



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
Governor
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December 14, 2000

Gary Gray, Resident Agent
Genwal Resources, Inc.
P.O. Box 1420
Huntington, Utah 84528

Re: Midterm Review, Genwal Resources, Inc., Crandall Canyon Mine, C/015/032-MT00,
Outgoing File

Dear Mr. Gray:

The Division has completed the Midterm Review of the Crandall Canyon Mine which we indicated we would do in our October 24, 2000 letter to you. We have enclosed a short Technical Analysis (TA) and a Field Visit Report which discuss the results of our review. Please review them carefully to make sure you understand the requirements.

There is one item that requires immediate "on-the-ground" action. Culvert C-15, which is a slotted culvert across the entrance road, is partially plugged. It requires some maintenance to reduce the possibility of coal fines and sediment being washed down the road and, possibly, into Crandall Creek.

A few other issues were identified which require written follow up to complete. These issues are as follows:

1. The plan and reclamation agreement should be consistent as to the described disturbed area. It was concluded that the appropriate number should be 10.7 acres. Exhibit "D" and the MRP must be corrected.
2. The blue PVC culvert needs to be shown on the pond designs and maps.
3. It was noted that there was no "Existing Riser Decant with Trash Rack and Skimmer" as indicated on Plate 7-3. This needs to be corrected.\
4. Culvert UD-1 is not shown in its entirety on Plate 7-5. The plate needs to be revised to show the whole culvert.

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Gary Gray
C/015/132-MT00
December 14, 2000

In order to comply with the requirements of the midterm review, Genwal Resources, Inc., must complete the "on-the-ground" maintenance item as well as submit a complete and accurate application for amending the approved Mining and Reclamation plan which addresses the above issues. The required information must be submitted by no later than January 31, 2001.

Please call if you have any questions.

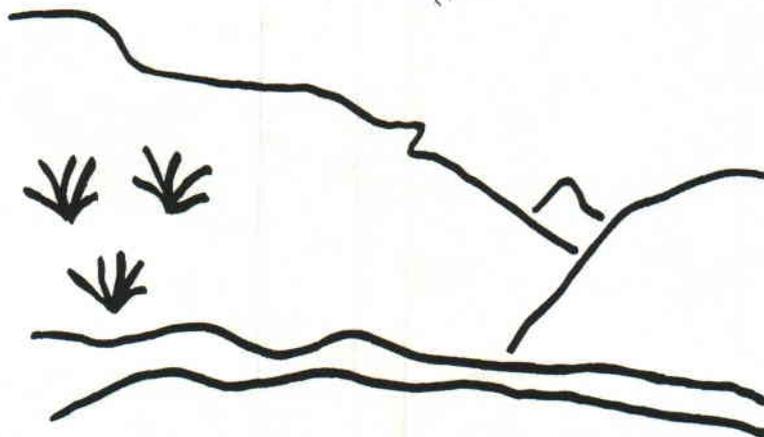
Sincerely,

A handwritten signature in black ink that reads "Daron R. Haddock". The signature is written in a cursive style with a large initial "D".

Daron R. Haddock
Permit Supervisor

drh/sm
Enclosure: (2)
cc: Price Field Office
O:\015032.CRA\FINAL\defMT00.wpd

State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Crandall Canyon Mine
Midterm Review
C/015/032-MT00
Technical Analysis
December 13, 2000

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INTRODUCTION

TECHNICAL ANALYSIS**INTRODUCTION**

The Crandall Canyon Mine Permit is at it's midterm and Division review is required. This review emphasizes the Hydrology aspects of the Mining and Reclamation Plan (MRP) and includes a review of past monthly inspections, submitted water monitoring data, and correspondence. A site visit by the review team was conducted on November 21, 2000 and some comments in this review resulted from that visit.

INTRODUCTION

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

As part of the midterm review the following documents were reviewed to determine their applicability to the Crandall Canyon Mine using the Best Technology Currently Available (BTCA). This is to prevent additional contributions of suspended solids, or other contaminants, to stream flows outside of the permit area.

- Chapter 7, Hydrology
- Correspondence Folder #2 for the Mine, spot checking for the last two years.
- Inspections Folder #5 for the Mine for the past two years.
- Water monitoring data in the DOGM database.

