



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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November 10, 1986

Mr. Charles Gent
Genwal Coal Company
P. O. Box 1201
Huntington, Utah 84528

FILE COPY

Dear Mr. Gent:

Re: Tract 1 Mid Permit Term Stipulation Review, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder No. 2, Emery County, Utah

The Division has reviewed information submitted by Genwal on September 8, 1986 and October 1, 1986 in response to the Division's August 5, 1986 Mid-Term Permit Review Conditional Approval. The stipulations written for the conditional approval of the sediment pond construction (letter dated July 2, 1986) are also incorporated into the review.

Response to Stipulation UMC 783.25-(1)-DC, UMC 817.41-(1)-RS, UMC 817.42-(1-2)-RS and UMC 817.52-(1)-RS are complete and adequate. However, the remaining stipulations UMC 771.19-(1)-RS, UMC 778.12-(1)-SCL, UMC 800-(1)-JRH, UMC 817.43-(1-2)-RS, UMC 817.46-(1)-RS and UMC 817.71-(1)-JRH are incomplete and/or technically deficient. The attached review document outlines information that is still required to be submitted by Genwal before the stipulation response can be considered complete and adequate. A response to these outstanding concerns must be made by December 12, 1986.

Please contact me if there are any questions.

Sincerely,

Susan C. Linner

Susan C. Linner
Reclamation Biologist/
Permit Supervisor

jvb

cc: A. Klein
L. Braxton
B Team

0967R-1

STIPULATION REVIEW
TRACT 1 MID PERMIT TERM REVIEW

Genwal Coal Company
Crandall Canyon Mine
ACT/015/032
Carbon County, Utah

November 10, 1986

Sediment Pond Construction Approval Stipulations:

UMC 771.19-(1)-RS

The applicant must obtain approval for the proposed pond design from the Utah State Department of Health and the United States Forest Service prior to initiation of construction of the sediment pond.

Stipulation Status

No response has been received on this stipulation. Conversations with Mr. Andy King have indicated that the necessary approvals were obtained, but the letters of approval have not been sent to the Division. Letters of approval from both agencies will satisfy this stipulation.

UMC 817.41-(1)-RS

The applicant must construct the in-mine sumps proposed in the MRP prior to initiation of construction of the sediment pond.

Stipulation Status

The sumps have been constructed in the mine (conversation with Andy King, October 27, 1986).

UMC 817.42-(1)-RS

The applicant must install interim sediment control measures for all areas affected by the construction of the sediment pond. These measures are to include, but are not limited to:

1. Installation and maintenance of silt fencing or straw bales (as per the specifications contained in the MRP) around the outside perimeter of the construction area. These measures are to be installed and functioning prior to any initiation of construction.

2. Installation and maintenance of adequate silt fencing or straw bales (as per specifications contained in the MRP) at all temporary material storage areas (i.e. volume of material removed from pond).

Stipulation Status

On-site inspection by Division staff has verified that adequate sediment control measures have been installed as required.

UMC 817.42-(2)-RS

All runoff occurring at the site during construction must be pumped from the pond into the in-mine sumps for holding until the pond construction is complete. The water must be discharged according to the NPDES provisions of the applicant's permit.

Stipulation Status

The pond construction is complete at this date. Stipulation no longer applicable.

UMC 817.46-(1)-RS

The applicant must submit adequate plans for the emergency spillway proposed at the site prior to July 20, 1986 and obtain approval from the Division and the USFS prior to construction of the emergency spillway.

Stipulation Status

This stipulation has been partially addressed. Plans have been submitted for the emergency spillway, yet a technical review has not been conducted and approval has not been granted. Again, the letter from the USFS required by stipulation 771.19 will satisfy the second portion of this stipulation.

UMC 817.52-(1)-RS

The applicant must conduct the construction phase monitoring program as proposed in the MRP. Results of the sample analysis must be submitted to the Division within five (5) working days of sample receipt.

Stipulation Status

The construction period is complete. Water quality samples were submitted from 7/21/86 thru at least 8/28/86 (the period of sediment pond construction).

Mid-Term Permit Review Approval Stipulations

Stipulation UMC 783.25-(1)-DC

1. The operator must submit a comprehensive map showing the locations of all surface and ground water monitoring points within 30 days of this approval. This map should include the monitoring well, proposed monitoring wells, and the sediment pond embankment piezometer.

Stipulation Status

This map has been submitted.

Stipulation UMC 788.12-(1)-SCL

1. Any necessary changes in design or construction of surface facilities due to on-site conditions shall be submitted to the Division as amendments to the Mining and Reclamation Plan and must be approved prior to implementation.

