

April 26, 1985

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

On April 3, 1985 I conducted a partial inspection at the above mentioned mine site. I was accompanied on this inspection by Division Hydrologists Rick Summers and Tom Suchoski.

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

The operator was issued the above mentioned violation on March 14, 1985 for their failure to comply with Stipulation 817.52-Groundwater-(2)-DWH. The operator had failed to respond to an August 17, 1984 letter from the Division requesting additional spring and seep inventory information by November 15, 1984. The operator was given until April 2, 1985 to respond to the Division's August 17, 1984 letter.

On April 1, 1985 this NOV was discussed during a meeting in the Division offices with Andy King, representing Genwal Coal Company, Division Hydrologist Wayne Hedberg and myself. At that time it was decided that the operator would be given the full 90 days to address the NOV. Therefore, on April 5, 1985 I modified the NOV extending it's abatement deadline until June 12, 1985. Failure of the operator to respond to the NOV by that date will result in the issuance of a cessation order.

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

This violation was issued for the operators failure to construct and maintain the roads within the permit area in accordance with the approved permit and design standards. The NOV required the operator to bring the roads up to the design specifications by April 2, 1985.

During our April 1, 1985 meeting and in a letter dated April 2, 1985. Genwal requested an extension for the time of abatement of this violation. Work on the roads has been delayed by winter weather conditions at the site.

At the time of my inspection I found that the Class I Road up to the permit area boundary was mostly dry except the road shoulders. The road narrowed as it approached the actual mine site so that it was one lane through the permit area with the sides of the road still being wet and muddy. The Class II road up to the portals had dried out some, however, it was still heavily rutted and too wet to grade. Because of the wetness of the roads the time for abatement of the NOV was extended until May 13, 1985.

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While discussing the Class II road with Andy King, it appeared that the primary source of the water problem on the road was the interception of surface and subsurface flow at the intake portal face. This water collects at the mouth of the portal, ponds on the pad and then goes down the road. I suggested to Mr. King that they may be able to slope the portal pad straight out from the portal to the outside edge of the pad and then convey the water off the portal pad down to the coal pad. This would be a modification to the operators existing operation plans therefore, the modification would have to be approved by the Division prior to implementation.

Sewage Facilities, NOV N85-4-5-2, # 1 of 2

The above mentioned violation was issued on February 22, 1985 for the operators failure to provide chemical toilets at the mine site in accordance with their approved plan and Forest Service regulations. The operator was required to provide toilets at the mine site by March 8, 1985. A chemical toilet was onsite and operational at the time of this inspection, therefore, the NOV was terminated.

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

This violation was issued on February 22, 1985 for the operator's failure to locate and construct their mine operation facilities in accordance with their approved permanent permit. The operator was required to submit plans for the relocation of the facilities and reclamation of the present facilities location by April 8, 1985,

On April 8, 1985, the Division received a letter from the operator requesting an extension of the time for abatement of the NOV. The operator explained that they had recently finished core drilling their upper seam to determine whether or not there was any mineable coal in the seam above them. Having completed the core drilling and determining that there are no additional mineable seams within the lease and permit area, they can now go ahead with the development of plans to expand the existing mine site and bring it into compliance. The violation was modified on April 8, 1985, to extend the time for abatement until May 8, 1985.

Portal Pad Runoff NOV N85-4-12-3, #1 of 3

When we approached the mine site I had noticed that the Class I road was mostly dry except for that portion adjacent to and above the sediment pond. It appeared that runoff was coming off the slope above the road. Some of this runoff after ponding on the road was

going to the sediment pond and some appeared to be going down the road bypassing the sediment pond.

When I inspected the portal pad, (a portion of which is located above the road) I found that runoff was coming from a sealed return portal on the east side of the conveyor. The water was flowing across the pad toward the fan and then going off the pad through a culvert in the berm. It was apparent that this was the water that I had seen coming off the slope above the road. It appeared that the water which was coming from the return portal was surface and subsurface flow being intercepted at the face of this portal.

Upon reviewing the runoff control plans for the area, I found that all runoff from the portal pad was suppose to leave the pad via the ditch along the inside of the Class II road. Because the runoff was not being controlled in accordance with the approved plans and not all of the surface drainage from the disturbed area was passing through the sediment pond, Notice of Violation N85-4-12-3, # 1 of 3 was issued, it reads as follows:

Nature of the Violation

Failure to mine in accordance with an approved mine plan.  
Failure to pass all surface drainage from the disturbed area through the sediment pond.

Provisions of the Regulations, Act or Permit Violated

UCA 40-10-22(1)(c)  
UMC 771.19  
UMC 817.42(a)(1)

Portion of the Operation to Which Notice Applies

The surface runoff from the portal pad, east of the conveyor.

Remedial Action Required

- A. Submit plans to the Division detailing how this runoff will be conveyed to the sediment pond in a controlled manner.
- B. Extend a temporary downspout from the existing culvert which will convey the runoff in a controlled manner to the inlet of the cross culvert to the sediment pond.