The MRP contains appropriate provisions for diversion ditches and culverts and these have all been installed. Also, numerous plan amendments have modified the basic plan over the life of the current permit. The inspection reports indicate the diversions have been performing adequately and they have been regularly maintained as needed to maintain their capacity. Sediment control measures at the minesite consist of straw bales, silt fences, gravel cover, and vegetative cover. Inspection reports indicate these are performing as intended and reduce sediment loss. These have been maintained as needed to retain their capacity. A site visit showed much of the disturbed area is paved and gravel cover extends over nearly all the remaining disturbed area. This will minimize sediment contributions to the sed pond.

The sediment pond appears to have been adequately designed and has been performing as intended. Inspection reports show it rarely discharges. Records indicate that, although the mine started operation in 1984, the first discharge occurred in 1996. Apparently there have only been five pond discharges during the life of the mine. During the site inspection it was noted that there was no "Existing Riser Decant with Trash Rack and Skimmer" as indicated on Plate 7-3. Discussion indicated there might be a decant device inside the Principal Spillway riser. This could not be determined at the time. The MRP indicates, on page 7-44, that there is supposed to be a decant system controlled by a valve. Sampling and testing to assure compliance with UPDES discharge requirements will be done before releases are made from this decant system.

It needs to be determined whether a decant device is installed. If not, one will need to be installed. Once the decant system situation is resolved, the Plates and MRP will need to be made consistent with each other and with the on-the-ground conditions.

During the site inspection it was noted that there is a UPDES sampling point in the 12-inch pipe near the road. This pipe conveys the minewater discharge directly into Crandall Creek. Discussions with the Utah Division of Water Quality indicate this is an acceptable arrangement and is in compliance with UPDES permit provisions. However, most such arrangements are for holding systems that discharge on the order of once or twice a year, and only after sampling is done to assure compliance with the UPDES permit. The Operator is cautioned that the current arrangement could result in non-compliance discharges that would only be discovered AFTER the discharge had occurred. The Division strongly recommends that an "Investigative Sample" be taken from the sump at the inlet end of the pipeline and sent for laboratory analysis. Then, IF the water does not exceed UPDES requirements, the water can be discharged. This investigative sampling would be in addition to the regular UPDES permit sampling.

The shotcrete wall on the uphill side of the road leading to the portal is performing as designed. No sediment appears to be generated by the installation. The several Alternate Sediment Control Areas (ASCA) were inspected. They all appear to be performing well. These are mostly undisturbed areas left during original mine site construction. Almost no sediment appears to be generated in the unused area drained by ditch UD-2. The sediment trap at the inlet to C-6 shows almost no sediment. Culvert UD-1 is not shown in its entirety on Plate 7-5. The plate needs to be revised to show the whole culvert. Culvert C-15, which is a slotted culvert across the entrance road, is partially plugged. This needs to be cleaned out to reduce coal fines and sediment being washed down the road and, possibly, into Crandall Creek.

During the site inspection, Division employees and the Operator discussed the possibility of installing a sediment trap between the crusher building and the sed pond. This is the main source of coal fines entering the pond. Such a trap would save money for pond cleanout and reduce the sed pond loading. Unfortunately, the crowded conditions at the site prevent installation of such a sediment trap. There just is no space available.

The Genwal Mine has had difficulty complying with their water monitoring program. Two Notices of Violation were issued for not submitting water monitoring data. These were on 11/24/98 and 10/29/99. In addition, a Division Order was issued on 11/23/99 to clarify the monitoring program. During the site visit the Operator indicated they have hired a new firm to perform the water monitoring. It appears the past problems have been resolved and the Operator will now be willing and able to meet the MRP monitoring requirements.

When the mine site operation pad was expanded four years ago, the U. S. Forest Service undertook to enhance the stream habitat in Crandall Creek above the mine. This proved successful and further enhancement is planned further above the mine. This is NOT part of the mine plan. However, since Genwal Resources Company paid for these improvements, it's worthy of noting that these efforts have improved environmental conditions. The site visit included a walk to examine the stream and note the improved habitat. The further enhancement is planned to take place next summer during low flows.

Overall, the mine site appears to be using the BTCA appropriate for the site conditions and is in good condition. There are minor improvements needed as outlined above.

