



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

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September 19, 2002

TO: Internal File

FROM: Karl R. Houskeeper, Sr. Reclamation Specialist, Team Lead *KRH by an*

RE: South Portals, Genwal Resources, Inc., Crandall Canyon Mine, C/015/032-02A

SUMMARY:

The Division received proposed changes to Genwal Resources Inc., Crandall Canyon Mine on July 17, 2002. The proposed changes involve the construction of three new portals in the coal outcrop located on the southern slopes of the disturbed area.

Plans call for the installation of one new culvert, a ventilation fan, three portal face up's, a conveyor belt, removal and placement of 110 cu. yd's of topsoil. This memo will address the Administrative, Engineering, and Reclamation sections of the submittal. Soils and Hydrology issues are being addressed under separate memos.

A review of the amendment shows that reclamation costs pertaining to the redistribution of soils and the removal and/or demolition of the coal conveyor, portal face up's, culvert and ventilation fan have not been discussed or included. Associated reclamation costs need to be discussed and submitted for the reclamation of these facilities in order to determine if the current bond needs to be adjusted.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

TECHNICAL MEMO

Analysis:

Information submitted in the permit amendment relative to the South Portals included changes to Chapter 1, Legal, Financial, Compliance, and Related Information. The submitted changes are listed as follows.

Page 1-1, Address changes for the Applicant, Operator and Resident Agent.

Page 1-3, Resident Agent of Andalex changed to Gary Gray.

Page 1-6, Address change for Genwal Resources, Inc.

Page 1-8, Address change for Genwal Resources, Inc.

The format style selected and used by the permittee shows the revision date as a footnote in the lower left hand corner of all of the pages submitted. In an effort to keep this format selection accurate, the revised date should be edited to reflect the date of the current revisions.

Findings

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-121.300, The revised date shown on all the submitted pages in the lower left hand corner of the page needs to be updated.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

Page 5-30a – 5-30c provides a discussion of the proposed facilities in this amendment. The discussion refers to the addition of three new portals on the south side. The three portals consist of an intake portal, ventilation portal, and belt portal. Discussion is very limited on these structures. Information should be provided as to what type of materials, size, or dimensions will be used for the portal face ups, i.e. concrete, corrugated metal, steel I-Beams.

Information also needs to be provided on the conveyor belt size, length, whether the belt is free standing, or if a support is necessary; is the belt covered, and what efforts are taken to minimize fugitive dust from the conveyor? If a support is necessary, the size of the support foundation and material used for the foundation should be identified.

Questions arise as to the type of fan used, the size of the fan, is the fan foundation a concrete pad, does the fan have a diesel backup, will there be a diesel storage tank at the site, does the tank have the proper containment in case it is ruptured, has the SPCC plan been updated?

The access to the proposed intake portal will now be considered a road and not a parking lot. Map 5-3, which was included in the submittal, indicates an access road with an 11% grade. The classification of the road, whether it is a primary road or ancillary road, should be addressed. The proposed road appears to be a primary road, and therefore, designs of the road need to be addressed and certified, including the size, material utilized, cross sections, drainage controls, and type of surface utilized.

The amendment should also address the reclamation of these facilities, whether the facilities will remain or be removed. Facilities scheduled to be removed should address the handling and/or disposal of the materials generated from reclamation. Reclamation costs associated with the removal of the facilities, soil redistribution, vegetation, sampling, and monitoring should also be given. Once the costs are established, a review of the bond should be conducted to evaluate the adequacy of the bond. There is a high likelihood that the bond will need to be increased.

The issues raised above are not intended to be a complete list of items identified to be addressed but certainly highlight areas that need to be addressed. The permittee should review the regulations and properly address all pertinent items in the proposed amendment, including, but not limited to those listed above.

Findings

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-526, A comprehensive description of all the proposed facilities, size, materials, maps, cross sections, permits, etc., needs to be included in the amendment.

R645-301-528, A complete narrative explaining the construction, modification, use, maintenance, and removal of facilities needs to be included in the amendment.

TECHNICAL MEMO

AIR POLLUTION CONTROL PLAN

Regulatory Reference: 30 CFR 784.26, 817.95; R645-301-244, -301-420.

Analysis:

A review of the proposed amendment does not provide any information that addresses the impacts to the currently approved air quality permit DAQE-827-01. The construction of the new conveyor out of the south portal will create a new point source. Information should be submitted to the Department of Air Quality to determine if issuance of a new permit is required. Once this determination is received the documentation should be provided to the Division.

Findings

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-420, Information needs to be provided to show that the coal mining and reclamation activities will be conducted in accordance with the Clean Air Act (42 U.S.C. Sec. 7401 et seq.) and other applicable state and federal regulations. The application should include a description of coordinated efforts taken with the Utah Bureau of Air Quality.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Subsidence Control Plan

Analysis:

Page 5-21 of the approved MRP states that mining will not occur within 200 feet of the outcrop except for portals. The proposed amendment refers to three new portals in the south portal area. Plate 5-2, Crandall Canyon #1 Mine Mining Projections, shows six portals in the south portal area and also depicts (panel A) mining outside of the outcrop designation. The mining projections need to be revised to indicate three portals in the proposed amendment, not six portals, and a 200' barrier between mining operations and the outcrop. The 200' barrier will eliminate (panel A).

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-521, Plate 5-2 needs to be revised to accurately depict the mining projections (i.e. three portals not six portals). The mining projections need to be revised to indicate a 200' barrier between the outcrop, as indicated in the approved MRP. Mining sequence and timing for the proposed area needs to be addressed in the amendment and incorporated into the submittal and/or map.

R645-301-525, The amendment needs to address if the current subsidence control plan addresses this area of mining or if modifications are necessary.

R645-301-724, The amendment needs to address if the current baseline data for hydrologic, geologic, and climatologic information applies or if additional baseline information is required.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Mine Workings Maps

Analysis:

The mine workings map, plate 5-2, does not accurately depict the information submitted in the proposed amendment and/or the approved MRP. The map depicts six portals in the south portal area, while the submittal indicates three portals in the south portal area. The map also depicts that (panel A) being mined outside of the designated outcrop. Page 5-21 of the approved MRP indicates that a 200' barrier between mining and the outcrop will be left to prevent subsidence.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

TECHNICAL MEMO

R645-301-521, Plate 5-2 needs to be revised to properly reflect the proposed mining activities. The plate should also include timing and sequence information and commitments made in the approved MRP on page 5-21, i.e., 200' barrier between mining activities and the outcrop.

Certification Requirements

Analysis:

Plate 5-2, 5-3, and 7-5 were included in the submittal. The plates contain a P.E. stamp, but do not have a signature or date to validate that the maps were reviewed.

Findings:

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the permittee must provide the following in accordance with:

R645-301-512, The maps should be reviewed and certified by a P.E. to verify their accuracy. The maps have been stamped, but do not have a signature and date to validate that they were reviewed.

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

No information was submitted for reclamation costs, timetables, reclamation cross-section maps, bonding, etc., for the proposed amendment.

Findings:

No information was provided in the proposed amendment. Information needs to be submitted to the Division to meet the requirements of the following sections.

R645-301-542, All plans, maps, surface configurations, timetables, demolition, costs, etc., needs to be submitted for review and approval. No information was submitted.

R645-301-830, Bonding amounts should be reviewed and adjusted as necessary to cover the additional facilities. No information was submitted.

RECOMMENDATIONS:

The information submitted in the proposed amendment is incomplete and contains inaccuracies that need to be addressed. It is recommended that this amendment be denied until the deficiencies are properly addressed.