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TO: Daron Haddock, Permit Supervisor

FROM: Wayne H. Western, Reclamation Engineer *W#W*

RE: MPR Chapter 3 Review, Genwal Coal Company, Crandall Canyon,
ACT/015/032, Folder #2, Emery County, Utah

SUMMARY

1. Drawings for the primary road have not been certified and are not consistent with how the road was actually constructed. The road design permits uncontrolled drainage that causes the embankment to erode.
2. Spoil disposal plan has not been developed.
3. Construction time table does not list the new facilities.
4. Genwal is placing coal stockpiles over the oil storage and fuel containment valves, and this needs to be stopped.

PRIMARY ROAD DESIGN AND CONSTRUCTION

Plat 3-6, Road Profile and Cross Section, was completed as of February 10, 1988 and revised on November 11, 1991. The revisions were not certified by a registered engineer as required by R645-301-512.250, "Primary Roads, the professional engineer will certify the design and construction or reconstruction of primary roads as meeting the requirements of R645-310-534.200 and R645-301-742.420." The stamp and signature that appear on the revised plat are the same as those appearing on the original document. Genwal needs to have the revision certified by a registered engineer.

The cross section for the primary road (class 1) shows a 6 inch berm on the stream side of the road. The berm does not exist. Either the berm needs to be constructed or the plat modified.

There is erosion on the road embankment caused by the uncontrolled drainage over the road surface which is in violation of R645-301-742.423.3, "Drainage ditches will be designed to prevent uncontrolled drainage over the road surface and embankment." The road will have to be modified to prevent further erosion.

SPOIL DISPOSAL

Sediment pond waste disposal is discussed in Chapter 3, Section 3.3.9.3. In that section Genwal proposes to notify DOGM 60 days prior to the disposal of sediment pond spoils and goes on to state that, "Disposal of excess spoil will be in compliance with Utah Coal Mining Regulations R645-301-535.100." That regulation states that "excess spoil will be placed in designated disposal areas within the permit area in a controlled manner." DOGM cannot grant an exemption nor approve a MRP that does not conform to all regulations. Genwal must develop a plan to properly dispose of the spoils .

The permitted surface area at the Crandall Canyon mine site is small and the terrain is steep which would make developing a surface disposal facility at the mine site difficult. Alternative disposal sites include: underground disposal; developing a disposal site away from the mine; or arranging to have the spoils sent to an existing DOGM permitted disposal facility. If the spoils are sent to an existing facility that site must have its permits and bonds modified before receiving any of Genwal's spoils.

CONSTRUCTION TIME TABLE

The construction schedule is outlined in Section 3.2.13. Missing from the schedule are the new buildings and fan complex. R645-301-526.113 states that the plans must include, "approximate dates on which construction of the existing structure was begun and completed." Genwal must list those dates in the MRP.

SURFACE BUILDINGS AND STRUCTURES

The oil storage and fuel containment area is located ninety feet west of the coal silo. Overflow from the silo is placed over the containment unit's valves thereby making them inaccessible. The spill prevention and control plan specifies that the valves are to be inspected on a routine basis, which is impossible if the valves are covered with coal. Regulation R645-301-526.220 states that, "the support facilities description must state that support facilities will be operated in accordance with a permit issued for the mine."

RECOMMENDATIONS

1. Plat 3-6, Road Profile and Cross Section, needs to be modified to show the as-built road, and all modifications made to the plate since February 10, 1991 need to be certified by a registered engineer. The road facilities must be modified to prevent erosion of the embankment.
2. Genwal needs to develop a spoils disposal plan.
3. The construction time table needs to include the partially completed buildings and fan complex.
4. The operator needs to change their operating procedures so that the oil storage and fuel containment facility's valves can be regularly inspected. Access to the valves should not be blocked by coal stockpiles.

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