Findings:

In its present form, the MRP does not meet minimum regulatory requirements. Accordingly, the Permittee must address those deficiencies as found within this Technical Memo and provide the following, prior to approval, in accordance with the requirements of:

R645-301-730, 1) Determine whether a decant device is installed. If not, install one. Make Plates and MRP text consistent with each other and with the on-the-ground conditions. 2) Revise Plate 7-5 to show the entire Culvert UD-1. 3) Clean out Culvert C-15.

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RULES INDEX

30 CFR

773.17	3
774.13	3
784.14	3
784.16	3
784.29	3
817.41	3
817.42	3
817.43	3
817.45	3
817.49	3
817.56	3
817.57	3

R645

-300-140	3
-300-141	3
-300-142	3
-300-143	3
-300-144	3
-300-145	3
-300-146	3
-300-147	3
-300-148	3
-301-512	3
-301-514	3
-301-521	3
-301-531	3
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-301-542	3
-301-720	3
-301-731	3
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-301-750	3
-301-761	3
-301-764	3



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December 6, 2000

To: Internal File
From: Daron R. Haddock, Permit Supervisor *DRH*
Re: Technical Field Visit as part of Midterm Review, Genwal Coal Company,
Crandall Canyon Mine, C/015/032

Other Attendees: Mike Suflita, Wayne Western, Bill Malencik, (DOGMI)
Gary Gray, (Genwal)

Date & Time: November 21, 2000
9:50 am to 1:00 pm

PURPOSE:

To document the status and effectiveness of operational, reclamation, and contemporaneous reclamation practices undertaken on the disturbed area.

OBSERVATIONS:

The site visit was commenced at the mine office in Huntington. Some of the mine records were reviewed and discussed. There has been some confusion as to the exact acreage of the disturbed area and it was concluded that the appropriate number should be 10.7 acres. Gary will revise the MRP and the Reclamation agreement "Exhibit D" to reflect this.

After traveling to the mine site, the review team accompanied by Mr. Gray, walked the site starting at the upper end and then working our way to the lower end of the site. The site is small and very compact. Much of the disturbed area is paved and gravel cover extends over nearly all the remaining disturbed area. As a result the sediment contributions to the sed pond will be minimized. The pond contained some water but was far from being full. It appeared to be handling any runoff as well as the washdown water that was coming from the crusher/transfer building. There were two drop culverts conveying water into the pond from the crusher/transfer building. One, a blue PVC culvert needs to be shown on the pond designs and maps. Mr. Gray indicated that the pond had never discharged since its construction. It was noted that there was no "Existing Riser Decant with Trash Rack and Skimmer" as indicated on Plate 7-3. Further investigation will need to occur to determine the status of the pond decant.

It was noted that there is a UPDES sampling point in the 12-inch pipe near the road. This pipe conveys the minewater discharge directly into Crandall Creek. This arrangement could result in non-compliance discharges since sampling occurs during a discharge and there would not be adequate time to determine compliance with the UPDES permit. The shotcrete wall on the uphill side of the road leading to the portal is performing as designed. The several Alternate Sediment Control Areas (ASCA) were inspected. They all appear to be performing well. These are mostly undisturbed areas left during original mine site construction. Almost no sediment appears to be generated in the unused area drained by ditch UD-2. The sediment trap at the inlet to C-6 shows almost no sediment. Culvert UD-1 is not shown in its entirety on Plate 7-5. The plate needs to be revised to show the whole culvert. Culvert C-15, which is a slotted culvert across the entrance road, is partially plugged. This requires some maintenance to reduce the possibility of coal fines and sediment being washed down the road and, possibly, into Crandall Creek.

The site visit included a walk to examine the stream above the mine and note the improved habitat. Further enhancement is planned to take place next summer during low flows.

RECOMMENDATIONS/CONCLUSIONS:

The site is compact and tidy. One issue was identified that requires immediate maintenance. Culvert C-15, which is a slotted culvert across the entrance road, is partially plugged. This requires some maintenance to reduce the possibility of coal fines and sediment being washed down the road and, possibly, into Crandall Creek.

A few other issues were identified for follow up which were centered primarily on making the plan a little clearer. The corrections are as follows:

1. The plan and reclamation agreement should be consistent as to the described disturbed area. It was concluded that the appropriate number should be 10.7 acres. Exhibit "D" and the MRP must be corrected.
2. The blue PVC culvert needs to be shown on the pond designs and maps
3. It was noted that there was no "Existing Riser Decant with Trash Rack and Skimmer" as indicated on Plate 7-3. This needs to be corrected.
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