Stipulation Status

Several changes to the approved construction plan were made during construction activities. Genwal must incorporate all design changes onto the surface facilities map and/or into the Tract I Mining and Reclamation Plan text.

Stipulation UMC 800-(1)-JRH

1. Within 30 days from the date of approval of the mid-term review, the Operator shall submit to the Division a complete and detailed cost estimate for the reclamation of the site. The detailed cost estimate shall include the following information:
 - a. Mass balance calculations for earthwork and topsoil distribution, quantities, equipment selection, and productivity and cost estimates for all phases and aspects of the work required for reclamation.
 - b. Calculations for the reclamation work to be accomplished shall include references as to the source of the information used and the date or dollar year on which the estimates are based.

- c. A map(s) to be used as Exhibit "A" to the surety bond which shows the boundaries of all areas to be disturbed. This shall include the permanent waste disposal facilities, all road cuts and fills and the topsoil stockpile storage locations. The map(s) must be certified correct to serve as a legal description of the disturbed areas for the reclamation bond.

Stipulation Status

Bonding information was received October 1, 1986 and a preliminary review has been performed by the Division. Bonding calculations will be finalized when as-built design drawings have been received and final plans for the noncoal waste disposal area have been approved.

Stipulation UMC 817.43-(1-2)-RPS/DC

1. The applicant must submit complete and technically adequate plans for the reclamation of channels RD-1 through RD-6 within 30 days of permit issuance. The applicant must obtain Division approval for these designs within 90 days of permit issuance.

Stipulation Status

Designs for the channels were submitted on July 10, 1986. These designs were preliminarily reviewed and found to be inadequate following a complete review, the Division will forward the deficiencies to the operator for clarification.

Stipulation UMC 817.71-(1)-JRH

1. Within 30 days from the date of the approval of the mid-term review, the Operator shall submit to the Division a detailed set of plans for the location, installation, operation and reclamation of a non-coal waste disposal facility to be included within the mine permit area and disturbed area boundaries. The Operator shall promptly review and respond to any deficiencies found by the Division in the plan. Upon completion of the 60 day public notice and review period required for a modification to the Mining and Reclamation Plan, the Operator shall have responded to all public and agency concerns regarding the plan and the modification shall be made complete and adequate within 30 days after the closing date of the public notice.

No permanent disposal of non-coal waste material, sediment pond waste, coal spoils, or coal processing waste shall be made by the Operator until such time as the above modifications are approved. The Operator shall store all such material within the temporary waste storage facilities as shown on Plate 3-1 of the MRP. This condition does not apply to trash and garbage or other such materials which are approved by the Division for disposal in the approved sanitary landfill.

Stipulation Status

The following comments relate specifically to the deficiencies pertaining to the waste disposal site, Stipulation UMC 817.71-(1)-JRH.

Hydrology

The waste disposal site submittal (dated 9-5-86) was reviewed relative to hydrology regulations on October 27, 1986. This document is to be considered deficient. Hydrology discussion in the proposal is limited to a one paragraph discussion. In light of the limited discussion, specific comments are not appropriate at this time. The following is a listing of hydrology regulations that may apply to this site and must be addressed in order to prepare an adequate technical analysis, decision document, and CHIA.

- UMC 783.13 Description of Hydrology and Geology: General Requirements - RS
- UMC 783.15 Ground Water Information - RS
- UMC 783.16 Surface Water Information - RS
- UMC 783.17 Alternative Water Supply Information. - RS
- UMC 783.25 (a), (b), (f), (g), (i) Cross-sections, Maps and Plans - RS
- UMC 784.14 Reclamation Plan: Protection of the Hydrologic Balance - RS
- UMC 784.16 (b), (c) Reclamation Plan: Ponds, Impoundments, Dams, and Embankments - RS
- UMC 784.19 (b)(2) Underground Development Waste - RS
- UMC 784.22 Diversions - RS
- UMC 784.23 (b)(10), (b)(12) Operation Plan: Maps and Plans - RS
- UMC 817.41 Hydrologic Balance: General Requirements - RS
- UMC 817.42 Hydrologic Balance: Water Quality Standards and Effluent Limitations - RS
- UMC 817.43 Hydrologic Balance: Diversions - RS
- UMC 817.45 Hydrologic Balance: Sediment Control Measures - RS
- UMC 817.49 Hydrologic Balance: Permanent And Temporary Impoundments - RS
- UMC 817.52 Hydrologic Balance: Surface and Ground Water Monitoring - RS
- UMC 817.71 (a)(1), (d) Disposal of Excess Spoil and Underground Development Waste: General Requirements-RS

UMC 783.21 Soil Resources Information - JSL

The applicant shall provide a soil survey for the area to be disturbed. This survey shall include soil identification, description, present and potential productivity of existing soils and a map delineating differing soils. All soil sample sites, and phases of soil series must be identified on this map.

