

February 19, 1985

TO: Coal File, Inspection and Enforcement Folder
FROM: David Lof, Mining Field Specialist 
RE: Meeting on February 8, 1985 with Manti-La Sal National Forest Personnel to Discuss the Status of Genwal Coal Company's Crandall Canyon Mine, ACT/015/032, Folder #7, Emery County, Utah

As was mentioned above I met on February 8, 1985 with Manti-La Sal National Forest personnel to discuss the Crandall Canyon Mine. Those in attendance at the meeting were Bill Boley, Ted Fitzgerald, Walt Novack, Sam Hotchkiss, Ira Hatch, Brent Barney and myself. The purpose of this memo is to list the topics discussed during the meeting and to document the agreements which were made.

Emergency Coal Lease Application

Forest Service personnel expressed concern over the operators emergency lease application because so much of the information provided in the application varies from and contradicts information provided in previous submittals. However, Mr. Boley said that they were going to complete their environmental assessment (EA) based upon the information submitted by Genwal in the application. He indicated that they would probably recommend that the emergency lease not be granted until the information discrepancies are cleared up.

While talking to Division Permit Supervisor Mary Boucek, she informed me that the application is actually a new mine permit application, not an emergency lease application. She said that the operator already holds the lease, however, it is not within the present Crandall Canyon Mine permit area boundary. Since the amount of area being added to the permit area is greater than a 10% area increase, the permit application is treated as a new mine permit. The amount of area to be added to the present permit area is approximately 80 acres.

The Division's role in reviewing the application is that of lead agency to which other agencies will make their comments. Since the operator has not proposed any additional surface disturbance the primary concerns the Division will address are ground water hydrology and subsidence.

Coal Exploration

As requested by Division Hydrologist Wayne Hedberg, I informed Mr. Boley that the operator is planning on conducting coal exploration into the upper two coal seams from inside the present mine and that plans will be forthcoming for their review.

Sediment Pond Certification

Mr. Boley informed me that one of the concerns the Forest Service had in regards to the sediment pond was that it should be certified by a registered professional engineer. He said that to date they had not seen a certification for the sediment pond. I told him that I thought that Sandy Pruitt had said that she had seen a certification letter for the sediment pond.

I told him that if infact it was certified that I had some concerns because the pond would have then been certified without the emergency spillway having been constructed and the primary spillway not constructed properly. Mr. Boley felt that if it was falsely certified, that it should be brought to the attention of the State Engineer and the Department of Business Regulation who is responsible for the licensing of professional engineers. I told Mr. Boley that I would check for the sediment pond certification and send him a copy, and then follow through with the State Engineer and Department of Business Regulation.

Sediment Pond Emergency Spillway

On September 10, 1984, the Division approved the operator's design modification for the sediment pond emergency spillway. A stipulation attached to the approval required that the operator obtain U. S. Forest Service concurrence on the plans. In a letter dated October 12, 1984, the operator informed the Division that they were submitting additional information to the Forest Service regarding the emergency spillway design modification.

The Forest Service has reviewed the plans and does not approve of the design. Mr. Boley said that they would write a letter to Genwal informing them that the spillway design is disapproved and copy the letter to the Division.

Sediment Dewatering Device

While discussing the sediment pond we briefly discussed the sediment dewatering device. The dewatering device is presently plugged off until it can be excavated and repaired. Mr. Boley expressed his

concern that even when repaired that the filtering device will not adequately treat the effluent to meet state and federal water quality limitations. The filtering device is only designed to filter sediment from the effluent and there is no way that oil and grease, or any other effluent constituents could be treated.

I told Mr. Boley that I would send him a copy of the water analysis for the discharge from the sediment dewatering device which Sandy Pruitt of the Division obtained on February 29, 1984 and that I would discuss their concerns with the Division technical staff.

Sewage Facilities

During a recent inspection, I had noted a lack of sewage facilities at the mine site. According to page 15, paragraph (b)(5) of the operator's September 16, 1981 ACR response the operator committed to having chemical toilets on site in lieu of a sewage system. These toilets were to be leased, pumped out under contract, and the sewage disposed of at an Emery County sewage disposal station.

While discussing the matter with Forest Service personnel I found out that MSHA enforces sewage facilities requirements underground and that the surface management agency has jurisdiction on the surface. Mr. Boley told me that he would write a letter to the Division stating their concern for a lack of proper sewage facilities and provide me with information on their requirements for the facilities. I told Mr. Boley that since the operator had not provided the facilities as committed to in their mine plan that a NOV would be issued.

Forest Development Road Within the Permit Area

According to the Technical Analysis the forest development road becomes part of the permit area at Station 67+00. Mr. Boley agreed that the Division is responsible for insuring compliance of the road through the permit area.

Forest Service personnel pointed out their concern with the present location of the operators operational facilities which include the office trailer, parking, oil and gas storage, and generator. The present location of the facilities is within the forest development road right-of-way. This is not in accordance with the approved plan. In addition, it is a safety hazard due to the fact the road is a public road through the permit area and the location of the facilities could easily conflict with other forest users.

Mr. Boley said that he would send a letter to the Division notifying the Division of their concerns. I told Mr. Boley that I would take

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enforcement action since the operator was not mining in accordance with their approved plan.

We discussed the need for the operator to install signs and guard rails along the forest development road in accordance with the approved plan and their road use permit. The operator also needs to provide forest user parking as required.

Forest Service personnel expressed their concern over the poorly maintained water bar across the access haulroad which is suppose to prevent disturbed area runoff from bypassing the sediment pond. I informed them that I had warned the operator to maintain the water bar and that I would follow through during my next inspection.

Forest Development Road Outside the Permit Area

The Forest Service is going to write a letter to Genwal requiring the completion of the road base construction by a given deadline and send a copy of the letter to the Division.

We discussed the snow removal requirements section of the operators road use permit. The Forest Service is going to remove the requirement to leave four to six inches of snow on the road bed. They are also going to require Genwal to clean the inside road ditch and culvert inlets as per their road use permit. Forest Service personnel felt that as long as the operator kept the road properly maintained to keep water off the surface that there would not be a problem with rutting occurring on the road surface. Forest Service personnel indicated that they were satisfied with the operators maintenance of the road at this point in time.

Mine Identification Sign

I informed them that I was going to have the operator move their mine identification sign from the bridge over Huntington Creek to the permit area boundary near Station 67+00.

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CC: Bill Boley, Manti-La Sal National Forest
Joe Helfrich, DOGM
Mary Boucek, DOGM

Statistics:

See Co-op Mining Company, Bear Canyon Mine memo dated February 20, 1985.

0072Q-51-54