

March 28, 1985

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

On March 6, 1985, a partial inspection was conducted at the above mentioned mine site. I was accompanied on the inspection by Andy King who was representing Genwal Coal company.

Notice of Violation N85-4-6-1

This violation was served the operator during this inspection for their failure to conduct surface water monitoring in accordance with their approved monitoring program. The remedial action required that all samples be taken in accordance with their approved plans starting immediately. This violation is discussed further in my March 12, 1985 inspection memo for my February 1985 complete inspection.

Spring and Seep Inventory, NOV N85-4-7-2, # 1 of 2

In an August 17, 1984 letter to the operator the Division requested that additional information be provided by November 15, 1984 regarding the operator's spring and seep inventory. This additional information is for the fulfillment of the requirements of Stipulation 817.52-Groundwater-2-DWH which was attached to their permanent permit. In a letter to the Division dated August 23, 1984 Genwal committed to provide the additional information. To the date of this inspection the information had not been received by the Division.

When I asked Charles Gent about this additional information during my February 22, 1985 inspection, he said that he had no knowledge of the spring and seep inventory because that matter was being handled by Bill Wollen who is no longer employed by Genwal. While looking through his files at that time, Mr. Gent was unable to find any information regarding the spring and seep inventory. Mr. Gent said that he would call Mel Coonrod who did the original spring and seep inventory to see if he had done the work on the additional information requested.

At the time of this inspection, Mr. Gent said that he was not able to get ahold of Mr. Coonrod to find out about the spring and seep inventory. Because of the operators failure to provide the Division with the additional information on the spring and seep inventory as required to complete the requirements of the stipulation, Notice of Violation N85-4-7-2, #1 of 2 was issued. It reads as follows:

Nature of the Violation

Failure to conduct mining activities in accordance with the terms and conditions of an approved permanent permit.

Provisions of the Regulation, Act or Permit Violated

UCA-10-22(1)(c)  
UMC 771.19

Portion of the Operation to Which Notice Applies

Stipulation 817.52-Groundwater-2-DWH

Specifically that information requested in a letter from the Division to the operator dated August 17, 1984 requesting that additional information be submitted on their spring and seep inventory by November 15, 1984.

Remedial Action Required

Submit the additional information requested in the August 17, 1984 letter from the Division.

Time for Abatement

April 2, 1985

This violation was sent to the operator from the Division offices on March 15, 1985.

Crandall Canyon Road, NOV N85-4-7-2, #2 of 2

As Mr. King and I drove up the Crandall Canyon road to the mine site I discussed with him the importance of proper snow removal and maintenance of the road. Specific items discussed were ditch maintenance, cleaning of culvert inlets, grading the snow off the road and maintaining a crown on the road surface.

At Station 67+00 the forest development road becomes part of the permit area. The road from this point on up thru the permit area was in extremely poor condition. It was down to a single passable lane, the road surface was rutted and covered with as much as four inches of mud. Road ditches were not maintained, culvert inlets were not cleaned, snow had not been removed from the entire surface of the road, etc. The Class II road from the truck turn-around to the mine portal was in much the same condition. Because of the poor condition of the roads Notice of Violation N85-4-7-2, #2 of 2 was issued. It reads as follows:

Nature of the Violation

Failure to mine in accordance with an approved permanent permit.

Failure to construct and maintain Class I roads to have adequate drainage and meet approved design standards.

Failure to construct and maintain Class II roads to have adequate drainage and meet approved design standards.

Provision of the Regulations, Act or Permits Violated

UCA 40-10-22(1)(c)  
UMC 771.19  
UMC 817.150(a)  
UMC 817.153(a)(1)  
UMC 817.155(a)(b)  
UMC 817.160 (a)  
UMC 817.163 (a)(1)  
UMC 817.165(a)(b)

Portion of the Operation to Which Notice Applies

All roads in the permit area.

Remedial Action Required

Bring the roads up to the approved design specifications and maintain existing road drainage structures.

Time for Abatement

April 2, 1985

Mine Identification Sign

During my February complete inspection, I discussed with Mr. Gent the moving of the mine identification sign to their permit area boundary at Station 67+00. At that time we found that there was some uncertainty as to exactly where the permit area boundary was. Therefore, upon returning to the Division I did some research and found that the Forest Service development road does infact become part of the permit area at Station 67+00. I informed Mr. Gent of my findings during this inspection and showed Mr. King the location of Station 67+00 so that the sign could be properly located.

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### Topsoil Stockpiles

The topsoil stockpiles were still mostly covered with snow except for the south facing slope. I could see some evidence of grass germination. I told Mr. King that I would evaluate the vegetation success this Spring and make any necessary request for additional vegetation work at that time.

I also suggested to Mr. King that they change the topsoil stockpile protection measures on the road side from strawbales to earthen berm and suggested that he make sure to inspect the effectiveness of the strawbales on the down hill side as soon as the snowmelts.

### Mine Operation Facilities, NOV N85-4-5-2, #2 of 2

This violation was issued to the operator on February 22, 1985 for their failure to locate and construct their mine operations facilities in accordance with their approved permanent permit. remedial action required the operator to submit plans for the relocation of the facilities by April 8, 1985 and to submit plans for the reclamation of the present facilities location by March 8, 1985. I agreed to extend the submittal date for the plans for the reclamation of the present site until April 8, 1985 so that they could consolidate the two plans.

re

cc: Bill Boley, Manti LaSal National Forest  
Charles Gent, Genwal Coal Company  
Donna Griffin, OSM  
Joe Helfrich, DOGM  
John Whitehead, DOGM

Statistics:

See Kaiser Steel, Sunnyside Mine Memo dated March 26, 1985

0166Q-25-28