UMC 817.21(a) Soil: General Requirement - JSL

Prior to the removal of any topsoil, chemical and physical analysis must be determined for the following parameters: pH, electrical conductivity, available phosphorus, calcium carbonate percentage, potassium and texture.

UMC 817.23(b) Topsoil: Storage - JSL

tockpile protection (i.e. berms, seeding, etc.).

UMC 817.25 Topsoil: Nutrients and Soil Amendments - JSL

The applicant shall submit a detailed fertilization program if soil analysis (see comment UMC 817.21(a)-JSL) determines that fertilizer will need to be incorporated and or applied to the soil to ensure reclamation success. This program must include the N-P-K analysis, rate, method and season of application and equipment to be used.

Engineering

UMC 782.13 Identification of Interests-JRH

The Operator must include the names and addresses of the holders of record of any lease hold interest in the areas to be affected.

UMC 783.24 Maps: General Requirements-JRH

A map must be provided showing the location of all buildings and their respective use in and within 1000 feet of the proposed permit area, and the location of surface and sub-surface man made features within passing through or over the proposed permit area, the location and boundaries of any proposed reference areas for determining the success of revegetation, each public road located or within 100 feet of the proposed permit area.

UMC 784.13 Reclamation Plan: General Requirements-JRH

The Operator has not completely addressed the general requirements of this section with regard to the reclamation plan.

UMC 784.14 Reclamation Plan: Protection of Hydrologic Balance-JRH

The Operator has not provided a detailed description with appropriate maps and cross sections determining the measures to be taken during and after the proposed operations to ensure the protection of the quality of surface and ground water as required under this section.

UMC 784.15 Reclamation Plan: Postmining Land Use-JRH

The Operator has indicated a change in the post mining land use but has not provided surface owner approval for the proposed post mining land use. The Operator must provide all materials needed for approval of the alternative use under UMC 817.133 and approval from applicable state and local agencies for land use plans and programs.

UMC 784.19 Underground Development Waste-JRH

The Operator has not provided sufficient information regarding the design characteristics of the waste disposal site. The Operator must provide the information required in this section in order to determine the submittal complete.

UMC 783.25 Cross-Sections, Maps, and Plans-JRH

The Operator needs to determine and locate elevations and locations for test borings and or pits for soil analysis required. This information must also be shown on an acceptable drawing.

The Operator has not provided the location and extent of sub-surface water, if encountered, within the proposed mine plan or adjacent areas, including but not limited to the areal and vertical distribution of aquifers, and portrayal of seasonal differences of head in different aquifers on cross-sections and contour maps.

UMC 786.11 Public notices of filing and permit applications-JRH

The Operator must provide a map of the waste facilities including the requirements under this section, part (a)(2). The Operator shall also prepare all the information required for a notice for publication as required under this section. A copy of this notice shall be submitted to the Division prior to publication.

Biology

UMC 784.15 Reclamation Plan: Post Mining Land Use-LK

The operator has indicated that the post mining land-use for this area would be for industrial use. This use can be approved provided: the landowner provides written comments that he wants the area left for a specific purpose; and, documentation from the county is provided that shows the proposed use is compatible with existing zoning and land use plans.

Since this land use is compatible with existing vegetation (see UMC 817.116(b)(3)(ii)) there would be no need to establish a reference area. However, the area will need to be stabilized during operations (ie. topsoil, berms, etc.) and between closure and development of the alternative land use. It is recommended the following species and rate be used:

	<u>Rate (lbs PLS/acre)</u> <u>Broadcast</u>
<u>Agropyron dasystachyum</u> Thickspike wheatgrass	4 lbs
<u>Oryzopsis hymenoides</u> Indian ricegrass	3 lbs
<u>Sporobolus cryptandrus</u> Sand dropseed	.5 lbs
<u>Medicago sativa</u> Alfalfa	2 lbs
<u>Melilotus officinalis</u> Yellow sweetclover	2 lbs
<u>Chrysothamnus nauseosus</u> Whitestem rubber rabbitbrush	.5 lbs
TOTAL	<hr/> 12 lbs

Areas seeded should be mulched with 3000 lbs/acre of alfalfa hay mulch crimped into or otherwise anchored to the soil. The applicant must commit to use these methods or submit other appropriate ones.