Time for Abatement

- A. April 25, 1985
- B. April 18, 1985

The violation was sent from the Division office on April 9, 1985. On April 11, 1985, I called Charles Gent of Genwal Coal Company to discuss the violation with him. At that time he informed me that they had installed a downspout on the existing culvert in accordance with Part B of the violation on April 10, 1985 prior to receiving the violation.

Sediment Pond

I discussed with Mr. King the need to regrade the ramp which starts near the office trailer and provides access down to the sediment pond embankment. The operator needs to regrade the ramp to insure that all disturbed area runoff goes into the pond and to keep runoff from ponding on top of the sediment pond embankment. Mr. King said that they would regrade the ramp and associated area as soon as it dried out. It should be noted that it did not appear that any disturbed area runoff had left the site but had merely ponded on top of the embankment and then drained into the sediment pond.

The sediment pond was discharging at the rate of approximately .25 gallons per minute. The discharge appeared to be occurring through the one inch perforation in the principal spillway standpipe. A sample of the discharge was taken and is presently being analyzed by the State Health Laboratories. A visual inspection of the discharge did not raise any concerns.

While inspecting the discharge point for the principal spillway, I did not feel that the riprap that was in place was adequate however, there had been no erosion at the discharge point to date. While discussing this with Mr. King and Division Hydrologists, I suggested installing a flexible downspout on the end of the principal spillway culvert. The flexible downspout could be put on in the Spring through Fall when the possibility of thunder showers is the greatest, since these type of precipitation events would most likely cause substantial discharge from the sediment pond. However, we decided that we should review the approved plans to see what was designed for the outlet before discussing it further.

Upon returning to the Division and reviewing the operator's mine plan, I found that Drawing No. G01-C-020 shows a riprapped principal spillway channel from the culvert discharge point to Crandall Creek.

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Details of this riprapped channel are shown on Drawing No. G01-C-022. This will be discussed further with the operator during my next inspection.

Upper Topsoil Stockpile, NOV N85-4-12-3, #2 of 3

While inspecting the the upper topsoil stockpile, I found that runoff from the road above the stockpile had deposited a large amount of sediment (several cubic yards) against the strawbales on the west end of the stockpile. The sediment overtopped some of the strawbales depositing material on the topsoil. Then the runoff followed along the inside of the strawbales causing erosion at the base of the topsoil stockpile. When this runoff got to a lower point on the south side of the stockpile it deposited sediment against the strawbales and went over the bales down the slope into Crandall Creek. In addition, there were several areas on the south side of the stockpile where the topsoil had eroded off the stockpile itself and then deposited against the strawbales overtopping the strawbales. Because the operator had not adequately protected the topsoil stockpile, Notice of Violation N85-4-12-3, #2 of 3 was issued. It reads as follows:

Nature of the Violation

Failure to protect topsoil stockpile from erosion.

Provision of the Regulations, Act or Permit Violated

UMC 817.23 (b)

Portion of the Operation to Which Notice Applies

The upper topsoil stockpile.

Remedial Action Required

Reconstruct strawbale dike around the stockpile as necessary.

Time for Abatement

April 18, 1985

This violation was sent from Division Offices on April 9, 1985. When I discussed the violations with Mr. Gent by telephone on april 11, 1985, he informed me that they had done some work on the strawbale dike on April 9, 1985.

Noncoal Waste NOV N85-4-12-3, #3 of 3

There were excessive oil and fuel spills around the generator/fuel

storage area. A barrel in the area was leaking its contents onto the ground and several other empty barrels were strewn around the area. In addition, the operator had dug a hole in the pad next to the generator to set a can in so that they could drain the oil from the generator. At the time of my inspection, the hole was full of used oil, there were probably several gallons of used oil in the hole. This pad area is within 100 feet of Crandall Creek and the pad itself is constructed primarily of large rocks.

The material storage area west of the truck turn-around was also a mess, there was noncoal waste strewn around the the trash bin. There had been oil and, or, some other material spilled, or leaked, from several barrels that were in the area and mining materials were stored in a very hazard manner.

Inspection of the portal pad also found noncoal waste and mining materials scattered about the pad.

Because of the operator's failure to store materials in a controlled manner, Notice of Violation N85-4-12-3, #3 of 3 was issued, it reads as follows:

Nature of the Violation

Failure to place and store noncoal waste in a controlled manner in a designated portion of the permit area. Failure to ensure that leachate and surface runoff do not degrade surface or ground water.

Provision of the Regulations, Act or Permit Violated

UMC 817.89

Portion of the Operation to Which Notice Applies

Oil and Gas storage area by the generator, material storage area by the truck turn-around, portal pad, downslopes to Crandall Creek.

Remedial Action Required

- A. Remove all soil materials contaminated by oil and gas spills and dispose of in an approved land fill.
- B. Pick up and dispose of all garbage, old timbers, metal and other noncoal wastes.

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- C. Submit complete plans to the division for storage of all materials in a controlled manner.

Time for Abatement

- A. April 18, 1985
- B. April 25, 1985
- C. May 4, 1985

This violation was sent from the Division offices on April 9, 1985.

re

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

Statistics: See Kaiser Steel Corporation, Sunnyside Mine memo  
dated April 24, 1985

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