 17, 1984, effective November 19, 1984, the date of my telephone conversation with Mr. Gent.

Notice of Violation N84-2-20-6, #4 of 6

This violation was issued for the operator's failure to install water monitoring stations in Crandall Creek in accordance with the approved Mine Plan by October 21, 1984. On October 24, 1984, I conducted a partial inspection of the mine site, at which time Mr. Gent informed me that the stations had been ordered but not received from the manufacturer. During my November 14, 1984 inspection, Mr. Gent showed me the equipment, which they had received, and he said they had not installed the stations because of weather and soil conditions hampering the effective installation of the monitoring stations. At that time, he showed me a letter to Division Hydrologist, Wayne Hedberg, outlining their concerns and requesting that the station's installation be delayed.

On December 11, 1984, the Division approved the operator's request for the delay of the installation of the Crandall Canyon flumes. Attached to the approval was a modification of Notice of Violation, extending the abatement deadline to July 1, 1985. The Division feels that Spring snow melt runoff will have adequately subsided by that date to allow the installation of the flumes

Snow Removal

There were no apparent problems with the operator's snow removal activities in the mine permit area.

UMC 817.52 Surface Ground Water Monitoring

The operator does not have a NPDES permit, however, a permit application was submitted by R & M Consultants on the operator's behalf on April 27, 1984.

The operator had daily turbidity data available through October 5, 1984.

The operator has obtained flow data for Crandall Creek from the U. S. Geological Survey for the Crandall Creek Water Years 1982-83 and 1983-84.

The operator had bi-monthly surface water monitoring data available through September, 1984. The data appeared to be complete, with the exception of field measurements. This problem was discussed with the operator during my November 14, 1984 inspection. At that time, I told them they had to start measuring pH, electrical conductivity, dissolved oxygen, and water temperature as field measurements immediately, whether they hired a contractor to do it, or bought the equipment to do it themselves.

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The operator's sediment pond discharge analysis did not include total manganese analysis. I told Mr. Wollen that from now on they must include analysis of total manganese when they sample sediment pond discharge.

wj

cc: Donna Griffin, OSM  
Charles Gent, Genwal Mining Company  
Joe Helfrich, DOGM

Statistics:

See Kaiser Steel Corporation, Sunnyside Mine memo dated January 15, 1985.

0072Q-22-25