

*File*

July 5, 1985

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

On June 13, 1985, I conducted a partial inspection at the above mentioned mine site. The weather at the time of my inspection was mostly clear and warm.

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

This violation was issued on February 21, 1985 for the operators failure to locate and construct their mine operations facilities in accordance with their approved permit. The operator was required to submit plans for the relocation of their facilities and reclamation of the present facilities location by May 23, 1985.

The plans were submitted to the Division on May 23, 1985 as required and reviewed by the Division Technical Staff. On June 21, 1985 the Division sent the operator a deficiency letter which expressed the Division's general agreement with the operator's concept and listed ten general areas which the operator must address completely and adequately by July 26, 1985.

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

This violation was issued on March 14, 1985 for the operator's failure to comply with Stipulation 817.52 Groundwater-(2)-DWH. The remedial action required that the operator respond to an August 17, 1984 letter from the Division requesting additional spring and seep inventory information, by June 12, 1985.

The spring and seep inventory information requested in the August 17, 1984 letter from the Division was submitted by the operator on June 12, 1985. This information is currently being reviewed by the Division Technical Staff.

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

This violation was issued on March 14, 1985 for the operators failure to construct and maintain the roads within the permit area in accordance with the permit and performance standards. The operator was to bring the roads up to design specifications by May 13, 1985.

When I conducted my inspection on May 24, 1985, I found that the operator still needed to complete the cleaning of the culverts along the Class I and Class II roads and the ditch along the inside of the Class I road from Station 76+00 to approximately Station 68+00. This was discussed with Andy King on June 3, 1985 at which time he committed to having the maintenance completed by June 12, 1985.

On June 10, 1985, I called Mr. King in order to find out the status of the roads and remind him of the June 12, 1985 deadline. During that discussion, Mr. King said that they would be able to complete the work by June 12, 1985. In addition, we discussed the berm on the outside of the road from approximately Station 76+50 to Station 70+00. Mr. King said that he had found out from a MSHA representative that MSHA does not have jurisdiction over this particular area. However, he went on to explain that he wished to leave that portion of the berm from Station 76+50 to approximately Station 74+00 (this is the section of berm from the upper access point to the sediment pond embankment down to the lower access point) Mr. King's reasoning for wanting to leave this section of berm was for safety purposes. I told Mr. King that the Division would consider a request to leave that portion of the berm in place if a modification was submitted by June 12, 1985. I told Mr. King that the remaining portion of the berm from Station 74+00 to Station 68+00 must be removed by June 12, 1985. The operators request to modify their approved plan to leave the berm in place adjacent to the sediment pond was received by the Division on June 12, 1985 and is currently being reviewed by the technical staff.

At the time of this inspection, I found that the culverts for both the Class I and II roads were clear, the ditches were fairly well maintained, and the roads graded. In addition, the operator had started to spread additional road base gravel on the Class I road but had not removed the berm from approximately Station 74+00 to Station 68+00 as required.

The next morning, June 14, 1985, I called Mr. King and informed him that I was issuing Cessation Order C85-4-5-2, #1 of 2 for their failure to remove the berm within the time set for abatement. I told Mr. King that they should contact me as soon as the CO was abated. The CO was issued from the Division Office on the afternoon of June 14, 1985. That same afternoon I called Genwal's office to find out the status of their work on the berm. The secretary told me that Andy King was not there but that he had left a message that the work to abate the NOV had been completed. I then tried to reach Mr. King at home, he was not there, so I left a message for him to call me as soon as possible. I left my office and home phone number so that he could contact me. On the evening of June 16, 1985, Mr. King called to inform me that the affirmative obligations required for abatement of the CO had been met.

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

This violation was issued on April 9, 1985 for the operators failure to mine in accordance with their approved mine plan and failure to pass all surface drainage from the portal pad area east of the conveyor through the sediment pond. The operator was required to extend a temporary downspout from the existing culvert to convey

runoff from the pad in a controlled manner to the inlet of the cross culvert to the sediment pond, immediately. In addition, they were required to submit plans to the Division by May 23, 1985 detailing how the runoff from the east end of the portal pad would be conveyed to the sediment pond.

On May 23, 1985 the Division received plans from the operator regarding this NOV. The plans were incorporated into the operators submittal for NOV N85-4-5-2, #2 of 2 which were the plans for the relocation of the mine operation facilities. The Divisions deficiency letter of June 21, 1985 encompasses the response to this NOV. Complete and adequate plans to address the NOV must be submitted along with the other information by July 26, 1985.

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

This violation was issued on April 9, 1985 for the operator's failure to properly store and control noncoal waste materials within their permit area. The operator was required to: remove all soil material contaminated by oil and gas by July 9, 1985; pickup and dispose of all garbage, old timbers, metal, and other noncoal waste by April 25, 1985; submit complete plans to the Division for storage of all materials in a controlled manner by May 23, 1985; and place oil and gas absorbing material around and under the generator and oil/gas storage area to absorb oil and gas spills by May 8, 1985.

During partial inspections conducted on May 8 and 24, 1985, I found that the operator had not provided adequate oil and gas absorbing material in the oil/gas storage area. On both occasions I requested that the operator place a minimum of two inches of sawdust over all the area where oil and gas spills had occurred in the past. This request for additional sawdust had also been made to Andy King on several occasions during telephone conversations with him and during a May 10, 1985 meeting in the Division offices.

At the time of this inspection, I found that the operator had not put down any additional sawdust around the oil and gas storage area. In addition, that sawdust which had been spread in the area was already soaked with oil. Because of this Cessation Order C85-4-5-2, #2 of 2 was issued for the operator's failure to abate the Notice of Violation within the time set for abatement. The Cessation Order required that the operator comply with Part D. of the NOV and spread a minimum of two inches of oil absorbing material over the entire oil and gas storage area immediately.

This CO was discussed with Mr. King on the morning of June 14, 1985 and issued that afternoon. Mr. King did not inform me of the abatement of the CO until the evening of June 16, 1985.

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The operator submitted plans for the relocation of the surface facilities which was to include plans for noncoal waste and materials storage on May 23, 1985. The Division's deficiency letter of June 21, 1985, also addresses plans submitted for abatement of this NOV.

Undisturbed Diversion, NOV N85-4-16-1

This violation was issued on May 10, 1985 for failure to mine in accordance with an approved mine plan and failure to construct and maintain the undisturbed diversion above the disturbed area. The operator was required to either construct the diversion so that it would meet the approved design specifications, or submit complete and adequate plans to the Division to modify the present design specifications by June 4, 1985.

On May 23, 1985, the Division received plans from the operator for the relocation of their surface facilities. These plans included a design change of the undisturbed runoff diversion. The Divisions June 21, 1985 deficiency letter to the operator regarding the May 23, 1985 plans submittal address this NOV.

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cc: Charles Gent, Genwal Coal Company  
Bill Boley, Manti La-Sal  
Donna Griffin, OSM  
Joe Helfrich, DOGM

Statistics: See Soldier Creek Coal Company, Soldier Canyon Mine  
Memo dated July 5, 1985

0290Q-3-6